### Individuals

Letter I1 Susan Arnold

January 7, 2021

Comment I1-1

As an alumni, long-time community member, and current employee, I am opposed to any development in the East Meadow.

I ride past this site every day and it sickens me to think of the light pollution, traffic, noise, etc. that will damage this grassland and the animals that live and travel through this space. We can do better.

From **Santa Cruz Bird Club website
Birds.** Grassland birds frequent the “Great Meadow,” the large grassland on the lower campus. Burrowing Owls (best found near dusk) winder here from October to March, **especially east of Hagar Dr to the south of the East Remote Parking Lot**. Several raptors, various swallows, and White-throated and Vaux’s swifts fly over the grassland. Look for Peregrine Falcon and Golden Eagle year round, and Merlin, Ferruginous Hawk, and Short-eared Owl in fall and winter (although the hawk and owl are rare). Scattered oaks along the edge of the grasslands support oak savannah birds such as Oak Titmouse and Ash-throated Flycatcher. A particularly good area to find these species is across Empire Grade from the campus’s west entrance. Western Meadowlark, and Grasshopper, Savannah, and Chipping sparrows also nest in this area. Until recently, Lark Sparrow and Western Bluebird also nested along the grassland edges.

https://www.eastmeadowaction.org/visualizing-the-site

Response I1-1

This comment expresses concern for impacts to sensitive habitat and species in the East Meadow. For a discussion of the potential impacts associated with 2021 LRDP implementation and development, refer to Impacts 3.5-2, 3.5-3, and 3.5-4, beginning on page 3.5-42 of Section 3.5, “Biological Resources” of the Draft EIR, which includes a detailed discussion of 2021 LRDP impacts on sensitive habitats and species, including impacts to the Great and East Meadows, and which also provides mitigation measures for significant impacts. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I2 Jesse Brennan

January 7, 2021

Comment I2-1

I support the dense development and the encouragement of a walkable/bikeable community. Developing part of the Great Meadow was I'm sure a difficult decision, but I think it's the most practical place for centralized growth that avoids car­dependent sprawl.

Response I2-1

The comment expresses support for dense development of the LRDP area and does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I2-2

We need to acknowledge the limited capacity of the campus and the community. UCSC needs to push back to the regents to prevent or at least slow down further growth. It's indisputable that the UC needs to allow more students, but at UCSC there simply isn't room. Growth must come elsewhere.

Some development of the campus is inevitable. The housing situation in Santa Cruz is horrible, but will be made far worse if new students are enrolled without housing to accommodate all of them. Santa Cruz needs housing development and UCSC is in a unique place to do that efficiently and in a way that reduces driving and residents' carbon footprint.

Response I2-2

This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. Regarding housing, the 2021 LRDP proposes to provide to provide housing for newly enrolled students, above 19,500 as discussed in Chapter 3, “Project Description,” of the Draft EIR. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I2-3

In order for campus housing to be effective it needs to be affordable. It cannot be substantially cheaper for students to live off campus.

Response I2-3

The comment expresses the opinion that campus housing should be affordable and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I3 Benjamin H. Garner

January 7, 2021

Comment I3-1

I think y'all could minimize the emotional impact of cutting trees if you processed the wood and reused it in the new developments somehow. Much rather that then have some private company take them.

Response I3-1

The comment provides a suggestion for implementation of the 2021 LRDP and construction materials, but does not address the adequacy of the EIR analysis. No further response is necessary or required under CEQA. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I4 Craig Hunter

January 7, 2021

Comment I4-1

I really like the goals to have 100% student housing and to try to keep the development footprint small and to keep as much natural open space as possible.

Thank you for doing this work. It's very important.

Response I4-1

The comment expresses support for the goal of 100% of new students being housed on campus under the 2021 LRDP, and does not address the adequacy of the EIR analysis. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I5 Cliff Nelson

January 7, 2021

Comment I5-1

I received the email below requesting feedback on the UCSC long range plan.

Given that housing is so expensive and that it creates a large burden on students, and that students may not have the income needed for even modest apartments in Santa Cruz, I would like to see substantial new student housing development on campus over the coming years over what has been proposed.

Thank you for receiving my feedback.

Response I5-1

The comment expresses support for additional student housing on campus, and does not address the adequacy of the EIR analysis. No further response is required. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I6 David

January 8, 2021

Comment I6-1

We would like to inform you that the applications are open for “Loretta Ford Centennial Nursing Scholarships”. All students are invited to apply.

Application Deadline: February 5, 2021

Total Award Amount: $10,000

Loretta Ford Centennial Nursing Scholarships

I hope you'll find this information useful for your students.

Response I6-1

The comment provides information regarding applications for the Loretta Ford Centennial Nursing Scholarship and does not address the adequacy of the EIR analysis. No further response is required. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I7 Matt Lumadue

January 9, 2021

Comment I7-1

Gotta reconsider/ cancel lower left corner (SW corner of project) field above homes in highview Dr. South/W of empire grade. Moore Creek starts here. Countless varied wildlife -tiger beetles to bobcats and mountain lions. Hundreds of types of birds, etc ... you see where I'm going with this, and I won't be the last one .... Homes /structures in this field are wrong.

Response I7-1

The comment expresses the commenter’s opinion regarding potential development areas under the 2021 LRDP. The comment addresses the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, it is important to note that no development is anticipated in the portion of the LRDP area west of Empire Grade. For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I8 Dianne Brumbach

January 10, 2021

Comment I8-1

My feedback on this entire LRDP is that there should be NOTHING built on the southern corner of the Great Meadow between Coolidge Drive and Hagar Drive.

I also see that you are proposing to build a ROAD across the Great Meadow (the Meyer Drive Extension) that would again impact the Great Meadow, the tranquility of the Jordan Gulch and the serenity of the people riding on the bike path??! NO NO NO NO NO.

Take a look at the picture in the LRDP Draft of Jan 2021, page 110 and 111 and picture a road cutting across the lower right half of this picturesque scene. As an avid cyclist and regular user of the bike path, part of the appeal of the bike path is that you feel like you are in the middle of nowhere! Adding 140 units of housing and a day care center and a road within eyesight and earshot of the path will ruin its appeal forever.

Meadows are one of the last natural habitats left on the west coast and I think the aesthetics of this one should be preserved forever.

Response I8-1

The comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Further, the comment’s discussion of Student Housing West is noted but Student Housing West, as described in further detail in Master Response 8 is part of the 2005 LRDP and is not considered part of the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I8-2

Just a note that offering a nearly 200-page NON-SEARCHABLE document for review is criminal.

Response I8-2

The comment addresses the 2021 LRDP document and does not address the adequacy of the EIR analysis. No further response is necessary. However, it is important to note that the Draft EIR includes a comprehensive table of contents and, using Adobe Acrobat or other appropriate pdf viewing application, both the 2021 LRDP and Draft EIR posted on the UC Santa Cruz website are searchable and comply with applicable accessibility requirements. To further assist the public in their review of the 2021 LRDP and Draft EIR, the Community Handbook is posted on the UC Santa Cruz website, and provides an overview of the project and key elements of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I9 Marisa Herzog

January 13, 2021

Comment I9-1

As an alum, long time resident of UCSC, and UCSC employee, I have some serious concerns about UCSC's ongoing attitudes towards the campus impacts to the community.

I do applaud the campuses growth and plans for on campus housing, refurbishing of buildings, and continued improvements.

However, current growth plans continue to not take into consideration the untenable housing issues in the County. While some of Santa Cruz's housing issues are due to Silicon Valley growth, and the City/County's own inability to address accessible and affordable housing and a considerable NIMBY attitude, the University does not take much responsibility for their impacts.

As a full time employee in a NON entry level job, attempting to take care of my family, I am spending well over half of my paycheck on substandard housing. I have zero options for betterment. PLEASE DO NOT refer me to your staff/faculty housing or community housing. While lovely resources, the first does not have the resources to actually help those who need help, and the second can't create affordable housing where there is none.

I make about $3k a month. I have a family, and am an adult, which means piling into "college student" housing, where rooms go for $1000 each to share a house is a dysfunctional concept. I have no hope of owning a home or improving my situation unless I leave Santa Cruz, somehow find my disabled husband work that he would need a 4 year college degree and non-disability-work-experience for, some rich relative dies of Covid19 and has us in their will, or we leave Santa Cruz and 30 years of friends and family. None of my 4 children have any intention of attending UCSC or remaining in the Santa Cruz area.

Given that UCSC is one of the most reliable employers in the county, one of the few that offers health benefits, and represents education and global community, it is well past time for the UC to also provide its working alum with options for housing and livable wages.

Response I9-1

The comment provides the commenter’s opinion related to availability and affordability of housing, as well as opinion regarding UC Santa Cruz as an employer, but the comment does not address the adequacy of the EIR analysis. No further response is necessary. However, for a discussion regarding affordable housing, please refer to Master Response 2, specifically the discussions under “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I10 James Lee Jones Jr

January 18, 2021

Comment I10-1

When UCSC is in session the grocery stores, restaurants and gas stations of westside Santa Cruz are over run with students, and it's been this way for many years. This issue is a major factor that greatly reduces the quality of life for westside residents, which include a great number of families, retired folks and hard working professionals.

Please build a Safeway, CVS, pubs, restaurants and indeed sufficient housing for the student population.

Response I10-1

The comment requests development of commercial and supporting uses as part of the 2021 LRDP to address social issues and does not address the adequacy of the EIR analysis. No further response is necessary. However, as noted in Chapter 2 of the Draft EIR, “Project Description”, the 2021 LRDP includes the provision of additional supporting land uses, which may include accessory commercial and retail establishments on campus. For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I11 Amber Yale

January 20, 2021

Comment I11-1

My name is Amber Yale. I and my 2 older brothers are a fourth-generation Santa Cruz'n from the same house on the west side. My 81 year old mother is a 3rd generation and my special needs daughter is the 5th generation to live here in this amazing home and community.

I can't even begin to tell you how the increase of cars, alot from your students living off campus, in this town have influence the ocean and HABs. Harmful Algar Blooms. Surfers, marine mammals etc. I'm all for you have any more housing up there but I would like to have the ocean included in the environmental impact report.
It seems to be the most important thing in our life in our planet and why people come here to go to your school, so please include the run off and the potential increase of red tides. Surfers are the canaries of the ocean.

The roll of the most harmful known toxin known to man and marine life is pseudo-nitzschia, causes by HABs and red tides. All of which occur when there is more oils on the roads when it rains, cat litter believe it or not.
Pseudo-nitzschia was discovered by retired UCSC professor Mary Silver and she also discovered marine snow and recieved Scientist of the year award for her work.

Mary was long-term predominant female scientist at UCSC.
The least we could do is include the ocean IN the impact report.
UCSC has had a tremendous impact for decades on our environment, our streets and our community.

Response I11-1

The comment includes introductory information and general statements regarding the need to include the ocean as part of the Draft EIR. The comment appears to address potential water quality concerns related to increased development within the LRDP area but does not directly address the adequacy of the EIR analysis. Potential water quality impacts are evaluated as part of Section 3.10, “Hydrology and Water Quality.” No further response is possible. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I11-2

Parking on campus should be included and maybe think about putting stores up there as well for students because it is a pandemic, and earthquakes can occur here, fires and if you're going to be the city on the hill that you were meant to be I would suggest you do it proper for the students instead of taking from the community.
Your students pay a lot of money and should be educated on how to behave and treat our one of a kind special community.
They shouldn't come down to town and express their grievances with the community when it's the university that's responsible for your students.
I personally went to a private school in Hawaii instead of going to UCSC because I grew up here and I didn't want to give my money to the university. I obtained a bachelor's degree that was taught along the lines of a Masters degree. Ability to write grant proposals included. I achieved that on a beautiful island of oahu. Before I transferred from Cabrillo College, I sold my car, by choice and I took the bus, rode my bike there and walked so I wouldn't have an impact on the coral reef system. Or the communities neighborhoods or the terrain.

I was very fortunate that I was welcomed into the Hawaiian community because I didnt want to change it. I wanted to be educated by it and all who lived in it.

Unfortunately I cant say the same for alot of the students that attended and remained here in Santa Cruz except for a few of which I am very glad they stayed after graduation and became a wonderful active part of Santa Cruz. They too appreciated the organicness of Santa Cruz, mountains and Pacific Ocean.

Response I11-2

The comment expresses opinions related to the behavior and conduct of UC Santa Cruz students and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I11-3

I don't want to ruffle any feathers but I would lile everybody in this project to stop and think please before you start doing things plan, and factor in every aspect and if I were you I would look at Google and Facebook campuses and see how they do things and add an environmental friendly twist like they have in San Francisco for the Museum of Natural History with a sustainable roof also your campus over on the west side by the Marine Sciences has a wonderful naturally incorporated parking lot that seems to be environmentally friendly to bird life there and the weather conditions. This is a good opportunity for you to be a leader as a federal university moving into the future with environmental concerns and please address every single one of them it's not just about the water supply and everything that because you can put in encatchment tanks like they do in Hawaii and catch your own water and use it.

Please consider all my words as I am only one voice for our mother ocean, our children, our elderly and our community. I am a loud and proud educated local and only want to think of our present and future generations that have been excluded in the past decades and you have grown without our consideration.

Many local families have left Santa Cruz and never to return. We want to grow here, raise our kids here and protect our environments and educate those you bring on campus as well. I am sure with Biden as president that you would get more financial assistance if you became a leader and environmental architecture for college campuses we are the oceans and the Redwoods of which had caught on fire and burned so drastically last year and some are on fire today.

Response I11-3

The comment provides suggestions regarding various aspects of the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is required. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I12 Matt Lumadue

January 23, 2021

Comment I12-1

Gotta reconsider/ cancel lower left corner (SW corner of project) field above homes in highview Dr. South/W of empire grade. Moore Creek starts here. Countless varied wildlife -tiger beetles to bobcats and mountain lions. Hundreds of types of birds, etc ... you see where I'm going with this, and I won't be the last one .... Homes /structures in this field are wrong.

Response I12-1

Refer to Response I7-1.

Letter I13 Michael A Riepe

January 25, 2021

Comment I13-1

Thank you for the thorough and open public comment process regarding the UCSC EIR. I commend the planning committee for their hard work integrating so many competing goals. However, I do want to voice my strong opposition to one item that I see in the plan: the "Proposed Roadway" that cuts east/west across the top of the Great Meadow, connecting to Meyer Drive near the Recital Hall. I'm sure traffic flow to that area of campus, including Kerr Hall, is a challenge. But we should be emphasizing alternative transportation options, not accommodating more cars. That area of campus, at the meadow/forest interface, is one of it's greatest natural treasures. I don't see how it could be possible to hide the siteline and noise of the road, no matter how creative you are with grading. It will forever spoil that quiet wild natural wonder of grassland and ancient Live Oaks. Please strike that road from the plans!

Response I13-1

The comment expresses opposition to the potential extension of Meyer Drive within the main residential campus and does not address the adequacy of the EIR analysis. With respect to the analysis and conclusions of the Draft EIR related to the extension of Meyer Drive, refer to Response O4-18 regarding transit impacts and O5-5 regarding visual impacts. With respect to noise, the Draft EIR evaluated potential increases in noise levels along roadway segments that would experience the greatest increase in ambient noise levels, including Hagar, Heller, and Coolidge Drives. As shown in Table 3.12-14 on page 3.12-28 of the Draft EIR, no significant increases in roadway noise would occur. Further, noise levels along Heller Drive would not exceed 60 dBA Ldn, and it is reasonable to conclude that any noise levels generated along the extension of Meyer Drive would be equivalent to or less than the anticipated noise levels along Heller Drive. This is because, while some vehicle trips from Heller Drive would extend onto Meyer Drive, the number of trips would be less than on Heller Drive, thereby generating less roadway noise. As a result, no significant noise impacts are anticipated as a result of the extension of Meyer Drive. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I14 Geoff Lightfoot

January 27, 2021

Comment I14-1

My review comments are as follows. They are numbered for future reference - but not necessarily sorted into relative importance nor in accordance with the layout/progression of the DEIR document. Thank you for your attention.

1. No metric is provided to compare UCSC to other UC campuses as to student population, host town/city population, catchment area, growth potential/expectation etc. There is no identification of any locale that may be under-served or over-served by the UC system.

Response I14-1

This comment requests additional information regarding how the projected enrollment was determined for the 2021 LRDP but does not address the adequacy of the EIR analysis, which evaluates the physical development of UC Santa Cruz to accommodate a projected student enrollment of 28,000 Full-Time Equivalent (FTE). No further response is necessary within the context of CEQA. However, for comments on the 2021 LRDP project, and how the projected enrollment for the 2021 LRDP was determined, please refer to Master Response 2. Further, the commenter does not explain why a comparison of UC Santa Cruz and the City of Santa Cruz to other UC campus locations would provide relevant information on the impacts of the 2021 LRDP on the environment. Each campus is located in a unique setting and is subject to its own unique environmental effects associated with its own LRDP. However the commenter is referred to the UC Santa Cruz website (<https://lrdp.ucsc.edu/2021/faq.html#q15>) for more information regarding the size of other UC Campuses compared to UC Santa Cruz. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I14-2

2. No metric/ratio is provided for building square footage on per student basis. Admittedly a rough number at best – this would provide a quick look at ‘square foot equity’ to see if any campus is being asked to ‘do more with less’. Conversely, it might identify any campus which is being asked to do significantly ‘less with more’.

Response I14-2

The comment requests information regarding square footage per student at UC Santa Cruz and other UC campuses. The square footage per student is dependent on numerous factors including the original construction date of on-campus buildings, programs offered within campus buildings, etc. and would likely not provide meaningful results. Nonetheless, this comment pertains to the manner in which the 2021 LRDP was developed, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I14-3

3. Although student and staff numbers are provided within the DEIR for both current and proposed occupancy, an analysis of building square footage seems to indicate that a given percentage increase in population will result in a greater increase in building square footage. Are current conditions so cramped such that the square foot per person ratio needs to be increased?

Response I14-3

The comment provides opinion that the increase in overall square footage may be due to current “cramped” conditions within the LRDP area. This comment pertains to the manner in which the 2021 LRDP was developed and does not address the adequacy of the EIR analysis. No further response is necessary. However, for more information regarding the factors considered in determining the building program please refer to pages 100 through 105 of the 2021 LRDP.

Comment I14-4

4. Have the recent changes to the instruction paradigm as dictated by the Covid pandemic been considered within the DEIR? I believe that while these recent changes have been generally negative/challenging to date, opportunities and realizations may have become newly apparent to UC staff that may change future educational models – and their supporting infrastructures.

Response I14-4

The comment requests additional information regarding whether changes brought on by the COVID-19 pandemic would be reflected in future operations. The proposed 2021 LRDP building program accommodates a range of future development approaches, including remote work and instruction. The COVID-19 pandemic, which began during the 2021 LRDP planning process, resulted in the near-term adoption of new teaching modalities (including remote and hybrid instruction) as well as new policies guiding remote or hybrid work modalities. The building program is intentionally flexible to accommodate potential changes to space needs as they arise.

Comment I14-5

5. The traffic impact on the City and especially the City residents living between the Campus and the downtown have previously been and are still grossly under-stated.

Response I14-5

The comment expresses the opinion that impacts related to traffic are understated but no specific comments on the contents of the Draft EIR are raised. For further discussion of the transportation analysis, please refer to Master Response 6.

Comment I14-6

6. Utilization of the Westside Research Park as a transportation hub seems a ‘natural’ expansion. Bus, car, shuttle, bicycle, rail, and hybrid options could each share in this development. This would, of course, ameliorate the issue raised in Item (5.) above.

Response I14-6

This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, the development of a multimodal hub at Westside Research Park is a component of the 2021 LRDP that is intended to reduce single-occupancy vehicle trips, consistent with the statements made in this comment.

Comment I14-7

7. Placement of the ‘Student Housing West’ complex at the intersection of Hagar and Coolidge violates almost every principle that previously dictated UCSC development. It’s placement bears no relationship to the academic core, defiles the current meadow surroundings, contributes noise (of several types) within close proximity to off-campus neighbors (top of Spring St. and Faculty Housing etc.), and placed as such would be the very definition of a ‘sore thumb’ with no attenuating natural features whatsoever.

Response I14-7

The comment expresses an opinion related to the placement of Student Housing West within the UC Santa Cruz campus. As noted in Master Response 8, Student Housing West is a part of the 2005 LRDP and is not considered part of the 2021 LRDP, the physical environmental impacts of which are addressed in the 2021 LRDP EIR. For further discussion of Student Housing West and its discussion with respect to the 2021 LRDP, please refer to Master Response 8. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I14-8

8. The North Campus region appears to provide more than adequate scope for expansion of facilities and infrastructure. It is myopic to continue to view the campus from a Bay/High Streets vantage point.

Response I14-8

The comment provides an opinion that further development of the North Campus would be preferable to development within the southern portion of the main residential campus, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I14-9

9. Broadly speaking, the DEIR document could have been much shorter, simpler and more straightforward. It is highly repetitious, contains an abundance of unnecessarily rich adjectives, uses euphemistic language, and deploys too many highly agreeable Disney-like photographs. As a result, it engenders the feeling that considerable obfuscation has been employed for the authors’ future benefit.

Response I14-9

The comment expresses an opinion regarding the quality of the Draft EIR, including its length, language, and photographs. The Draft EIR was prepared in accordance with CEQA requirements and reflects an objective evaluation of the potential physical environmental impacts of implementation of the 2021 LRDP. The comment does not address the adequacy of the EIR analysis, and is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I14-10

10. Compliance with U.S. Green Building Council LEED Certification requirements should be noted within the DEIR – perhaps this is already contained within existing Physical Planning Principles and Guidelines.

Response I14-10

The comment requests that compliance with LEED standards should be stated in the Draft EIR. Compliance with LEED Building Standards is a system-wide UC requirement per the UC Sustainable Practices Policy. All new buildings must achieve a minimum of LEED “Silver” and strive for LEED “Gold.” This is stated in several places in the Draft EIR, including pages 3.3-5 (“Air Quality”) and 3.6-7 (“Energy”) of the Draft EIR.

Comment I14-11

11. How is provision of staff housing justifiable? In which of the LRDP documents is this explained?

Response I14-11

The comment inquires about how staff housing was justified. The purpose of an EIR is to objectively evaluate a proposed project, not to justify it. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2, Housing. In addition, for information regarding the factors considered in determining the building program please refer to pages 100 through 105 of the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I15 Sabra

February 2, 2021

Comment I15-1

There are severe problems with expanding the campus, the number of students and staff at UCSC.

1. Firstly, there has been a ballot measure within the town of Santa Cruz with an overwhelming response that the town cannot accommodate additional students.

2. Owning land does not constitute the ability to add such a large number of students to a college campus.

3. Housing in the town of Santa Cruz is a negative to cash strapped students. You do students trying to obtain their degree a disservice by expanding UCSC when there are campuses in more affordable locations to better aid students in California. i.e. Merced and other towns where the land is not as expensive as the land in Santa Cruz.

4. The negative impact on the Riparian Habitat includes ground disturbances, vegetation removal would negatively impact various habitats.

5. Future development associated with the 2021 LRDP could be located on properties that contain known or unknown archaeological resources and ground-disturbing activities could result in the discovery of or damage to yet undiscovered archaeological resources as defined in CEQA Guidelines Section 15064.5. This would be a potentially significant negative impact.

Response I15-1

The comment expresses opposition to the expansion of university operations within the LRDP area, and does not address the adequacy of the EIR analysis. The statements regarding impacts associated with development under the 2021 LRDP are consistent with the analysis provided in Sections 3.4, “Archaeological, Historical, and Tribal Cultural Resources,” and 3.5, “Biological Resources.” The Draft EIR also includes Mitigation Measure 3.4-2 for protection of tribal cultural resources. However, for comments on the 2021 LRDP project, including housing affordability, please refer to Master Response 2, specifically the discussions under "2021 LRDP Planned Development” and “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I15-2

There is respectfully a better solution with the State of California's money which would better aid the state and the education of it's young adults which would be to buy land in a more affordable area and build there. Many towns would welcome the opportunity to have a college near to them. The overall cost would be less. Affordable housing would be a huge incentive for staff and instructors to be part of the new UC.

Due to the baby boom coming in years ahead California needs to be wise with its expenditure to educate its students.

Do the right thing for students, Santa Cruz, Staff, and Professors built in another area of California.

Response I15-2

The comment expresses the opinion that development should occur elsewhere as part of a new university. Refer to Response I15-1. The comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, and its components, please refer to Master Response 2. The commenter is also referred to Chapter 6, “Alternatives” of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I16 Tsim Schneider

February 2, 2021

Comment I16-1

As a citizen of a California Native American tribe, to me the choice is straightforward. We should be expanding and permanently protecting the Campus Natural Reserve, which offers not only unparalleled opportunities for student-involved research at UCSC but also critical space for protecting and honoring Indigenous Ohlone peoples and sacred sites in perpetuity.

Response I16-1

The comment expresses the opinion that the Campus Natural Reserve should be expanded. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I17 Faye Crosby

February 3, 2021

Comment I17-1

1. What is the process by which the administration evaluates the costs and benefits of constructing family student housing and child care on any of the different sites now that have been considered including East Campus infill, Ranch View Terrace, and the East Meadow?

Response I17-1

The comment requests clarification on the site selection process and refers to the Student Housing West project. With respect to the site selection process and as noted in Master Response 2, the envisioned development areas were selected based on a variety of inputs and considerations, including public participation, land use compatibility, and maintenance of the campus’s character and appeal. With respect to Student Housing West, this development, which is part of the 2005 LRDP, is reflected appropriately in both the 2021 LRDP and the Draft EIR as a related project. As the project was proposed and considered as part of the 2005 LRDP implementation, it is considered a cumulative project (refer to Chapter 4, “Cumulative Impacts” of the Draft EIR). Whether or not the 2021 LRDP is approved, Student Housing West was reapproved by the UC Regents on March 18, 2021 and is a reasonably foreseeable development within the LRDP area and not considered part of the proposed 2021 LRDP. For additional information regarding Student Housing West, refer to Master Response 8.

Comment I17-2

2. Is a complex multistage question: Does the current administration agree that true education goes beyond the mere instruction of information; and, if so, does the current administration envision an appreciation for the awesome sweep of nature as part of a true education; and if so, does the current administration recognize the iconic value of the East Meadow as the portal to our community of learning?

Response I17-2

The comment provides questions regarding the manner in which education is provided at UC Santa Cruz and if the East Meadow serves as part of that educational experience, which are related to the 2021 LRDP and current UC Santa Cruz operations. This comment does not address the adequacy of the EIR analysis. No further response is necessary. However, for more information regarding development of Student Housing West, refer to Master Response 8. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I18 Alex Krohn

February 3, 2021

Comment I18-1

I am a current staff member at UCSC. I would like to voice my support for permanent protection of the Campus Natural Reserve by making it part of the UC Natural Reserve System.

Response I18-1

The comment expresses support for protection of the Campus Natural Reserve. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I19 Janelle Maguire

February 3, 2021

Comment I19-1

- I am curious how the LRDP takes climate change into account, and what steps will be taken to have our campus serve as a carbon sink instead of a source?

Response I19-1

The Draft EIR includes an evaluation of the 2021 LRDP’s impact on climate change, including an evaluation in light of UC and UC Santa Cruz GHG-emission-reduction goals (e.g., through the UC Carbon Neutrality Initiative, UC Sustainable Practices Policy, and UC Santa Cruz Climate and Energy Strategy). Refer to Section 3.8 of the Draft EIR, “Greenhouse Gas Emissions and Climate Change”. As noted in this section, mitigation (see Mitigation Measure 3.8-1 on page 3.8-25 of the Draft EIR) would be required and implemented in order to ensure that UC Santa Cruz achieves applicable targets. The comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment I19-2

- What climate change maps and models are you using in your planning, and how do you think that sea level rise, increasing heat, and long fire seasons will affect the future of the campus?

Response I19-2

The analysis of the Draft EIR considered a variety of applicable data and modeling techniques, including UC Santa Cruz’s verified GHG inventory, the California Emissions Estimator Model (CalEEMod), California’s Renewable Energy Portfolio, the EPA’s Emissions & Generation Integrated Database, information from the Intergovernmental Panel on Climate Change, and others. Refer to references for Section 3.8, “Greenhouse Gas Emissions and Climate Change,” beginning on page 8-13 of the Draft EIR.

Comment I19-3

- The pandemic has shown that remote work is just as effective as in-person, for many different jobs.

----- Will campus leadership make a serious effort to expand remote work opportunities after the pandemic, to reduce traffic and unnecessary travel emissions?

----- Will campus leadership set policy or guidelines that encourage meeting virtually unless an in-person meeting truly enhances the topic? (for example, looking at physical samples for a project). Cross-campus commuting for meetings is, in itself, a huge resource drain (employee time, use of shuttles/cars/limited parking).

Thank you!

Response I19-3

The comment expresses positive interest for remote work and learning opportunities in light of circumstances and behaviors demonstrated during the COVID-19 pandemic but does not address the adequacy of the EIR analysis. No further response is necessary. Refer to Mitigation Measure 3.16-2, for a discussion of telecommuting as a potential VMT program measure. For more information regarding remote work and instruction under the 2021 LRDP refer to Response I14-4. In addition, regarding remote work options for employees, UC Santa Cruz has recently adopted principles to guide flexible work arrangement options. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I20 Mary McMillan

February 3, 2021

Comment I20-1

1. What is the current total amount of on campus housing dedicated for students?

2. Current amount of dedicated faculty/staff campus housing?

3. Current total student population?

4. Current number of faculty/staff population?

5. What is total amount of student on campus housing being proposed?

6. What is the total amount of faculty/staff on campus housing being proposed?

7. What is the anticipated/proposed student population by 2040?

8. What is the anticipated/proposed faculty/staff population by 2040?

Response I20-1

The comment includes questions related to campus housing and demographics and does not address the adequacy of the EIR analysis. No further response is necessary. However, information regarding campus enrollment and population is provided on page 2-10 of the Draft EIR. Information regarding the 2021 LRDP building program, including on-campus housing, is provided on page 2-11 of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I20-2

9. What is current number of California taxpaying resident students?

Response I20-2

The comment includes a question related to UC Santa Cruz taxpaying students and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I20-3

10. What is the total annual amount of student fees "tuition" for full-time resident students?

Response I20-3

The comment includes a question related to total tuition fees; however, the comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I20-4

10. What is the current number of out-of-state students?

Response I20-4

The comment includes questions related to out-of-state student enrollment and does not address the adequacy of the EIR analysis. No further response is necessary. However, to access information related to the UC Santa Cruz campus, please visit: https://news.ucsc.edu/awards/files/some-facts.pdf. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I20-5

11. What is annual amount of student fees "tuition" for full-time out-of-state students?

Response I20-5

The comment includes a question related to total out-of-state student tuition fees but does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I20-6

12. Does UCSC provide on campus children care? If so, how many slots?

Response I20-6

The comment includes questions related to on-campus childcare and does not address the adequacy of the EIR analysis. No further response is necessary. However, to access information related to the UC Santa Cruz campus early education services, please visit: https://childcare.ucsc.edu/. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I21 Jarmila Pittermann

February 5, 2021

Comment I21-1

I wish to give my strongest endorsement for the proposed incorporation of UCSC's Campus Natural Reserve into the UC Natural Reserve System.

The CNR has been absolutely critical to my work on the drought tolerance of redwood forest understory plants, as well as research on the drought tolerance of oaks and madrones, other student projects, as well as long-term studies on ecosystem resilience during and after drought. Several of my published research studies have relied heavily on the CNR.

Furthermore, my graduate students, as well as the undergrads in my upper division Plant Physiology Bio 135e Plant Physiology course depend on campus lands for their research and learning. There is no other UC or Cal State school that provides the easy and safe access to such a diversity of ecosystems as the UCSC's campus natural reserve.

Maintaining the integrity of the CNR is critical for preserving a functional ecosystem and any extensive plans for development will threaten this. Incorporation of the CNR into the UC Natural Reserve System will be an excellent step toward enhancing protection for our campus lands.

Thank you for the opportunity to comment on this important initiative.

Response I21-1

The comment expresses support of incorporating the Campus Natural Reserve into the UC Natural Reserve System but does not address the adequacy of the EIR analysis. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I22 Leonna Heavens

February 8, 2021

Comment I22-1

We are opposed to UCSC expansion without guaranteed housing for students and faculty. We are opposed to building on the East Meadow.

Response I22-1

The comment expresses the opinion that expansion should not occur without guaranteed housing for students and faculty and that no development should occur within the East Meadow as part of the 2021 LRDP. See Response to Comment Letter I17 regarding Student Housing West. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I23 Lisa Segnitz

February 12, 2021

Comment I23-1

I'm writing as a concerned citizen re: the plan to increase UCSC enrollment to 28,000 students over the next 10 years. Our town does not have the ability to absorb so many new residents, with accompanying increase in traffic over hwy 17 and an already evident deficit of affordable housing for students and long term town residents alike.

Expanding other sites which are not as limited geographically, or considering adding another UC site in a region which is not already overpopulated for its resources, would be potentially more environmentally sustainable and also could prove economically and logistically beneficial to other population centers. PLEASE consider alternatives to further overpopulating this limited community.

Response I23-1

The comment expresses concerns related to increased enrollment and expresses the opinion that alternatives to the 2021 LRDP should be considered to avoid overpopulation. The comment does not directly address the adequacy of the EIR analysis, and no further response is necessary. All universities in the UC system have LRDP’s that accommodate additional students. The Draft EIR provides an assessment of potential population and housing impacts within Section 3.13, “Population and Housing,” and evaluates several alternatives that would reduce project-related impacts within Chapter 6, “Alternatives,” including Alternative 4 that would include some development at UC MBEST. For additional information related to alternatives, please refer to Master Response 3. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I24 Matty Lums

February 23, 2021

Comment I24-1

I admit I haven't read the current LRDP, but I've studied all of the other ones since the early 80s. I'm fairly familiar with the process and purpose.

I searched the handbook, LRPD, and EIR for the word "covid" "corona" and pandemic. I found nothing.

I did find this:

The projected enrollment number is based on the City's and UC's plans at the time the campus was founded, is driven by a demonstrated need for public university capacity in California, and reflects the actual enrollment growth rate at UC Santa Cruz over the last twenty years. It reflects the campus's commitment to expand opportunity for California's residents - enhancing diversity, producing more college graduates to fuel economic growth, and continuing to provide a path for social mobility.

The pandemic accelerated everything in our civilization by ten years. But the disruption of the Higher Ed business model will be catastrophic for institutions that use pre-pandemic enrollment models. The pandemic is the greatest disruption in academia since the Reformation and the printing press 500 years ago.

Unless UCSC and UC planners recognize that the business models of Higher Education are toast, we won't have a UC anymore. The foreign students are not coming back. The residential model is not coming back. Conferences are not coming back.

Most importantly, parents who took out second mortgages to pay the most expensive rents in the country have seen what they are paying for. Too many of them are going to make the sensible decision not to send their kids to Santa Cruz.

The LRDP doesn't address this. I know, you wrote it over the last few years. But it needs to be informed by our reality. University planners need to make investments in the unique values of UCSC that translate to research and education that are not centralized on the campus.

Here's what I'm reading:

<https://www.forbes.com/sites/alisonmccauley/2020/04/09/how-covid-19-could-shift-the-college-business-model/>

<https://www.frontiersin.org/articles/10.3389/fpsyg.2021.616059/full>

<https://nymag.com/intelligencer/2020/05/scott-galloway-future-of-college.html>

<https://marker.medium.com/this-chart-predicts-which-colleges-will-survive-the-coronavirus-8aa3a4f4c9e6>

Here's the worksheet that analyzes hundreds of US universities. You can see how UCSC compares to other UCs or other state university campuses of similar size. In Galloway's analysis, UCSC is in the "survive" quadrant. Does the LRDP plan for this mediocre physical growth? Could the campus make investments in post-pandemic Higher Ed instead of building more apartment towers?

Imagine the political benefits if UCSC expanded enrollment without building new housing, drinking more water, and tearing out redwood groves.

Thanks for taking time to read this comment, and more importantly, the references. I hope that you're already familiar with them.

Response I24-1

The comment expresses opinions related to operation of UC Santa Cruz and the COVID-19 pandemic. The comment poses a number of theoretical questions regarding long-term response to the Covid pandemic, which would be speculative to address. For further discussion of the baseline conditions and alternatives evaluated under EIR, please refer to Master Response 1 and Master Response 3, respectively. Additionally, regarding the evaluation of potential online learning within the 2021 LRDP EIR, the commenter is referred to Alternative 4, which includes an expansion of online learning to account for up to 10 percent of the projected student enrollment and is considered a reasonable expectation for the development of online learning as a program at UC Santa Cruz. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I25 Christopher Gentry

February 20, 2021

Comment I25-1

I am writing in OPPOSITION to the proposed 2021 LRDP.

The idea of increasing student enrollment to 28,000 plus 5,000 faculty is insane. And these figures do not even include all the ancillary support staff that would be required with such an increase.

The EIR notice describes "unavoidable", unmitigateable impacts which include "substantial unplanned population growth and housing demand, and impacts on water supply". To those of us who call Santa Cruz home, this is not news - it has been going on here for many years, and now the University Regents are committed to making a bad problem worse.

During a non-Covid year, we are already dealing with overcrowded housing. There used to be young families living in my neighborhood - they have all gone, replaced by 4 to 6 (or more} students per house with the attendant noise, traffic, lack of parking, and especially water impacts.

All indications are that we are entering another drought year. For many of the last 10 years, we have been on water rationing, because there is inadequate water to serve the people who already live here. And now the University proposes to add 1/3 more population to this fragile situation. This is heavy handed, tone deaf madness.

The University has not been a good neighbor. It is untenable that there is now a proposal to make a bad situation worse.

For the good of our City, the environment, our quality of life, and our water supply, please do not approve this proposal.

Response I25-1

The comment expresses opposition of the project and concerns related to water supply, but does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, as well as issues related to water supply, please refer to Master Response 2 and Master Response 7, respectively. The comment also states that the 2021 LRDP would add 5,000 faculty; to clarify, as stated on page 2-1 of the Draft EIR, the 2021 LRDP campus population forecast is 28,000 FTE students and 5,000 FTE faculty and staff, not just faculty. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I26 Matty Lums

February 23, 2021

Comment I26-1

Tiger Beetle. Just one species in lower south east field across empire grade that is being considered for construction.



Response I26-1

The comment provides a statement regarding the Ohlone Tiger Beetle one of the species identified and evaluated as part of Section 3.5, “Biological Resources,” but does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I27 Adam Millard-Ball

February 28, 2021

Comment I27-1

Thank you for the opportunity to comment on the 2021 draft LRDP for UC Santa Cruz. I provide the following comments on the transportation sections.

I appreciate the proposed bicycle facilities in Figure 4.12. However, there are several significant gaps in the plan as follows:

1. Some of the existing bicycle routes are one-way (e.g. between OPERS and the East Remote parking lot), or are substandard (e.g. narrow paths that are hard to cycle on or are blocked by gates (e.g. past the police station and to the east of Rachel Carson College). Therefore, the maps gives a misleading impression of how complete the network is. The LRDP should restrict its designation of "existing bicycle route" to those that meet design standards, and identify improvements for one-way or sub-standard routes.

Response I27-1

The comment expresses the opinion that the bicycle network as reflected in Figure 4.12 of the 2021 LRDP is misleading and suggests revisions. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. However, UC Santa Cruz acknowledges the comments that there are existing gaps in the bicycle network, which will be addressed through implementation of the 2021 LRDP, including a more detailed study of campus wide circulation, for all modes of access, to identify project level improvements necessary to improve campus connectivity and access for bicycles and pedestrians. As discussed further in Master Response 11, Level of Detail, the Draft EIR is a program level document. Figure 4.12 illustrates an existing and proposed campus wide bicycle network in broad terms, illustrating primary bicycle routes for cross-campus connectivity but does not include many of the less critical bicycle paths that will ultimately fit into a broader network. However, UC Santa Cruz is committed to improving bicycle facilities, as stated in the Integrated Transportation Strategy on page 128 of the LRDP, including a recognition of filling existing gaps in the transportation network. For example, UC Santa Cruz recently constructed project level improvements on a one-way uphill segment of the Great Meadow bike path to allow for the addition of bi-directional pedestrian access by widening the existing path, meeting current design standards. UC Santa Cruz will continue to make similar project level improvements to the campus transportation network, to support 2021 LRDP implementation. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I27-2

2. Figure 4.12 shows that, even if all the proposed routes are implemented, the bicycle network will still be fragmented, and connections will still be dependent on the campus roadway network. But almost no bicycle improvements are proposed for campus roadways. The most obvious gap in the proposed network is on upper Hagar Drive, where numerous bicycle routes are proposed to dead-end into Hagar and leave bicyclists stranded. The LRDP should propose widening upper Hagar and/or restricting traffic to allow for bidirectional protected bicycle lanes, and also create a policy to upgrade existing bicycle lanes to protected bicycle lanes on roads such as Coolidge and Hagar. One such proposal for the campus entrance is shown here:
<https://greentransport.sites.ucsc.edu/2020/05/09/rethinking-ucscs-main-entrance/> The LRDP should propose a bicycle network, not a series of isolated facilities.

Response I27-2

Refer to response I27-1. Furthermore, refer to page 2-23 of the Draft EIR that discusses proposed vehicular access restrictions of designated campus roadways near the campus core, including Hagar Drive, to prioritize transit, bicycle and pedestrian access.

Comment I27-3

On parking: The statement on p. 133 - "Some existing parking spaces could be displaced due to new development; these existing spaces will be replaced." - is unnecessary and at odds with other parts of the plan. The second clause should be deleted. There is no need for a policy for parking replacement, especially given the policies in the LRDP and DEIR to reduce parking demand.

Response I27-3

The comment expresses the opinion that a statement on page 133 of the 2021 LRDP should be removed, but does not address the adequacy of the EIR analysis. However, refer to Mitigation Measure 3.16-2, specifically related to TDM Parking Management Tools program measure regarding no net new parking. Existing parking may be replaced during 2021 LRDP implementation, as stated in the plan, however these replaced spaces may have additional eligibility requirements or parking policies implemented at the time of replacement, which could increase utilization rates for higher occupancy vehicles and/or reduce parking demand. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I28 Maria Borges

March 1, 2021

Comment I28-1

My name is Maria Borges. I am a UCSC Alumni and resident and taxpayer of Santa Cruz County.

The whole reason that I attended UCSC was to be around the nature and natural beauty that the campus had to offer. The best part of my time at UCSC was not the buildings, professors, or activities, but rather, spending time getting to know the native plants and wildlife. If you destroy the natural areas of campus in order to build new buildings, you are destroying the very reason that I and so many other students chose to attend UCSC.

My stance is that the No Action plan is the only acceptable plan for development at UCSC.

The mitigation ideas that are being proposed do not consider the importance of protection for the entire ecosystem within the boundaries of the LRDP. Permanent loss of habitat is not considered which would lead to the loss of the endangered species and many native animals over time.

UCSC needs to take a holistic approach that involves environmental stewardship of the natural areas on their property.

In addition, I am not just concerned with preserving the scenic beauty of the campus, but I am here to speak up for the native animals and plants that live on campus.

According to UCLA's Belinda Waymouth, it is less costly to protect natural areas than to restore them later on. The LRDP is short sighted when considering the longevity of the ecosystems on campus that we humans are also a part of. It is time that people start valuing things that are more important than making a profit.

Connection to nature helps to reduce stress for students and if the natural places on campus are destroyed, it will be a great loss for the future students of UCSC and of course for all of the animals that call those places home including burrowing owls, california red-legged frogs, coyote, mountain lions, bobcats, white tailed kites, golden eagles, and many more.

I am speaking up for the:

Sensitive Natural Communities (15 in total and possibly more)

Wildlife Movement Corridors for a number of species including mountain lions

Wildlife Nursery Sites

Environmentally Sensitive Habitat Areas

At least seven special-status plant species

At least nineteen special-status wildlife species

My family and I enjoyed spending time not only with the redwoods at UCSC, but also with the blue elderberries, hairy honey suckles, blue eyed grass, california poppies, sky lupine, snow berries, yerba buena, douglas fir, interior live oak, bay trees, coffeeberry, trillium, pacific star flowers, redwood violets, two eyed violets, globe lilies, horse tails, giant chain ferns, coral root orchids, native irises, False solomon's seals, mariposa lilies, suncups, rushes, grasses, sedges, willows, and more.

My children and I found tracks of bobcats and mountain lions on campus, we see coyotes, black tailed deer, California ground squirrels, brush rabbits, western gray squirrels, red foxes, gray foxes, long tailed weasels, many species of bats, shrews, moles, voles, mice and more and we want future students and their children to be able to visit the natural places that are home to these animals on campus.

Also, over 260 species of birds can be found on campus and we often see American kestrels, Northern Harriers, red tailed hawks, red shouldered hawks, cooper's hawks, sharp shinned hawks, nighthawks, Great Horned Owls, Barn Owls, white tailed kites, peregrine falcons, burrowing owls, and golden eagles hunting in the meadow areas of campus. These development plans would disturb the nesting sites and homes of the native birds, especially the raptors.

The proposed development sites provide habitat for birds such as acorn woodpeckers, pileated woodpeckers, downy and hairy woodpeckers, northern flickers, the redbreasted sap sucker, violet green swallow, western bluebirds, steller's jays, scrub jays, dark eyed juncos, golden and white crowned sparrow, California Quail, Anna and Allen's hummingbirds, black phoebe, chestnut backed chickadees, brown creepers, vieros, shrikes, warblers, nuthatches, and more.

These sites are also home to gopher snakes, yellow eyed encinitas, slender salamanders, western fence lizards, alligator lizards, the pacific chorus frog, the endangered California red legged frog, arboreal salamanders, the rough skinned newt, california toad, western skink, coast horned lizard, and more.

These projects would pose a threat to the endangered cave spiders on campus and the endangered California red legged frog and I really believe that these animals have a right to be able to survive and have a home. Even if the construction areas are not close to the caves, increasing the number of students by thousands would increase foot traffic into the caves and into the habitat of the red legged frogs.

There are many reasons to preserve these areas besides just having a beautiful view. There have been many scientific studies that show how important it is for children to connect with nature and that show that being in nature and hearing natural sounds relieve stress. I find that being in natural spaces relieves stress and anxiety for me. In addition, my children have an increased appreciation for the natural world and a better understanding of lifecycles from observing the native plants and animals of campus. I want my children to grow up wanting to protect our environment and I have learned that what children understand, they will love and what they love, they will protect and care for. We have come to understand and love the natural spaces of UCSC though studying them and spending time in them and we really want them to be protected so that one day my children's children can come and see these wild places that their parents played in when they were young. These natural spaces are invaluable for the students of UCSC and their families.

There is scientific value in preserving these areas as well. The thousands of native plants and animals that live in these spaces can be studied as I have done through classes at UCSC, such as the environmental interpretation class and through the Kamana naturalist program.

For example, my family and I have learned what the calls are of many different birds and that each species of bird has a variety of calls that mean different things ranging from alarm calls if a predator is nearby to juvenile begging to territorial aggression. We have noticed migration patterns of birds and have been able to know the first day that golden crowned sparrows and violet green swallows have returned to the meadows through our nature studies.

In addition, we have learned which plants are poisonous, edible, and medicinal and which ones were/ are used by the Native Amah Mutsun people of our area.

We really value these places that serve as refuges for Santa Cruz's native plants and animals and if these animals and plants were able to provide their own testimonies, they would of course want their homes, migration corridors, and hunting and foraging areas to be protected so that they and their future generations could continue to survive.

Here are some links to websites about the importance of nature connection:

https://blogs.ei.columbia.edu/2011/oF>/26/whY.-We-must-reconnect-with-nature/

https://www.12sychreg.org/connection-nature-matters/

Here's a TED talk by John Muir Laws explaining the importance of nature connection:

https://www.Y.outube.com/watch?v=af1kB8912Isw

We use his nature journaling methods to learn about the natural areas of UCSC.

Books that support our views include:

Coyote's Guide to Connecting with Nature

Last Child in the Woods: Saving Our Children From Nature-Deficit Disorder by author Richard Louv

The Laws Guide to Nature Drawing and Journaling by John Muir Laws

What the Robin Knows by John Young

In conclusion, the only acceptable plan is the "no action" option because that is the only plan that would protect and ensure the survival of the native plants and animals of UCSC, especially the endangered ones such as the redlegged frogs. UCSC would be violating the endangered species act if they went through with these development plans.

Developing the natural areas that are left on the UCSC campus would be a huge loss for the future students of UCSC and my family and I are very against it.

Response I28-1

The comment describes the biological resources on campus and expresses a preference for the No Project Alternative (Alternative 1) identified in Chapter 6 of the Draft EIR as it represents the least development of natural areas. The comment does raise some concerns about project impacts on sensitive habitats and species and cultural resources. Sections 3.4, “Archaeological, Historical and Tribal Cultural Resources,” and 3.5, ”Biological Resources,” of the Draft EIR include detailed discussion of 2021 LRDP impacts on known and unknown tribal cultural resources and impacts on sensitive habitats and species, including the potential permanent loss of sensitive habitat (refer to Impacts 3.5-2, 3.5-3, and 3.5-4, beginning on page 3.5-42 of Section 3.5, “Biological Resources” of the Draft EIR.) The remaining comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I29 Joanne Brown

March 1, 2021

Comment I29-1

My name is Joanne Brown. I am a resident of Santa Cruz County living in the Santa Cruz Mountains. I have a Master’s Degree in Biology with a focus in Ecology. The following includes comments in addition to comments already submitted during the public meeting on February 3rd.

The landscape within the boundaries of the UCSC Long Range Development Plan is an area rich in biodiversity.

It includes:

Sensitive Natural Communities

Wildlife Movement Corridors for a number of species including mountain lions

Wildlife Nursery Sites

Environmentally Sensitive Habitat Areas

At least seven special-status plant species known to occur within the LRDP area, and 28 additional species determined to have potential to occur in the LRDP area

At least 19 special-status wildlife species known to occur within the LRDP area and 16 additional species determined to have potential to occur

From the EIR:

**Special-Status Species**

*Of the* ***64 special-status plant species*** *that are known to occur within the eight U.S. Geological Survey (USGS) 7.5- minute quadrangles including and surrounding the LRDP area, seven species are known to occur within the LRDP area, and 28 additional species were determined to have potential to occur in the LRDP area based on the presence of habitat suitable for the species (California Natural Diversity Database [CNDDB] 2020, CNPS 2020, Table 3.5-2). Of the* ***66 special-status wildlife species that could occur within the eight USGS quadrangles****, 19 species are known to occur within the LRDP area (currently or historically) and 16 additional species were determined to have potential to occur in the LRDP area based on the presence of habitat suitable for the species (CNDDB 2020, Table 3.5-3).*

If UCSC truly cares about protecting biological resources on campus, the presence of even one special-status species, there should be detailed planning to ensure the survival of that species within the LRDP area. There are **at least 26 special-status species** within the boundaries of the LRDP, and potentially many more. The current LRDP does not provide permanent protection for these species and shows a deep lack of environmental stewardship by UCSC.

Response I29-1

The comment expresses the opinion that the 2021 LRDP should provide permanent protection for the known and potential special status species within the LRDP area, and does not address the adequacy of the EIR analysis. Section 3.5: Biological Resources of the Draft EIR includes a detailed discussion of 2021 LRDP impacts on sensitive habitats and species. Refer to Master Response 12 regarding long-term habitat protection. Refer to Table 2-3 on page 2-15 of the Draft EIR for net land use changes, including an almost doubling of the Campus Natural Reserve acreage, as proposed in the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-2

To protect the unique environments within the LRDP, I support **Alternative 1 (No Project)**, *which would represent the least amount of overall development compared to existing conditions and thus, least potential physical environmental impacts, would be considered the environmentally superior alternative*.

Response I29-2

The comment expresses support for the No Project Alternative (Alternative 1) and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-3

My comments will focus primarily on the destruction of habitat and harm to wildlife that will result from the LRDP. However, I am also concerned about many other negative aspects of the LRDP, including the following items:

**--Impacts on Water Supply**

*Implementation of the 2021 LRDP would generate an additional demand for water; while there would be adequate water supply from the City’s existing water sources in normal water years, during single and multiple dry water year conditions,* ***there would be a substantial gap between demand and available supplies, which would require the City to secure a new water source. This impact would be significant****.*

The gap between demand and available water supply is of tremendous concern.

The proposed mitigations are not sufficient to solve this critical issue and show a lack of consideration for residents of Santa Cruz County.

Response I29-3

The comment expresses concern related to water supply. For further information related to water supply, please refer to Master Response 7. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-4

**--Significant and unavoidable cumulative impacts related to air quality, historical resources, noise, population and housing**

*Due to the recent (summer 2020) loss of homes associated with the CZU fires, the availability of housing has tightened. Therefore, the total on-campus population increase accommodated by the 2021 LRDP may directly or indirectly induce substantial housing demand in the region. This impact would be significant.*

These significant & unavoidable environmental impacts detailed in the LRDP will have enormous consequences and severely impact residents of Santa Cruz County. There is already a housing crisis in our county that will only be worsened by the increased growth resulting from the LRDP.

Response I29-4

The comment states that the 2021 LRDP would have significant and unavoidable cumulative impacts on air quality, historical resources, noise, and population and housing. The statement is consistent with the conclusions of the Draft EIR, and no further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-5

**--Create a New Source of Light or Glare**

In addition to causing increased light pollution, the potential negative impact of increased light/glare on wildlife is not addressed at all. The articles below highlight some of the many negative effects of light pollution on wildlife.

<https://www.darksky.org/light-pollution/wildlife/>

<https://www.nationalgeographic.org/article/light-pollution/>

Response I29-5

The comment states that the Draft EIR does not include an evaluation of potential lighting impacts on wildlife, however, the Draft EIR’s assessment of potential disturbance of sensitive biological resources, including special status wildlife, is included within Section 3.5, “Biological Resources.” As provided in Section 3.5, potential impacts associated with “disturbance” would include impacts associated with additional lighting as a result of 2021 LRDP implementation, both during construction and operation. Revision of Section 3.1 of the Draft EIR, “Aesthetics” is not considered necessary or appropriate as the requested analysis is already provided elsewhere within the Draft EIR. With respect to operational lighting impacts, it is also worth noting where development would occur within the LRDP area. Species that may consider those areas that would be developed/redeveloped under the 2018 LRDP as habitat are already located proximate to similar types of land uses with similar noise, lighting, refuse, and domestic pets, and would be considered acclimated to the types and levels of noise, lighting, refuse, and domestic pet activity in the area. Nonetheless and as noted above, the Draft EIR does account for these potential impacts in the more comprehensive consideration of potential disturbance impacts to special status wildlife.

Comment I29-6

**--Agriculture and Forestry Resources**

No consideration is given to the negative impacts on wildlife that would result from the “conversion” of 68 total acres of farmland and grazing land to non-agricultural use. How this would negatively impact wildlife currently utilizing that land is not addressed.

Response I29-6

The comment states that no consideration is given to negative impacts on wildlife from conversion of grazing and farmland. However, the comment is incorrect. Section 3.5, “Biological Resources,” of the Draft EIR considers the potential impacts to biological resources that may occur as a result of 2021 LRDP development. Agricultural land and grassland, which includes grazing land, was included as part of the overall habitat assessment in the Draft EIR, as demonstrated in Tables 3.5-1 on page 3.5-8 and 3.5-4 on page 3.5-36 of Section 3.5, “Biological Resources.” As noted on page 3.5-12, agricultural land typically does not provide high quality habitat for wildlife but may be used for foraging and cover. As shown in Table 3.5-4 on page 3.5-36 of the Draft EIR, approximately 0.4 acres of agricultural land and 67.9 acres of grassland could be impacted by 2021 LRDP implementation. In addition, Impact 3.5-2, beginning on page 3.5-42 of the Draft EIR, assesses the potential impacts to special status wildlife species and habitat, including agricultural lands and grassland, as requested in this comment.

Comment I29-7

**--Result in a Loss or Conversion of Forest Land to Non-Forest Use**

Destroying 123 acres of intact forest will have a negative impact on the natural biodiversity in the area. Retaining an estimated 10 percent or greater tree cover throughout each development area will ​not ​mitigate the destruction of 123 acres of intact forest land and yet the Summary states that forest resource impact is “considered less than significant” and “no mitigation is required”.

Response I29-7

The comment expresses concern that the impacts to forest land, as provided in Section 3.2, “Agriculture and Forestry Resources,” should be considered significant. Page 3.2-2 of the Draft EIR defines “forest land” in the context of CEQA:

Section 12220(g) defines “forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

This definition conforms with the suggested criteria in the CEQA Guidelines, Appendix G. As evaluated in the Draft EIR and as stated on page 3.2-12, UC Santa Cruz would retain an estimated 10 percent or greater tree cover at a given development site such that each project area would still be considered forest land per PRC Section 12220(g). Maintaining at least 10 percent forested land cover would continue to provide public benefits such as aesthetics, biodiversity, water quality, and recreation, which are essential to UC Santa Cruz’s objectives for the 2021 LRDP and would be consistent with local policy direction of the surrounding county. Because UC Santa Cruz would retain forest land under the criteria included in PRC Section 12220(g) under the 2021 LRDP, impacts were found to be less than significant.

Comment I29-8

**Comments on the Biological Resources section of the EIR:**

The Biological Resources component of the EIR focuses primarily on mitigation efforts for a single species or a specific habitat. This approach does not take into account the need to protect all components of the ecosystem within the boundaries of the LRDP and surrounding natural areas.

Where a conflict arises with proposed construction, the DEIR does not plan to permanently protect habitat where species of concern currently or potentially occur within boundaries of the LRDP. ​Permanent loss of habitat is not considered throughout the LDRP. The proposed mitigations do not afford real protection to help ensure the survival of special status species over time.

Rather than implementing mitigation efforts after habitats are destroyed, it makes sense to protect sensitive natural communities, sensitive habitat areas and special status species that currently or potentially occur within LRDP boundaries.

Impacts and proposed mitigations described in the LRDP do not take into account the overall destruction of habitat for all species in the area. Construction activities and the resulting permanent changes to the landscape will affect all natural areas and wildlife therein, not only special status species.

For wildlife, the LRDP focuses primarily on mitigation efforts during the breeding season. There is little effort/planning for long term protection/preservation of habitat for species outside of the breeding season.

Response I29-8

Refer to Response to Comment I29-7 with respect to impacts to the habitat types present within the LRDP area and the species associated with each habitat type. The Draft EIR appropriately evaluates potential direct impacts on special status species and sensitive habitat (refer to Impacts 3.5-1 through 3.5-3 beginning on page 3.5-38 of the Draft EIR) consistent with CEQA requirements. In particular, the proposed mitigation (e.g., Mitigation Measure 3.5-3b on page 3.5-67 of the Draft EIR) requires avoidance or compensation for the unavoidable loss of sensitive habitat such that no net loss would occur, consistent with the commenter’s request for long-term protection/preservation of habitat for sensitive species and/or habitat that may be affected by implementation of the 2021 LRDP.

Comment I29-9

**Result in Disturbance or Loss of Special-Status Plant Species**

A data review and biological reconnaissance survey will be conducted within a project site by a qualified biologist prior to project activities (e.g., ground disturbance, vegetation removal, staging, construction) and will be conducted no more than one year prior to project implementation.

-How much time will biologists spend in the field collecting data over multiple seasons? How many biologists will be employed for this purpose? Data collection and analysis should be part of environmental monitoring over time before long term project decisions can be made.

A “biological reconnaissance survey” is insufficient.

**-Protecting intact habitats is the best way to support the perpetuation of Special-Status plant species.**

<https://www.cnps.org/conservation/endangered-species/mitigation-impacts-policy>

Response I29-9

The comment expresses the opinion that a biological reconnaissance survey related to special status plants is insufficient and requests additional information regarding survey protocols. To clarify, Mitigation Measure 3.5-1a beginning on page 3.5-39 of the Draft EIR, requires a biological reconnaissance survey as an initial step to field verify potential biological resources that may occur within a given development area. Additional surveys may be required depending on the results of the survey (e.g., protocol-level surveys for special status plants) as required by Mitigation Measure 3.5-1b. depending on the results of the survey required by Mitigation Measure 3.5-1a. Further, the time required and protocol implemented for various surveys will depend on the species determined to be potentially present and in accordance with industry standards (including regulatory agency guidance) for the assessment and identification of sensitive species. The mitigation measures identified for biological resources are intended to provide a consistent manner in which to evaluate and mitigate potential impacts to sensitive biological resources and are consistent with CEQA requirements.

Comment I29-10

**Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat**

Implementation of the 2021 LRDP would include land use conversion and development activities including ground disturbance, vegetation removal, and overall conversion of wildlife habitat, which could result in disturbance, injury, or mortality of several special-status wildlife species if present, reduced breeding productivity of these species, and loss of species habitat. This would be a potentially significant impact.

- If it is determined that habitat suitable for California giant salamander, foothill yellow-legged frog, or Santa Cruz black salamander is present within a particular project site habitat within that site should be protected.

- Similarly, construction should not occur within the LRDP where “adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frogs cannot be avoided”.

- If any special-status amphibians are detected during the preconstruction survey, **construction should not occur on that site**.

Response I29-10

The comment provides opinion regarding the preservation of habitat for several potential special status wildlife species and is noted. The mitigation measures presented in the Draft EIR are considered to be consistent with CEQA requirements and would prevent significant, adverse impacts to sensitive species. The comment does not provide any information to address why the Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-11

**Conduct Pre Construction Surveys for Southwestern Pond Turtle**

If “aquatic or upland habitat suitable for southwestern pond turtles is present or that southwestern pond turtle was otherwise determined to be historically present within a particular project site” habitat within **that site should be protected**.

Response I29-11

The comment provides opinion regarding the preservation of habitat for southwestern pond turtle and is noted. The mitigation measures presented in the Draft EIR are considered to be consistent with CEQA requirements and would prevent significant, adverse impacts to sensitive species. The comment does not provide any information to address why the Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-12

**Conduct Pre Construction Surveys for Coast Horned Lizard, Implement Avoidance Measures, and Relocate Individuals**

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for coast horned lizards (e.g., chaparral, coyote brush) is present within the project site that habitat should be protected. It is ​not​ reasonable to think that a biologist will be onsite and be able to find and relocate every horned lizard present and move it to “safety”. Even if every horned lizard could be relocated (which I seriously doubt), this does not guarantee their survival:

Unfortunately, many translocation efforts fail to meet their goals for myriad reasons, particularly because translocated animals make large, erratic movements after release, which can result in high mortality rates.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7460367/>

Response I29-12

The comment provides opinion regarding the preservation of habitat for coast horned lizard and is noted. The mitigation measures presented in the Draft EIR are considered to be feasible, consistent with CEQA requirements, and would prevent significant, adverse impacts to sensitive species. Translocation of individuals, in accordance with USFWS and CDFW standards, is considered an appropriate method of preventing impacts on individual organisms. The comment does not provide any information to address why the Draft EIR analysis and mitigation measure is inadequate. No further response is required.

Comment I29-13

**Conduct Protocol-Level Surveys for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows**

Habitat that is suitable for burrowing owls occurs within a project site should be protected. There is no guarantee that disturbed and displaced burrowing owls will survive even with the proposed mitigation efforts. There is also no guarantee that owls within the burrows will be found by the biologist.

From: *APPENDIX H: COLORADO DIVISION OF WILDLIFE'S 2002 RECOMMENDED BUFFER ZONES AND SEASONAL RESTRICTIONS FOR COLORADO RAPTORS*

“...owls may be present at burrows up to a month before egg laying and several months after young have fledged.”

Response I29-13

The comment expresses an opinion that habitat for burrowing owls should be protected and is noted. However, the citation provided from the Colorado Division of Wildlife is not considered appropriate within the context of assessing impacts on burrowing owls within Santa Cruz, California as species may behave differently based on climate and other environmental conditions. The Draft EIR’s analysis was based on official guidance from CDFW with respect to burrowing owls, as noted in Mitigation Measure 3.5-2e on page 3.5-51 of the Draft EIR. The mitigation measure (Mitigation Measure 3.5-2e) provided in the Draft EIR is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any information to address why the Draft EIR analysis and mitigation measure is inadequate. No further response is required.

Comment I29-14

**Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers**

*An avoidance buffer of a minimum of 0.25 mile will be implemented for American peregrine falcon, bald eagle, golden eagle, and white-tailed kite, in consultation with CDFW. For other species, a qualified biologist will determine the size of the buffer for non-raptor nests after a site and nest-specific analysis. Buffers typically will be 500 feet for raptors (other than special-status raptors) and 100 feet for non-raptor species.*

The proposed avoidance buffers for raptors are **not sufficient in size**. (See comments for species listed below). Even if buffer zones are increased in size, construction and permanent habitat changes will potentially **disturb/disrupt** future nesting activities unless nesting sites **and surrounding habitats** are permanently protected.

**From the Colorado Division of Wildlife:**

*(APPENDIX H: COLORADO DIVISION OF WILDLIFE'S 2002 RECOMMENDED BUFFER ZONES AND SEASONAL RESTRICTIONS FOR COLORADO RAPTORS)*

A **‘holistic’** approach is recommended when protecting raptor habitats. **While it is important for land managers to focus on protecting nest sites, equal attention should focus on defining important foraging areas that support the pair's nesting effort.** Hunting habitats of many raptor species are extensive and may necessitate interagency cooperation to assure the continued nest occupancy.

From: ***USFWS: Building Houses Near Eagle Nests***

“Disturb” is defined by regulation 50 CFR§ 22.3 as “**to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available**:

* **Injury to an eagle,**
* **Decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or**
* **Nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior**

“Disturb” **includes immediate impacts such as loud noises around the nest that may cause eagles to abandon their eggs or young chicks. Disturbance may also happen if humans change the landscape around the eagle nest. Even if these changes happen outside of the eagle nesting season, the eagle may have future decreased nest success or may abandon the nest if these changes are significant.**

Proposed actions detailed in the LRDP may violate the Federal Endangered Species Act and the Bald and Golden Eagle Protection Act:

**Bald and Golden Eagle Protection Act** For the purpose of the act, disturbance that would injure an eagle, decrease productivity, **or cause nest abandonment, including habitat alterations that could have these results, are considered take and can result in civil or criminal penalties**.

Response I29-14

The buffer distances identified in Mitigation Measure 3.5-2f, beginning on page 3.5-53 of the Draft EIR, for special-status birds, nesting raptors and other native birds were based on applicable guidance information from USFWS and CDFW, as well as the professional experience of biologists in the region. The buffer distances identified in Mitigation Measure 3.5-2f also take into consideration the level of development and activity within the LRDP area and adjoining areas, as well as the potential for species in the area to acclimate to certain noises, such that nest abandonment would not occur. Of note, the mitigation does allow for increasing buffer distances if nesting birds/raptors appear agitated by project-related activities to prevent nest abandonment. With respect to the use of guidance from the Colorado Division of Wildlife, refer to Response I29-13. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any information to address why the Draft EIR analysis and mitigation measure is inadequate. No further response is required.

Comment I29-15

Permanent loss of habitat for these species within the LDRP could result in “take”.

**Federal Endangered Species Act:**

Under Section 9 of the ESA, the definition of “take” is to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” **USFWS has also interpreted the definition of “harm” to include significant habitat modification that could result in take.**

Response I29-15

The comment expresses concern that the permanent loss of habitat for certain raptors and special-status birds could result in “take” within the definition of the Endangered Species Act. It is unclear from the comment to which habitat the commenter is referring. The Draft EIR evaluated potential impacts to raptor and other special-status bird species on pages 3.5-52 through 3.5-54, including the potential loss of habitat. As stated on page 3.5-54 of the Draft EIR, implementation of Mitigation Measures 3.5-1a and 3.5-2f would reduce potential impacts on special-status birds, raptors, and other native nesting birds by requiring reconnaissance-level surveys for projects under the 2021 LRDP to determine the likelihood of presence of nesting birds, focused surveys for the nesting birds if determined to be likely to occur, and implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected. No further response is possible.

Comment I29-16

**Peregrine Falcon:**

From the EIS: *An avoidance buffer of a minimum of 0.25 mile will be implemented for American peregrine falcons*.

From: (APPENDIX H: COLORADO DIVISION OF WILDLIFE'S 2002 RECOMMENDED BUFFER ZONES AND SEASONAL RESTRICTIONS FOR COLORADO RAPTORS)

Nest Site: **Seasonal restriction to human encroachment within ½ mile of the nest cliff(s) from March 15 to July 31**.

Response I29-16

Regarding the comment’s preference for a 0.5-mile buffer for peregrine falcons, refer to Response I29-13.

Comment I29-17

**Golden Eagle:**

*From the EIS: An avoidance buffer of a minimum of 0.25 mile will be implemented for American peregrine falcon, bald eagle, golden eagle, and white-tailed kite, in consultation with CDFW.* From: **US Fish and Wildlife Service Pacific Southwest Region Migratory Birds Program Recommended Buffer Zones for Ground-based Human Activities around Nesting Sites of Golden Eagles in California and Nevada**

For most ground-based human activities, we recommend a **one-mile no-disturbance buffer surrounding golden eagle nesting sites in California and Nevada** Activities: Industrial, Municipal, and Construction Activity: Including, but not limited to, urbanization; mining; oil and gas development; solar development; logging; power line construction; road construction & maintenance; facilities construction; and agricultural operations.

Response I29-17

The comment summarizes the minimum buffer distance for American peregrine falcon, bald eagle, golden eagle, and white-tailed kite and provides USFWS guidance information. The differences between the cited USFWS guidance and the proposed mitigation measure of the Draft EIR are noted. As stated above in Response I29-14, the buffer distances identified in the Draft EIR were based on applicable guidance information from USFWS and CDFW, as well as the professional experience of biologists in the region. The buffer distances also take into consideration the level of development and activity within the LRDP area and adjoining areas, as well as the potential for species in the area to acclimate to certain noises, such that nest abandonment would not occur. Further, the buffer distances identified in the Draft EIR are recommended minimum buffers. Larger buffers could also be established if deemed necessary by qualified biologists, CDFW, or USFWS. No further response is possible.

Comment I29-18

**White Tailed Kite:**

*From the EIS: An avoidance buffer of a minimum of 0.25 mile will be implemented for American peregrine falcon, bald eagle, golden eagle, and white-tailed kite, in consultation with CDFW.* From: ***Appendix I CDFW's Conservation Measures for Biological Resources That May Be Affected by Program-level Actions***

Swainson's hawk and White Tailed Kite Surveys will cover a minimum of a 0.5-mile radius around the construction area. If nesting Swainson's hawks or white tailed kites are detected, **CDFW will establish a 0.5 mile no disturbance buffer**.

Response I29-18

The comment summarizes the minimum buffer distance for American peregrine falcon, bald eagle, golden eagle, and white-tailed kite and provides information from CDFW’s conservation measures for the San Joaquin River Restoration Program. The differences between the cited CDFW guidance and the proposed mitigation measure of the Draft EIR are noted. As stated above in Response I29-14, the buffer distances identified in the Draft EIR were based on applicable guidance information from USFWS and CDFW, as well as the professional experience of biologists in the region. The buffer distances also take into consideration the level of development and activity within the LRDP area and adjoining areas, as well as the potential for species in the area to acclimate to certain noises, such that nest abandonment would not occur. Further, the buffer distances identified in the Draft EIR are recommended minimum buffers. Larger buffers could also be established if deemed necessary by qualified biologists, CDFW, or USFWS. No further response is possible.

Comment I29-19

**Native Nesting Birds**

From the EIR: *Because the nests of olive-sided flycatcher, yellow warbler, and yellow breasted chat are small and difficult to find, occupancy of habitat suitable for these species (i.e., riparian woodland) for these species will be determined by a qualified biologist familiar with the life history of olive-sided flycatcher, yellow warbler, and yellow-breasted chat and with experience identifying the calls of these species*.

The EIR addresses only three of the species that are known to occur or may occur within the LRDP. The species not addressed include the loggerhead shrike, purple martin, tricolored blackbird and Vaux's swift. Having a biologist identify bird calls for three species in **no way guarantees the protection of current or potential nesting sites and does nothing to give permanent protection to the riparian/woodland habitat** that is vital for the survival of native nesting bird populations. It is critical to **protect all riparian habitat within the LRDP**. See information below:

**From: *The Riparian Bird Conservation Plan***

**More than 225 species of birds, mammals, reptiles, and amphibians depend on California’s riparian habitats. Riparian ecosystems harbor the most diverse bird communities in the arid and semiarid portions of the western United States (Knopf et al. 1988, Dobkin 1994, Saab et al. 1995). Riparian vegetation is critical to the quality of in-stream habitat and aids significantly in maintaining aquatic life by providing shade, food, and nutrients that form the basis of the food chain (Jensen et al. 1993). Riparian vegetation also supplies in-stream habitat when downed trees and willow mats scour pools and form logjams important for fish, amphibians, and aquatic insects.** The National Research Council (2002) concluded that **riparian areas perform a disproportionate number of biological and physical functions on a unit area basis and that the restoration of riparian function along America’s water bodies should be a national goal. Riparian vegetation in California makes up less than 0.5% of the total land area**, an estimated 145,000 hectares (CDF 2002). Yet, studies of riparian habitats indicate that they are important to ecosystem integrity and function across landscapes (Sands 1977, Johnson and McCormick 1979, Katibah 1984, Johnson et al. 1985, Faber 2003). Consequently, they may also be the most important habitat for landbird species in California (Manley and Davidson 1993). Despite its importance, riparian habitat has been decimated over the past 150 years. Today, depending on bioregion, riparian habitat covers 2% to 15% of its historic range in California (Katibah 1984, Dawdy 1989). **Due to their biological wealth and severe degradation, riparian areas are the most critical habitat for conservation of Neotropical migrants and resident birds in the West** (Miller 1951, Gaines 1974, Manley and Davidson 1993, Rich 1998, Donovan et al. 2002). California’s riparian habitat provides important breeding and over wintering grounds, migration stopover areas, and corridors for dispersal (Cogswell 1962, Gaines 1977, Ralph 1998, Humple and Geupel 2002, Flannery et al. 2004). **The loss of riparian habitats may be the most important cause of population decline among landbird species in western North America** (DeSante and George 1994).

**From : California Riparian Systems - UC Press E-Books Collection**

**California Riparian Systems**

"In California, the habitat that most clearly approximates the eastern broadleaved hardwood forests is the riparian woodland. This is so because of the nature of the trees in this woodland, their denseness, and the unparalleled diversity of the bird life." (Small 1974).

"**Today, with the last extensive remnants of these forests in jeopardy, it behooves us to weigh the importance of riparian habitat to birds and other wildlife**." (Gaines 1977).

These two quotations address both the importance of, and the threat to, lowland riparian systems in California and the West. Statewide, the extensive riparian forests encompassing hundreds of thousands of hectares have been reduced to mere remnants within 100 years.

Response I29-19

The impact discussion for special-status birds, which starts on page 3.5-52, includes discussion of all 14 special-status birds that may occur in the LRDP area, including those that the comment states were omitted. Mitigation Measure 3.5-2f on pages 3.5-53 to 3.5-54 of the Draft EIR, which outlines nesting bird survey methods and protection measures, includes a bullet that references three special-status bird species for which slightly different survey methods are required. The comment also includes background statements regarding riparian habitat and the importance of this habitat to birds, and states that all riparian habitat in the LRDP area should be protected. Mitigation Measure 3.5-3a and 3.5-3c on pages 3.5-66 through 3.5-68 of the Draft EIR includes requirements to avoid impacts on riparian habitat resulting from implementation of the 2021 LRDP or compensation for unavoidable impacts on this habitat.

Comment I29-20

**Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures**

From the EIR: *To minimize the potential for loss of monarch overwintering colonies, project activities that include vegetation removal within suitable overwintering habitat (e.g., coniferous forest, eucalyptus forest) will be conducted from April through September to avoid the overwintering season (October through March), if feasible. If project activities are conducted outside of the overwintering season,* ***no further mitigation will be required****.*

Also from the EIR: *The cause of (monarch) decline is thought to be loss of milkweed (Asclepias spp.) and nectar plants; loss and degradation of overwintering groves…*

Removal of a tree or stand of trees that provides suitable overwintering habitat for a monarch colony will **destroy habitat that is crucial for the survival of the species** since there will be nowhere for the colony to return for overwintering the following year. Even with proposed mitigations, destruction of monarch overwintering habitat outlined in the LRDP could contribute to the plummet and collapse of monarch populations. How can UCSC destroy monarch habitat and then claim to be committed to environmental stewardship?

From:

*Monarch butterfly population plummets 86% in one year in California*

**There were 4.5 million of them in the 1980s. Now there may be fewer than 30,000.**

From:

<https://yubanet.com/california/monarch-population-in-california-spiraling-to-another-record-low/>

-Early count numbers from the Xerces Society's Western **Monarch** Thanksgiving Count suggest that the western migratory **population** is at an all-time low. ... The greatest number of **monarchs** at a single site so far is 550, at Natural Bridges State Beach in **Santa Cruz**.

-**Protecting monarch overwintering sites is paramount**. Many are still subject to development on private lands and many sites on state lands are in urgent need of restoration and management.

From:
<https://xerces.org/blog/vanishing-butterfly-groves-of-california>

**Action is urgently needed to address the challenges facing monarch butterfly overwintering sites.**

With the number of western monarchs overwintering in California at less than 1% of historic levels for the second year in a row, it is obvious that monarchs are vanishing from the state. What’s less obvious, but vitally important to understand, is that the forested groves that the western monarchs call home each winter are also disappearing.

The latest research suggests that the damage and loss of overwintering habitat is one of the primary drivers of the decline of western monarchs. Yet the dominant story of monarch conservation in the United States so far has focused on planting milkweed and other nectar plants; reducing pesticides; and, to a lesser extent, acknowledging the roles of climate change and disease.

When overwintering habitat issues are mentioned, it’s nearly always in regards to the eastern monarchs’ overwintering grounds in central Mexico, where illegal logging continues to be a threat to the butterfly and, sometimes even human rights—as evidenced by the recent disturbing deaths of individuals involved with protecting the monarch forests. Here at Xerces, we are keeping their families and their communities in our thoughts.

We of course need to continue to work to meaningfully support overwintering protections in Mexico. **It is also time for the U.S. monarch conservation efforts to bring their energy to bear on the problems facing the California overwintering sites, which still have no meaningful protection from damage or destruction.**

We must hold out hope that we can still recover monarchs in the West,” said Sarina Jepsen, director of the endangered species program at the Xerces Society. “But we also must step up to truly protect the monarch butterfly, its overwintering sites and breeding areas if that hope is to become reality.

Clearly, vegetation used for monarch overwintering colonies **should not be removed for project activities**. Even if removal is conducted outside the overwintering season, vegetation removal destroys critical habitat and leaves no place for the monarchs to return to the following season. The monarch population has plummeted and every effort should be made not to disturb existing habitat in Santa Cruz County.

I support planting native species to provide additional habitat for monarch overwintering.
However, planting new habitat should be in addition to preserving existing monarch habitat.

Response I29-20

This comment states that monarch overwintering habitat should not be removed as a result of implementation of projects under the 2021 LRDP. Refer to Response S1-5 regarding impacts to monarch butterflies and amendments to Mitigation Measure 3.5-2h.

Comment I29-21

**Conduct Site-Specific Habitat Suitability Analysis for Ohlone Tiger Beetle, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures**From the EIR: *If a qualified biologist determines that the individual project would have no substantial adverse effect on Ohlone tiger beetle or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed.*

How is “substantial” quantified?

Response I29-21

The comment asks how the term “substantial” is quantified. The evaluation of whether a given project would have no substantial effect would depend on several factors, including whether the potential project area would involve the proper habitat and soils conditions for the species and whether implementation of the project would likely result in take. Other factors could include the historic observation of the species in the area, the potential to observe the species (if present), and the dispersal potential for the species from known locations. For example, if a project is proposed within an area that does not include the appropriate habitat and the dispersal potential of species individuals is unlikely, a conclusion of no substantial adverse effect could be considered appropriate.

Comment I29-22

From the EIR: *The Ohlone tiger beetle is listed as endangered under ESA. Ohlone tiger beetles are known to occur in lower campus within the grassland/coastal prairie area in the southwest corner of the LRDP area west of Empire Grade, including IAA (one of the preserves established for the Ranch View Terrace HCP)*

In areas where “disturbance, injury, or mortality of Ohlone tiger beetles cannot be avoided”, **those areas need to be protected** not “replaced”.

**Ranch View Terrace Habitat Conservation Plan***The Ranch View Terrace HCP was developed by the UC Regents to seek regulatory compliance for the construction and operations of the Ranch View Terrace project and a new Emergency Response Center and was approved in 2005 (UC Santa Cruz 2005b). The HCP area includes approximately 38.8 acres in the lower campus portion of the LRDP area (Figure 3.5-1).* ***This HCP covers two federally listed species: California red-legged frog (Rana draytonii) and Ohlone tiger beetle (Cicindela ohlone). Two preserves were established as mitigation areas to maintain habitat for Ohlone tiger beetle and California red-legged frog, including the 12.5-acre Inclusion Area A (IAA) preserve (off-site of the Ranch View Terrace project site) in the southwestern portion of the LRDP area and the 13-acre Inclusion Area D (IAD) preserve (onsite) directly south of the Ranch View Terrace project site (Figure 3.5-1). A 5.7-acre Ohlone tiger beetle management area was established within IAD.***

In areas where “disturbance, injury, or mortality of Ohlone tiger beetles cannot be avoided”, **those areas need to be protected**, rather than replacing Inclusion Area D with replacement habitat “that may be suitable, created, or restored for Ohlone tiger beetles”. It makes no sense to destroy an area that was specifically created to maintain habitat for the Ohlone tiger beetle!

Response I29-22

This comment states that habitat for Ohlone tiger beetle should be protected. See Response I29-35.

Comment I29-23

Similar comment for any proposed destruction of current California red-legged frog habitat.

Response I29-23

This comment states that habitat for California red-legged frog should be protected. See Response I29-35.

Comment I29-24

**Conduct Focused American Badger Survey and Establish Protective Buffers**From the EIR: *If occupied dens are found, impacts on active badger dens will be avoided by establishing exclusion zones around all active badger dens, the size of which will be determined by the qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging) will occur within the exclusion zone until denning activities are complete or the den is abandoned, as confirmed by a qualified biologist. The qualified biologist will monitor each den once per week to track the status of the den and to determine when it is no longer occupied. When it is no longer occupied, project activities within the exclusion zone may occur.*

There is **no plan** for permanent protection of American badger denning sites. The project activities are set to continue once the den is vacant. This does nothing for long term protection of this species.

Response I29-24

The comment states that Mitigation Measure 3.5-2j on page 3.5-60 of the Draft EIR does not permanently protect American badger dens. Mitigation Measure 3.5-2j would avoid loss of American badgers by identifying and protecting active dens until they are no longer occupied. This mitigation measure would result in avoidance of injury or mortality of badgers or destruction of active dens. While some dens may be lost as a result of implementation of projects under the 2021 LRDP, American badgers use multiple dens within their home ranges, and loss of one, inactive den, would not be considered a substantial adverse effect. The mitigation measures presented in the Draft EIR are feasible, consistent with CEQA requirements, and would prevent significant, adverse impacts on American badgers.

Comment I29-25

**Conduct Focused Noninvasive Surveys for Mountain Lion Dens and Implement Avoidance Measures**From the EIR: *If potential dens are found, further investigation will be required to determine if the den is being used by a mountain lion or another carnivore species (e.g., coyote [Canis latrans], bobcat [Lynx rufus], gray fox [Urocyon cinreoargenteus]). Survey methods will include the use of trail cameras, track plates, hair snares, or other noninvasive methods. Surveys using these noninvasive methods will be conducted for three days and three nights to determine whether the den is occupied by mountain lions.*

Why 3 days?

From the EIR: *If the den is determined to be occupied by a mountain lion, UC Santa Cruz will notify and consult with CDFW to identify adequate seasonal restrictions and/or no disturbance buffers to avoid disturbance, injury, or mortality of mountain lion.*

Seasonal restrictions are not enough to mitigate the loss/disturbance of den sites that could be destroyed/disturbed by planned construction within the LRDP. The permanent loss of mountain lion denning sites is not addressed here. This is another example of the lack of planning to permanently protect wildlife habitat throughout this document.

From the EIR: *In April of 2020, the California Fish and Game Commission determined that* ***listing of the Central Coast and Southern California ESU of mountain lion under CESA may be warranted****. As a result, mountain lions within these ESUs are candidates for listing, and are thus protected under CESA. The LRDP area is within the Central Coast North ESU, which includes mountain lions in the Santa Cruz Mountains and the East Bay Hills. Mountain lions occupy a variety of habitats* ***but are most abundant in riparian habitats****.*

*...lions are traversing through the LRDP area regularly and that many of the lions’ home ranges overlap the LRDP area (Santa Cruz Puma Project 2020). Only a subset of mountain lions in the Santa Cruz Mountains are radio collared, and uncollared lions are often detected using camera traps on campus, so it is probable that additional mountain lions also occur within the LRDP area (Jones, pers. comm., 2020).*

***The LRDP area contains large areas of relatively undeveloped habitat within north campus and portions of central campus. The LRDP area is surrounded by undeveloped natural habitat (e.g., Wilder Ranch State Park, Henry Cowell Redwoods State Park), and provides connectivity between these habitats (Santa Cruz Puma Project 2020). Suitable denning habitat for mountain lions includes caves, other natural cavities, and thickets.*** *Mountain lions are known to den within nearby Wilder Ranch State Park (Santa Cruz Puma Project 2015). While some areas of the LRDP area may have relatively heavy human use (e.g., vehicles, pedestrians) compared to surrounding State Parks,* ***some of the undeveloped areas may provide suitable denning habitat for this species... However, proposed projects in forested areas in upper campus (e.g., along Empire Grade, along Heller Drive) may contain den habitat suitable for the species.***

The above statements validate **the necessity of protecting riparian habitat and “undeveloped” habitat within north campus and portions of the central campus to provide connectivity between surrounding “undeveloped” habitat, thus providing corridors and denning sites for mountain lions and other wildlife within the LRDP.**

**From** ***Genetic source–sink dynamics among naturally structured and anthropogenically fragmented puma populations***
Gene flow is critically important to individual fitness and to the evolutionary potential of populations because successful migrants can diversify gene combinations (i.e., increase heterozygosity) and introduce new genetic material (i.e., increase allelic richness) (Caballero and García-Dorado 2013; Chapman et al. 2009; Frankham 2015). Without receiving gene flow, small populations are especially subject to inbreeding, genetic drift, and increased extinction risk (Carlson et al. 2014; Wootton and Pfister 2015). Population fragmentation is increasing worldwide and urbanization is one of the primary contributors…

Response I29-25

As stated in the Draft EIR on page 3.5-60 and based on data collected by the Santa Cruz Puma Project, den habitat suitable for mountain lions would be limited to remote, undeveloped habitat, which is only present in north campus and potentially in forested areas in upper campus, where most of envisioned development would not occur. Mitigation Measure 3.5-2k requires an initial focused survey to identify potential mountain lion dens (e.g., caves, cavities, thickets), which likely would not be present in the majority of project areas under the 2021 LRDP. If habitat potentially suitable for mountain lion is present within a particular project site (e.g., caves, other large natural cavities, thickets) or signs of mountain lion activities are observed (e.g., tracks, scat, carcasses or bones of prey species), an additional survey using trail cameras or other noninvasive methods would be conducted outside of the potential den for three days and three nights. This survey period would be sufficient based on information provided by the Santa Cruz Puma Project and qualified experts (as provided on page 3.5-60 of the Draft EIR) to determine whether a potential den with signs of mountain lion use is being actively used by lions. Mitigation Measure 3.5-2k has been edited to incorporate additional measures to reduce impacts on occupied mountain lion den (refer to edit below and Chapter 4, “Revisions to the Draft EIR”). The mitigation measures presented in the Draft EIR are feasible, consistent with CEQA requirements, and would prevent significant, adverse impacts on mountain lions and mountain lion dens.

Mitigation Measure 3.5-2k on page 3.5-61 of the Draft EIR was revised as follows:

**Mitigation Measure 3.5-2k: Conduct Focused Noninvasive Surveys for Mountain Lion Dens and Implement Avoidance Measures**

If it is determined through implementation of Mitigation Measure 3.5-1a that den habitat potentially suitable for mountain lion is present within a particular project site (e.g., caves, other large natural cavities, thickets) or signs of mountain lion activities are observed (e.g., tracks, scat, carcasses or bones of prey species), the following measures shall be implemented to avoid take of mountain lions or destruction of den habitat:

* Within ~~at least~~ 30 days before commencement of project activities, a qualified wildlife biologist with familiarity with mountain lion and experience using survey methods for the species will conduct focused surveys of habitat suitable for the species within the project site to identify any potential mountain lion dens. Potential mountain lion dens will include caves, large natural cavities within rocky areas, or thickets deemed appropriate for use by mountain lions based on size and other characteristics (e.g., proximity to human development, surrounding habitat). The qualified wildlife biologist will also survey for signs of mountain lion (e.g., tracks, scat, prey items) in the vicinity of the cave, cavity, or thicket to help determine whether the den may be occupied by mountain lions. If the start of project activities lapses and more than 30 days pass since the survey was completed, an additional survey shall be conducted.
* If no potential dens are found, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and no further mitigation will be required.
* If potential dens are found, further investigation will be required to determine if the den is being used by a mountain lion or another carnivore species (e.g., coyote [*Canis latrans*], bobcat [*Lynx rufus*], gray fox [*Urocyon cinreoargenteus*]). Survey methods will include the use of trail cameras, track plates, hair snares, or other noninvasive methods. Surveys using these noninvasive methods will be conducted for three days and three nights to determine whether the den is occupied by mountain lions.
* If the den is determined to be unoccupied by any carnivore species, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and no further mitigation will be required.
* If the den is determined to be unoccupied by mountain lion, but is occupied by another carnivore species, the den will not be disturbed while the young of any species are dependent on the den for shelter.
* If the den is determined to be occupied by mountain lion, a no-disturbance buffer of at least 2,000 feet will be established around the occupied den within which no project activities will occur, and UC Santa Cruz will notify and consult with CDFW to identify additional adequate seasonal restrictions and/or no disturbance buffers to avoid disturbance, injury, or mortality of mountain lion.

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 because it corrects a typographical error and does not result in new or substantially more significant impacts. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the UC Regents for certification.

Comment I29-26

**Conduct Focused Surveys for Ringtail**From the EIR: *If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for ringtail is present within a particular project site (e.g., forest or chaparral habitat within 0.6 mile of a permanent water source), the following measures shall be implemented: To minimize the potential for loss of ringtail and active ringtail dens, project activities (e.g., tree removal, other vegetation removal, ground disturbance, staging) within potentially suitable ringtail habitat will be conducted outside of the ringtail breeding season (not well defined, but likely approximately March 1 to July 31), if feasible.*

As with other proposed mitigation measures for wildlife in this document, the effort is to “minimize the potential for loss”. There is no long term effort to protect habitat and only minimal effort made to mitigate impacts during the breeding season. According to this document, “the breeding season is **not well defined**”. How can you possibly propose mitigations for ringtail when you do not have even this basic information?

*From the EIR: Within seven days before initiation of project activities within potentially suitable ringtail habitat, a qualified biologist with familiarity with ringtail and experience conducting ringtail surveys will conduct a focused survey for potential ringtail dens (e.g., hollow trees, snags, rock crevices) within the project site. The qualified biologist will identify sightings of individual ringtails, as well as potential dens.*

CDFW classifies the Ring Tail as a **fully protected species**.

From: Fully Protected Animals - California Department of Fish and Wildlife

The classification of Fully Protected was the State's initial effort in the 1960's to identify and **provide additional protection to those animals that were rare or faced possible extinction**. Lists were created for fish, mammals. amphibians and reptiles, birds and mammals. Please note that most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations.

From: <https://animals.sandiegozoo.org>
**Not a lot is known about the ringtail’s mating habits, as they have not been observed to much extent.** Female ringtails experience a single estrous cycle in a season, usually mating from February to May. The gestation period ranges from 51 to 54 days. Births usually occur in May or June, with a litter size ranging from one to four.

If the qualified biologist identifies suitable ringtail habitat within the LRDP, that habitat should be permanently protected from disturbance/development. However, I am not confident that sufficient resources (time for data collection in the field by a qualified biologist) will be allocated to determine the current or potential presence of ringtail within the boundaries of the LRDP.

Response I29-26

This comment states that mitigation for ringtail cannot be proposed because the Draft EIR states that the breeding season for this species is not well defined but only presented part of the statement regarding the typical ringtail breeding season, which in full stated “…the ringtail breeding season (not well defined, but likely approximately March 1 to July 31).” Ringtail, like many other wildlife species, is not a well-studied species and CDFW acknowledges that even basic life history information for the species is not fully understood. However, the Draft EIR, beginning on page 3.5-62, included the best available science, and incorporated a typical, approximate date range for the ringtail breeding season. The mitigation measures presented in the Draft EIR are feasible, consistent with CEQA requirements, and would prevent significant, adverse impacts on ringtail through monitoring and avoidance of individuals. The commenter’s opinion regarding the potential need to protect potential ringtail habitat is noted; however, as stated on page 3.5-62 of the Draft EIR, a variety of habitats are considered potentially suitable for ringtail. As such, the Draft EIR’s evaluation and mitigation to prevent impacts to individuals (for a fully protected species under California Fish and Game Code) is considered appropriate.

Comment I29-27

**Conduct Focused Surveys for San Francisco Dusky Footed Woodrat, Implement Avoidance Measures, or Relocate Nests**From the EIR: *If active woodrat nests within a project site are detected that cannot be avoided, and project activities are planned to occur during the woodrat breeding season (April through June), these active nests must be avoided until the end of the breeding season. If active woodrat nests within a project site cannot be avoided, and project activities are planned to occur outside of the woodrat breeding season, a qualified biologist in consultation with CDFW will dismantle the woodrat nest by hand, removing the materials layer by layer to allow adult woodrats to escape. If young are discovered during the disassembling process, the qualified biologist will leave the area for at least 24 hours to allow the adult woodrats to relocate their young on their own.*

Throughout this document no plan exists for the long term protection of habitat where the species under consideration currently or potentially occurs!

Response I29-27

The comment states that long-term protection of habitat is not included in the Draft EIR, however, consistent with CEQA requirements, the Draft EIR is required to analyze the impacts associated with implementation of the 2021 LRDP. It is unclear to which plan for long-term protection of habitat the comment refers. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-28

**Conduct Focused Bat Surveys and Implement Avoidance Measures**From the DEIR: *Three special-status bat species could occur in the LRDP area: pallid bat, Townsend’s big-eared bat, and western red bat. All of these species are CDFW species of special concern. These species use a variety of habitats to roost, including caves, crevices, mines, hollow trees, and buildings. Potentially suitable roosting habitat is present within and adjacent to the LRDP area within crevices (e.g., exfoliating bark, cracks and fissures in tree stems or branches, crevices in buildings), cavities (e.g., large tree hollows, unoccupied buildings, caves), and foliage (e.g., clusters of leaves found in California bay, eucalyptus, willow, other tree species).* ***These types of habitats would be largely present within undeveloped forested areas in upper campus***

*A no-disturbance buffer of 250 feet will be established around active pallid bat, Townsend's big-eared bat, or western red bat roosts, and project activities will not occur within this buffer until after the roosts are unoccupied.* ***Three special-status bat species could occur in the LRDP area: pallid bat, Townsend’s big-eared bat, and western red bat. All of these species are CDFW species of special concern.***

Bat populations are plummeting **due to habitat destruction** and disease. **Permanent** protection of natural roosting areas within the LRDP is essential to help the survival of these species.

Response I29-28

This comment states that permanent protection of natural roosting habitat for bats is essential for species survival. The comment does not address the adequacy of the EIR analysis, as provided on page 3.5-64 of the Draft EIR. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-29

Townsend’s Big Eared Bat:
***Townsend's Big-eared Bat Protected Under California Endangered Species Act***The bat, which is known for its long ears, **has declined steeply in recent decades and is severely threatened by a combination of habitat destruction, disturbance of roost sites**, and the potential introduction of white-nose syndrome, a disease that has already wiped out nearly 7 million bats across the eastern United States.

**From the DEIR**: *These species use a variety of habitats to roost, including caves, crevices, mines, hollow trees, and buildings.* ***Potentially suitable roosting habitat is present within and adjacent to the LRDP area*** *within crevices (e.g., exfoliating bark, cracks and fissures in tree stems or branches, crevices in buildings), cavities (e.g., large tree hollows, unoccupied buildings, caves), and foliage (e.g., clusters of leaves found in California bay, eucalyptus, willow, other tree species). These types of habitats would be largely present within undeveloped forested areas in upper campus…*

From:
[https://www.usgs.gov/centers/werc/science/bat-research-california?qt-science\_center\_objects= 0#qt-science\_center\_objects](https://www.usgs.gov/centers/werc/science/bat-research-california?qt-science_center_objects=%200%23qt-science_center_objects)

**Many bat species are rare, declining, or have unknown population sizes and trajectories, and without better information, it is difficult or impossible to develop effective bat conservation strategies. Bats in the western U.S. face historical and ongoing challenges, including habitat loss and alteration and disturbance.**

It is imperative that the habitat condusive to the survival of bat species be protected within the LRDP boundaries.

Response I29-29

This comment states that habitat suitable for bat species should be protected within the LRDP area and summarizes some current threats to bats. The comment does not address the adequacy of the EIR analysis, as provided on page 3.5-64 of the Draft EIR. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-30

Result in Degradation or Loss of Riparian Habitat or Other Sensitive Natural Communities

From the EIR: *Implementation of projects under the 2021 LRDP would include potential land use conversion and development activities including ground disturbance, vegetation removal, a mkand land development, which could result in the degradation or loss of riparian habitat, other sensitive natural communities, or ESHAs, or the reduction in the function of these habitats, if present. This would be a potentially significant impact.*

*Mitigation:*

*...For preserving existing habitat outside of the project site in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation…*

Intact riparian habitat is irreplaceable. All **riparian habitat within the LRDP should be protected**. Mitigations proposed in the EIR will not compensate for the loss of intact riparian habitat. The articles cited below highlight the importance of intact riparian habitat.

From: **Riparian Habitat
Riparian** forests have largely been lost to stream channelization, development, logging, grazing and water diversion throughout the west**. Only 5% to 10% of California's original (pre-European contact) riparian habitat exists today and much of the remaining habitat is in a degraded condition.**

When compared to grasslands and upland forest, **riparian areas have the highest species diversity and productivity for both flora and fauna**. Over 135 species of California birds such as the willow flycatcher, yellow-billed cuckoo and red-shouldered hawk either completely depend upon riparian habitats or use them preferentially at some stage of their life. Riparian habitat provides food, nesting habitat, cover, and migration corridors.

**From: California Riparian Habitat Conservation Program
Riparian systems are one of our most important and most neglected renewable natural resources.** These systems also supply food, cover and water for a diversity of animals and serve as migration routes and stopping points between habitats. Riparian vegetation stabilizes streambanks and resists the flow of floodwaters, while increasing the time available for water to infiltrate into the soil recharging groundwater and alluvial aquifers.

**From The value of riparian habitat to buffer effects of climate change in california's central valley
The ecosystem services provided by riparian habitats are a potential alternative to mitigate the impacts of climate change** on the Central Valley of California (CVC). The rise in regional temperature increasingly alters the hydrological regime which degrades aquatic ecosystems, contributes to water scarcity, and imposes stress on the flora and fauna throughout the CVC. Though riparian habitats historically characterized much of the CVC, its current potential in onset of climate change is not as widely acknowledged. **A literature review supports the capacity for riparian habitats to provide biological refugia through thermal cover, enhanced habitat quality and role as a corridor for migration. Further research determined that riparian habitats can likely influence aquifer recharge and effectively store water resources. As the effects of climate change become more severe, it will be essential to incorporate the role of riparian habitats.**

Response I29-30

This comment states that all riparian habitat within the LRDP area should be protected and includes excerpts from various sources regarding the importance of riparian habitat. However, the Draft EIR’s analysis and mitigation, as provided in Impact 3.5-3, is based on guidance from CDFW and the *Manual of California Vegetation* (Sawyer et al. 2009) and is considered sufficient to reduce impacts to less-than-significant levels. Refer to Impact 3.5-3 on pages 3.5-65 to 3.5-66 of the Draft EIR, which discusses potential impacts of the 2021 LRDP on riparian habitat. Mitigation Measures 3.5-3a and 3.5-3c on pages 3.5-66 through 3.5-68 of the Draft EIR describe the required surveys for these riparian habitat and avoidance and compensation requirements for unavoidable impacts with a standard of no net loss. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements.

Comment I29-31

**Result in Degradation or Loss of State or Federally Protected Wetlands**From the EIR: *Implementation of projects under the 2021 LRDP would include potential land use conversion and development activities including ground disturbance, vegetation removal, and land development, which could result in inadvertent alteration of wetland hydrology, removal of wetland vegetation, or inadvertent fill or dredging of wetlands.* ***This would be a potentially significant impact.***

**Aquatic Habitats** within the LRDP include: Lake 0.3 Freshwater Forested/Shrub Wetland 0.3 Stream 7.2 miles Perennial Stream 1.7 miles Intermittent Stream 2.4 miles
Swale 3.1 miles

Proposed mitigation efforts **do not protect aquatic habitats, including wetlands, within the LRDP**. These habitats should be protected and not degraded/destroyed as a result of construction activities.

It is estimated that up to **90% of California wetlands have already been lost**. Preserving and protecting wetlands within the LRDP should be of utmost concern. Excerpts below stress the importance of protecting aquatic habitats.

From : **My Water Quality: Wetlands**

Estimates of total historical wetland loss vary for California. Some regional studies have reported loss rates up to 90% in the state. **Some wetland types, such as vernal pools, riparian habitat, and coastal wetlands, have experienced disproportionately higher rates of loss.** For example, an estimated 7 million acres of vernal pools existed at the time of initial Spanish exploration, of which less than 13% remains today.

Many types of land use activities can cause wetland degradation, destruction, or modification. Agricultural drainage, dewatering from groundwater withdrawals and construction of roads and rail have accounted for much of the historical wetland loss. In more recent times, **urban development, infrastructure**, pollution, and invasive species have contributed to wetland loss.

From: Save California's Last Wetlands

A century ago, 4 million acres of California wetlands supported millions of migratory waterbirds. Ducks, geese, terns, cranes, and shorebirds depended on great expanses of wetlands in the Central Valley for water, food and habitat during their long journeys along the Pacific Flyway. **Since then, over 90% of California’s wetlands have disappeared**, and by the 1980s Central Valley bird populations had plummeted to less than 15% of their historic numbers.

Excerpts From: Protecting California’s Aquatic Biodiversity in a Time of Crisis

**“Nowhere is the biodiversity crisis more acute than in freshwater ecosystems” (Tickner et al. 2020)**

A major response to the state’s biodiversity challenge by the state has been the California Biodiversity Initiative of 2018, which was supported by Governor Brown and continues to be supported by Governor Newsome. The initiative proposes statewide measures to halt the decline of native species and ecosystems, under the leadership of the Department of Fish and Wildlife and the Department of Food and Agriculture.

We applaud this initiative as a good beginning, even if stalled by the effects of the present pandemic. However, it also has a major flaw: it is so focused on terrestrial ecosystems and native plants that it **overlooks the needs of native aquatic (freshwater) species, habitats, and ecosystems. California’s aquatic biodiversity is particularly imperiled, as it is worldwide** (Tickner et al. 2020).

Unfortunately, **efforts to protect terrestrial habitats and ecosystems rarely do an adequate job of protecting aquatic biodiversity**; most of the key rivers that support threatened fishes, for example, flow outside of protected areas (Grantham et al. 2016). Of course, because terrestrial ecosystems drain into or encompass freshwater systems, management of terrestrial habitats is important for conserving aquatic habitats. However, most protected areas in the state are not explicitly managed to maintain freshwater ecosystems and their biota.

In short, California does a poor job of protecting aquatic biodiversity. **A bold and imaginative, systematic effort is needed to protect and manage aquatic biodiversity.** This will take leadership, money, and dedication to getting the job done by federal, state, and local agencies. **As a biodiversity hotspot with an economy bigger than most nations, California should be leading the country and the world in protecting its aquatic systems.** We have the tools at hand, but have been unable to muster the will to do the hard work. **But as we reflect upon the natural world during the current public health crisis, it just may be that our growing appreciation of California’s biological richness is what is needed to inspire meaningful action.**

From the EIR : **Wildlife Movement Corridors**

The bolded text below highlights the fact that important wildlife corridors exist throughout the LRDP and connect to blocks of natural landscape outside of the LRDP. Furthermore **the ENTIRE north campus portion of the LRDP is considered an ECA**. Construction should not occur in any areas currently or potentially used as wildlife corridors.

***The north campus portion of the LRDP area is predominantly composed of relatively intact natural habitat, including redwood, coast live oak, coastal prairie, northern maritime chaparral, coastal mixed hardwood, and coyote brush habitat (Figure 3.5-2).***

***Wilder Creek and several other intermittent and perennial streams run through the LRDP area (Figure 3.5-3). These features likely provide value as movement corridors for terrestrial and aquatic wildlife species and also provide connectivity with other natural habitats surrounding the LRDP area.*** *Some of the important areas for habitat connectivity in California were mapped as Essential Connectivity Areas (ECA) for the California Essential Habitat Connectivity Project, which was commissioned by the California Department of Transportation and CDFW with the purpose of making transportation and land-use planning more efficient and less costly, while helping reduce dangerous wildlife-vehicle collisions (Spencer et al. 2010). The ECAs were not developed for the purposes of defining areas subject to specific regulations by CDFW or other agencies.* ***As shown in Figure 3.5- 5, the LRDP area is surrounded on the north, west, and south by areas characterized as natural landscape blocks. The north campus portion of the LRDP area itself is considered an ECA, providing connectivity between these natural landscape blocks, and is generally “more permeable” relative to other areas outside of natural landscape blocks (see Figure 3.5-5)*** *. Most of the central campus and all of the lower campus portions of the LRDP area are not considered ECAs or natural landscape blocks due to the developed nature of those areas;* ***however, these areas, especially riparian corridors, may still be used for wildlife movement to some degree.***

Response I29-31

This comment states that Draft EIR mitigation measures do not protect aquatic habitats, including wetlands; includes excerpts from various sources regarding the importance of wetlands, and states that development should not occur in wildlife corridors. Mitigation Measure 3.5-4 on pages 3.5-69 and 3.5-70 of the Draft EIR requires identification of state and federally protected wetlands through a formal delineation process approved by the U.S. Army Corps of Engineers, avoidance of wetlands, and permitting and compensation for unavoidable impacts with a standard of no net loss. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements.

Comment I29-32

I am inserting the **entire** text of Impact 3.5-5 below since it clearly details how the implementation of projects proposed in the 2021 LRDP will be disastrous for wildlife. I request that those who will be making the final decision on the LRDP **take time to read this section and truly consider how damaging the LRDP is to wildlife** --loss of terrestrial and aquatic habitats, fragmentation of wildlife corridors, loss of migration paths and wildlife nurseries. There is no mitigation for this level of destruction. If UCSC really cares about environmental stewardship, do not proceed with land “conversions” and “development” activities that will result in adverse effects on wildlife and habitat.

**Impact 3.5-5: Interfere with Wildlife Movement Corridors or Impede the Use of Wildlife Nurseries**

*Implementation of projects under the 2021 LRDP would include potential land use conversion and development activities including* ***ground disturbance, vegetation removal, and land development, which could result in adverse effects on resident or migratory wildlife corridors through habitat fragmentation, degradation of aquatic habitat (e.g., streams), or blockage of important wildlife migration paths. These activities could also disturb wildlife nursery sites or degrade essential nursery habitat components. Impacts on movement corridors, habitat connectivity, and wildlife nursery sites would be potentially significant. The LRDP area contains natural habitats, especially within north campus, which likely function as wildlife movement corridors. Aquatic habitats within the LRDP area, including perennial and intermittent streams, and associated riparian habitat likely serve as migratory corridors for fish, aquatic invertebrates, amphibians, and birds associated with riparian habitat. Terrestrial habitat within the north campus portion of the LRDP area has been identified as an ECA connecting natural landscape blocks to the north, west, and south*** *(Figure 3.5-5)****. These areas are known movement corridors for mountain lions (see mountain lion discussion above under Impact 3.5-2, Santa Cruz Puma Project 2020) and likely are also used by bobcats (Lynx rufus), coyotes (Canis latrans), gray foxes, and mule deer. Wildlife nursery sites include locations where fish and wildlife concentrate for hatching and/or raising young. Nursery sites that could occur within the LRDP area include bird rookeries (e.g., herons, cormorants), fawning areas for deer,*** *Biological Resources UC Santa Cruz 2021 Long Range Development Plan EIR 3.5-71* ***or maternal******roosts for common bat species. Native nursery sites are not mapped on a regional scale and have generally not been mapped in the LRDP area. Nursery sites may be occupied by common wildlife species; however, these species may depend on these sites for important life history periods (e.g., breeding) and local nursery sites may have importance to wildlife populations at a regional level. Impacts on locally or regionally significant wildlife nursery sites may result in a substantial reduction in habitat for that species. Noise or visual disturbance due to the presence of vehicles, equipment, or personnel or physical impediments, such as material storage or equipment staging during implementation of projects under the 2021 LRDP could cause resident or migratory wildlife to temporarily avoid or move out of the areas immediately surrounding project sites. These disturbances could temporarily disrupt the movement patterns of some wildlife species that may use project sites or adjacent lands for regular movements locally or for seasonal migrations. Additionally, access or use of any wildlife nursery sites (e.g., bat maternity roosts, deer fawning areas, bird rookeries, monarch overwintering sites) present within or adjacent to active project sites could be disturbed or impeded temporarily by project activities,*** *as explained further below. Much of the proposed development under the 2021 LRDP would be infill projects in already developed areas or in proximity to developed areas. The general types and levels of disturbance (e.g., vehicle and equipment noise, visual disturbance, human activity) from project construction activities near developed areas (e.g., buildings, public roads with consistent traffic) would likely be similar to existing disturbance levels in these areas. Wildlife near human development is likely accustomed to human presence and motorized vehicles (e.g., mule deer); therefore, any temporary incremental increases in noise and human disturbances from project activities in these areas are unlikely to substantially disrupt current movement patterns. Infill projects would likely not create any temporary or permanent barriers to wildlife movement in excess of surrounding development and existing barriers. Additionally, urban/developed areas within the LRDP area are less likely to contain sensitive wildlife nursery sites compared to undeveloped natural habitats. Proposed development would occur within redwood, grassland,* ***landscaping/ornamental (which may retain similar habitat function to natural habitats), northern maritime chaparral, coastal prairie, coyote brush, agricultural, and riparian woodland and scrub habitats*** *(Table 3.5-4)****. Disturbance associated with project construction activities would likely result in noise and visual disturbance levels greater than existing conditions in these undeveloped areas and would also result in new temporary or permanent barriers to movement which could result in temporary or permanent disruption of wildlife movement. Additionally, if nursery sites are present within project sites under the 2021 LRDP in these undeveloped or relatively undeveloped areas, project activities could potentially result in removal or abandonment of a wildlife nursery.*** *For example****, project activities could remove trees containing a bat maternity roost or a bird nesting colony. In addition, project-related noise and human disturbance near nursery sites could result in temporary avoidance, changes in behavior, separation of adults and young, or, if the disturbance is severe, abandonment of the nursery site. These disturbances and behavioral responses could decrease the reproductive success of the affected population. In addition to construction-related impacts, the placement and design of buildings and other infrastructure (e.g., fencing, lighting) could also result in adverse effects on wildlife movement or wildlife nursery sites, including bird strikes and wildlife entanglement. The amount of glass in a building, especially untreated glass, is the strongest predictor of the risk of bird collisions (American Bird Conservancy 2015). Under certain conditions, glass on buildings can form a mirror, reflecting sky, clouds, or nearby habitat attractive to birds. Under other conditions, glass may appear transparent or black, which birds may perceive as an unobstructed route (American Bird Conservancy 2015).*** *If placed in front of ground level windows, landscaping (e.g., shrubs, trees) can be reflected in these windows, causing birds to collide with the building (American Bird Conservancy 2015). Bird-friendly building-design strategies include (1) using minimal glass, (2) placing glass behind some type of screening (e.g., netting, screens, grilles, shutters, exterior shades), and (3) using glass with inherent properties that reduce collisions (American Bird Conservancy 2015). Although most bird collisions occur during the day,* ***some avian species migrate at night, and artificial night lighting on buildings may result in disorientation, potential collisions, changes in animal behavior (e.g., foraging behavior, communication), and an increased likelihood of predation.*** *Certain fencing materials can impale or entangle wildlife, including barbed, loose, or broken wires, and wrought iron fencing; and the height of fencing can result in snaring of legs or antlers of migrating deer, potentially result in injury or death.* ***Biological Resources UC Santa Cruz 3.5-72 2021 Long Range Development Plan EIR Interference with wildlife movement corridors and disturbance or removal of wildlife nursery sites during construction or as a result of building or fencing design would be a potentially significant impact.***

The following article highlights the importance of protecting connectivity and three strategies being implemented by Fish & Wildlife to make that happen. Why isn’t the critical necessity of protecting wildlife corridors being taken seriously in the EIR?

**From : Habitat Connectivity Planning for Fish and Wildlife**

**A functional network of connected habitats is essential to the continued existence of California's diverse species and natural communities in the face of both human land use and climate change.** Habitat is key to the conservation of fish and wildlife. Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. As habitat conditions change in the face of climate change, some species ranges are already shifting and wildlife must be provided greater opportunities for movement, migration, and changes in distribution. In addition, aquatic connectivity is critical for anadromous fish like salmon that encounter many potential barriers as they return upstream to their places of origin.

**How We Ensure Connectivity**

The California Department of Fish and Wildlife works closely with federal, tribal, state, and local agencies on three primary strategies to ensure habitat connectivity for wildlife.

**-Protect connectivity while habitat is still intact, through permanent conservation and adaptive management.**

**-Avoid further fragmentation of habitat. Cluster urban development and site roads and other infrastructure projects where they are least likely to disrupt habitat connectivity.**

**-Minimize or mediate the effects of existing barriers. Create wildlife crossings or fish passage structures.**

“Protecting connectivity while habitat is still intact​” should be given utmost consideration in the LRDP.

Response I29-32

This comment includes the text from Impact 3.5-5 from pages 3.5-70 through 3.5-72 of the Draft EIR and summarizes the importance of habitat connectivity. The comment provides this Draft EIR text as evidence that implementation of the 2021 LRDP would result in impacts on wildlife. The discussion in Impact 3.5-5, beginning on page 3.5-70 of the Draft EIR, is intended to disclose all potential impacts on wildlife movement corridors and wildlife nursery site without implementation of mitigation measures. This impact discussion also includes seven mitigation measures (see pages 3.5-72 and 3.5-73 of the Draft EIR) that would reduce this impact to less than significant under CEQA. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any information to address why the Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-33

The LRDP will destroy wildlife nursery sites:

**From the EIR: Wildlife Nursery Sites**

*Nursery sites are locations where fish or wildlife concentrate for hatching and/or raising young, such as nesting rookeries for birds (e.g., herons, egrets), spawning areas for native fish, fawning areas for mule deer (Odocoileus hemionus), and maternal roosts for bats.* ***The LRDP area could contain a variety of these wildlife nursery sites. Deer fawning areas typically occur in chaparral, woodland, and riparian habitats which occur within the LRDP area. Several common bat species are known to occur within the LRDP area: big brown bat (Eptesicus fuscus), silver-haired bat (Lasionycteris noctivagans), hoary bat (Lasiurus cinereus), California myotis (Myotis californicus), long-eared myotis (Myotis evotis), little brown myotis (Myotis lucifugus), fringed myotis (Myotis thysanodes), long-legged myotis (Myotis volans), Yuma myotis (Myotis yumanensis), and Mexican free-tailed bat (Tadarida brasiliensis; UC Santa Cruz 2016b).*** *Roost characteristics of common bat depend on the species, but may include specialized roosting habitat, such as caves, tree foliage, buildings, bridges, crevices, and tree hollows.* ***Significant common bat roosts may also be present within habitat suitable for roosts in the LRDP area.***

**Mitigation Measure 3.5-5b: Retain Wildlife Nursery Habitat and Implement Buffers to Avoid Wildlife Nursery Sites**

*A no-disturbance buffer will be established around the nursery site if project activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors, but will typically be a minimum of 100 feet. No project activity will commence within the buffer area until a qualified biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the no-disturbance buffer around the nursery site by a qualified biologist during and after project activities will be required.* ***If project activities cause agitated behavior of the individual(s), the buffer distance will be increased, or project activities modified until the agitated******behavior stops.*** *The qualified biologist will have the authority to stop any project activities that could result in potential adverse effects to wildlife nursery sites.*

“If project activities cause agitated behavior of the individual(s), the buffer distance will be increased, or project activities modified until the agitated behavior stops.”

Does it really seem appropriate to anyone that “project activities” should be carried out knowing that there are currently or potentially could be animals present in these nursery sites?

Mitigation Measure 3.5-5b does not effectively protect current/potential wildlife nursery sites nor the wildlife within those nursery sites. It does not offer any permanent protection to nursery sites. Permanent protection of these areas is essential to help ensure survival of these species. **Wildlife nursery areas within the LRPD should not be disturbed and should be permanently protected.**

Response I29-33

This comment summarizes the Draft EIR impact discussion for wildlife nursery sites on pages 3.5-70 through 3.5-72 and states that Mitigation Measure 3.5-5b on pages 3.5-72 and 3.5-73 of the Draft EIR does not effectively protect wildlife nursery sites. Further, the comment states that wildlife nursery sites should be permanently protected. Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR requires identification of wildlife nursery sites and Mitigation Measure 3.5-5b requires demarcation of habitat features associated with identified nursery sites, establishment of no-disturbance buffers while the nursery is occupied. Impacts on common wildlife occupying a wildlife nursery site would be avoided. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any information to address why the Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-34

**From the Biological Resources Executive Summary***A data review and biological reconnaissance survey will be conducted within a project site by a qualified biologist prior to project activities (e.g., ground disturbance, vegetation removal, staging, construction) and will be conducted no more than one year prior to project implementation.*

What percentage of biological research for the LRDP was/will be conducted in the field as compared to online research? During field research, how much time was spent/will be spent collecting data in the field during different times of the day/night, during different seasons and over a number of years? How can long term decisions that will permanently affect habitats and wildlife be made unless there have been long term ecological studies of areas within the LRDP?

Response I29-34

This comment asks if preparation of the Draft EIR included field studies. The programmatic analysis in the Draft EIR included a review of the best available data (including database and guidance information from CDFW, California Native Plant Society, and USFWS and recent biological surveys and assessments), as described on page 3.5-1. Future projects under the 2021 LRDP will require project-level review, including reconnaissance-level surveys for biological resources and subsequent protocol-level surveys (per CDFW and USFWS guidance) if special-status species or sensitive habitats may occur. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA. The Draft EIR represents a programmatic evaluation of the 2021 LRDP and presents feasible mitigation consistent with CEQA requirements. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-35

**3.5.1 Regulatory Setting**Proposed Mitigations for the LRPD violate the Federal Endangered Species Act.

**Federal Endangered Species Act:**Under Section 9 of the ESA, the definition of “take” is to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” **USFWS has also interpreted the definition of “harm” to include significant habitat modification that could result in take.**

Damage to forest, riparian, aquatic and wetland habitat, wildlife corridors and wildlife nurseries within the LDPR **will cause significant habitat modification** that could result in take, thus violating the Federal Endangered Species Act. This alone should be sufficient to halt construction activities that would result in habitat destruction within the LRDP.

Response I29-35

This comment states that impacts on habitat under the 2021 LRDP would cause significant habitat modification resulting in take under the federal Endangered Species Act (ESA). Two species listed under the ESA are known to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47 of the Draft EIR and Mitigation Measure 3.5-2i on pages 3.5-58 and 3.5-59 of the Draft EIR outline the requirements for projects that may adversely affect California red-legged frog and Ohlone tiger beetle, respectively. These mitigation measures require project-level habitat suitability verification, refined design-level determination of impacts (including loss of habitat function, as required under ESA), and consultation with USFWS prior to project implementation. Including mitigation acceptable to USFWS, such as Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47 of the Draft EIR or Mitigation Measure 3.5-2i on pages 3.5-58 and 3.5-59of the Draft EIR, would fully mitigate impacts to these species The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA and ESA requirements. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-36

**From the EIR:** County of Santa Cruz General Plan
*The Conservation and Open Space Element of the County of Santa Cruz General Plan contains the following policies related to biological resources in the county and that may be relevant to the 2021 LRDP:*

After reviewing the specifics of the Conservation and Open Space Element of the County of Santa Cruz General Plan, I believe that the LDRP **violates our county’s objectives to protect biological diversity** as defined by the following policies:

*Policy 5.1.2: Definition of Sensitive Habitat*

*Policy 5.1.3: Environmentally Sensitive Habitats*

*Policy 5.1.6: Development Within Sensitive Habitats*

*Policy 5.1.9: Biotic Assessments.*

*Policy 5.1.10: Species Protection*

*Policy 5.1.11: Wildlife Resources Beyond Sensitive Habitats*

*Objective 5.2: Riparian Corridors and Wetlands*

Furthermore, the LRPD does not abide by the policies related to protecting biological resources as outlined in the Natural Resources and Conservation Element of the City of Santa Cruz General Plan.

Although UC Santa Cruz “is not subject to municipal regulations of surrounding local governments”, I would hope that UCSC decision-makers feel a moral obligation to do their part by adhering to municipal regulations that protect our local environment and wildlife, especially considering the current environmental crises we are experiencing in our county (fires, floods, debris flows & resulting loss of wildlife habitat, including wildlife nurseries and corridors).

Protecting the biodiversity and natural beauty that occurs within the boundaries of the LRDP will be a gift to generations of students, educators and our community. These unique habitats offer opportunities for ecological research and long term environmental studies. **Protecting natural areas where people can connect with nature should be an essential component of the Long Range Development Plan.** This is aligned with the ‘public service” component of the LRDP.

Response I29-36

This comment includes a summary of local policies and states that the 2021 LRDP is in violation of some of these policies. Refer to Master Response 2, specifically the discussion under “Adherence to Local Policies.” Further, the Draft EIR adequately addresses impacts of 2021 LRDP on the on biological resources and proposes mitigation measures that are feasible, appropriate, and in accordance with CEQA and ESA requirements. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-37

**From the EIR: VEGETATION COMMUNITIES***Only “coarse scale” mapping was conducted in 2019...Because the 2019 mapping was conducted at a coarse scale, some vegetation communities are not presented, including known sensitive natural communities mapped for the 2005 LRDP (i.e., coastal prairie, northern maritime chaparral), and layers depicting these communities from 2005 LRDP were included for completeness (UC Santa Cruz 2005a, Figure 3.5-2). Because of the coarse scale of the 2019 mapping, some vegetation communities may be overrepresented or underrepresented in Table 3.5-1 and Figure 3.5-2. However, the overall habitat types as presented below and in Figure 3.5-1 are considered the best available comprehensive data and appropriate for this analysis.*

Were there no field studies conducted for the LRDP within the past year? **How can a long term plan be approved when there has been no recent data collection or studies conducted in the field?**

Response I29-37

As described in the introduction to Section 3.5, “Biological Resources,” on page 3.5-1 of the Draft EIR, the analysis of biological resources was based on a variety of sources, including field surveys. These surveys have been conducted over the past several years, and a biologist confirmed that the surveys and other information was reflective of LRDP area resources during a site visit as part of the LRDP EIR. Please also see pages 8-7 through 8-10 for a comprehensive list of all sources referenced that formed the substantial evidence to provide the analysis. This is appropriate for a program-level EIR, where the exact locations of future buildings and infrastructure disturbance has not been determined but will in the future with development is specifically proposed. Future projects under the 2021 LRDP will require project-level review, including reconnaissance-level surveys for biological resources and confirmation of vegetation community mapping. Mitigation Measures 3.5-1a on page 3.5-39 of the Draft EIR describes these reconnaissance-level survey requirements. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements, and fully mitigates impacts to sensitive biological resources. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-38

Redwood

The LRDP area contains an estimated 860.4 acres of redwood habitat, which occurs throughout north campus...Distinct stands of “dwarf” redwood trees have been observed within the LRDP area… the uniqueness of these stands in the LRDP area may warrant additional consideration for campus planning purposes due to the potential rarity of this community type.

Where has protection of these stands of dwarf redwoods been addressed in the LRDP?
The importance of these 860+ acres of redwood habitat to wildlife can not be overstated.

Response I29-38

This comment states the importance of redwood habitat in the LRDP area and asks where protection of dwarf redwoods has been addressed in the Draft EIR. Mitigation Measures 3.5-3a, 3.5-3b, and 3.5-3c on pages 3.5-66 through 3.5-68 of the Draft EIR describe the required surveys for sensitive natural communities (including redwood habitat and dwarf redwoods) and avoidance and compensation requirements for unavoidable impacts on these habitats, including a standard for no net loss of these habitats. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-39

**From the EIR: SENSITIVE BIOLOGICAL RESOURCES Special-Status Species**The fact that **64** special status plant species and **66** special status wildlife species are known to occur or have potential to occur within and surrounding the LRDP area highlights how important it is to protect this landscape.

Response I29-39

This comment summarizes the number of special-status species that may occur in the LRDP area and states that protection of the LRDP area is important. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-40

**From the EIR Result in Disturbance or Loss of Special-Status Plant Species** Seven special-status plant species are known to occur within the LRDP area.

***Some of the proposed development under the 2021 LRDP would occur within natural vegetation communities where special-status plants could potentially occur, including redwood, grassland, coastal mixed hardwood, northern maritime chaparral, coastal prairie, coyote brush, and riparian woodland and scrub.*** *Implementation of projects under the 2021 LRDP may include* ***ground disturbance, vegetation removal, and conversion of habitat within these natural vegetation communities.*** *As a result, direct loss of special-status plants or indirect damage could occur through trampling or damage to root systems of these species, if present. Additionally,* ***implementation of projects under the 2021 LRDP could result in inadvertent introduction or spread of nonnative plants which could result in adverse effects to special-status plants and special-status plant habitats through competition or degradation of habitat.*** *This would be a* ***potentially significant impact****.*

**All** natural vegetation communities where special-status plants could potentially occur, including redwood, grassland, coastal mixed hardwood, northern maritime chaparral, coastal prairie, coyote brush, and riparian woodland and scrub, should be permanently protected.

Proposed mitigations are **not enough** to ensure that invasive plant species will not be introduced and/or that special status plant species will not be destroyed due to implementation of the LRDP.

Response I29-40

This comment summarizes the impact discussion for special-status plants in the Draft EIR and states that all natural vegetation communities in the LRDP area should be protected and that the Draft EIR’s proposed mitigation measures are not sufficient. However, Mitigation Measures 3.5-1b, 3.5-1c, and 3.5-3a in the Draft EIR require protocol-level surveys for special-status plants and sensitive natural communities following CDFW protocols, protection of these resources, compensation for unavoidable impacts following the requirements of CDFW or USFWS with a standard of no net loss, and measures to avoid introduction of invasive plants and plant pathogens consistent with guidance from state and federal agencies. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not specifically address the efficacy of the mitigation, so no further response can be provided.

Comment I29-41

**Result in Disturbance to or Loss of Special-Status Wildlife Species** *Implementation of the 2021 LRDP would include land use conversion and development activities including ground disturbance, vegetation removal, and overall conversion of wildlife habitat, which could result in disturbance, injury, or mortality of several special-status wildlife species if present, reduced breeding productivity of these species, and loss of species habitat. This would be a potentially significant impact.*

**Nineteen** special-status wildlife species have been documented in the LRDP area and **sixteen** additional special-status wildlife species may occur within the LRDP area.

Some of the proposed development under the 2021 LRDP would occur within natural vegetation communities where special-status wildlife species could potentially occur, including redwood, grassland, coastal mixed hardwood, northern maritime chaparral, coastal prairie, coyote brush, and riparian woodland and scrub.

As with the special-status plant species, protection of all the natural vegetation communities listed above is vital to help ensure survival of special-status wildlife species occurring/potentially occurring within the LRDP boundaries. Potential negative impacts on wildlife detailed in the EIR can not be ignored or mitigated.

Response I29-41

This comment states that protection of special-status wildlife and natural vegetation is important and is noted. The Draft EIR evaluated potential impacts to special-status wildlife species and habitat under Impact 3.5-2. As stated on pages 3.5-42 through 3.5-65, implementation of Mitigation Measures 3.5-1a, and 3.5-2a though 3.5-2n would reduce potential impacts by requiring species specific reconnaissance-level surveys to determine the likelihood of presence and implementation of measures to avoid injury or mortality of the species if detected, incidental take authorization. and habitat compensation. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-42

**From the EIR: Critical Habitat***Critical habitat is mapped by USFWS and is defined in ESA as specific geographic areas that contain features essential for the conservation of a threatened or endangered species and that may require special management and protection.* ***Critical habitat may include an area that is not currently occupied by the species but that may be needed for its recovery.*** *Given the large scale at which critical habitat is mapped, it may also include areas that are not suitable for a species and would not be occupied.* ***The LRDP area contains approximately 969.5 acres within the area mapped as California red-legged frog critical habitat, and approximately 3.8 acres of marbled murrelet critical habitat in the north eastern portion of the main residential campus (Figure 3.5-4).***

*. ..critical habitat is described in this EIR for informational purposes and* ***to highlight the importance these areas may have to the recovery of California red-legged frog and marbled murrelet.***

Protection of the **969.5 acres of red-legged frog critical habitat and 3.8 acres of marbled murrelet habitat within the LRDP** is essential due to the **“importance these areas may have to the recovery of California red-legged frog and marbled murrelet”!**

Response I29-42

This comment emphasizes the importance of protecting critical habitat for California red-legged frog and marbled murrelet and is noted. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-43

From the EIR: **Sensitive Natural Communities**
*Sensitive natural communities are those native plant communities defined by CDFW* ***as having limited distribution statewide or within a county or region and that are often vulnerable to environmental effects of projects.***

***Eight sensitive natural communities were identified within the eight USGS quadrangles surrounding the LRDP.***

***...it is assumed that other sensitive natural communities may occur in the LRDP area based on the vegetation communities known to occur in the LRDP area, as identified below.***

**Northern Maritime Chaparral
*-The LRDP area contains approximately 54.9 acres of northern maritime chaparral habitat.***

The protection of this habitat from “conversion to other land uses” is essential.

***Draft Findings of the Monterey County LCP Periodic Review, Chapter 3: Environmentally Sensitive Habitat Areas*The greatest threat to central maritime chaparral is direct loss due to conversion to other land uses and the resultant fragmentation of the remaining habitat.**

***Coastal Prairie
-The LRDP area contains approximately 107.9 acres of coastal prairie habitat. Coastal prairie is rare, irreplaceable and*** should be protected.
**Less than one percent of California's native grassland is still intact today.** The northern coastal prairie, which extends into Oregon, is the most diverse type of grassland in North America.
(Prairies and Grasslands - Point Reyes National Seashore (US National Park Service))

**Redwood Forest
*-The LRDP area contains an estimated 860.4 acres of redwood habitat, which occurs throughout north campus and portions of central campus.
Dwarf redwoods are not considered a distinct vegetation community type, but the uniqueness of these stands in the LRDP area may warrant additional consideration for campus planning purposes due to the potential rarity of this community type.***

Some of the modern-day threats to redwoods include **climate change; human land uses not compatible with forest health (such as development** and conversion to vineyards); **intense fires**; people’s increasing **detachment from nature**... <https://www.savetheredwoods.org/about-us/faqs/the-threats-to-the-redwoods/>

The EIR does not take into account the effects of climate change, recent fires in the Santa Cruz Mountains or how the destruction of redwood habitat will adversely affect both neighboring land areas as well as flora and fauna within the forest. The importance of protecting these 860.4 acres of redwood forest to wildlife is highlighted throughout the EIR.

Shreve Oak Forest

Response I29-43

To provide additional context regarding the 2020 California Department of Forestry and Fire Protection (CAL FIRE), San Mateo–Santa Cruz Unit (CZU) Lighting Complex fire, Section 4.3.5, “Biological Resources” on pages 4-24 and 4-25 of the Draft EIR has been edited to include the following text:

Additionally, as described in Section 3.18, “Wildfire,” the CZU Lightning Complex fire burned approximately 86,509 acres in Santa Cruz and San Mateo Counties in August and September 2020, including forested areas at Big Basin, Butano, and Henry Cowell State Parks (Figure 3.18.2; CAL FIRE 2020, Sempervirens Fund 2020). Wildfire is a natural process in ecosystems, including redwood forest ecosystems (Sempervirens Fund 2020). The impacts of high-intensity wildfires, like the CZU Lighting Complex fire, are complex and vary dependent on the species. Some plant species are likely killed during wildfires, while other plant species depend on fire for germination. Some wildlife species were capable of fleeing during the CZU Lighting Complex fire, while others (e.g., immobile young) likely perished. High-intensity wildfires can alter habitats such that they temporarily no longer provide the optimal attributes (e.g., canopy cover, understory complexity) for some wildlife species, while improving habitat for other wildlife species. Although wildfire is a natural process, the CZU Lighting Complex fire contributed to the existing significant cumulative impacts described above.

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the UC Regents for certification.

Also see Master Response 4 regarding wildfire. A discussion regarding the impacts of climate change is provided in Section 3.8, “Greenhouse Gas Emissions and Climate Change” (see pages 3.8-16 and 3.8-17 of the Draft EIR). Potential impacts on redwood habitat are discussed in Impact 3.5-3 on pages 3.5-65 and 3.5-66 of the Draft EIR.

Comment I29-44

**Arroyo Willow Thickets
*-The LRDP area contains approximately 5.2 acres of riparian woodland and scrub habitat, some of which is known to contain arroyo willow (Jones, pers. comm., 2020). Riparian habitat is considered sensitive, but riparian habitat dominated by arroyo willow may also qualify as this sensitive natural community.***

**Black Cottonwood Forest and Woodland
*-The LRDP area contains approximately 5.2 acres of riparian woodland and scrub habitat, which contains black cottonwood. Riparian habitat is considered sensitive, but riparian habitat dominated by black cottonwood may also qualify as this sensitive natural community.***

**Shreve Oak Forest
*-This community could be interspersed with areas identified as coast live oak habitat, redwood habitat, or other forested areas in the LRDP area.***

**Purple Needlegrass Grassland***This habitat is likely* ***interspersed with grassland and coastal prairie habitat within the Great Meadow, IAA and IAD, and the Marshall Fields complex in the LRDP area.***

**California Bay Forest
*-This habitat may be interspersed within coastal mixed hardwood habitat in the LRDP area.***

Since “known occurrences of sensitive natural communities are included in the CNDDB; however, no new occurrences have been added to the CNDDB **since the mid-1990s** when funding was cut for this portion of the CNDDB program” and apparently no research was done in the field for this EIR, how can you confidently determine where sensitive natural communities are currently located within the boundaries of the LRDP, how many there are and how to protect them?

**ALL** the sensitive natural communities occurring within the boundaries of the LRDP should be protected.

Response I29-44

Regarding information used to prepare the Draft EIR, please see Response to Comment I29-37. Future projects under the 2021 LRDP will require project-level review, including reconnaissance-level surveys for biological resources, including sensitive natural communities. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA. Mitigation Measures 3.5-3a, 3.5-3b, and 3.5-3c on pages 3.5-66 through 3.5-68 of the Draft EIR describe the required surveys for sensitive natural communities and avoidance and compensation requirements for unavoidable impacts on these habitats, including a standard for no net loss of these habitats. The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. The comment does not provide any additional information to address why this Draft EIR analysis and mitigation measures are inadequate. No further response is required.

Comment I29-45

**Environmentally Sensitive Habitat Areas***The Coastal Act defines ESHAs as “[a]ny area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could easily be disturbed or degraded by human activities and developments.” Portions of the LRDP area fall within the coastal zone, including the Westside Research Park and the area west of Empire Grade within the Main Residential Campus. Some habitats in these areas, including Mima mound wetlands within coastal prairie habitat and northern maritime chaparral habitat, may qualify as ESHAs.*

How will these Environmentally Sensitive Habitat Areas be protected? How is this addressed in the EIR?

Response I29-45

Regarding how protection of Environmentally Sensitive Habitat Areas (ESHAs) was addressed in the Draft EIR, Impact 3.5-3 on pages 3.5-65 to 3.5-66 of the Draft EIR discusses potential impacts on riparian habitat and other sensitive natural communities, including ESHAs. Mitigation Measures 3.5-3a, 3.5-3b, and 3.5-3c on pages 3.5-66 through 3.5-68 of the Draft EIR describe the required surveys for these habitats (including ESHAs) and avoidance and compensation requirements for unavoidable impacts (including a coastal development permit pursuant to the California Coastal Act). The Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. No further response is required.

Comment I29-46

Additional Questions:

* Why is protection of the environment not included as one of the overarching LDRP objectives? …”The overall objective of the 2021 LRDP is to guide the physical planning and development of the plan area in support of the teaching, research, and public service missions”.

Response I29-46

This comment includes a question regarding 2021 LRDP objectives. As stated on page 2-9 of the EIR, 2021 LRDP objectives also include protection of existing campus open spaces and reinforcement of Physical Planning Principles and Guidelines included in the 2021 LRDP which seek to preserve the integrity of campus landscapes and protect the natural environment. The 2021 LRDP Physical Planning Principles and Guidelines are listed on pages 3.1-36 through 3.1-38 of the Draft EIR. This comment addresses an aspect of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I29-47

* What percentage of biological research for the LRDP was conducted *in the field* as compared to online? During field research, how much time was spent collecting data in the field during different times of the day/night and during different seasons? What type of data was collected in the field within the past year? How many biologists were employed in this process? Of the biologists collecting/analyzing data collected in the field, what are their areas of expertise? How can a plan impacting wildlife and the environment for the next 20 years be realistic unless it is based on current data collected in the field?

Response I29-47

With regard to the information used to prepare the Draft EIR and its level of detail in considering biological resources, please see Response to Comment I29-37. This information is sufficient to draw conclusions with respect to the potential impacts of the LRDP and measures to mitigate the impacts, and the comment does not specifically address these conclusions.

Comment I29-48

* As a result of the CZU Complex fires, over 100,000 acres were burned, resulting in massive habitat loss for wildlife in the Santa Cruz Mountains. How is the increased necessity of protecting wildlife habitat in the Santa Cruz Mountains being addressed in the LRDP?

Response I29-48

This comment includes a question regarding increasing wildlife habitat protections due to wildfires. To provide additional context regarding the 2020 CZU Lighting Complex fire, Section 4.3.5, “Biological Resources” on pages 4-24 and 4-25 of the Draft EIR has been edited (refer to Response I29-43 and Chapter 4, “Revisions to the Draft EIR”). Also see Master Response 4 regarding wildfire.

Letter I30 Mark F Massoud

March 1, 2021

Comment I30-1

I have reviewed the draft public LRDP. I write with two comments to the transportation section.

1. UCSC's existing bicycle network does not meet safety and design standards. Campus routes are 1) fragmented rather than a complete network; 2) substandard with potholes and dangerously narrow paths alongside speeding vehicles, 3) blocked by gates in various places, and 4) one-way, for instance, between East Remote and OPERS. The LRDP proposes almost no corrections to these problems on existing campus roads. Explaining and correcting these problems in the final LRDP would deepen the UCSC's commitment to sustainable modes of transit.

Response I30-1

The comment expresses the opinion that existing bicycle facilities are in need of repair and that the 2021 LRDP should include a stronger commitment to improving the condition of existing facilities. Refer to Response I27-1. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, please refer to Master Response 2 and Master Response 11 Level of Detail. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I30-2

2. Develop a bidirectional bike path on Coolidge between the main entrance and Ranch View Road. This area is dangerous for bicycles, especially those coming to campus who must cross over Coolidge to turn left on Ranch View Road to join the bike path into the meadow. Bi-directional bike paths like this one (developed by UCSC students in Environmental Studies) and others like it across campus would protect bike commuters from vehicle traffic and emissions and create a sustainable bike network for students, staff, faculty, and visitors.

Response I30-2

The comment provides a suggested bicycle network improvement for the 2021 LRDP, and does not address the adequacy of the EIR analysis. Refer to response I27-1. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I31 Karen Holl

March 5, 2021

Comment I31-1

I am a professor in the Environmental Studies Department and I am the only person who served on both the 2005 and 2021 LRDP advisory committees. Below I make a few general comments on the LRDP and associated EIR, as well as more detailed comments on specific points in the EIR. Two of the comments are similar to those I made at several LRDP committee meetings and that I submitted as written comments on Notice of Preparation. However, neither was addressed in the draft LRDP or EIR so I repeat them again here.

First, the EIR should not only consider a growth envelope of 28,000 students but should also address what resources are needed for the campus to increase enrollments to specific increments (such as, 22,000, 24,000 etc.). If sufficient resources have not been allocated and construction completed, then enrollments should not increase. The 2005 LRDP committee carefully reviewed the environmental impacts and needed construction and mitigation to grow to an enrollment of 19,500 students. The campus has now nearly reached that enrollment figure but much of the proposed housing, classrooms, lab space, and mitigation for cumulative environmental impacts has not happened. Despite substantial increases in enrollments no new general assignment classrooms have been constructed at UCSC in more than a decade. I compared the proposed new assignable square footage proposed in the 2005 LRDP with the numbers of what has been constructed since that time and in fact only **~30% of the proposed Academic and Support Space and Housing proposed in the 2005 LRDP have actually been constructed** despite student enrollments reaching nearly 18,500 students.1 This means that student housing is overcrowded, class scheduling is challenging, class times have been shortened, and campus lands have become increasingly degraded. To my knowledge there is currently no available public funding for academic building construction since the March 2020 Higher Education Bond Fund did not pass. And the budget situation is even worse now with additional COVID related deficits.

1 A note that these numbers have been updated since I made my verbal statement at the Feb. 3 public meeting, as I was using an earlier version of the 2005 LRDP for my calculations. The numbers have now been updated to the version available at [https://lrdp.ucsc.edu/final‐lrdp.shtml](https://lrdp.ucsc.edu/final%E2%80%90lrdp.shtml)

**Space Calculations in Assignable Square Feet from 2005 and 2021 LRDPs
2005 LRDP (from Tables 1 and 3) 2021 LRDP (from Table 3.1)**

| **Space description** | **Existing and approved space** | **Additional space needed** | **Total** | **Existing space** | **Additional needed** | **Percentage of new space proposed in 2005 LRDP that was constructed1** | **Percent additional space needed for 2021 LRDP2** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Academic and support space | 1,693,400 | 1,315,640 | 3,009,040 | 2,088,428 | 3,083,824 | 30.0 | 147.7 |
| Housing | 1,419,600 | 806,360 | 2,225,960 | 1,664,560 | 2,545,000 | 30.4 | 152.9 |
| Total | 3,113,000 | 2,122,000 | 5,235,000 | 3,752,988 | 5,62,8824 | 30.2 | 150.0 |

1This was calculated by subtracting the existing space in the 2021 LRDP from the existing and approved space in the 2005 LRDP and dividing it by the additional space needed from the 2005 LRDP.

2This was calculated by dividing the additional space needed in the 2021 LRDP by the existing space in the 2021 LRDP.

I know that the LRDP is a plan to allow for growth rather than a mandate for growth. But as the last LRDP shows, the student population can grow without the resources outlined in the LRDP being available. Therefore, I consider it essential that the 2021 LRDP and EIR include discussion of specific intermediate student population limits or trigger points beyond which UCSC cannot grow without adequate resources to implement the Long Range Development Plan. In other words, there would be specific actions that have to be funded and undertaken to increase to the next enrollment increment.

The aesthetically pleasing and thoughtful LRDP that the consultants produced is meaningless if we do not have the funding to implement it. The plan repeatedly states that this growth will be done responsibly and sustainably. For example, the 2021 LRDP states a commitment to respond to “climate change through climate resiliency and adaptation strategies and integrating sustainability leadership into campus teaching, learning, research, design, and operations.” But doing this will requires sufficient funding. It seems implausible that UCSC is going to have the money to add an additional 147% of Academic and Support Space and to do so responsibly with no known source of funding. Inevitably what will happen is what happened with the 2005 LRDP, namely that we will admit more students without the necessary academic space and housing needed to grow responsibly. This will continue to degrade the experience of the students, faculty, and staff, as well as the campus lands.

Response I31-1

With respect to the need for interim targets and population limits, refer to Master Response 9 regarding phasing and implementation of the 2021 LRDP. See also Master Response 2, specifically the discussion under "Planned Development,” and “Public Engagement Opportunities and Participation,” for further information regarding refinements to the 2021 LRDP as a result of public input/participation.

Comment I31-2

On a related note, the LRDP and EIR presume that there will continue to be extensive enrollment growth and funding to support that growth. The lower enrollment alternatives in the EIR are ruled out because they will not allow for a sufficient number of students to attend UCSC. But there is little support for the claim of continued enrollment growth over the next couple of decades. The Western Interstate Commission for Higher Education Report predicts that California high school graduation numbers and college going students in general will peak in 2025 and then start to decline (<https://knocking.wiche.edu/report/>). As discussed above, past evidence strongly contradicts the assumption that there will be funding for increased enrollments if there is demand. The EIR explicitly states (P 3.13‐2) “Nevertheless, actual California resident enrollment growth has far outpaced the levels supported in recent Budget Acts.” So. the justification for setting such a high enrollment target is not well justified in the LRDP nor has it been throughout the LRDP development process.

Response I31-2

With respect declining enrollment, it is acknowledged that data has been published recently that suggests declining enrollment is occurring on a national and even regional scale due to the COVID-19 pandemic conditions, the increase in online education opportunities, and other factors. However, there is also data to suggest that UC enrollment is not declining and may increase. A recent article by EdSource noted that the UC systems as a whole has “bucked national enrollment trends” and that, in a related note, enrollment within the California State University system has increased at more than half of its campuses (EdSource 2020). Further, applications for fall 2021 enrollment exceeded 74,000 applicants (an 11 percent increase from the previous year), indicating that enrollment growth may continue into the foreseeable future. With respect to funding, the 2021 LRDP includes a reasonable (yet ambitious) estimate of potential new facilities based on the projected enrollment at UC Santa Cruz in 2040 and considers the potential for funding, including through public-private partnerships and state funding, as part of the overall feasibility of the 2021 LRDP. Refer to Master Response 2, specifically the discussion under "2021 LRDP Planned Development,” “2021 LRDP Growth Projections,” and “Housing” regarding the development process and considerations for the 2021 LRDP.

Comment I31-3

My second major concern regards permanently protecting at least some portions of the Campus Natural Reserves, which falls under several EIR topics. The CNR is a critical resource and living laboratory for the campus teaching and research mission, as noted in the draft LRDP. I appreciate that the area of the CNR was nearly doubled in the new LRDP. The stated intent of “this land use designation is to protect natural features and processes for the purposes of teaching, learning, and research, as integral to the academic mission. The boundary of the Campus Natural Reserve captures critical habitat and sensitive vegetation, specific sites engaged in long‐term research, wildlife continuity zones, and sensitive archaeological resources.” However, nothing is stated in the LRDP or EIR about what will happen to these lands at the end of this LRDP period and the boundaries of the CNR have changed over the past couple of EIRs.

For faculty to invest in long‐term research projects that involve students they need to know that certain areas of land are permanently protected. Moreover, to protect critical habitat and species, sensitive archaeological resources, and natural processes requires that these lands be protected in perpetuity. Every time I have asked about permanent protection of the CNR during the planning process I have been told not now, we will discuss this later. In the final LRDP committee meeting and in my correspondence with Planning Office staff I was told that this issue would be addressed during the EIR process. So, I was anticipating that permanent protection would be addressed in the draft LRDP and EIR but it wasn’t, which I consider to be a major oversight for a document that will guide the next 20 years of campus planning. I feel strongly that permanent protection of the CNR does need to be addressed in the final version of the LRDP.

Response I31-3

The comment expresses a preference for the permanent protection of the Campus Natural Reserve. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I31-4

Third, I think it is both judicious and important at this point for the campus to pursue a campus‐wide Habitat Conservation Plan for the federally‐listed species. In the past, the campus has approached planning and mitigating for the negative effects of construction on the listed species on a project‐ by project‐ basis (e.g. mitigation for the effects of Ranch View Terrace construction on the Ohlone Tiger Beetle and California Red‐Legged Frog), despite the fact that there is clear scientific evidence that conservation planning is much more effective when done at a larger scale. I was glad to hear at the February 3, 2021 EIR Public meeting that the campus is in discussion with the U.S. Fish and Wildlife Service about doing a campus‐wide HCP. Having been involved with the monitoring of the Ohlone Tiger Beetle at Inclusion Area D. I support the changing of the land‐use designation there to housing in return for doing more integrated, campus‐wide planning for conservation of the Ohlone Tiger Beetle and other listed species.

Response I31-4

The comment expresses a preference for the preparation of a campus-wide HCP. The campus intends to prepare a campus-wide Habitat Conservation Plan and has initiated conversations with the U.S. Fish and Wildlife Service. Refer to Master Response 12 regarding long-term habitat protection. Mitigation Measure 3.5-2a, which begins on page 3.5-46 of the Draft EIR, includes preparation of a comprehensive HCP in the regulatory approach for mitigating impacts on California red-legged frog and Ohlone tiger beetle as one option for mitigation. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I31-5

Specific comments on the EIR

P. ES‐5 – It says that “All the substantive environmental issues raised in the NOP comment letters and at the scoping meetings have been addressed or otherwise considered during preparation of this Draft EIR.” There were at least 10 letters in response to the NOP that mentioned the need to address permanent protection for the Campus Natural Reserve (see EIR appendix), yet this issue was not addressed in the EIR. This oversight needs to be rectified in the revised EIR.

Response I31-5

The comment states that the EIR should address the need for permanent protection of the Campus Natural Reserve and that comments regarding the matter in response to the Notice of Preparation (NOP) were not addressed. Refer to Master Response 12 regarding long-term habitat protection. However, commitment to permanent protection of the Campus Natural Reserve does not affect the conclusions of the EIR; no development would occur on these lands under the 2021 LRDP. Because no development impacts would occur in this area, no development-related impacts would be expected. Because the NOP comment requesting permanent protection of these lands would not change the analysis in the EIR, no further response is necessary.

Comment I31-6

P. 3.5‐8‐9. What was the source of information used for this vegetation map and in particular to distinguish between coastal prairie and grassland? Given the proximity to the coast all the grasslands on campus fall within the coastal prairie zone.

Response I31-6

The commenter is referred to the response to comment S3-19.

Comment I31-7

p. 3.5‐21 ‐ The Bank swallow Latin name is Riparia riparia.

Response I31-7

This comment identified a typo in Table 3.5-3 on page 3.5-20 through 3.5-29 of the Draft EIR. This typo has been corrected.

Comment I31-8

p. 3.5‐35 – The plan mentions concerns about Sudden Oak Death (Phytophthora ramorum), but does not mention other species of Phytophthora, such as Phytophthora tentaculata, that infect a wide range of native California species and are a growing concern in nurseries (Sims et al. 2019).2 Other species of Phytophthora should be considered and addressed as any landscaping efforts have the potential to spread these pathogens into the natural landscapes on campus.

Response I31-8

This comment states that other species of *Phytophtora*, in addition to Sudden Oak Death, should be included in the “Invasive Plant Species, Noxious Weeds, and Plant Pathogens” discussion of Section 3.5.2, “Environmental Setting” of the Draft EIR on page 3.5-35. This discussion has been edited to include additional species of *Phytophtora* (refer to edit below and Chapter 4, “Revisions to the Draft EIR”).

The first paragraph on page 3.5-35 of the Draft EIR was revised as follows:

Invasive Plant Species, Noxious Weeds, and Plant Pathogens

An invasive plant is one that is not native to a region, but rather is introduced, and tends to crowd out native vegetation and thereby adversely affect the wildlife that feeds on it. There are many invasive plant species in Santa Cruz County, and they occur throughout several different habitat types (Calflora 2020). Noxious weeds are plants that injure or cause damage to crops, livestock, or other agriculture and are designated by the US Department of Agriculture in accordance with the Plant Protection Act of 2000. Aggressive noxious weeds such as Scotch broom (*Cytisus scoparius*) and French broom (*Genista monspessulana*) can invade grasslands and exclude native grassland species. Invasive plant species such as English ivy (*Hedera helix*), Acacia (*Acacia* spp.), blue gum (*Eucalyptus globulus*), Pampas grass (*Cortaderia jubata*), giant reed (*Arundo donax*), and Himalayan blackberry (*Rubus armeniacus*) can invade forest or riparian habitats and exclude native understory species. Additionally, plant pathogens in the genus *Phytophthora*, including sudden oak death (*Phytophthora ramorum*) and *Phytophthora tentaculata*, pose a threat to native plant species. Sudden oak death ~~which is caused by the pathogen~~ *~~Phytophthora ramorum~~*~~,~~ is a forest disease that results in widespread dieback of oak trees in California and Oregon forests. Sudden oak death has been documented in many trees in Santa Cruz County, including one tree within the LRDP area (California Oak Mortality Task Force 2019).

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 because it corrects a typographical error and does not result in new or substantially more significant impacts. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the UC Regents for certification.

Comment I31-9

p. 3.5‐42‐43 – Latin names should be included for Giant salamander, California red‐legged frog, and Ohlone tiger beetle

2 Sims, L., Tjosvold, S., Chambers, D. & Garbelotto, M. (2019) Control of Phytophthora species in plant stock for habitat restoration through best management practices. Plant Pathology, 68, 196‐204. doi:10.1111/ppa.12933

Response I31-9

This comment identified a typo on page 3.5-42 of the Draft EIR. The Latin name for California giant salamander has been added to page 3.5-42; however, the Latin names for California red-legged frog and Ohlone tiger beetle were introduced earlier in the section and will not be repeated on Page 3.5-42.

Comment I31-10

p. 3.6‐15 – I strongly applaud UC’s commitment to Carbon Neutrality and appreciate it being stated that all construction under the 2021 LRDP will comply with the stringent building efficiency standards. However, building construction to reduce energy usage typically has higher up‐front costs even though there are net savings over the longer term due to decreased costs of operation. One question that was raised repeatedly during LRDP committee meetings was where the funding would come from for the extensive construction that is proposed. Those costs will be high due to the carbon neutrality commitment, other mitigation measures required, and the generally exorbitant costs of constructing buildings at UC. But there is no discussion in the LRDP about where that funding will come from.

Response I31-10

The comment states that the 2021 LRDP does not include a discussion of construction funding. Funding that could be reasonably achieved during implementation of the 2021 LRDP was considered by campus during development of the 2021 LRDP and included consideration of existing and historic funding levels achieve by UC Santa Cruz. Please refer to Master Response 2. This comment is related to the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, including a discussion of funding, please refer to Master Response 2, specifically the discussion under "2021 LRDP Planned Development.”. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I31-11

p. 3.10‐16 – Many of the drainages on the UCSC campus are degraded and eroding due to the impact of prior construction, as well as due to extensive mountain bike recreational usage in upper campus. The EIR states that “the overall CRAM scores indicate that the stream restoration efforts have provided little overall improvement (Huffman‐Broadway Group 2019).” This section later concludes that the effects of construction activities and the overall construction would have less‐than‐significant effects on water quality and drainage patterns, which seems implausible since these watersheds are already heavily impacted by prior construction and mitigation efforts to date have not had the desired effect.

Response I31-11

The comment questions how the Draft EIR could conclude less-than-significant impacts on water quality and drainage patterns if it acknowledges the condition of on-site drainages and erosion. The Draft EIR’s conclusion is based on an assessment of the potential changes in water quality and drainage that could result due to implementation of the 2021 LRDP. The assessment included consideration of current conditions within the LRDP area, as well as existing regulatory requirements (e.g., NPDES and SWPPP requirements). No further response is possible.

Comment I31-12

P. 3.15‐11 – The EIR discusses more trails in upper campus due to more development and concludes that there will be less than significant impact of these trails. But, there is no evidence to support this claim. As noted, there is already extensive erosion along the trails in upper campus due to recreational usage and insufficient funds to manage them and police the illegal land uses in upper campus. Increasing development and enrollments will only exacerbate this situation.

Response I31-12

The comment states that additional trails that may be constructed or existing trails may be more heavily used and that the EIR does not provide evidence to support its conclusion of a less than significant impact on the trails. However, as noted on pages 3.15-10 and 3.5-11, funding for the management and maintenance of recreational facilities would increase as on-campus population (students, faculty, and staff) increases. The additional funding would be allocated for, among other things, trail management to prevent/address deterioration (including erosion of trails) of on-campus facilities. UC Santa Cruz acknowledges the commenter’s issues with trails in the upper campus. The Draft LRDP (page 138) outlines this issue by stating: “There are also a number of undesignated trails throughout the campus, some of which are used by bicyclists. The LRDP integrated transportation strategy recommends better managing the fire roads and existing campus bike paths and identifying key through-campus routes to connect the lower, central and upper campus to adjacent parks. This on-going planning process balances pedestrian access for student research areas, recreation and wellness with the need for protecting environmental resources to ensure the health of the natural landscape while providing regional bicycle trail connectivity.” In addition, the adaptive management and implementation of the UC Santa Cruz construction and maintenance policy would allow UC Santa Cruz to adjust funding priorities, as necessary, to address individual instances where unforeseeable circumstances (due to instantaneous use or storm event) may require correction/restoration. Further, and as noted in Section 3.10, “Hydrology and Water Quality,” (refer to Impact 3.10-2 starting on page 3.10-30), all new facilities would be constructed in accordance with applicable regulations, such as NPDES and SWPPP requirements. As a result, the impact determination is considered supported by evidence and is appropriately determined to be less than significant.

Comment I31-13

P. 3.16‐25 – The EIR states that the campus is expanding the vanpool program and has plans to expand to new routes in the San Lorenzo Valley and elsewhere. I rode the SLV vanpool for over 20 years and, in fact, the SLV vanpool was discontinued a few years ago rather than adding vanpools. Those of us on the SLV vanpool were so committed to joint ridership that we formed a 5‐person carpool and were told by TAPS that 5‐person carpools were not allowed even though most passenger cars hold 5 people. So, we were doing our best to reduce carbon emissions and parking, and those efforts were actively impeded by TAPS. We had to argue for an exception. Then when one rider left and we found a new rider we were again told that we couldn’t have a 5‐person vanpool and again had to argue for an exception. As somebody who is strongly committed to minimizing single passenger vehicle trips and has commuted jointly for over 25 years, I have found that TAPS makes it difficult to rather than facilitates efforts to increase carpooling, so I find the statements in the EIR about increasing vanpool and carpooling programs less than credible.

Response I31-13

The comment expresses the commenter’s personal opinion and experience with the UC Santa Cruz Vanpool Program and is noted. This comment expresses an opinion on current/historic operations at UC Santa Cruz, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. Furthermore, UC Santa Cruz encourages the commenter to please communicate these concerns directly to Transportation and Parking Services (TAPS). The commenter is correct that carpool permits are currently provided for groups of two to four, due to safety reasons associated with typical vehicle sizing and potential risks associated with a fifth rider in the middle seat.

Comment I31-14

As Figure 3.18‐1 notes there is high wildfire risk in upper campus which implies a huge fire risk of developing in upper campus. The challenge in evacuating this past summer, when there were very residents on campus, graphically illustrates the high potential risk. The conclusion on p. 3.18‐17 is that the increased risk of wildfire for developing in upper campus can be reduced to less‐than‐significant through vegetation thinning and management. But there is minimal discussion of the plan for the extensive vegetation thinning that is needed throughout upper campus to compensate for years of minimal vegetation management. There is also no discussion of cost of who will pay for this. Vegetation management falls under deferred maintenance costs which is separate from building costs.

Response I31-14

The comment states that the Draft EIR included minimal discussion of the Campus-Wide Vegetation Management Plan that would require vegetation thinning to reduce wildfire risk and costs associated with vegetation management. Guidelines section 15126.4(a)(1) requires that the “EIR describe feasible measures which could minimize significant adverse impacts....” Mitigation Measure 3.18-2 would require UC Santa Cruz to prepare and implement a Campus-Wide Vegetation Management Plan following approval of the 2021 LRDP and certification of the EIR. As detailed on page 3.18-17 of the Draft EIR, the Campus-Wide Vegetation Management Plan would identify fire hazard areas consistent with California Government Code Sections 51179 (related to the designation of very high fire hazard severity zones) and 51182 (regarding obligations to reduce risk associated with structures within very high fire hazard severity zones), and implement a policy framework for managing fuel loads and maintaining defensible space consistent with Public Resources Code Section 4291. Therefore, the Draft EIR’s proposed mitigation is considered feasible, appropriate, and in accordance with CEQA requirements. Refer also to Master Response 4 regarding the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment I31-15

An associated question is how students, many of whom will not have cars, will evacuate from campus on short notice when the next fire comes. There are certain to be more in the future. There are huge fire risks to developing in upper campus, which are understated in the EIR.

Response I31-15

UC Santa Cruz Wildland Response Procedures outline evacuation procedures, including carpooling and the use of buses and other vehicles when it is safe to operate. Also refer to Master Response 4 regarding current campus programs and efforts to reduce wildfire risk and the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Letter I32 Daniel Schmelter

March 2, 2021

Comment I32-1

I'd like to submit a public comment, advocating for the long term protection of the Campus Natural Reserves. This place and program is extremely important to our students, site, and public image. It is loved by environmental advocated and researchers. Please include it in your plan and safeguard it for the long-term.

Response I32-1

The comment requests that the long-term protection of the Campus Natural Reserves be included in the 2021 LRDP and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I33 Karen Stout

March 2, 2021

Comment I33-1

My name is Karen Stout and I am a senior here at UCSC. I am writing today to express my strong support for the UCSC Campus Natural Reserve becoming a part of the UC Natural Reserve System. As a campus that is only 45% developed we have the responsibility to care for the undeveloped lands that are a valuable part of the area's ecosystem. Part of the mission to create a more sustainable and equitable campus is being responsible stewards of nature, working with conservationists and Amah Mutsun tribal band members to ensure the best steps are being taken to preserve the land for generations to come. Permanently protecting the CNR is a crucial next step in the realization of that goal. The CNR has done an incredible job maintaining the land and we are a part of the UC system too, so I strongly urge you to grant them UC Natural Reserve System status.

Response I33-1

The comment expresses support of the Campus Natural Reserve to be included as part of the UC Natural Reserve System and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I34 Chris Wilmers

March 2, 2021

Comment I34-1

I want to commend you for increasing the size of the Campus Natural Reserve from 409 acres to 789 acres in the latest draft of the 2021 LRDP. I would now ask that you amend the plan to make this protection permanent. These acres are essential to the mission of our University to provide teaching and research opportunities into the functioning of the natural environment for students, faculty and staff. Without permanent protection - which will be easy to enact now -some future UC president will no doubt develop these lands citing other priorities. One thing I can assure you though is that no one will be upset by the fact that the lands were protected. Do we regret protecting Yellowstone or Yosemite, or to bring it closer to home - Wilder or Moore Creek? Absolutely not! Lets do the same with the campus reserve.

Response I34-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I35 Haley Burrill

March 3, 2021

Comment I35-1

Hello, my name is Haley Burrill, and I am a PhD student at the University of Kansas. In 2017 I earned my bachelor's of science from UC Santa Cruz. During my 4 years at UCSC I spent a lot of time on the Campus Natural Reserves (CNR). Although I was admitted as a physics major, in my first year I took an internship in the Redwood forest of the upper campus Natural Reserves, which ultimately led to my change in major to Plant Science. Throughout my time as an undergraduate I continued to stay involved, volunteering for data collection and outreach; I took every chance I could to spend time on the CNR. Then, my senior year, I began working as an intern crew leader, collecting forestry data for the CNR. In addition, I began working in a lab that used this data and completed a senior thesis.

I tell you this story because I will never know what my life would be like today if I hadn't had that first internship on the campus reserves as a freshman. I have since gone on to earn my Master's and am now working on my PhD in ecology. I love what I do and I have UCSC and the Campus Natural Reserves to thank for showing me that. I know I'm not alone; I've met so many others who were inspired by the CNR in a similar way.

It is for these reasons that I urge you to permanently protect the Natural Reserves by adding it to the UC Natural Reserve System. The UCSC Campus Natural Reserves have served the same purposes as UC Natural Reserves; providing "outdoor laboratories to field scientists, classrooms without walls for students, and nature's inspiration to all" (UCNRS mission statement). In addition, a major aspect of what makes UC Santa Cruz such a unique school is that this reserve land is right on campus. Many other UC schools are several hours of driving away from the nearest UC Natural Reserve. Therefore, adding the UCSC Campus Natural Reserves to the UC Natural Reserve System, and thereby protecting it for future generations of students to learn from and enjoy, will continue to offer a one-of-a-kind and life-changing experience.

Response I35-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I36 Greg Gilbert

March 3, 2021

Comment I36-1

I appreciate the tremendous work that went into creating this planning document and the attention made to supporting the living research laboratory and experiential teaching resources of the UCSC campus lands. I applaud the designation to nearly double the area designated as Campus Natural Reserve. The CNR provides the opportunity for extensive training of students in ways that cannot be done inside classrooms, allows high profile and long-term research, and protects critical habitat, natural features, and ecological processes. The CNR, including the UCSC Forest Ecology Research Plot, should be considered a critical research and training facility in the same way as are modern molecular biology laboratories, greenhouses, performance and arts studios, and chemical analytical facilities. I would like to urge the campus to go one step further and designate the CNR as permanently protected. This is essential to allow the extensive investment of time and finance resources by faculty into the long-term research endeavors that are necessary to understand how global change is affecting our environment. Such research relies on the foundation of monitoring natural systems over decades, and the uncertainty of changing land-use designations on the campus lands interferes with such investments. One excellent and feasible option for such permanent designation would be to incorporate the Campus Natural Reserve into the world-renowned UC Natural Reserve System. UCSC already manages several UCNRS reserves, and it would make logistical and administrative sense to have the CNR join that system. Other types of permanent designation, administered directly by UCSC, could also be possible, but the permanent designation as protected natural reserve sites is essential.

Response I36-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I37 Alex Krohn

March 3, 2021

Comment I37-1

I would like to voice my support of expanding the Campus Natural Reserve to 789 acres, as proposed in the current LRDP draft. I would also like to strongly advocate for permanent protection of the CNR by adding it to the UC Natural Reserve System.

Response I37-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I38 Andrew Mathews

March 3, 2021

Comment I38-1

1. While I welcome the expansion of the UC Nature Reserve in the proposed plan from 409 acres to 789 acres, I would like this reserve to be permanently protected and incorporated into the UC Nature Reserve system. Development pressures are not going to stop, and we should protect this area for the long term, so that a hasty decision is not made at some point in the future. I use the UC Nature reserve to train my students in fire history, settlement history, and social/ecological observation. One of the gems of the UCSC campus is to have the nature reserve so close to classrooms that one can literally walk out the door, with possibilities for longer engagements also easy to organize.

Response I38-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I38-2

2. I strongly object to the siting of graduate student housing at the base of the Great Meadow. This is a bad location for an important set of buildings. We need to build graduate student housing, but this is not a good place. It damages the coherence of the landscape of the campus, and will generate huge amounts of traffic at a busy road. Many alternatives have been proposed, and these options should be incorporated into the LRDP.

Response I38-2

The comment expresses opposition towards the location of graduate student housing and is noted. This comment expresses an opinion of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, as well as project alternatives, please refer to Master Response 2 and Master Response 3, respectively. To the extent that this comment is referring to the Student Housing West project, please refer to Master Response 8. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I39 Ingrid Parker

March 3, 2021

Comment I39-1

Thank you for the opportunity to comment on UCSC's 2021 LRDP, and for all the hard work that went into creating these plans and documents.

As a long-term faculty member of Ecology and Evolutionary Biology, I have taught students in field-based classes on the UCSC campus since 1998. The natural resources available for teaching on our campus are extensive and vitally important. I appreciate the expansion of the Campus Natural Reserve under the 2021 LRDP, and the recognition of the importance of the natural reserve to our core mission. I appreciate the careful planning and consultation that was done in the detailing of the CNR-designated lands.

In addition to teaching on the campus, I also have used the campus lands for many research projects over the years, some short-term and some long-term. To accommodate long-term research projects, as well as long-term student projects associated with courses (which often involve substantial investment in time and materials at the start), there is a strong need for permanent designation of the reserve. In addition to the great value of long-term ecological datasets, we need to feel secure that our investments in research and teaching are recognized and respected by the campus.

The plans for the Campus Natural Reserve under the LRDP reflect an immense amount of hard work that went into designing the best possible configuration for these protected lands, addressing risks and benefits and the value of all the natural features across the campus landscape. Permanent protection for the reserve is the natural and essential outcome of this work and should be part of the permanent legacy of Chancellor Larive and the 2021 LRDP process.

Response I39-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I40 Kelly Pettit

March 3, 2021

Comment I40-1

Please add the UCSC Campus Natural Reserve to the UC Natural Reserve System. The UCSC Reserve is a rare and precious ecology of both natural features and species, and Native American historical habitat. Please ensure that future generations have access to witnessing this unfettered space that has much left to teach us about the past and the future. Please be rightfully protective public stewards of this incredible space. My deepest appreciation.

Response I40-1

The comment expresses the opinion that the Campus Natural Reserves should be added to the UC Natural Reserve System and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I41 Ronnie Lipschutz

March 4, 2021

Comment I41-1

Section 3.18 of the Draft EIR for the 2021-40 LRDP is woefully deficient in addressing the hazards and risks of wildfires at the wildland-urban interface as well as evacuation plans in the event of a wildfire on campus. Our comments address four lacunae:

1. Inadequate assessment of wildfire risks and hazards posed by development in the North Campus;

2. Lack of adequate analysis of comparative wildfire risks and hazards posed by alternatives to proposed expansion;

3. Inadequacy of campus emergency evacuation plans in the event of wildfire; and

4. Inadequate analysis of impacts on evacuation traffic as a result of campus expansion and wildfires.

Taken together, we believe these four concerns render the Wildfire Risk Section of the DEIR insufficient and in violation of CEQA Guidelines and require review and revision.

Response I41-1

The comment provides introductory information and expresses opinions related to the wildfire analysis, emergency evacuation, and evaluation of traffic as a result of campus expansion and wildfires. Each of these items is addressed in responses below.

Comment I41-2

**1. Inadequate assessment of wildfire risks and hazards posed by development in the North Campus**

In this section, we draw on an earlier review conducted by the Office of the California Attorney General of the Guenoc Valley Mixed-Use Planned Development Project Final Environmental Impact (many footnotes come from that document).1 That project involved building at the wildland-urban interface and includes many of the same wildfire hazard risks posed by proposed construction north of the existing campus:

The December 2018 Update to the CEQA Guidelines added provisions addressing wildfire impacts to implement Public Resources Code section 21083.01. The updated CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000 et seq.) direct lead agencies to analyze the impact of a project on wildfire risk.2 Specifically, wildfire-related impact thresholds include: (1) whether a project would “expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires” and (2) whether it would, “due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.” (CEQA Guidelines, App. G, subds. IX(g), XX(b).)

*The Natural Resources Agency “drafted the questions in the new wildfire section to focus on the effects of new projects in creating or exacerbating wildfire risks.”3 The analysis must start at this core question of a project’s potential to create or increase the risk of wildfires and may need to then address the impacts of any new or exacerbated wildfire risks on the proposed project. But the first question about increased risk is critic al to the wildfire analysis because “it is clear that development may exacerbate wildfire risks.”4 Wildfire research shows that land use decisions, such as that before the Board now, are particularly impactful:*

*[H]ousing arrangement and location strongly influence fire risk, particularly through housing density and spacing, location along the perimeter of development, slope, and fire history. Although high-density structure-to-structure loss can occur, structures in areas with low-to intermediate-housing density were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions.5*

*As development encroaches into exurban areas and the wildland-urban interface, large fire probability necessarily increases because humans are the leading cause of wildfires—and the degree of increased risk is determined by factor s such as topographical and wind conditions, land use, structure arrangement, and density.6 In short, land use planning and project design is an important determinant of wildfire ignition risk and the scale of wildfire spread.7 Accordingly, it is critical to a wildfire analysis to analyze whether the Project itself—in its location and with its land uses, arrangement of structures, density, spacing, topography, grading, etc.—exacerbates the risk of wildfire ignition and spread [emphases added].*

These comments apply directly to proposed expansion into North Campus as described in the LRDP Draft of January 2021 and addressed in the DEIR, Chapter 3.18. The North Campus area has not burned in at least 60 years, and possibly not in a century. Figure 3.18-1 indicates that a significant portion of North Campus is in a high fire severity zone and that the Lower Campus is bounded by a similar high fire severity zone. The DEIR lists in considerable detail the various laws, regulations and practices that apply to life in such zones but also suggests that no vegetation management activities have taken place within the core North Campus (p. 3.18-9) over the past two decades, such that the area remains subject to a severe wildfire. The DEIR lists in considerable details the actions and activities that will be taken to mitigate and reduce wildfire risk, but nowhere does it analyze or provide data on the annual risk of a fire in the North Campus area, as required by the December 2018 update to CEQA. Nor does the DEIR address the impact of the project itself on wildfire risk (the frequency of fires in the Pogonip area adjacent to campus, caused by homeless encampments, suggests that development of the North Campus is likely to increase the number of encampments, the incidence of fires and the associated risks and hazards).

Both the LRDP and DEIR offer only information about the expansion of campus use areas (e.g., residential, academic) and tables of planned expansion in square feet. What these plans might consist of in concrete terms will greatly affect the levels of potential risk arising from development of North Campus. The lack of specificity regarding construction plans further contributes to uncertainty about wildfire risks and hazards that might arise from expansion.

1 Office of the Attorney General, State of California Department of Justice, “Guenoc Valley Mixed-Use Planned Development Project, Planning Commission, Final Environmental Impact Report,” July 6, 2020, at:
https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-lake-county-feir-070620.pdf (accessed February 13, 2021).

2 The scope of analysis on wildfire risk was codified and clarified in the CEQA Guidelines, but it is not a new requirement. (See S. Orange Cnty. Wastewater Auth. v. City of Dana Point (2011) 196 Cal.App.4th 1604, 1616 [“A true example [of an impact associated with bringing development to a hazard] with respect to, say, wildfires would be increasing the risk in a fire-prone area by people using their fireplaces or their backyard barbeques or by children playing with matches.”])

3 California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines (Nov. 2018) at p. 87, https://resources.ca.gov/
CNRALegacyFiles/ceqa/docs/2018\_CEQA\_Final\_Statement\_of%20Reasons\_111218.pdf (“CNRA Final Statement”).

4 Ibid.

5 Ibid. (citing Syphard, A.D, Bar Massada A, Butsic V, Keeley, J.E, Land Use Planning and Wildfire: Development Policies Influence Future Probability of Housing Loss (Aug. 2013) PLOS ONE 8(8): e71708.
https://doi.org/10.1371/journal.pone.0071708.)

6 Ibid.; Syphard A.D, Keeley J.E, Nexus Between Wildfire, Climate Change, and Population Growth in California, FREMONTIA Vol. 47, No. 2 (March 2020) (“On [high-wind] landscapes, fire is more of a people problem than a fuel problem. More people translates into a greater probability of an ignition during a severe wind event.”); Syphard, A.D., Rustigian-Romsos, H., The relative influence of climate and housing development on current and projected future fire patterns and structure loss across three California landscapes, GLOBAL ENVIRONMENTAL CHANGE 56 (March 2019) 41–55.

7 Syphard A.D., Keeley J.E., Why Are So Many Structures Burning in California?, FREMONTIA Vol. 47, No. 2 (March 2020), p. 33 (“[T]he most effective strategy at reducing future structure loss would focus on reducing the extent of low-density housing via careful land planning decisions.”).

Response I41-2

The comment expresses concerns related to wildfire as a result of campus expansion. For a discussion of wildfire risks, including the 2021 LRDP’s potential to exacerbate wildfire risk, please refer to Master Response 4. Further, the Draft EIR presents a programmatic analysis of development under the 2021 LRDP. Future site-specific and project-specific details including site-specific considerations related to wildfire (including consideration of vegetation, topography, and wind conditions) will be evaluated further as design of individual developments within the LRDP area occurs. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I41-3

**2. Lack of adequate analysis of comparative wildfire risks and hazards posed by alternatives to proposed expansion**

The DEIR offers seven alternatives to the proposed LRDP, of which two are focused on the main campus: Alternative 6.4.1, “Main Residential Campus Infill” and Alternative 6.4.2, “High-Rise Development.” The DEIR also omits consideration of potential risks and hazards from increased enrollments and employee numbers without commensurate expansion (that omission is addressed in other comments). These alternatives are largely dismissed out of hand, without consideration as to whether they might reduce the risks and impacts of wildfires on the campus, eliminate the risk of wildfires due to expansion into the North Campus (presumably the more compact and higher density footprints of the two alternatives would reduce the risks), and reduce the impacts of people and human activity on the risk of wildfires.

It should be noted that, while the existing campus is vulnerable to wildfires, as evidenced by the near approach of the CZU Complex fire in August 2020, no part of the campus has burned since at least 1960. This suggests that infill and high-rise development on the campus as currently configured is subject to lower wildfire risks and hazards (and would probably be less costly, given the presence of utilities and infrastructure). These alternatives must be analyzed; otherwise, the DEIR does not meet CEQA requirements.

Response I41-3

The comment states that two of the “Alternatives Considered But Rejected” would reduce wildfire risks and must be analyzed. The Draft EIR presents a reasonable range of alternatives that meets CEQA requirements (refer to Master Response 3 for further clarification). While certain modifications to the proposed project or wholly different (i.e., alternatives) may result in incremental reductions in impacts, a primary requirement of any EIR alternative is that it must fulfill most of the basic project objectives and the two alternatives suggested by the commenter do not for the reasons stated on pages 6-3 and 6-4. Further, the alternatives suggested by the commenter for further evaluation would not result in a reduction in a significant and unavoidable impact to less than significant (either with mitigation or without). The commenter’s statement that no part of campus has burned since at least 1960 also applies to the entire LRDP area, including the upper campus subarea that the two suggested alternatives would avoid. Refer to Master Response 4 for further information regarding the frequency and proximity of historic wildfires to the LRDP area. As a result, further evaluation of the suggested alternatives is not considered necessary and the EIR’s evaluation of alternatives is considered appropriate and in accordance with CEQA requirements.

Comment I41-4

**3. Inadequacy of campus emergency evacuation plans in the event of wildfire**

The campus’s emergency evacuation plans are thoroughly inadequate and have never been tested. This poses unacceptable risks and hazards in the event of wildfires and other disruptive events. According to CEQA Guidelines, App. G, subds. IX(g), XX(a) and (b), a DEIR *is required to consider evacuation and accessibility for emergency response in the event of wildfire. Its analysis must take into account whether the project will adversely impact any adopted emergency response or evacuation plans; adversely impact emergency vehicle access, which can in turn slow emergency response and exacerbate the spread of wildfire; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.*8

Nowhere does the DEIR offer such an analysis. The DEIR repeatedly refers to “evacuation procedures,” “plans” and “routes” without ever offering an assessment of whether these procedures will function as intended during a rapid evacuation of a fully occupied campus in the event of wildfire (the summer 2020 evacuation took place in the context of a largely closed campus). Instead, it states that construction activities associated with expansion will not impede *emergency access to the campus* (which might well take place during an emergency evacuation).

The DEIR reports that the campus Emergency Operations Plan “establishes policies, procedures and an organizational structure for the preparedness, response, recovery and mitigation of disasters and events impacting the main campus and its satellite facilities. The plan also provides guidance to departments, units and activities within UC Santa Cruz with a general concept of potential emergency assignments before, during, and following emergency situations.”

Of what does these policies, procedures and structures consist? Students, staff and faculty are offered several one-page on-line instruction documents. According to “Campuswide Evacuation Procedure,”9

**When you receive a campus evacuation order, immediately respond. Do not return to your residence or office to grab personal items. Immediately proceed to your vehicle and exit the campus. Directions to avoid dangerous areas will be provided when possible. Tune your radio to 88.1FM for updates. If you do not have a vehicle on campus, follow the directions provided by CruzAlert messaging. Bus shuttles or secure sheltering may be advised.**

If you are part of a group visiting campus, group leaders should ensure that the group remains together and all members are accounted for. Follow instructions provided by staff event leaders.

* If your personal vehicle (including bicycles) is parked within walking distance, drive off campus.
* If your personal vehicle is parked remotely, quickly access your vehicle and exit campus. If the alert indicates a time limit to evacuate, consider exiting on foot, if that will place you in a safer distance than reaching your car.
* If you typically ride a Metro bus to campus, you will be transported to a centralized disbursement point and then transported to a designated location off-campus to board the Metro (assuming Metro service is active).

If you are transported to the off-campus safe area, you can arrange for personal transportation from that location.

“UCSC Wildland Fire Response Procedures” 10 is somewhat less sanguine:

**Evacuate:** When directed to evacuate, use any means possible to seek safety: flee by car, foot, bike, mass transit. Continue moving away from the threat until you are safe.

* Evacuate by personal vehicles when traffic is moving quickly enough to egress. Provide emergency carpooling to colleagues and friends.
* If you cannot access your car or if traffic is moving too slowly, abandoned your car and evacuate by foot.
* Shuttles and buses will only operate when it is safe for the drivers. Do not wait at bus stops. Continue moving away from the fire.
* If you have mobility needs, call Disability Services Vans for emergency pickup (831) 459-2829. Or call 911 for emergency rescue. When possible, move near a road for faster pickup.

**Shelter in Place:** If ordered to shelter in place, stay where you are. Remain calm. The building or open space that you are sent to will be chosen by first responders. If the direction of the hazard changes, respond as need to seek safety.

Nowhere does the DEIR address whether these procedures are safe or adequate in the event of wildfire, how these instructions might be accessed (especially if the internet should go down or power shut off for safety reasons) and how students and staff know what to do (to be entirely fair, the campus conducts periodic fire drills for specific buildings and areas, but these do not entail evacuation from campus). In effect, in the even of wildfire, those present on campus are advised to “get off” however you can. The absence of such an assessment violates the requirements of CEQA.

8 Note 1, op cit.

9 Emergency Management, 10/17/17, at: <https://oes.ucsc.edu/emergency-preparedness/procedures/campus-evacuation-procedure-2.pdf>

10 “UCSC Wildland Fire Response Procedures,” Office of Emergency Services, 2019-20, at:
<https://oes.ucsc.edu/emergency-preparedness/procedures/campus-wild-fire-procedure-2019-2020-v.4.pdf>

Response I41-4

The comment states that the Draft EIR did not evaluate wildfire risk consistent with Appendix G of the State CEQA Guidelines, specifically with respect to emergency evacuation plans. CEQA provides for use of environmental standards as thresholds of significance (CEQA Guidelines section 15064.7(d)), provided that the lead agency “explain how the particular requirements of that environmental standard reduce project impacts…to a level that is less than significant, and why the environmental standard is relevant to the analysis of the project under consideration.” Consistent with Appendix G of the State CEQA Guidelines, the impact analysis considered the potential for increased wildfire risk from the implementation of the 2021 LRDP in terms of wildfire exposure of more people and structures to wildfires, and of the potential for increased wildfire frequency and intensity. It also evaluated the effects of implementing the 2021 LRDP on emergency planning and evacuation in the event of a wildfire, and any conflicts with existing emergency plans and policies.

As noted on pages 3.18-5 and 3.18-13, the EOP outlines specific procedures and evacuation plans in the event of various types of emergencies. The Draft EIR evaluated the potential for the 2021 LRDP to interfere with those specific procedures and evacuation plans. As shown on page 3.18-13, Impact 3.18-1 determined that preparation and implementation of construction traffic management plans, through implementation of Mitigation Measure 3.9-4, would adequately address any potential conflicts with the EOP and its designated emergency access or evacuation routes during construction. Further, the 2021 LRDP would improve emergency access, including points of access and frequency (including transit), within the LRDP area. Therefore, the Draft EIR explains how Mitigation Measure 3.9-4 would reduce impacts meeting the requirements of CEQA Guidelines section 15064.7(d). Further, this combined with campus-wide vegetation/fuel management (as required by Mitigation Measure 3.18-2 on page 3.18-17 of the Draft EIR) would reduce wildfire risks associated with on-campus activities and to both on-campus and off-campus populations. Refer also to Master Response 4 regarding the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

The commenter’s statement discussed the degree to which campus evacuation procedures have been tested. With the recent CZU Lightning Complex fires, the main residential campus was evacuated using the established procedures from the EOP and California Governor's Office of Emergency Services (Cal OES), which are considered evidence in support of effective emergency management procedures and plans. Although a fully occupied campus would require longer to evacuate fully, the EOP and Cal OES procedures and policies provide for early warning evacuation (as evidenced by the August 20, 2020 evacuation) and multiple notification methods such that the campus was evacuated fully and appropriately.

Comment I41-5

**4. Inadequate analysis of impacts on evacuation traffic as a result of campus expansion and wildfires.**

Expansion into North Campus will likely exacerbate evacuation difficulties, rather than reducing them.

According to the DEIR’s section on emergency access (section 3-16),

the 2021 LRDP includes a new internal roadway connection and a new access point on Empire Grade, which would improve emergency access to the campus and evacuation capacity. The existing roadway network and proposed new primary connections provide redundancy for travel pathways and options if one or more roadways are closed. As a result, the 2021 LRDP is not anticipated to result in inadequate emergency access, and the impact would be less than significant.11

And

Implementation of the 2021 LRDP would result in circulation and transportation infrastructure improvements intended to enhance alternative transportation opportunities and increase connectivity within the UC Santa Cruz and to the city. Several new roads would be added to the transportation network in order to provide better cross-campus. transit service, create safer bicycle and pedestrian environments, and fill gaps in the existing roadway system.12

Nowhere, however, does the DEIR analyze address the adequacy of an evacuation plan’s impacts on traffic exiting from the campus or areas adjacent to the campus in the event of wildfire on North Campus or adjacent areas around the campus. The addition of roads across campus will not reduce congestion on campus, since there are a limited number of egress points from campus. Moreover, new entrances/exits to campus at Western and Empire and onto Empire from North Campus will not reduce congestion because all campus roads drain onto the same three access streets: Empire Grade and Western Drive, Empire Grade and High Street and Bay Avenue and Empire/High. In the event of wildfire on North Campus and/or in the high fire risk zones around campus, residents of Bonny Doon and surrounding communities as well as areas around the campus will also be evacuating by the same routes. In other words, the vehicle volume on those roads will consist not only of cars exiting the campus but also hundreds or even thousands of cars leaving other areas. Since such evacuations will not be orderly (as indicated by recent experience), traffic jams are almost inevitable, forcing vehicle occupants to evacuate on foot. A rapidly moving wildfire could trap them behind fire lines and even burn them to death (as has happened with other recent wildfires in California).

It might also be noted that Empire Grade is currently subject to heavy truck traffic due to post-fire cleanup activities. This cannot be ruled out as an exacerbating element in a future evacuation.

In this respect, the DEIR is wholly inadequate and violates CEQA requirements. The DEIR must address whether an inadequate evacuation plan increases the hazards and risks to both those on campus and those who live north of and near to the campus.

11 Draft DEIR for 2021 LRDP, Impact 3.16-4, p. 40.

12 Draft DEIR for 2021 LRDP, Impact 3.9-4., p. 25.

Response I41-5

The comment expresses the opinion that congestion would not be reduced through new roads, entrances, or exits, and expresses concerns related to wildfire. Regarding the adequacy of UC Santa Cruz evacuation procedures and plans, refer to Response I41-4. For additional discussion related to wildfire and the Draft EIR’s assessment of potential increases in wildfire risk associated with the 2021 LRDP, refer to Master Response 4. As noted above and in the Draft EIR (on pages 3.18-13 through 3.18-17, implementation of the 2021 LRDP with project-specific traffic control plans and a campus-wide vegetation management plan would not impair implementation of emergency response or evaluation plans, nor would it exacerbate risks associated with wildfire in the area. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I41-6

In conclusion, the DEIR as currently written violates CEQA EIR requirements in at least four respects (no doubt, there are other inadequate analyses in the document):

1. Inadequate assessment of wildfire risks and hazards posed by development in the North Campus;

2. Lack of adequate analysis of comparative wildfire risks and hazards posed by alternatives to proposed expansion;

3. Inadequacy of campus emergency evacuation plans in the event of wildfire; and

4. Inadequate analysis of impacts on evacuation traffic as a result of campus expansion and wildfires.

We request that the EIR team reassess and revise the Wildfire section of the DEIR in order to address these CEQA violations.

Response I41-6

The comment expresses opinions related to the wildfire and evacuation analyses of the EIR. Each of the four aspects are addressed above in Responses I41-2 through I41-5. Please refer to Master Response 4 for further discussion related to wildfire. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I42 Ronnie Lipschutz

March 3, 2021

Comment I42-1

These comments address the absence of any financial analysis of the campus expansion proposed in the 2021 LRDP and its implications for the DEIR and the campus environment. The lack of financial considerations is important, especially if the campus expands to 28,000 students and 5,000 faculty, staff and instructors, as proposed in the LRDP. The fact is that the development plans in the 2021 LRDP are unlikely to be fully carried out: according to Professor Karen Holl’s analysis, only about 30% of development plans in the 2005 LRDP were actually accomplished, even as the campus added thousands of students. If we assume the same results for the 2021 LRDP, the campus population will grow by about 50%. Because there is already inadequate space for the current 22,000-odd campus population, the shortage of space will increase, with commensurate effects on the quality of undergraduate education.

Here is my rough analysis of this problem:

According to the LRDP (p. 101), the University plans to more than double total campus space by 2040, adding 5.63 million square feet to the current 3.75 million square feet. Of those additions, 1.13 million are for “instruction and research.” This should be compared to the existing 860,000 square feet), including classrooms (115,900 sf), teaching labs (152,600 sf) and research laboratories (859,000 sf). That growth will take place primarily in research space; the increment to classroom space is considerably smaller.

What will this expansion cost? Here, the math gets both tricky and speculative. It is difficult to locate costs per square foot for campus construction, which varies widely depending on the facility. A nice round number is $500/square foot. Consequently, the total capital cost for the proposed expansion, assuming a 2% interest rate and 20-year repayment, will be around $4.2 billion (and probably more). Much of the expansion is in housing, which is supposed to pay for itself, but construction funds must still be borrowed.

Under similar assumptions the capital cost of the instruction and research portion will be around $840 million—and research space is very expensive, so this is probably a low estimate.

To pay for the entire plan, the university will have to find $200 million per year. From where will these funds come?1 The University can borrow money in the form of bonds, allot a portion of the various revenue streams to the campus to repayment, or create public-private partnerships of the type developed for the Student Housing West project. UCSC’s current bond capacity is, anecdotally, far less than required and the state no longer provides funding for capital projects, so that source is excluded. What are left are student tuition and fees, general support funds from the state and other nonobligated revenues. Remember that the University must also pay current costs of instruction and research.

The University’s budget is very opaque. All revenues not restricted to specific projects flow into a general fund, which is are allocated to specific sectors on an academic year basis. In 2018-19, UCSC spent about $300 million on instruction and research out of a total budget of about $763 million (including student services). Revenues for these functions came from student tuition and fees ($300 million), state funds ($200 million) and federal aid ($32 million), totaling $532 million. Adding together current costs and repayments gives us a total of around $500 million per year. That surplus is misleading, of course, since it does not include academic student services

With the proposed enrollment increase to 28,000 students, student tuition and fees at current levels will bring in around $430 million annually, while state support will not increase much above $200 million, if at all. The cost of instruction and research will rise, as well, leaving very little for other functions, especially if financial aid requirements grow. And none of this takes into account the radical changes in higher education that may result from the pandemic.

UCSC has been chronically short of funding for decades, and this is unlikely to change. Nowhere are there any specifics about proposed projects, where they will go or what they will cost. Nor is there any consideration of the University’s future if it grows to 33,000 students, staff and faculty but is unable to expand as proposed. In the absence of reliable budget and cost figures, it is difficult to determine whether this LRDP pencils out. It is incumbent upon the UCSC Administration and its consultants to show that it does and that undergraduate education will not be undermined and the City and County of Santa Cruz not be unduly impacted by the failure to meet those goals.

1 Of course, construction will take place over the 20-year period and so will financing and repayment. Discounting will make these figures somewhat less but increases in construction costs are likely to be significant. So, the numbers are more or less on target.

Response I42-1

The comment expresses concern related to campus finances, budget, and growth. This comment addresses the nature of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. Please refer to Master Response 2 regarding funding priorities. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I43 Michael Loik

March 4, 2021

Comment I43-1

Re “Climate Change and Wildfire” page 3.18-7

It should be noted in the final sentence that fire risk, under dry humidities and dry fuel conditions, is enhanced by seasonal wind events. Such “Diablo Winds” have become drier over time (Liu et al. 2021).

Liu, YC., Di, P., Chen, SH *et al*. Climatology of diablo winds in Northern California and their relationships with large-scale climate variabilities. *Clim Dyn* 56, 1335-1356 (2021). <http://doi.org/10.1007/s00382-020-05535-5>

Response I43-1

The comment suggests an additional citation and rephrasing of the final paragraph on page 3.18-7. The additional citation is noted, and while valid, the suggested content does not alter the meaning of the paragraph that as climate change continues, increasingly drier fuel sources and winds may lead to larger wildfire events. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I44 Chad Noyes

March 3, 2021

Comment I44-1

I am writing to express my concerns about the projected growth envisioned in the 2021 LRDP for UCSC, specifically with respect to the issue of housing for employees of the university.

Our family moved to Santa Cruz in 2009 so that my wife, Irene Lusztig, could take a tenure-track position in Film & Digital Media; she is now a full Professor. I was never able to obtain work at UCSC in my field of PhD studies

(Harvard PhD, Government, 2003) and have mostly taught courses in the Core program at various colleges, a system whose entire academic mission was recently revised to permit significantly larger class sizes for incoming students.

Although the financial crisis of 2008 and the resulting crash in housing prices temporarily softened the local market, we were still priced out of homes everywhere in Santa Cruz except for San Lorenzo Valley, where we purchased a home in Boulder Creek in 2009. We lived in the mountains for a decade, watching with steadily accruing anxiety as the fire danger worsened, and the provision of basic utilities became more precarious, until finally last August much of our neighborhood burned to the ground. Astonishingly, our house today (which fortunately survived - we sold in November) is valued at over $700,000, despite the evident fire danger and the fact that insurance companies will no longer write policies for the area.

As the median home price in Santa Cruz recently tipped over $1,000,000, we find ourselves unable to purchase anything in town, and have decided to rent ($3100/month for 900 square feet for the three of us) until we can find a way to leave Santa Cruz. We are being forced to leave UCSC because the situation for our family is simply unsustainable. New homes under $1 million appear on the market at the rate of about 1 every 2 weeks, and these are frequently in such bad condition that they are essentially uninhabitable and would require an additional six-figure expenditure for necessary upgrades. Educator families simply can't afford to live here anymore.

Your committee can probably imagine our reaction, then, on reading this passage from the LRDP for 2021: "It is estimated that an additional 2200 FTE faculty and staff will be required ... Growth in employment will be addressed through the provision of additional housing for as much as 25 percent of new employees."

First of all, even that modest figure of 25% invites serious skepticism: No new housing for employees has been built on campus since Ranch Terrace in 2009. Jen Talusan in the Housing Office informed me that there are serious problems with the plans for building and pricing new employee houses, so new and existing faculty should probably not have a great deal of confidence in the University's ability to meet its 25% target.

But let's stipulate for the sake of argument that the University is able to meet this goal: Where on earth do you imagine that the other 1500+ families are going to live??? Is this the same University that recently sent out a desperate (and stunningly inappropriate) email to its own faculty inquiring into the possibility of housing the overflow of the undergraduate population IN OUR OWN HOMES? Is this the same University that recently endured traumatic and damaging strikes from its graduate students, who find their stipends are not enough to live on in a town with an acute housing crisis?

It's as if the leadership of this University has succumbed to a blind and heedless imperative of Growth at all costs, irrespective of its consequences for the UCSC and larger Santa Cruz communities. Your undergrads are being stuffed 4-at-a-time into doubles in the residential colleges (this is a true story that I confirmed with my Merrill students), your grad students are striking, even your professors are effectively priced out of the housing market, but never mind: GROW!

We can only hope that we are able to get our family out the path of your development plan before it draws its horrendous and entirely predictable consequences for university families.

Response I44-1

The comment expresses concerns related to housing and growth. UC Santa Cruz is committed to providing housing options for up to 25 percent of the increase in faculty and staff, and shares concerns about the impacted housing market, further exacerbated by the COVID-19 pandemic and the CZU lightning complex fires. UC Santa Cruz is working to identify several sites for potential employee housing projects, including in areas designated as Employee Housing in the 2021 LRDP, at both the main residential campus and the Westside Research Park. This comment addresses the merits of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I45 Janet Parkins

March 4, 2021

Comment I45-1

Please accept my comments on the UCSC Long Range Development Plan and Draft Environmental Impact Report. I am a UCSC Alumna (Crown 1972), living in British Columbia so I do not return to campus often. I was last on campus 5 years ago after an interval of many years. I was impressed with how the campus had grown, and impressed with the sensitivity of the planning to preserve as much of the beautiful natural environment as possible. I could also see that there was a severe student housing shortage on campus. I then learned of the plan to build large architecturally unattractive student housing in the meadow. I was absolutely appalled, and I do not believe I was the only one who felt that way. This went against all the critical UCSC development traditions - environmental sensitivity, responsible planning, and attractive design. I understand that plan has been rejected, but it shook my trust in UCSC's planning and decision making processes.

Response I45-1

The comment expresses the opinion that no architecturally unattractive student housing should occur within the East Meadow. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. Refer also to Master Response 8 regarding the Student Housing West project. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I45-2

I believe there are several important aspects to the way forward:

1. Grow UC Merced and slow growth at UCSC - why?

A. The San Joaquin Valley would benefit from the growth.

B. The Monterey Bay Area would benefit from the reduced growth pressure.

C. It would allow time for UCSC to resolve the outstanding water and sewer issues with the City of Santa Cruz and LAFCO.

D. It would allow time for UCSC to catch up on construction of student and staff housing.

E. Construction costs are probably cheaper at UC Merced.

Response I45-2

The comment expresses the opinion that growth of UC Santa Cruz could be decreased or phased in and instead focused at the UC Merced campus. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, including the 2008 Cooperative Settlement Agreement, as well as alternatives considered in the EIR (e.g., offsite alternatives) and phasing please refer to Master Responses 2, 3, and 9, respectively. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I45-3

2. Re construction at UCSC

A. Work out frog mitigation with the USFWS - that has been done previously for another area of the UCSC campus and would very likely be possible for the area in current question. Consider a frog migration tunnel under Empire Grade between the West Entrance and the Arboretum.

B. Resolving the frog mitigation would free up the 26 acres on the west side for use for student housing. Using the west side for student housing would provide adequate separation of childcare, family student housing, and student dorms.

C. This plan would resolve the pending litigation.

D. This plan would also go a long way to repair trust between the university and the community of Santa Cruz.

E. This plan would also repair trust between UCSC and alumni. I believe ongoing alumni support is critical to UCSC. I have been supporting UCSC annually for many years, but if I were to become so disgusted with what UCSC had become that I stopped contributing and removed UCSC from my will, and I were not the only one to do that, I believe uses would suffer.

Response I45-3

The comment provides opinion regarding potential mitigation for California red-legged frog, including a potential frog migration tunnel under Empire Grade. As noted in Master Response 12 and the response to Comment Letter F1, UC Santa Cruz is currently coordinating with USFWS regarding creation of a campus-wide Habitat Conservation Plan. Regarding the remaining statements of adequacy and relationships, these statements reflect the opinion of the commenter and are noted. The statements do not address the adequacy of the EIR analysis, and as such, no further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I46 Tsim Schneider

March 4, 2021

Comment I46-1

Is it UCSC's plan to continue to protect the historical/archaeological quarry features near the main entrance to campus in a state of arrested decay? Perhaps those spaces have outlived their usefulness and could be put to better use or, minimally, interpreted differently? As a campus community that is endeavoring to be more open and hospitable to the Amah Mutsun Tribal Band, I wonder about the message that is being sent at our front door: a collection of buildings that broadcast white settler history and the dispossession of Indigenous homelands.

Response I46-1

The comment expresses the commenter’s opinion regarding the designated Cowell Lime Works Historic District and the message it may be sending to the Amah Mutsun Tribal Band. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. Regarding continued protection of the Cowell Lime Works Historic District, page 123 of the 2021 LRDP states that the intent of the Historic District designation is to recognize and integrate regional history by rehabilitating historic structures with programs that will actively contribute to campus and community life. Further and as stated in responses to Letter O10, UC Santa Cruz has continued coordination with the Amah Mutsun Tribal Band regarding the 2021 LRDP under its Assembly Bill (AB) 52 compliance requirements and is committed to further coordination and notification to ensure the appropriate treatment and respect for tribal cultural resources within the LRDP area. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I47 Elaine Sullivan

March 4, 2021

Comment I47-1

I am submitting a critique of UCSC’s 2021 LRDP in terms of the project’s negative aesthetic impacts (Section 3.1 of the LRDP draft). As stated in the LRDP, the planned project would have substantial adverse effects on the visual character and quality of the Main Residential campus and it would break-up campus meadow spaces, which would negatively impact the scenic and visual resources of the campus as a whole.

Response I47-1

The comment provides introductory text and does not address the adequacy of the EIR analysis. No further response is required. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I47-2

1. The LDRP (Section 3.1) does not acknowledge the significant and irreparable damage to the visual resources of the campus caused by the planned construction of student housing in the East Meadow area. This area was designated as Campus Resource Land in the 2005 LDRP, and planned to “be maintained in their natural state to serve as long-term reserve lands for future use”: https://lrdp.ucsc.edu/final2005lrdp/2005lrdp(lrdp).pdf. The number of scenic vistas from this area, which is one of the main entrance ways to campus via Hagar Dr. or Coolidge Dr. are never considered in the LRDP (see: Impact 3.1-1):

* Across the East Meadow today there are incredible views up to the residential campus, with campus buildings in Cowell and Stevenson college buildings strategically hidden by the rise of the land, with full views of the redwood forest behind them (See **IMAGE** 1). This view would be considered a “significant public vista” from a public road whose “landform and aesthetic character” would retain high value (policy 5.10.3, protection of public vista, Section 3.1 page 5). This vista would be blocked by new construction planned for the base of the East Meadow.
* The expansive views out towards the Monterey Bay across the East Meadow that students and visitors have while walking, biking, or driving down Hagar Dr. is one of the most iconic parts of campus (see **IMAGE** 2). This type of view is explicitly mentioned in the LRDP as having key value in Policy 5.10.6 (preserving ocean vistas Section 3.1 page 6). The LRDP specifically suggests it will not “compromise views of the Monterey Bay” (Section 3.1 page 39) through construction, which is directly contradicted by this planned construction in the East Meadow.

Hagar Dr. and the associated public bike lanes and walking paths are highly trafficked by pedestrians and bikers and are popular with the larger Santa Cruz community. Losing this iconic visual resource would negatively impact the many members of our community who visit our campus to enjoy its beautiful long-range vistas and open spaces. All of these scenic and historic views will be blocked by new construction at the base of the East Meadow and will significantly degrade these vistas. The LRDP does not consider this major aesthetic damage in any way. I therefore object to the construction of student housing in this area.

Response I47-2

The comment states that the Draft EIR did not evaluate impacts to visual resources caused by the planned construction of student housing in the East Meadow area. The Draft EIR evaluated potential impacts to scenic vistas, including views towards the Great Meadow along Webster Way, under Impact 3.1-1. CEQA provides for use of environmental standards as thresholds of significance (CEQA Guidelines section 15064.7(d)), provided that the lead agency “explain how the particular requirements of that environmental standard reduce project impacts…to a level that is less than significant, and why the environmental standard is relevant to the analysis of the project under consideration.” As stated on page 3.1-41, development under the 2021 LRDP would be clustered nearby or adjacent to existing buildings and structures such that short- and long- distance views, both from and towards campus would not be adversely impaired. Further, consistent with CEQA Guidelines section 15064.7(d), the Draft EIR explains how compliance with the standards set forth in the Campus Standards Handbook and the Physical Design Framework, would reduce impacts by requiring specific landscaping and design features to soften the visual interface between new development and the existing campus, as stated on page 3.1-44 of the Draft EIR.

Comment I47-3

2. The LRDP (Section 3.1.1, “UC Santa Cruz physical design framework”) suggests the campus values “the continuity and visual ‘sweep’ of the meadow landscape across the lower campus,” and “the integrity of the meadows,” aims to limit encroachment on natural lands, and “consider[s] long-range views in the siting and design of facilities.” These goals are directly contradicted by the proposed construction in the LRDP:

* The East Meadow would be dramatically reduced, with the whole lower section of the meadow given over to student housing and parking.
* New student housing, academic support buildings, and a roadway would significantly intrude into the “Natural Space” of the Great Meadow (southeast of the Music Center) and into the “Campus Natural Reserves” southwest of Oakes College and west of Porter College.

These constructions would significantly and negatively impact the historic character of the campus, scenic views to and from the campus, and shrink the spectacular open spaces that make the campus unique. These construction plans ignore the stated policy of maintaining meadow spaces (in one case, the roadway extension of Meyer Drive, by actually bisecting the Great Meadow). I therefore object to the planned constructions in these areas.

Response I47-3

The comment states that the 2021 LRDP contradicts with guidelines set forth in the UC Santa Cruz Physical Design Framework by proposing development near the East Meadow and the Great Meadow. To the extent that this comment refers to the Student Housing West project, please refer to Master Response 8. Regarding implementation of the 2021 LRDP, as stated under Impact 3.1-1, development under the 2021 LRDP would be clustered nearby or adjacent to existing buildings and structures such that short- and long-distance views, both from and towards campus would not be adversely impaired. Further, in compliance with CEQA Guidelines section 15064.7(d) the Draft EIR explains how compliance with the UC Santa Cruz Design Review Process, standards set forth in the Campus Standards Handbook, and the Physical Design Framework, would reduce impacts to less than significant. For example, and as noted on page 3.1-44, site- and project-specific landscaping and design features (including color) would be required to soften the visual interface between new development and the existing campus and to maintain visual continuity.

Letter I48 Tiffany Theden

March 5, 2021

Comment I48-1

Please add the Campus Natural Reserve to the UC Natural Reserve System as a permanently protected reserve.

Please do not cut down any more redwoods. They are endangered and it is absolutely unacceptable.

Response I48-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and that the redwoods should not be cut down is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I49 Martha Brown

March 7, 2021

Comment I49-1

I am writing to comment on the Draft LRDP and Draft EIR for the 2020 LRDP. I am a graduate of UC Santa Cruz (biology, sociology, science communications) and served as editor for the Environmental Field Program (EFP) and the Center for Agroecology & Sustainable Food Systems. As part of my work for the EFP, I helped Professor Ken Norris survey the UC Santa Cruz campus open spaces and identify critical biotic sites for the Campus Natural Reserve. I also edited the initial Academic Plan for the UCSC Campus Natural Reserves and co-edited The Natural History of the UCSC Campus (Haff, Brown, and Tyler, eds., 2008).

In light of the tremendous value that the UCSC Campus Natural Reserve (CNR) provides to the campus's research, education, and public service missions, I request that the CNR be added to the UC Systemwide Natural Reserve System (NRS). Since the CNR's establishment, I have watched it develop into a popular "outdoor classroom" for myriad courses, as well as an easily accessible resource for student and faculty research projects, and campus and community natural history outings. Adding it to the NRS would give this important resource the permanent protection it deserves.

The CNR is one of UCSC's unique and valuable attributes, which can't be duplicated in a laboratory or classroom. Ideally, the LRDP should also consider enlarging as well as adding the CNR to the UC Systemwide NRS, as planned enrollment increases will bring both further development pressures on undeveloped and unprotected land, and an increase in the use of campus lands for education and research.

Campus reserve managers and staff of the Norris Center for Natural History have done an outstanding job of creating unique educational and research opportunities for undergraduate and graduate students on the CNR; enlarging and permanently protecting the CNR will enhance this work and ensure its continuity.

I appreciate this opportunity to comment on the draft LRDP and draft EIR process. If you have any questions, please let me know (mtbrown@ucsc.edu).

Response I49-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I50 Mark Carr

March 7, 2021

Comment I50-1

We, the faculty of the Department of Ecology and Evolutionary Biology, strongly encourage the campus to permanently designate the UCSC Campus Reserve as a UC Natural Reserve. This permanent protection will assure that this unique and essential campus resource will be available for teaching and research in the long term. Collectively, we utilize the campus natural reserve for a wide range of teaching and research opportunities and appreciate that the draft EIR and LRDP recognize the importance of these uses. Due to its proximity to formal teaching classrooms, the reserve serves as a primary field site for many of our courses, providing accessible space to practice field methods, access the natural world for organismal courses, elucidate concepts covered in lecture material, and expose our students to inquiry-driven field learning experiences. In reality, it serves as our outdoor classroom and research facility, not unlike traditional bricks and mortar classrooms and laboratories. However, across the entire UC system (and perhaps globally), UCSC is unique in having such an incredible resource literally outside our door.

Because the reserve is part of our campus, we are able to provide applied opportunities for a number of courses, both large and small. This is particularly important for students involved in large introductory level courses who would not have access to these types of activities due to the costs and complications of transporting several hundred students to offsite locations (most of which are charged to student fees). The proximity of the reserve to our classrooms allows us to take students into the field within scheduled lab or lecture periods. For example, two of our lower-division courses, Development & Physiology and Ecology & Evolution, include a field component in every academic quarter, providing field experiences for over 5000 students in the past ten years. Many of these students have progressed into internships and several have completed senior theses on the reserve (some being published in journals).

Examples of other Ecology and Evolutionary Biology courses that routinely use the reserve include Field Methods in Herpetological Research, Introduction to Field Research and Conservation, Systematic Botany of Flowering Plants, Plants and Society, Mammalogy, Molecular Ecology, Behavioral Ecology, Ecology and Conservation in Practice, Ecological Field Methods, Ornithology, and Field Methods in Plant Ecology. These courses provide in-depth experiences for our students as the reserve is utilized as a true laboratory and research site. Experiences on the reserve help students navigate their course of study at UCSC, motivating them to focus on academic tracks within our curriculum that they were exposed to via experiences and observations on the Campus Reserve. These activities are accessible to the entire student body making them equitable for all.

In addition to undergraduate support, the reserve is used by a number of our faculty and graduate students for research. Research efforts include long-term monitoring plots, community ecology, evolution and speciation of cave fauna, and pedagogical approaches to teaching field science. Almost all of these activities include undergraduate and graduate student participation.

We recognize that the Campus Reserve fulfills these roles without permanent protection. However, for UCSC to project its global reputation in field-based experiential learning and training of diverse leaders in ecology, evolutionary biology, and conservation into the future, it is important to ensure that this resource is permanently preserved so that future boundaries the ecological resources contained within are not eroded over time. These lands are truly our campus’ most unique resource and permanent protection would ensure continued and expanded use going forward.

Response I50-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I51 Dan Costa

March 7, 2021

Comment I51-1

I would like to express my complete support for the UCSC Campus Reserve's proposed designation as a UC Natural Reserve. I have a somewhat unique perspective on the UC NRS program. First, Professor Ken Norris, the UC Natural Reserve System founder, was my dissertation advisor. I can clearly remember when he created the campus reserve. When I became faculty at UCSC in 1991, I took on the campus representative's role to the UC Systemwide NRS office. I eventually became the Chair of the UC NRS Systemwide Advisory Committee, a position I held for 16 years and just stepped down in 2020. So I have a very in-depth understanding of the NRS and what it would mean for the campus and the NRS system. As you are aware, the UCSC campus is unequaled in its natural beauty. How many campuses are there that you can walk outside of your office and enter such unique natural habitat!

Placing the Campus Reserve into the UC NRS will provide permanent protection assuring that this unique and essential campus resource will be available for teaching and research in perpetuity. The campus natural reserve is already being used for a wide range of teaching and research opportunities documented in the draft EIR and LRDP. The close proximity to formal teaching classrooms enables the reserve to serve as the primary field site for many courses, providing accessible space to practice field methods, access the natural world for organismal courses, elucidate concepts covered in lecture material, and expose our students to inquiry-driven field learning experiences. It is truly an outdoor classroom and research facility, not unlike traditional brick-and-mortar classrooms and laboratories.

Because the reserve is part of our campus, we can provide applied opportunities for several large and small courses. This is particularly important for students involved in large introductory-level classes who would not have access to these types of activities due to the costs and complications of transporting several hundred students to offsite locations (most of which are charged to student fees). The proximity of the reserve to classrooms allows students to go into the field during scheduled lab or lecture periods. For example, two of our lower-division courses, Development and Physiology and Ecology and Evolution, include a field component in every academic quarter, providing field experiences for over 5000 students in the past ten years. Many of these students have progressed into internships. Several have completed senior theses on the reserve (some being published in journals).

While I recognize that the Campus Reserve already provides these roles without being part of the UC NRS system. Nevertheless, incorporating the campus reserve into the UC NRS system will cement UCSC's international reputation as a university committed to field-based experiential learning and training of diverse leaders in ecology, evolutionary biology, and conservation. This resource must be permanently preserved so that the future boundaries of the ecological resources are not eroded over time. These lands are indeed our campus's most unique resource, and permanent protection would ensure continued and expanded use going forward.

Response I51-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I52 Jennifer Gonzalez

March 7, 2021

Comment I52-1

I served on the LRDP in 2005, and I know how much work it entails. First, thank you for the time you took, and the commitment you made to this difficult task.

My comments are based on experience, and on the recognition that one can make an important impact with fairly simple decisions. For example, one of the key elements of the 2005 plan was the maintenance of "critter" corridors for natural animal habitats across the campus, and a commitment to architectural design that would allow students, staff and faculty to see a tree from every window on campus. These are not frivolous ideas, but reveal instead a stewardship model of leadership.

This campus is a jewel of beauty that is literally world renowned for its redwood forests, spectacular views and pristine meadows. The current LRDP's housing, road and academic construction proposals will deeply damage the character, reputation and value--indeed the unique brand--of this campus.

The 2021 LRDP needs to answer the following questions for it to move forward:

Response I52-1

The comment expresses the opinion that development of the LRDP would negatively affect the campus and is noted. The comment expresses an opinion of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I52-2

1. There is no funding model for the implementation of the proposed plan. Nowhere are there any specifics about proposed projects, where they will go or what they will cost. UCSC Administration must show that undergraduate education will not be undermined, that housing will be acceptably integrated into current campus sites, and the City and County of Santa Cruz will not be unduly impacted by water, traffic and other environmental impacts due to the proposed expansion of the student body.

Response I52-2

The comment expresses various opinions related to the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Student housing will be located on areas of the campus that are designated as Colleges Student Housing land use. Employee Housing will be located on areas designated as Employee Housing. Potential impacts on water supply and related mitigation measures are evaluated in Section 3.17, “Utilities and Service Systems,” of the Draft EIR. Potential impacts to transportation and related mitigations measures are evaluated in Section 3.16, “Transportation,” of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I52-3

2. There is no adequate safety model for fire evacuation for students, faculty and staff now, and certainly the issue is unlikely to be resolved with 8,000 more students.

Response I52-3

The comment expresses concern related to fire evacuation. Section 3.18, ”Wildfire,” of the Draft EIR and Master Response 4 of the Final EIR adequately address wildfires risks, including wildfire evacuation process in accordance with the CEQA Guidelines. For additional discussion related to wildfire and evacuation, please refer to Master Response 4. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I52-4

3. If student housing and childcare are built on the busiest traffic intersection on campus, where cars reach maximum velocity, the chances of great harm to young children (even death) are significant. Moreover the LRDP includes no study showing the effect of pollution on young children located near busy roads. Many studies have linked proximity to busy roads to a variety of adverse health outcomes in both adults and children, including respiratory symptoms, asthma attacks, decreases in lung function, heart attacks, and low birth weight.

One study conducted at OEHHA looked at residential traffic exposure and the risk of miscarriage among pregnant women living in three regions of California.

* Residential Exposure to Traffic and Spontaneous Abortion
* Traffic-related air pollution near busy roads: the East Bay Children's Respiratory Health Study
* Residential Traffic and Children's Respiratory Health
* Proximity of California public schools to busy roads

Response I52-4

The comment states that the EIR should have included a study of increased traffic on young children living nearby. The Draft EIR considered the potential for increased vehicle traffic to have potential health effects. In general, and as noted on page 3.3-15 of the Draft EIR, major highways and roadways are considered potential sources of air-pollution-related health risks to residents. As shown in Appendix I (Energy Modeling) of the Draft EIR, no roadways on or near the LRDP area would approach 100,000 vehicles/day. As stated on page 3.3-15 of the Draft EIR, “[d]ue to the relatively isolated location of UC Santa Cruz’s campus, TAC” (toxic air contaminant) “emissions from major roadway traffic, including sensitive populations, do not substantially affect air quality on campus.” To the extent that the comment is related to the Student Housing West project, refer to Master Response 8.

Comment I52-5

I strongly urge those involved with the LRDP to reconsider putting housing of any kind on the East Meadow that will jeopardize the health or safety of the residents.

Response I52-5

The comment expresses the opinion that no development should occur within the East Meadow and is noted. Refer to Master Response 8 regarding the Student Housing West project. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I53 Kathleen Kay

March 7, 2021

Comment I53-1

I am writing to express my strongest possible support for adding the UCSC Campus Natural Reserve to the UC Natural Reserve System as a permanently protected reserve. The Campus Natural Reserve is a living laboratory well deserving of permanent protection. It is one of the most unique features of UCSC. I use it extensively for teaching my Systematic Botany course, my kids attend the Kids in Nature aftercare program and camps that use the reserve, and the whole community benefits extensively from having such easy access to natural habitats. The UC Natural Reserve System is the appropriate steward for such a jewel.

Response I53-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I54 Bonnie Stibbe

March 7, 2021

Comment I54-1

I would like to comment on the EIR for the future UCSC development plans.

I was a student at UCSC from 1973 to 1976, proudly graduating in Earth Sciences in 1976. I can remember the days of Dean McHenry. Dean McHenry did not allow any trees to be cut down before his personal approval. In those days, and the original spirit of UCSC was to learn in a very special environment. It was not to transport UC Riverside or UC Berkeley to a Santa Cruz location. It was to make a complete learning-environmental experience in unique Santa Cruz and in a unique environment. And that was epitomized by the careful guardianship of Dean McHenry. It is my feeling that your plans are intending to make something of UCSC that was never intended to be. In your attempts to accommodate development, you are absolutely destroying the intent of learning in a special and protected environment. It is extremely disappointing.

Here are some high points, as noted by Alumni Matthew Waxman and completely supported through my analysis of the EIR:

Response I54-1

The comment provides introductory language and expresses the opinion that development of the LRDP would negatively affect the campus. The comment expresses an opinion of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. Please refer to Master Response 9 regarding plan implementation. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I54-2

**Academic Planning: physical plan not motivated by education**

* While the prior 2005 LRDP had a special faculty-driven process integrated with its physical plan that proposed three enrollment scenarios based on faculty and student academic needs, the 2021 LRDP had no such academic process despite a misleading reference to former EVC Tromp's 2018 academic plan.
* The 2021 LRDP was not motivated by academic planning, had a single enrollment target, and does not evaluate how the campus can implement growth incrementally.

Response I54-2

The comment expresses concern that the 2021 LRDP is not motivated by education. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I54-3

**Campus Academic Core: student experience will be of big buildings on axial roads**

* Because UCSC only built 30% of facilities for current students, they will need to increase academic and student support space on campus 148% beyond the current level to meet the needs of 28,000 students.
(2021 LRDP p 101)
* While the prior 2005 LRDP emphasized different disciplinary zones of the academic core, nuanced network of pedestrian paths responding to student experience and topography, and the connection of academics to the colleges; the 2021 LRDP abandons each of these and instead consolidates new academic zoning along two super-block orthogonal pedestrian axes through the core (2021 LRDP p168-173).
* McLaughlin Drive is to be lined with buildings, creating what they call a new "main street" to move large volumes of students along a single artery. This kind of conventional, centralizing axis is modeled after what you find at UCLA's Bruin Walk or UT Austin's Speedway, but has zero relationship to the unique UCSC landscape context.

Response I54-3

The comment expresses concerns regarding the level of development under the 2021 LRDP and the potential for changes in the overall UC Santa Cruz student experience. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I54-4

Environment: plan undervalues how ecology complements the student experience

* The 2021 LRDP land-use concept does not show the environment weaving through the Academic Core, even though the prior 2005 LRDP emphasized this experience. While subtle, this is important as embedded assumptions shape future administrative values.
* While the prior 2005 LRDP designated the environment that weaves through the Academic Core as "Protected Landscape," the 2021 LRDP actually gets rid of this land-use category entirely, and replaces it with a new vague­sounding zone called "Natural Space." If intent is to protect landscape, why did they remove the word "Protected"?
* The 2021 LRDP gives UCSC the ability to build roads through "Campus Natural Reserves" and "Natural Space" (2021 LRDP p 122-123).
* The 2021 LRDP proposes moving endangered species habitat at the base of the campus (2021 LRDP p 121) for building employee housing but does not show how meaningful alternatives could have also worked.
* The 2021 LRDP does not commit to limiting auto traffic in the campus core and instead only says roads "may be" restricted (2021 LRDP p 131 ).

Response I54-4

The comment expresses concern regarding the placement and designation of land uses within the LRDP area under the 2021 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I55 Rachel Aichele

March 8, 2021

Comment I55-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I55-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I56 John Aird and Ted Benhari

March 8, 2021

Comment I56-1

A quick word about our background: Each of us individually played leadership roles with the Coalition for Limiting University Expansion (CLUE), actively participated in and became parties to what became the 2008 Settlement Agreement, and representing CLUE have joined with representatives of the University, City and County to monitor its implementation. As a result, we have had considerable experience in working with the University and observing its impacts on the community as its grown to its current enrollment level of approximately 18,500 students.

Separately, Gary A. Patton, Attorney at Law has submitted comments on UCSC’s 2021 LRDP and Draft EIR on behalf of CLUE. These comments are supplemental to those and are being submitted by us individually to emphasize several key points.

Response I56-1

The comment includes introductory language and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I56-2

But first a note relative to UCSC’s last round of growth under its current LRDP: While the university has met most of its student growth enrollment plan and has abided by the provisions of the 2008 Settlement Agreement, it has fallen woefully short by some 70% in actually developing the on-campus infrastructure identified as being needed to support that growth. This includes not only needed classroom and lab facilities and the like, but most importantly the on-campus housing requirement which has only been met through “temporary” lobby conversions and adding third beds to what had been two bedroom units. While technically this has resulted in meeting the housing requirement of the Settlement Agreement, the actual living experience has been subpar and diminished the quality of student life and experience to such an extent that as soon as possible these student have migrated off-campus thereby creating a disaster in the community’s local rental market both in terms of rental availability (almost none) and rates (among the highest in the nation!), both of which have eroded the community’s capacity to adequately house its own local work force, an enormous negative community impact with no university mitigation.

Based on this history, the following three items must be addressed and/or addressed and analyzed more adequately in the 2021 LRDP and Draft EIR:

Response I56-2

The comment includes remarks related to growth under the 2005 LRDP and does not address the adequacy of the EIR analysis. Refer to Master Response 9 regarding plan implementation. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I56-3

1. Given that the development and implementation of identified and needed infrastructure has severely lagged behind enrollment growth, it is necessary for the DEIR to be meaningful to analyze the specific environmental impacts at different points of its projected enrollment growth with infrastructure shortfalls of 30%, 50% or 70%.

Those are the impacts that need to be specifically described because unfortunately they are the ones that are real, not the mystical presentation of all identified facilities being in 100% developed and in place. As but one example, the LRDP specifically identifies the objective of housing 100% of the added new student enrollment and up to 25% of new faculty and staff on campus, but entirely lacks a detailed description of how this is to be accomplished. The current DEIR does not address this inadequacy or outline meaningful mitigations relative to this and is therefore inadequate.

Response I56-3

The comment states that the Draft EIR does not address how development will occur over time as a result of 2021 LRDP implementation and how on-campus housing objectives will be achieve. The 2021 LRDP plans for a total campus population increase over 2018-2019 baseline conditions of 12,830 people (students and non-students), and also plans additional on-campus housing over baseline for 9,856 people, as shown on Tables 2-1 (total campus population) and 2-5 (on-campus residents) of the 2021 LRDP Draft EIR. Phasing is not considered in the EIR because phasing cannot reasonably be known, due to multiple factors that inform when individual educational, support, and residential structures would be proposed. Any attempt at evaluating a phasing plan would be purely speculative, so analyzing one would not be meaningful. Nevertheless, as individual projects under the 2021 LRDP are proposed, they will be evaluated to determine whether they are within the scope of this 2021 LRDP Final EIR, including whether any new significant impacts would result associated with the timing of the project and other factors. Refer to Master Response 9 regarding phasing and implementation of the 2021 LRDP.

Comment I56-4

2. Beyond the above, these documents should definitely include and address the Guiding Principles formally approved by the UCSC Advisory Group on April 20, 2019 as a way of addressing the community impacts and problems with the shortfall dynamics cited above, most particularly the adoption of the commitment referenced in Point #3 that “the local campus will not support additional enrollment growth when the needed infrastructure is not provided” and in place. Its omission is a serious one and must be addressed and corrected.

Response I56-4

The comment states that the 2021 LRDP and Draft EIR must include and address the Guiding Principles approved by the UC Santa Cruz Advisory Group in 2019. UC Santa Cruz appreciates the advisory recommendations drafted by the Community Advisory Group during the planning process for the 2021 LRDP. The seven advisory recommendations are included on page 22 of the 2021 LRDP. Consistent with the advisory recommendations, the 2021 LRDP goals and objectives listed on page 2-8 of the Draft EIR support increasing on-campus housing for both students and staff, an efficient roadway network, transportation demand management, and expansion of on-campus infrastructure. In addition, development of the 2021 LRDP and Draft EIR was based on extensive public input, which formed both the Physical Planning Principles in the 2021 LRDP and the project objectives in the Draft EIRs. Refer to Master Response 2, specifically the discussions under "2021 LRDP Planned Development,” for further information on plan development and public input received by UC Santa Cruz. Furthermore, the Draft EIR evaluates the potential infrastructure needs, as well as the potential impacts associated with infrastructure, as part of its analysis. A policy adopted by an advisory group is not considered an applicable regulation that requires inclusion for the purposes of evaluating the physical environmental impacts of development under the 2021 LRDP. No further response is possible.

Comment I56-5

3. Given the University’s poor past history in the provision of identified planned infrastructure and the almost certain constraints on university funding for such infrastructure going forward, the current-presented LRDP and DEIR must do a much better and more complete job in its exploration and analysis of alternatives. Specifically as but one example, Alternative 3 was identified as an environmentally superior alternative and yet this conclusion was contradicted just a page later when Alternative 2 was identified as “result(ing) in greater impact reductions and is thus considered superior to Alternative 3”. This contradiction not only needs to be clarified on its own, but is indicative of why this entire section of comparing alternatives needs more work, especially the “No Growth” alternative one. What has been presented in these documents in this section is totally inadequate to CEQA standards and must be redone.

We look forward to these issues and those identified in the above referenced Patton CLUE comments submission being addressed in a revised DEIR.

Response I56-5

The comment states that a contradiction exists in the description of environmentally superior alternatives. Although no specific reference to where the contradiction may exist, it is assumed that the commenter is referring to statements made on page 6-34 of Chapter 6, “Alternatives” of the Draft EIR, where the specific quoted statement is made. The prior Draft EIR page referenced by the commenter includes a table depicting relative impacts of each alternative compared to the project. While more total impacts are reduced in Alternative 3 than Alternative 2 compared to the project, the magnitude of some impacts in Alternative 3 are greater than Alternative 2. Ultimately, the authors of the Draft EIR made a reasonable judgment call based on the totality of factors. For instance, Alternative 3 would result in potentially greater impacts to historic resources than Alternative 2, and this is an important issue to the University. Both Alternatives 2 and 3 would result in less impacts than the project, as stated on page 6-34. As some judgment is involved, different reviewers, including the UC Regents, may arrive at different conclusions than those stated in the Draft EIR with respect to this issue, and the impacts of each alternative are fully disclosed. It is not unusual for such a circumstance to exist in EIRs where different alternatives may present different impacts than other alternatives and the proposed project. A reasoned, good faith effort is made in the EIR to determine the environmentally superior alternative, and the rationale for choosing Alternative 2 is explained. This is consistent with Section 15151 of the CEQA Guidelines, in particular. CEQA does not require “perfection[,] but adequacy, completeness, and a good faith effort at full disclosure.” The analysis of the Draft EIR is considered appropriate, adequate, and in accordance with CEQA requirements.

Letter I57 Bijan Ashtiani-Eisemann

March 8, 2021

Comment I57-1

Comment:

The upcoming LRDP proposes a nearly 50% increase in student enrollment with a slew of environmental impacts. It does not include a meaningful commitment to tie growth to critical infrastructure, like housing, basic needs or academic resources. Regarding affordability, Santa Cruz is currently the least affordable metro area for renters in the nation. Expansion will exacerbate the current housing crisis. Additionally, increasing enrollment without additional student support infrastructure will degrade the educational and social quality at UCSC.

Response I57-1

The comment expresses the opinion that the 2021 LRDP would exacerbate housing issues and negatively affect the educational and social quality at UC Santa Cruz. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Refer also to Master Response 9 regarding plan implementation and phasing of development. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I57-2

The university needs to re-center the student experience above all else. It is unacceptable that development plans that impact students, did not include students (as in the past) in the planning process for the LRDP and the EIR. The short comment period did not allow adequate time for students to become aware of and fully understand the impacts of this very long and complicated proposal. The university did not reach out to students or seek out their input. I believe the comment period should be extended and the rushed planning process be revisited (to include students) to recalibrate the goal of the LRDP to center the student experience at the core of its purpose. The EIR needs to more broadly include social and academic impacts that affect the student body that directly correlate to the sustainable health of the UCSC.

Response I57-2

The comment expresses the opinion that students were not involved in the planning process of the 2021 LRDP. To clarify, both undergraduate and graduate students were members of the 2021 LRDP Planning Committee that guided decision-making. The 2021 LRDP Planning Committee met approximately 19 times between April 2017 and November 2019. Student feedback included the preference to keep housing as close as possible to the academic core to reduce the distance and changes in elevation to student resources. This feedback led in part to the strategy of a compact development footprint of the 2021 LRDP land use map. The LRDP Executive Committee also included students, with representation from the president of the Student Union Assembly (SUA) and the president of the Graduate Student Association (GSA). Their responsibilities included bringing information back to their respective student groups for feedback throughout the process. The Executive Committee met approximately 14 times throughout the planning process. Refer also to Master Response 2 regarding public engagement opportunities and participation. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I57-3

The LRDP's proposed growth is unnecessary and does not align with student interests. Current basic needs student services and cost of living are not adequately accommodated for by the university and need to be addressed first. The LRDP also needs to greatly consider broader sustainability issues and social issues as a factor in campus growth.

Response I57-3

The comment expresses the opinion that the 2021 LRDP does not align with student interests. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project and affordable housing opportunities, please refer to Master Response 2, specifically the discussions under "Public Engagement Opportunities and Participation” and “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I57-4

The UC needs to move away from a goal of carbon neutrality, and a reliance on carbon offsets, and instead go completely fossil free. The UC should invest the necessary financial resources into electrifying all ten UC campuses instead of investing resources to reduce emissions elsewhere (in the from of carbon offsets) that would continue to allow the UCSC to emit GHGs.

Response I57-4

The comment expresses the opinion that the UC system move away from a goal of carbon neutrality. The analysis of carbon generation from the 2021 LRDP is addressed in Section 3.8 of the Draft EIR. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I58 John Balawejder

March 8, 2021

Comment I58-1

I strongly urge the UCSC system to add the Campus Natural Reserve to the UC Campus Natural Reserve System allowing for permanent protection. I've followed the various iterations of LRDP 2010 2014 and now 2040 as a concerned local citizen in the Save Upper Campus group and as a member of MBoSC - Mountain Bikers of Santa Cruz- who are now in the process of recreating a viable mountain trail through a previous irregular and environmentally damaging trail through upper Moore Creek.

Response I58-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I59 Sandra Baron

March 8, 2021

Comment I59-1

Avoiding Sensitive Species, historical resources, and maintaining campus aesthetics are some reasons being used to justify building in previously undeveloped areas north of campus and west of Empire Grade.

While it is nice for students and staff to have an aesthetically pleasing college experience, and habitat fragments within the developed central campus can be important for some species, new development into forest and chaparral areas is hard to defend, especially after the CZU fire and the resulting loss of trees & wildlife habitats.

People of the future won’t know that UCSC is a little less beautiful and more developed, but local wildlife species will know today that their habitat is getting smaller from cumulative impacts from clearing and development.

Human impacts on resources extend much further than the development footprint. Employee housing in previously undeveloped areas west of Empire grade will be a significant impact on that area. Water use, household pets, invasive plants, noise and lights will be an ongoing impact to wildlife habitat and to Wilder Creek.

These are some of the reasons I support less growth, less impact on water resources and wildlife habitats, and clustered development (also known as conservation development).

Response I59-1

The comment expresses preference for less growth and clustered development within the LRDP area. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I59-2

Project objectives that set a specific rate of growth without concern for local conditions should not be used to determine the suitability of each Alternative.
Alternative 3 may be the best one developed under this EIR.

Response I59-2

The comment expresses preference for Alternative 3 of the alternatives evaluated in the Draft EIR and states that project objectives should not include specific growth rates without concern for local conditions. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I60 Sarah Bennett

March 8, 2021

Comment I60-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I60-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I61 Fay Bohn

March 8, 2021

Comment I61-1

Please hold enrollment numbers as low as possible, capping it at the current 20,000 FTE. Although the plan states that housing will be built on campus for the increase in student FTE and for 25% of the additional staff, the community of Santa Cruz cannot absorb the impact the UCSC population currently has.

Principle 7 states: "Fully mitigating adverse off-campus impacts of University growth authorized by the LRDP, and recognizing the profound effects of this growth on the almost fully built out Santa Cruz community, is a critical outcome of the LRDP process."

New housing in Santa Cruz is virtually non-existant. There's only so much land, and housing prices are already unaffordable for the bulk of the population. (Santa Cruz County is one of five least affordable counties in the state: the California Association of Realtors Traditional Housing Affordability Index shows that only 19% of people in the county can afford the median priced home.) Santa Cruz has "escalating housing prices, increased housing demand and lack of availability, and homelessness." Adding students and staff spills over into the community housing market.

Based on the plans outlined in the LRDP, if you were to hold student and staff numbers at the current levels, you could still build the additional housing, but instead of housing future growth, it would be built to accommodate 100% of your current students and staff on campus. "High density housing for faculty and staff, as well as individual residences, should ultimately occupy a portion of the University's land." By 1990, UCSC was to have 2,400,000 sq feet of staff housing. Was that goal met? (No. Table 3.2 shows that only 317,622 ASF exists for Employee Housing.) Currently, UCSC provides 239 homes for employees. The LRDP would add 558 units, reducing demand for in town housing, and reducing vehicle trips to campus. The proposed additional ASF of 3,083,824 should be adequate to provide housing for the current population numbers of students and staff.

With increased demand for graduate programs and research opportunities, how could this happen? I would propose that UCSC eliminate freshman and sophomore student enrollment, and allocate those numbers to graduate and professional student slots. As a first class research institution, UC is the "primary state-supported academic agency for research at various academic levels." Students could attend community colleges and Cal state colleges their first two years, then transfer to UCSC for their junior year, when they would begin to benefit from specialized instruction in their areas of interest.

Response I61-1

The comment expresses opinions related to student enrollment and housing. The comment includes opinions based on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, refer to Master Response 2, specifically the discussion under “Housing Affordability and Other Socioeconomic Considerations,” for further information related to affordability of housing on campus. Further, Section 3.10, “Population and Housing” of the Draft EIR does evaluate the potential impacts to the City and County of Santa Cruz with implementation of the 2021 LRDP, including increased enrollment. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I61-2

"New student housing should be apartment type units for older students (expansion of graduate students). Continuing and upper division students, including graduate students, will be able to find alternate types of housing on campus such as apartments and suites, which allow for more autonomy and privacy, but which also will be configured to provide shared study and recreation space, lounges, kitchens and other amenities for socializing. Since a significant portion of upper division students may be transferring from two-year institutions, and may be more experienced, these living arrangements will be more suitable and attractive for them."

Response I61-2

The comment cites text from the 2021 LRDP and expresses a preference for apartment-style units for older students. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I61-3

Water is another major issue. Ninety-five percent of Santa Cruz's water supply comes from local surface waters, primarily the San Lorenzo River. "Overall campus water demand is projected to increase by almost 60% over FY 2017-18 water use to approximately 292 MGY to accommodate planned growth under the LRDP." Since our local water supply is not increasing, but is contingent on variable rainfall, longer hotter summers, and wildfire firefighting use, there is not an increased quantity to supply this projected 60% increase in UCSC's use. Systems to use non-potable water for irrigation and central plant cooling systems and continued conservation strategies will be crucial, but maintaining current student and staff numbers rather than increasing them would eliminate this increased water use. In addition, wastewater year­round flow of 357,698 gallons per day (=130 MGY) is discharged to City of Santa Cruz's collection system, impacting the local capacity. What mitigation is being offered to the City for this impact?

Response I61-3

The comment expresses concerns related to water supply. Please refer to Master Response 7 for further discussion of water supply, including the EIR’s evaluation of potential water supply impacts associated with the 2021 LRDP. With respect to wastewater service and as noted on page 3.17-16 of the Draft EIR, wastewater under existing and future conditions would be conveyed via existing piping to the City’s wastewater treatment plant. Similar to residents within the City, UC Santa Cruz pays appropriate fees for the handling and treatment of wastewater supplies generated within the LRDP area. The collected fees, which are based on the level of wastewater flows received, are then used by the City to address facility operations, maintenance, and expansion needs. As such and taking into consideration the level of available capacity at the City’s wastewater treatment plant (refer to Impact 3.17-3 on pages 3.17-36 and 3.17-37), inclusion of mitigation measures is not required for wastewater impacts. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I61-4

Transportation is a third issue. I support an entirely car-free central core, for environmental as well as safety reasons. The LRDP seeks to avoid pedestrian and vehicular conflicts where possible. The proposed Meyer Drive extension should be restricted to pedestrian, bicycle and transit shuttle use, and available only for emergency vehicles. Steinhart Way should be an exclusively pedestrian/bicycle thoroughfare. Cars can enter campus from the main entrance, Heller Drive, and the new north entrance, but should stop at outer parking lots, where passengers disembark for campus shuttles, e-bike pick­ups, or walking. This would eliminate the dangerous situations on McLaughlin, crossing Heller at Porter, and crossing to Stevenson from the Bookstore. The "last mile" is walked, biked, or on campus shuttle. Mobility hubs (Uber & Lyft) should be located at campus entrances, not mid-campus. Extensive arrays of EV charging stations should be placed in all campus parking lots, not just the science hill parking garage.

Response I61-4

The comment expresses preference for certain access restrictions to encourage the use of alternative transportation and the potential location of charging stations. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, UC Santa Cruz acknowledges the support the commenter provides for the LRDP Integrated Transportation Strategy. All of the commenter’s detailed suggestions are consistent with the intent of the LRDP, have been considered during the planning phase and will be evaluated for implementation at the project level. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I61-5

'The intention of the 2021 LRDP is to limit intrusion to the greatest extent feasible, into previously undeveloped areas of the campus so as to maintain the natural beauty of the site as well as its environmental integrity, supporting a diversity of wildlife and vegetation and the university's associated research endeavors. the LRDP also establishes metrics to guide the renewal, expansion and operation of campus infrastructure in the areas of energy and carbon emissions, water and transportation." We can only hope.

Response I61-5

The comment includes text from the 2021 LRDP. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I62 Mark Boolootian

March 8, 2021

Comment I62-1

My name is Mark Boolootian and I'm a retired, as of summer 2019, UCSC network engineer, having spent 25 years supporting campus IT needs. I continue to assist my former colleagues pro bona as needed.

Without belaboring the details, while I both recognize the need for and support the plans to build Student Housing West on the west side of campus, I am adamantly opposed to the planned construction in the east meadow. I will continue to support the East Meadow Action Committee financially in their efforts to prevent the loss of a part of campus that should never be built upon. I urge the campus to act as responsible stewards of this land, and take steps to preserve both the beauty and habitat that form the open spaces of the lower campus meadows.

I am both a resident of the city of Santa Cruz and a frequent visitor to campus.

Response I62-1

The comment expresses the opinion that no development should occur within the East Meadow. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Additionally, refer to Master Response 8, Student Housing West. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I63 Amanda Cameron

March 8, 2021

Comment I63-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I63-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I64 Ryan Carle

March 8, 2021

Comment I64-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I am a lecturer (since 2016) with the UCSC Environmental Studies department, where I teach field- and classroom-based natural history classes. I am also an alumnus of UCSC. My first concern about the draft LRDP and EIR is that permanent protection of the UCSC Campus Natural Reserve be included. Despite there being at least 10 letters in response to the NOP that mentioned the need to address permanent protection for the Campus Natural Reserve, this issue was not addressed in the EIR. The current EIR state that “All the substantive environmental issues raised in the NOP comment letters and at the scoping meetings have been addressed or otherwise considered during preparation of this Draft EIR,” but this is clearly not the case.

I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. I believe the open spaces on campus are one of the primary attractants for new students to come to UCSC—they certainly were for me as a student. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research.

I can speak most directly to the value of the Campus Natural Reserve from a teaching perspective. In all of my natural history classes, we regularly visit the Reserve, which serves as a valuable teaching resource—having the Reserve right on campus means that in a short class period we can take a 10-minute walk from Science Hill to visit to a variety of ecosystems and vegetation communities, and have enough time there to engage in meaningful, experiential curriculum in the outdoors. My Natural History of the UCSC Campus class relies entirely on the natural spaces of UCSC, and especially the Reserve, as the basis to introduce students to natural history, which is a gateway for many students toward more deeply pursuing academic and career paths in biology, ecology, and policy. For many of my students, visiting the CNR on one of my classes is their first exposure to field science, outdoor recreation, and/or personally connecting with the natural world. In my other classes, Natural History Field Quarter and the Natural History of Birds, we likewise regularly venture out to the Campus Natural Reserve for lessons. The Reserve offers a rich array of subjects to teach about, and I have taught lessons on geology, insects, lichens, botany, birds, herpetology, fire ecology, and indigenous and contemporary land management, and more, on the CNR. I cannot over-emphasize the uniqueness and value of having the Reserve right on campus—we do not need to rent vehicles, plan extensively, and spend travel time to arrive in an ecological-intact outdoor classroom; we can simply walk 5-10 minutes and arrive. In the era of Covid-19 restrictions, the value of such an easily accessible outdoors classroom now is even more obvious. However, without permanent protection of the CNR, these teaching resources could be lost, along with a one-of-a-kind learning opportunity for UCSC’s students. Once again I urge you to include the theme of protecting the CNR permanently as part of the proposed EIR; it is clearly relevant to many EIR topics including biological resources, cultural and tribal cultural resources, greenhouse gas emissions, noise, recreation, and wildlife. The lands chosen for protection in the reserve should include the values of teaching and research, and not just be areas where development cannot occur due to other reasons.

Response I64-1

The comment expresses the opinion that the Campus Natural Reserve should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I64-2

My second request is that, instead of only planning for 28,000 students, that the EIR should also assess resources needed for specific increments of growth below the 28,000 number (i.e., 22,000, 24,000 students). The 2005 LRDP planned for 19,500 students, which we have nearly reached; however, many of the steps outlined in the 2005 LRDP have not happened, such as construction of new housing and classrooms, and mitigation for environmental impacts. As a result, dorms and classrooms are over-crowded, class periods have been shortened, and traffic and parking issues are worsening. I believe that student quality of life and education has gone down as a result. Thus, the current EIR process should consider evaluation of resources for incremental numbers of students, and if resources are not met, then growth should be delayed until resources are available. Increasing student enrollment to 28,000 without the resources to do so responsibly will worsen already existing problems with traffic, class sizes, and dorm space.

Response I64-2

The comment requests that the EIR evaluate interim phases or increments of growth below an enrollment of 28,000 FTE. Refer to Master Response 9 regarding phasing.

Letter I65 Jennifer Chebahtah

March 8, 2021

Comment I65-1

Thank you for accepting public comments. I was a UCSC transfer student from 2018-2020 in the Ecology and Evolutionary Biology Department. The protection and growth of the Campus Natural Reserve is necessary to protect valuable wildlife and for the students that participate in campus activities and internships.

I spent nearly 2 years interning and working on the CNR FERP and that experience introduced me to like-minded peers, provided a refuge into nature, and gave me invaluable field knowledge which has helped me get my first job as a Biology Field Assistant. With the expansion of the CNR, students will have more resources for projects that will give them experiential knowledge required in a competitive job market, inevitably grow our scientific knowledge, and help fight climate change. Save and grow the Campus Natural Reserve!

Response I65-1

The comment expresses opinions for protection and growth of the Campus Natural Reserve. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I66 Christian Cormier

March 8, 2021

Comment I66-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

As a former student in the Environmental Studies department, I can personally attest to the quality of education afforded to me as a result of the Campus Natural Reserve system. Without the access to the undeveloped natural land that encompasses the Reserve, I would not have been able to participate in the research internships and projects that gave me the experience to become a biological field technician following graduation. The Campus Natural Reserve deserves full and permanent protection not only for the mental health of the students living adjacent to it, but for the quality of education that it gives for students in the Biology, Ecology and Evolution, and Environmental Studies departments.

Response I66-1

The comment expresses the opinion that the Campus Natural Reserve should be permanently protected and is noted. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I67 Eduardo Izquierdo

March 8, 2021

Comment I67-1

As A resident of Santa Cruz since 1975 I am very concerned about the university's to grow the student body. I live on the westside and know first hand the negative impact of the overgrown university has on my neighborhood as well as the general ecosystem of the westside environs. Please consider slowing down your plan to grow the university. thanks for your considerations.

Response I67-1

The comment expresses concerns related to growth in student population. This comment expresses concerns related to the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I68 Kiran Favre

March 8, 2021

Comment I68-1

I wanted to provide my feedback since I am a student here and I don't think our voices are being considered in these decisions. I am a third year Environmental Science major and I have lived on and off campus.

1) I lived in a quad in Stevenson College my freshman year (the only year I lived on campus). I felt as if I had space in my room, but I noticed that the 'triples' are really small. Feels like a double. How will UCSC fix this problem before adding more students? Our dorms are already overcrowded and outdated. Can we not somehow make these buildings more sustainable instead of just building new ones?

2) I already felt as if my lower division classes (taken in classrooms like Classroom Unit 2) were really overcrowded. People would have to sit on the stairs on the side of the class to even attend a class they are paying for.

3) While I am not opposed to the expansion of UCSC, I do think that this is ignoring the current issues students are dealing with. As a student, I am paying for what, overcrowded buses and overcrowded dining halls and classrooms? It feels as if UCSC is becoming a more of a business than a public university.

Response I68-1

The comment expresses concerns related to overcrowding. The comment does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, and information regarding public outreach, please refer to Master Response 2. Refer also to Master Response 9 regarding plan implementation and phasing. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I69 David Fierstein

March 8, 2021

Comment I69-1

Increasing the campus student population to 28,000 is part of a larger pattern of unsustainable growth. In addition, the future of education likely includes more virtual and online learning, which would mean that more people can get an education while using fewer resources, and not having to cram more people into an area that can't accommodate them without major impacts on housing availability, traffic, water usage, etc. Santa Cruz already has a large homeless population with no or limited affordable housing available to them. Many people I know have already had to leave the area due to lack of a place to live. This week I just heard from another friend who needs to look for a place to live, and has little hope of finding anything affordable. Bringing in more students, even while building more student housing (which will likely be quite expensive for those students to live in), will only make this situation worse.

The recent CZU fires gave us a glimpse of the future we are facing - the danger of living out of balance with nature -and it's likely to only get worse. We have to bring ourselves back into balance, and the most obvious step to do that is to keep our population size reasonable, not ever-expanding. We can't control that everywhere, but at least we can attempt to control it locally. In the shorter term, the CZU complex fires have reduced the housing in the area available, and once the covid pandemic is more under control and more students move back to the area, the impact of the lost housing will become even more clear.

Response I69-1

The comment expresses opinions related to student population increases and affordable housing, and expresses concerns related to wildfire. The comment does not address the adequacy of the EIR analysis, and no further response is necessary. However, refer to Master Response 2’s discussion of ”Housing Affordability and Other Socioeconomic Considerations” for further information related to the analysis of affordable housing within the context of CEQA. For additional discussion related to wildfire, please refer to Master Response 4. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I69-2

I would like to also point out that the increased population proposed would also impact the local natural areas used for recreation. These areas are already heavily impacted by mountain bikers, who have made numerous illegal trails criss­crossing from UCSC down to Highway 9, turning the UCSC Nature Reserve and other natural areas including state parks lands, into something like a downhill ski resort (but with mt. bikers instead of skiers). In other words, the impacts will go far beyond the footprint of the housing these additional students would live in.

Response I69-2

The comment expresses the opinion that impacts beyond housing development would occur in natural areas of the campus and is noted. The Draft EIR includes an evaluation of 2021 LRDP impacts to recreational resources, including trails, within Section 3.15, “Recreation.” Refer to Impacts 3.15-1 and 3.15-2, beginning on page 3.15-10 of the Draft EIR, for the Draft EIR’s analysis of potential on- and off-campus impacts to recreational facilities that may occur with implementation of the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. Refer to response S3-12 regarding trails.

Comment I69-3

The UCSC campus lands are an unmatched, world-class nature sanctuary, outdoor learning lab, and research resource uniquely in proximity to a major research and education center. They should be preserved for such as much as possible, and not allocated to student housing and other building projects. The nature reserve should be expanded to include the other natural lands at UCSC, and should be added to the UC Nature Reserve system.

Response I69-3

The comment expresses the opinions that the nature reserve should include the other natural lands at UCSC and Campus Natural Reserves should be permanently protected. and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I69-4

In regards to water usage, two locally endangered/ threatened species, Coho salmon and steelhead, whose populations have been decimated over the previous decades, are already having too little water left for their continued viable existence. In particular with the future vagaries of the effects of climate change on the water supply, we need to first ensure that these fish species can survive and thrive before taking away more of their water. Despite the conservation efforts of UCSC, the water usage of 28,000 students (I believe an increase in the neighborhood of 40% from current levels), is bound to impact the water available for these fish species locally. We need to reduce the amount of water that needs to be drawn from Santa Cruz streams, not increase the demand, or even keep it the same.

Response I69-4

The comment states that the increased demand for potable water supplies may affect available surface water supplies and biological species that may use the surface waters. UC Santa Cruz, as a customer to the City of Santa Cruz (per the 1965 Agreement between the City and UC Santa Cruz), does not procure its own water supplies. The City, as a water retailer, has established water rights that are partially used to fulfill the demands of the LRDP area, up to 2,000,000 gallons per day. In January 2021, the City of Santa Cruz initiated a water rights change petition to the State Water Resources Control Board to improve flexibility to meet the water needs of the community while providing protective flow conditions for Coho and Steelhead, as agreed upon between the state and federal agencies. The City released a Draft EIR in June 2021 to evaluate the water rights change petition. The City, as part of its current General Plan EIR (as prepared in 2011), evaluated the potential impacts associated with the additional water demand (up to 4,537 million gallons per year) within its existing water rights. Further, the City uses the Confluence Water Resource Planning Model as part of its assessment of current and future water supply system operation and is currently working with USFWS, CDFW, and National Marine Fisheries Service regarding necessary flows to ensure that significant impacts to coho salmon and steelhead do not occur. As shown in the Draft EIR (refer to Table 3.17-10, beginning on page 3.17-23 of the Draft EIR), future year water demand with the 2021 LRDP would not exceed the previously evaluated water demands and their potential impacts, as evaluated by the agency responsible for procuring water supplies for UC Santa Cruz. The Draft EIR does include an assessment (as an alternative water supply) of the potential use of available groundwater in Section 3.17, “Utilities and Service Systems” and provides a preliminary evaluation of the potential impacts to biological resources on page 3.17-31 of the Draft EIR in accordance with CEQA requirements. Based on the evaluation provided therein, UC Santa Cruz would only utilize water supplies within the sustainable yield of the groundwater aquifer, pending future evaluation and monitoring. Refer to Master Response 10 related to Hydrology and Water Quality for further clarification.

Letter I70 Jacob Ferrall

March 8, 2021

Comment I70-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I70-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I71 Litzia Galvan

March 8, 2021

Comment I71-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I71-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I72 Hunter Gieseman

March 8, 2021

Comment I72-1

Hello again! Hope everyone and their families are keeping safe and well. This is in addition to the public comment that I made verbally. Here is an attachment of my proposed light pollution mitigation on campus, I have gotten a lot of positive responses both from the community and also the City and County of Santa Cruz about this proposal - let me know if there is any trouble downloading or viewing it.

**EIR Light Pollution Mitigation Proposal - Hunte ...**

If there are any opportunities to further work with the campus or committee on how to implement these, please let me know as soon as possible.

Response I72-1

The comment provides suggested edits to the UC Santa Cruz Campus Standards Handbook and does not address the adequacy of the EIR analysis. The suggested edits are considered to be consistent with Mitigation Measure 3.1-4. Further, Mitigation Measure 3.1-4 requires consistency with the Illuminating Engineering Society of North America (IESNA) Lighting Handbook, which includes specific considerations for the color temperature (referred to as the Kelvin scale in the comment) depending on the situation and conditions where lighting is being considered. As a result, the Draft EIR’s analysis and proposed mitigation is considered to be consistent with the comment, and no further response is necessary.

Letter I73 Maria Gitin Torres

March 8, 2021

Comment I73-1

As a long time resident with no direct affiliation with UCSC, I am in support of the long range plan and expansion. UCSC provides vitality, creativity and energetic problem solvers in a beautiful setting. The university is our second largest employer, contributing hundreds of thousands of dollars annually to good paying jobs, affordable housing for staff and faculty and securing retirement for many who would otherwise be unable to continue to contribute to our community. Housing more students on campus will free up market rate housing for local residents and their offspring.

I'm in favor of the plan.

Response I73-1

The comment expresses support of the 2021 LRDP. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I74 Courtney Golts

March 8, 2021

Comment I74-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-classteaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I74-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I75 Gillian Greensite

March 8, 2021

Comment I75-1

Thank you for the opportunity to comment on the 2021 Draft Long Range Development Plan’s (LRDP) Draft Environmental Impact Report (DEIR). DEIR sections quoted are in small font. My comments are in larger font.

On numerous CEQA issues the DEIR lacks sufficient analysis of the impacts involved so that the resulting mitigations are inadequate to bring the impacts down to the less than significant level as claimed. I will focus on one example:

**3.1-35 Aesthetics
Light and Sky Glow Conditions**

Artificial Light At Night (ALAN) is a recognized source of negative impact for flora and fauna yet the DEIR gives it scant attention. The DEIR fails to analyze the impact of new, lighted areas of campus lands that at present have no lights such as the upper campus. Lighting for Athletics facilities is recognized by the International Dark-Sky Association (IDA) as an impactful light pollution source yet it is mentioned only in passing, both in the Aesthetics section and the Biological Resources section. In the latter, the DEIR mentions lighting impacts only briefly as in:

**Bio Resources
Impact 3.5-5:** Interfere with Wildlife Movement Corridors or Impede the Use of Wildlife Nurseries

**Mitigation Measures 3.5-5a:** Utilize Wildlife-Friendly Building and Fencing Designs

Building design shall utilize guidelines regarding building height, materials, external lighting, and landscaping provided in the American Bird Conservancy’s “Bird Friendly Building Design” (American Bird Conservancy 2015). UC Santa Cruz shall require review of the design plans by a qualified biologist, who will determine whether the plans are sufficient to reduce the likelihood of bird strikes or recommend additional measures. 3.5-72

The American Bird Conservancy is not a resource for lighting standards and should not be used as such.

There is no mention in the BIO Resources section of the impact of lighted Athletics Fields on the various sighted nocturnal species of birds and animals that hunt and forage in the areas proposed for such lighting. This significant impact needs detailed inclusion with appropriate mitigations.

Response I75-1

This comment states that impacts on wildlife from artificial light at night is not analyzed sufficiently in the Draft EIR and that the use of American Bird Conservancy standards for impacts of artificial light on birds is not appropriate because the organization is not a resource for lighting standards. Impact 3.5-5 on pages 3.5-70 and 3.5-71 of the Draft EIR discuss potential impacts on wildlife, including nocturnal birds and birds migrating at night, resulting from artificial light at night. The American Bird Conservancy resource referenced in Mitigation Measure 3.5-5a on page 3.5-72 of the Draft EIR, “Bird Friendly Building Design,” provides guidance regarding appropriate lighting to avoid impacts on birds. However, Mitigation Measure 3.5-5a has been amended to emphasize that other appropriate resources could be used, such as the International Dark Sky Association, in addition to the American Bird Conservancy’s “Bird Friendly Building Design.” The analysis in the Draft EIR is programmatic, and as a result, specific detail regarding the types and character of lights used for future project are not known at this time. Future projects under the 2021 LRDP will require project-level review, during which a qualified biologist will review project design plans, including lighting, as described in Mitigation Measure 3.5-5a. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA. The Draft EIR represents a programmatic evaluation of the 2021 LRDP and presents feasible mitigation consistent with CEQA requirements.

Comment I75-2

**Aesthetics
Impact 3.1-4: Create a New Source of Light or Glare**

With regard to lighted recreational facilities, development under the 2021 LRDP may include additional/improved recreational opportunities, including potential sport facilities that could require nighttime lighting. Illumination of these facilities (e.g., athletic fields, tennis courts, etc.) would include light fixtures that would be located along the periphery of the facilities. While these fixtures would be similar in character to existing recreation field light fixtures at existing recreational fields and areas within the main residential campus, new fixtures, if not properly directed and shielded, could result in sky glow and light spillover onto adjacent uses, including housing both on and off campus.

On pages 3 and 4 of this document there are two photos of the current UCSC outdoor night lighting for rugby practice at the East Field. The first is taken four miles south on Highway 1. The second is taken from the Wharf entrance. Both show the current UCSC field lights at night and the impact they have on views, sky glow, light pollution and the not seen but certainly impacted nocturnal birds and animals.

Mitigation for the new sources of light pollution from additional illuminated
athletics fields and newly lighted upper campus needs far more analysis and detail that is contained in the following brief reference. The DEIR mentions the IESNA Lighting Handbook, and that: “Consistent with the Illuminating Engineering Society of North America (IESNA) Lighting Handbook, installation of new lighting sources shall comply with the recommended “light trespass” standards for light spillover specific to the lighting environment in the project area (e.g., dark, low brightness, medium district brightness, and high district brightness) identified in the Illuminating Engineering Society of North America (IESNA) Lighting Handbook.”

However specific lighting environments in the project area as per IESNA Handbook
have not been determined nor included in the DEIR. Thus there is no standard on which to base the impact of the new lighting as compared to current brightness ratings. The significance of the impact of future lighting cannot be evaluated without prior specified standards.

Response I75-2

Regarding environmental lighting zones, the IESNA handbook ranks geographic areas by the amount and intensity of existing light sources, referred to as environmental zones. The environmental zones range from E0 (protected and most sensitive) to E4 (urban and least sensitive). Pursuant to Mitigation Measure 3.1-4, future projects under the 2021 LRDP will require project-level review, during which UC Santa Cruz will incorporate site- and project-specific design considerations to minimize light trespass and glare consistent with standards for the environmental lighting zone identified on the project site. The programmatic analysis of the Draft EIR provides an assessment of the overall 2021 LRDP because specific development proposals will follow, over time, after the adoption of the 2021 LRDP, and it is not ripe for consideration of site- or project-specific details. Therefore, the Draft EIR evaluates the range of impacts that may occur and offers mitigation intended to broadly address these impacts. Therefore, the programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA.

Comment I75-3

**Mitigation Implementation of Mitigation Measure 3-1.4**Significance after would ensure the use of non-reflective surfaces and direction lighting with shielded and cutoff type light fixtures such that light spillover onto adjacent uses and sky glow, which is typically associated with upward directed lighting, **as a result of development under the 2021 LRDP would not substantially increase beyond existing conditions** and impacts would be reduced to a less-than-significant level.

I have bolded the phrase in Mitigation Measure 3-1.4 that demonstrates its inadequacy. “Existing conditions” as you can see from the two photos include significant light pollution. If that is the standard by which environmental impacts of Light and Sky Glow are being measured then the only reasonable conclusion is that significant light pollution and sky glow will not only continue but will be standard.

Response I75-3

The nighttime lighting conditions on the main residential campus referenced in the comment pertains to impacts of existing conditions and therefore does not relate to impacts of the proposed project. CEQA does not require a project to mitigate existing environmental conditions, rather, it is required to evaluate and mitigate the incremental change caused by a project. Pursuant to State CEQA Guidelines section 15126.2(a) in assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Therefore, the Draft EIR complies with CEQA requirements.

Letter I76 Eric Grodberg

March 8, 2021

Comment I76-1

Please find the following attachments

* 2021 DEIR comments on Population and Housing Chapter 3.13
* Chancellor Larive's campus email dated 3/5/21
* Brailsford and Dunlavy Housing Demand Study Summary 12/21/18

My comment letter contains references to the other documents, so I would like them all entered into the official record. I would also appreciate a confirmation of receipt, as my comments on the 2005 LRDP were mysteriously lost even though I submitted them on time.

Response I76-1

The comment includes introductory text and reference to attachments. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-2

**Section 3.13 Analysis is Flawed**

Note: Because relevant UCSC commissioned studies were done earlier and the Covid-19 Pandemic shutdown the UCSC Campus and also skewed the Off Campus housing market (rental prices decreased, but selling prices increased), I used housing statistics from prior to the shutdown.

**1. Additional On Campus Housing will not be fully occupied**

The DEIR claims that the campus will house all of the projected 8,500 additional students contemplated under the 2021 LRDP. However, even if UCSC were to build housing to accommodate the entire growth in student population, there is no mechanism to ensure that those students live on campus.

Response I76-2

The comment states that Section 3.13, “Population and Housing,” is inadequate because the evaluation relied on information gathered prior to the COVID-19 pandemic. Refer to Master Response 1 regarding the Draft EIR’s selection of baseline conditions.

The comment also states that UC Santa Cruz lacks a mechanism to require student to reside on campus. This comment references the UC Santa Cruz Housing Policy on page 3.13-2 of the Draft EIR and does not address the adequacy of the EIR analysis. As stated on page 3.13-2 of the Draft EIR, UC Santa Cruz does not require students to live on campus or within a certain distance of campus. However, the 2021 LRDP would accommodate planned student population growth, which is inherent to a long-term campus plan, much like a city or county general plan, and the 2021 LRDP housing goals are considered achievable. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-3

**2. On Campus Housing Pricing drives students to live Off Campus Housing**

Because campus housing is so much more expensive than off-campus housing, most students currently choose to move off campus after their freshman year. The LRDP presents no plan to reduce the cost of on-campus housing, and increase the percentage of students living on campus.

**3. On Campus Housing currently costs 2 to 3 X the price of Off Campus Housing**

In the 2019-2020 Academic Year, UCSC charged **$9,528/month** for a four bedroom apartment without a meal plan. This is a real example of an On Campus undergraduate apartment with two singles and two double (i.e., shared) rooms. I personally know students who lived in this configuration recently. They now live **off campus** and their housing costs are **less than half**. Furthermore, they now live in much nicer and more spacious housing.

**$9,528 / month** = (2 x $1,728/single + 4 x $1,518/double) and that's a 28 day “UCSC month.”

See attached UCSC apartment price list

**4. Planned On Campus Housing will also cost 2 to 3 X the price of Off Campus Housing**

According to UCSC commissioned Brailsford and Dunlavy's Housing Demand Study p. 2, (see excerpt below) projected pricing for the Student Housing West (SHW) is similar to current on campus housing. All UCSC month rates assume a short (i.e., 28 day month.) Brailsford projects the SHW undergraduate apartment pricing as follows (Units A and B do not have kitchens):

Unit C: 1BR/1BA - $3,540/month (3 students)

Unit D: 2BR/2BA - $5,880/month (4 students)

Unit E/F: 3BR/1BA - $6,240/month (4 students)

Unit G: 4BR/2BA - $6,680/month (4 students)

Unit H/I: 5BR/2BA -$10,220/month (7 students)

Though SHW is not part of the 2021 LRDP, there is no indication in the DEIR or other related documents that show, or even claim, that UCSC will reduce its On Campus housing prices to be competitive with Off Campus housing prices.

**5. Off Campus Housing costs are substantially lower than On Campus prices**

UCSC Community Rentals Office collects real world community rental pricing statistics. The prices used in the DEIR and UCSC consultants (i.e., Brailsford) examine only a few large apartment complexes. These complexes represent a small minority of the City's rental housing and are priced much higher than the typical Off Campus rental.

According to UCSC Community Rentals statistics Off Campus rentals are 2 to 3 times cheaper than On Campus prices. See statistics attached below.

Response I76-3

The comment states that the 2021 LRDP does not include a mechanism to reduce the cost of on-campus housing and provides a comparison of on- and off-campus housing prices. This comment expresses an opinion on the cost of on- and off-campus housing costs, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-4

**6. UCSC has had periods of significant Vacancies**

Most recently in Winter Quarter, 2020, immediately preceding the Covid-19 shutdown, there were reportedly 711 empty beds on campus. See <https://www.cityonahillpress.com/2020/02/07/711-empty-beds-on-campus/>

Response I76-4

The comment states that UC Santa Cruz has experienced periods of “significance vacancies” and cites an article from February 2020. As later stated in that same article, the number of beds observed during the 2020 winter quarter was considered abnormal compared to historic vacancy rates within the LRDP area (approximately 72 in 2018) and was considered unlikely to last. This comment expresses an opinion on the availability of housing within the LRDP area, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-5

**7. UCSC has argued that it cannot house more than 50% of its students**

In the 1988 LRDP, UCSC set a goal of housing 70% of its undergraduate students. However, it never came close to meeting that goal. In the developing 2005 LRDP, UCSC changed course and argued that it would never be able to house much more than 50% of its students because students would choose to move off campus for lifestyle preferences. Now, without any noted change in conditions or housing policies, UCSC once again assumes that it will be able to house close to 70% of its student body.

Response I76-5

The comment expresses concern that UC Santa Cruz will not be able to meet its stated on-campus housing goal. The housing goals identified in the 2021 LRDP are considered achievable based on UC Santa Cruz funding priorities and staff commitments UC Santa Cruz has met the housing thresholds in compliance with the CSA and currently houses more than 50 percent of the enrolled students. As stated on page 2-8 of the Draft EIR, one of the 2021 LRPD’s objectives is to provide housing for 100 percent of the additional FTE students above the 2005 LRDP total of 19,500 FTE students. Further, the 1988 LRDP and 2005 LRDP were previous documents with different on-campus housing goals. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-6

**8. Chancellor Larive's Statement that SHW is affordable is false**

In a campus letter dated 3/5/21, Chancellor Larive stated multiple times that SHW would be an “*affordable housing option*.” From the prices described above, SHW is exorbitantly priced, far above market rates, and will be extremely unaffordable.

Response I76-6

The comment expresses the opinion that on-campus housing is not affordable. This comment expresses an opinion on the cost of housing at UC Santa Cruz, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I76-7

**9. Chancellor Larive acknowledges that UCSC students create housing pressure off campus**

*This project [SHW] will draw upper-division undergraduates now living in the community back to campus, giving them a secure, affordable housing option while also easing pressure on the local housing market.*

Yet given the exorbitant pricing, SHW is unlikely to draw existing students back onto campus or relieve pressure on the local housing market. Just the opposite is true – more students will seek Off Campus housing.

Again, though SWH is not part of the 2021 LRDP, there is no indication in the DEIR or other planning documents that UCSC has any plan or intention to bring its On Campus housing prices in line with Off Campus prices.

Response I76-7

The comment expresses the commenter’s opinion and concern that on-campus housing prices are unlikely to “draw… students… onto campus” due to the difference in pricing between on- and off-campus housing. However, as noted above, on-campus housing has a historically high rate of occupancy. Further and as indicated by the level of occupancy of on-campus housing, it is considered affordable for enrolled students.

Comment I76-8

**10. Impacts and Mitigation Measures – DEIR 3.13.3 is flawed**

The DEIR assumes that UCSC will build 8,500 additional beds and all of them will be filled regardless of pricing, yet there is no evidence to back this up and every reason to think that many of the additional students will seek housing Off Campus. Contrary to the claim in DEIR Section 3.13.3, this will displace substantial numbers of existing people. Additional students looking for more affordable housing **will displace** more existing residents and also drive up Off Campus rental prices.

Response I76-8

The comment states that UC Santa Cruz lacks a mechanism ensure students to reside on campus and that implementation of the 2021 LRDP will displace existing residents. Refer to Response I76-2 regarding the UC Santa Cruz Housing Policy. Regarding displacement of residents, consistent with Appendix G of the State CEQA Guidelines, the Draft EIR evaluated the potential for the 2021 LRDP to displace substantial numbers of people and existing housing, necessitating the construction of replacement housing elsewhere. As stated on page 3.13-9, 2021 LRDP includes a substantial addition of new housing. It would reasonably be expected that UC Santa Cruz, like any other entity that manages housing, would adjust prices to ensure that on-campus housing is occupied. No evidence is provided to indicate otherwise, and as noted in Response I76-4, UC Santa Cruz has a record of high occupancy of on-campus residences, contrary to statements made in this comment. Implementation of the 2021 LRDP would not permanently remove housing nor displace substantial numbers of existing people. Therefore, the Draft EIR concluded that there would be no environmental impact associated with displacement resulting from the construction of replacement housing elsewhere.

Comment I76-9

**Conclusion**

Given the facts of its (1)prior failures, (2)the exorbitant cost of On Campus student housing, (3) past significant vacancies and (4)past arguments that it would be unable to do so, there can be no reasonable expectation that UCSC will be able to house all additional 8,500 students under the 2021 LRDP without drastically reducing the price of On Campus student housing. Since there is no plan for this, many of the additional 8,500 students will seek housing off campus. The **DEIR is fatally flawed** because

* It fails account for the effect on campus **student housing pricing** will have on students' choice to live off campus.
* It falsely assumes that all 8,500 additional students **will live on campus**.
* It fails to analyze and mitigate the **displacement** of significant numbers of existing off campus residents without drastic reductions in on campus student housing pricing.

Response I76-9

The comment contains conclusory remarks and expresses opinions related to student housing. Please refer to Responses I76-2 through I76-8. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I77 Brett Hall

March 8, 2021

Comment I77-1

Thank you for the thorough work preparing the documentation and EIR and presenting it clearly to the public. I am concerned that there is no mention about moving the proposed Campus Natural Reserve into a permanent UC Natural Reserve at the UC wide level, where longer term protection and better access to stewarding resources might be more readily available. If the Campus goals are genuinely to protect the natural resources and steward them properly, moving the Campus Reserve into UC NRS seems obvious. Yet, each time this question is asked, there has been no direct response or explanation for the lack of discussion on the part of the Planning Group. This is very worrisome.

Additionally, more Arboretum lands are projected to be part of the reserve with the caveat that the Arboretum will maintain management of these lands indefinitely. The two units, Arboretum and Reserve, are currently working on an MOU that will be acceptable to both parties. This needs to be stated in the LRDP. Both groups have invested enormously in the planning effort that helped develop these land designations.

Thank you in advance for accurately describing the land use of these jointly managed areas and thank you in advance for openly discussing the effort to move the Campus Natural Reserve into UC NRS with the deliberate goal, to raise the level of protection and stewardship. Future generations will celebrate with gratitude our foresight. This is about the future and the imperative need to conserve and manage biodiversity on Campus.

Response I77-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I78 Virginia Jansen

March 8, 2021

Comment I78-1

**Introduction**

A LRDP is meant to work in tandem with an academic plan. There is none that this LRDP is the physical embodiment of. Thus, it is a defective document, missing its head. Why the campus **needs** to plan for a student population increase on the scale of about 11,000 (8500 + 2700) more is not made clear, just assumed. Other than numbers, there seems to be no real justification nor basis.

From the first physical planning of the campus, the concepts that the landscape is primary, the buildings shall fit the landscape, the campus has an obligation to steward the land have been guiding principles, and the best form of university structure to accomplish this on this particular piece of land is the flexible design of colleges, not only for the physical accommodation to the land but also as a humane model of university education. In the past, these principles have largely been followed and met. In the currently LRDP, these principles are too often overlooked. The parts that don't follow these principles should be struck from the plan. It is deception to claim such principles and then to design the opposite.

Response I78-1

The comment expresses the opinion that the 2021 LRDP does not adhere to the basic planning concepts of the campus. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. For additional reference, one of the 2021 LRDP objectives is to “[r]espect and reinforce the Physical Planning Principles and Guidelines to maintain the unique character of the UC Santa Cruz campus.” These principles and guidelines are included in detail in Section 4.2 of the 2021 LRDP on pages 110 through 117. They are consistent with both the Physical Design Framework guidelines, as well as the pattern of campus planning. To clarify, the campus plans for a net new student population of 9,482, for a total projected population of 28,000 over the next twenty years as stated on pages 2-8 and 2-10 of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-2

**Consultation**Although it appears that the proposals were widely considered, I understand from various communities that this is not so. Members of the committee, who were selected as representing constituencies, were not allowed to discuss committee deliberations with those constituencies. The meetings were full of UCSC staff, dissent was discouraged, alumni officers and current students were not included on the committee, and no final discussion happened, no final vote, and no minority report was possible. Without a final vote, how can the LRDP and its EIR be seen to be valid?

Moreover, the LRDP was not brought before the vitally important DAB (Design Advisory Board), established per Regental order to supervise and advise the campus. In the past, DAB had given input to the LRDP on multiple occasions. What happened here? Doesn't this lack of consultation render the EIR and the LRDP invalid per se?

Response I78-2

The comment expresses the opinion that the 2021 LRDP did not consider certain input from committees and the Design Advisory Board. This comment expresses an opinion on the project, the 2021 LRDP, and planning process and does not address the adequacy of the EIR analysis. No further response is necessary. The LRDP was presented to the Design Advisory Board several times throughout the process, on December 6, 2017, February 26, 2018, and November 6, 2019; their feedback tangibly influenced the final land use plan. In addition, the 2021 LRDP Planning Committee was comprised of undergraduate students (including an Amah Mutsun student representative), graduate students, alumni, community members, faculty and staff. For a comprehensive plan of this magnitude, broad insight and feedback is vital to the success of the plan. The 2021 LRDP Planning Committee’s role, including their role in representing various constituencies across campus, is described in section 1.2 Process and Participants, on page 20 of the 2021 LRDP. A full list of Campus and Community Engagement is included in the Appendix on page 188 of the 2021 LRDP. However, for a description of 2021 LRDP public engagement, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-3

**Housing**

Colleges or big dormitories?
The UCSC campus was academically and physically planned to serve students' learning experiences by giving students a smaller community in which they are treated for the human beings they are rather than a number that is wholesaled through to a degree with a sub-par education. Students have endorsed academic components of colleges as well.

The college plan should be maintained because it provides a better model for education, a positive student learning educational experience which encourages students of different ages to learn from each other. Students of college age are growing up very quickly, and the college experience can guide them whereas dormitories contribute more readily to a less mature experience. While two new pairs of colleges are planned, too much of the housing is said to be in large dormitories that UCSC was founded to get away from. Furthermore, to segregate upper­level students from lower-level students is not the best model at all. This special campus deserves the best not a mediocre plan. Surveys of alumni and prospective students often cite the college system as a major aspect of their attending UCSC or wanting to come to UCSC. It serves to give first-generation students a connection with crucial campus life and brings them into the campus community, which surely should be a goal for the University. It gives our campus a real point of attraction. It should not be dumped without serious discussion among all stakeholders. (For example, see Housing Market Survey, 2014.)

How do colleges or dormitories respond to an academic plan? I did not find anything on this issue? It seems that housing is treated merely as a numbers game, not reflecting student welfare and educational value.

Moreover, large housing dominates the landscape and produces warehousing of students for the sake of numbers. At the minimum, these dormitories, if they do come into being, should have some kind of college affiliation, as the infill apartments do now (wrongly cited in the LRDP, p. 71) as unaffiliated). Thus, it is unsuitable and does not follow campus principles as enunciated in the EIR. There are many other ways of producing the number of accommodations required, but these are not well discussed in the EIR.

Also, the land-use map does not distinguish colleges which provide considerably more than housing, from simple single-use, warehouse-type housing. The latter surely will take the form of mega-structures which is also incompatible with the location and raises traffic and visual problems that will require serious mitigation efforts.

Response I78-3

The comment expresses concern that the 2021 LRDP does not emphasize the college plan upon which UC Santa Cruz was founded and instead emphasizes large housing development. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The infill apartments referenced on page 71 of the 2021 LRDP are indeed affiliated with their respective colleges. This revision has been made. The Colleges and Student Housing land use designation continues the college model as the basis for expansion, while offering flexible options for other student housing for graduate, transfer, and continuing students, who desire more independent living but still benefit from being on campus in close proximity to academic and student support facilities. In addition, the Colleges and Student Housing land use designations are intentionally located immediately adjacent to existing colleges, to cluster with this existing development for maximum benefit for the students. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-4

The Student Housing West complex with its East Meadow off-shoot, added suddenly with very little campus and community input, and subject to a barrage of well-deserved criticism, has not been approved by the Regents at this time (which the EIR does note) and thus needed to be included in this LRDP and its EIR. Its omission is a serious lacuna and on this basis alone the EIR is unsatisfactory and needs to be corrected.

Response I78-4

The comment states that Student Housing West should have been included as part of the 2021 LRDP and EIR. Student Housing West is reflected appropriately in both the 2021 LRDP and the Draft EIR. As the project was proposed and considered as part of the 2005 LRDP, it is reflected as a cumulative project (refer to Chapter 4, “Cumulative Impacts” of the Draft EIR). Whether or not the 2021 LRDP is approved, Student Housing West was reconsidered and reapproved by the UC Regents on March 18, 2021 and is a reasonably foreseeable development within the LRDP area. With respect to the 2021 LRDP, the land use map provided in the 2021 LRDP (e.g., as shown on page 118 of the Draft LRDP) appropriately reflects the land use designations associated with housing development along Hagar and Heller Drives. No further response is necessary. To the extent that this comment is referring to the Student Housing West project, please refer to Master Response 8. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-5

North campus
The original layout of the campus foresaw a complete use of the northern lands. Whereas this is now probably not the best plan, some further development to the north beyond what this LRDP gives, should be more seriously considered. This would relieve pressure on the open lands south and east of the current Core, which the campus principles has sworn to steward but is not doing well in this LRDP. To try to squeeze the number of students onto the campus without using more of the land as it was planned in 1963 seems unresponsive to the campus guidelines and the bitty spaces suggested by the LRDP proves that it's not a good idea.

Response I78-5

The comment expresses a preference for land use development within the north campus subarea of the main residential campus. Initial land use scenarios that extended the developable footprint further north were reviewed early in the planning process. These are included in the on page 25 of the 2021 LRDP. While these might provide more flexibility in the siting of capital projects, UC Santa Cruz received significant feedback from faculty, staff, students and the public, to preserve the campus open spaces and unique habitats. Based on the feedback received and due to the inefficiencies associated with infrastructure and access improvements required to develop in the north campus subarea, the planning team proposed a more compact footprint to limit development within infill areas and adjacent to existing academic and college areas. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-6

**Roads and Traffic Issues**Traffic on the campus is now already very congested at peak times. There are some solutions including banning regular single-vehicle travel with some exceptions, as the LRDP notes. However, more attention should be given to a north loop road which was proposed years ago and closing McLaughlin off to regular traffic. Not enough attention has been given to the traffic and parking issues.

Response I78-6

The comment expresses the opinion that traffic and parking issues need to be further reviewed. Please refer to Master Response 6 for further discussion of the scope of the transportation analysis provided in the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-7

East Meadow housing & childcare proposed development
This proposed development is a good example of traffic impact problems on campus. The intersection of Hagar and Coolidge is already crowded much of the day. Adding a high-use Childcare Center is a terrible idea, especially considering that small children are added to the traffic. Second, visually the development will have strong visual impacts counter to the core principles of the campus. These cannot be validly mitigated. There are many biological and environmental problems as well, which were addressed in that EIR. The development should be placed elsewhere, probably with the rest of Student House West, especially if the campus would work with Fish & Wildlife to mitigate the biological and environmental impacts.

Response I78-7

The comment expresses the opinion that no development should occur within the East Meadow and that visual impacts stemming from the development cannot be fully mitigated. This comment expresses an opinion on the project, the 2021 LRDP. Further, the comment does not provide specific details related to visual impact mitigation for which an informed response can be provided. To the extent that this comment is referring to the Student Housing West project, please refer to Master Response 8. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-8

Meyer Drive extension
In the UC Santa Cruz Physical Design Framework of 2010, cited on p. 3.1-3, the importance of continuity of the meadow landscape was mentioned to preserve its biological, environmental, and visual integrity, but this would be seriously impaired by the extension of Meyer Drive. Once before this route was discussed and dismissed by the wise Chancellor Karl Pister, a professor of civil engineering and dean of the College of Engineering at Berkeley, who knew professionally about roads. In his oral history he said that he recognized such an extension was a poor idea for the campus environment and design. It would be highly destructive of the campus as it has been known.

The extension illustrated produces too much disturbance for the meadowlands around which the campus was laid out. The noise, air, and light pollution cannot be successfully mitigated. Previously, alternative routes for a southern cross-campus road have been discussed, but not this route: an alternative a bit further north is better, as was suggested in the 1993 plan ( often called the "Bender plan" and drawn up by professional architects and planners).

Response I78-8

The comment expresses the opinion that the extension of Meyer Drive would be counter to the continuity of the meadow landscape and suggests an alternate route a bit further north. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, the LRDP is diagrammatic and the exact alignment of the extension of Meyer Drive has yet to be determined. During further site- and project-specific planning/design efforts (including subsequent review under CEQA), a more refined alignment that may better maintain the continuity of the meadow landscape would be studied, as noted in Master Response 9. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I78-9

In sum, the 2005 LRDP as well as the 1993 "Bender Plan" has much better solutions for roadways and paths than does this LRDP.

**Final comment**There are many other issues that others have pointed out that need examination and discussing, or better deliberation that I could have addressed, but I will end my remarks here.

Response I78-9

The comment contains conclusory remarks and expresses opinion related to roadways and paths within the campus. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I79 Jazmine Jensen

March 8, 2021

Comment I79-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I79-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I80 Brian Johnson

March 8, 2021

Comment I80-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

I attended UCSC because of the direct access to field work and observation in a living classroom on campus. It would be a tragedy to future students and long term studies if the reserve was lost in any capacity.

Response I80-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I81 Elise Knittle

March 8, 2021

Comment I81-1

I would like to comment on the plans for the Campus Natural Reserve in the LRDP. In terms of land use strategies, I am pleased to see that the LRDP is increasing the size of the CNR from 409 to 789 acres. I want to advocate for adding the Campus Natural Reserve to the systemwide UC Natural Reserve System and being protected from development in perpetuity. The CNR is a unique asset encompassing a variety of ecosystems from rare coastal chaparral habits to redwood forest. Understanding the ecology of CNR is also relevant to understanding the effects of devastating wildfire on second growth redwood forest ecosystems following the 2020 CZU fires. Addition of the CNR to the UC Natural Reserve System would protect these habits in perpetuity and perhaps help with the chronic underfunding of UCSC's stewardship of our Campus Natural Reserve -- particularly in the area of staffing.

It's vital that this increase in CNR acreage be accompanied by an increase in resources to help the CNR staff provide even more opportunities for our students to utilize campus land for teaching and research, particularly to train undergraduate students in field methods. These opportunities are key for increasing participation in the science of students from URM groups, as field teaching is closely connected to success in the earth sciences and ecology. It would also be extremely beneficial for the CNR staff size to increase to help deal with (what seems to me over 30+ years of observation) the ever-increasing degradation of the CNR from off-trail activities and, I'm sorry to say, a noticeable increase in vandalism to the campus forest, caves and historic structures such as the campus' lime kilns.

The CNR is a critical part of outdoor teaching for the campus - I use the CNR every year in teaching a large general education course on California Geology by taking the entire class on field trips of the campus lands twice over the course of fall quarter. For many students, especially our students whose home is in an urban area, these class sessions, held outdoors teaching about the geology and ecology of the campus, are the triggering events in deciding to major in science. I have heard over and over that it was these field trip days that made students aware of majoring in earth science (or biology) - something that had never occurred to them. Our campus lands are one of the most unique features of UCSC and should be protected to the maximum extent possible, and incorporating them within the UC Natural Reserve System would be a strong step in that direction.

Response I81-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I82 Chris Lay

March 8, 2021

Comment I82-1

I am the director of the Ken Norris Center for Natural History. I manage UCSC’s natural history collections, many of which were collected on campus as documentation of its biodiversity. I help support many research projects and teach field courses myself that actively use the campus lands, including especially the Campus Natural Reserve (CNR). I am also a UCSC alumnus (Crown College, 1995). Like the thousands of students that I have worked with over the last 30 years that I’ve been associated with the campus, I strongly believe that the natural lands on our campus, if protected and not degraded, will only grow in value as both social and ecological resources. As professor Ken Norris said nearly 40 years ago around the time the CNR was created, “*I expect the leaders of UCSC to look up and find that their lovely land has made them a center within the entire University for studies of the natural worlds. As the focus comes closer to being unique within the University, the message seems clear enough: ‘Cherish your natural things and you will become the center for their study and protection.*’”

Below are several more specific comments relating to the LRDP and associated EIR:

Response I82-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I82-2

1. **The CNR needs permanent protection.** While I’m thrilled that the area of the CNR was nearly doubled in the new LRDP, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, now is the time to grant permanent protection for the CNR. UCSC has been a worldwide leader in ecological research, conservation, and activism. This has come from the collective actions of our staff and alumni, but it has also come from the resources we have used to inspire our students and the example we have set for the world on our own campus lands. The CNR is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research that gets used to enhance thousands of students’ academic experiences each year. Additionally, our campus is internationally renowned for its undeveloped natural character. If we continue to let this resource dwindle and degrade, it will only weaken our impact and example to the rest of the world.

Response I82-2

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I82-3

2. **Please ensure that ALL needed resources for enrollment growth are in place as we continue to grow.** This did not happen for the 2005 LRDP: while we have nearly reached the target enrollment of 19,500 students, much of the proposed housing, classrooms, lab space, and mitigation for environmental impacts has not happened at all. In fact, only ~30% of the proposed academic and support space and housing proposed in the 2005 LRDP have been constructed. To remedy this oversight, the EIR should address what resources are needed for specific intermediary increments (such as enrollments of 22,000, 24,000, etc..). *If sufficient resources have not been allocated and construction completed, then enrollments should* ***NOT*** *increase.* Including language like this is an example of how to specifically integrate, as the current draft states, “sustainability leadership into campus teaching, learning, research, design, and operations.”

Response I82-3

The comment requests that the 2021 LRDP and Draft EIR be revised to include interim targets and population limits. Refer to Master Response 9 regarding plan implementation and phasing. See also Master Response 2 as it relates to changes and refinements to the 2021 LRDP as a result of public input/participation.

Comment I82-4

3. **Please pursue a campus-wide habitat conservation plan for the federally listed species found at UCSC.** In the past, the campus has pursued planning and mitigating for negative effects on listed species on a project-by-project basis. There is clear evidence that better conservation planning is done when plans are adopted at a larger scale.

Response I82-4

This comment supports preparation of a campus-wide HCP. Mitigation Measure 3.5-2a, which begins on page 3.5-46 of the Draft EIR, includes potential preparation of a comprehensive HCP in the regulatory approach for mitigating impacts on California red-legged frog. Refer to Master Response 12 for long-term habitat protection on the main residential campus. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I82-5

4. **Please more adequately address the high fire-risk associated with developing upper campus.** There will certainly be more dangerous fires that threaten the campus in the future. There is little specific discussion for the extensive vegetation management that is needed to compensate for the decades of minimal thinning/management that has built up fuels on and around campus. There is also no discussion of cost and who will pay for it. In addition, much more thought needs to be put into whether the campus can be quickly and safely evacuated, especially if even more students, many of whom will not have cars, will be housed on upper campus.

Response I82-5

The comment requests additional information regarding how fire risk within the north campus subarea of the main residential campus will be managed/minimized. Refer to Response I31-14 regarding preparation of a Campus-Wide Vegetation Management Plan and Master Response 4 regarding the assessment of wildfire impacts in the Draft EIR.

Letter I83 Athena Lynch

March 8, 2021

Comment I83-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I83-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I84 Lucy Malamud-Roam

March 8, 2021

Comment I84-1

UCSC LRDP comment letter template

Response I84-1

The comment cited a comment letter template for the 2021 LRDP but no additional comment was provided. This comment does not address the adequacy of the EIR analysis. No further response is necessary.

Letter I85 Julie Mascarenhas

March 8, 2021

Comment I85-1

**Section 3.5 Biological Resources
Vegetation Communities, Special‐Status Species***Not enough information to adequately determine impacts* – Coarse‐scale and outdated vegetation surveys were not adequate to obtain information on dependent and listed plant and animal species in the potential expansion/construction zones. The recent wildfires are unprecedented and no data after these fires (and their potential impact on surrounding animal territories/presence/occupancy) was presented. Likewise, listed plant species that occur ephemerally and in non‐drought conditions were likely not captured by such minimal surveys. For both plant and animal species, inadequate seasonal surveys were conducted (surveys during which time specific species are most likely to be detected).

Response I85-1

This comment states that the vegetation surveys were not adequate to obtain information on plant and animal species that could be adversely affected by project activities under the 2021 LRDP. As discussed on page 3.5-8 of Section 3.5.2, “Environmental Setting,” confirmation of fine-scale vegetation community distribution will be conducted during project-specific review associated with 2021 LRDP implementation. Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR requires project-level biological reconnaissance sensitive species and habitats surveys for every project under the 2021 LRDP, during which a qualified biologist will determine the potential impacts on special-status plants and animals and sensitive habitats for a given project.

Comment I85-2

**Section 3.7 Geology and Soils***Inadequate assessment* – The Karst formations throughout campus are highly susceptible to earthquakes and have the potential to create sinkholes when extreme high/low volumes of water flow through them (which again, is predicted under climate change models, even within the next 20 years). There was inadequate assessment of this in the DEIR for the safety of students, staff and faculty. New construction should therefore be limited, and adequate geotechnical engineering solutions should be presented for the limited construction to be allowed.

Response I85-2

The comment requests additional detailed assessment regarding risks associated with development within Karst formations. The evaluation of potential geotechnical engineering solutions are considered site specific and dependent on the specific conditions that exist at a given development site. As development is proposed within the main residential campus, the requested geotechnical engineering studies and solutions will be developed as part of further design and engineering of new and renovated campus buildings, as described in Impact 3.7-5 on page 3.7-27 of the Draft EIR. However, the Draft EIR, as noted on page 1-8, is a program EIR. The focus of the EIR is on the entire 2021 LRDP and potential impacts resulting from construction and operation of anticipated land uses consistent with the plan. This is considered to be consistent with CEQA Requirements. A program-level EIR focuses on the broader impacts expected to follow the implementation of the plan and need not be as detailed as an EIR or other CEQA document for a specific construction project that will follow (refer to State CEQA Guidelines Section 15146).

It is premature to consider site-specific conditions, including those associated with Karst, and impacts associated with potential individual efforts under the 2021 LRDP at this time, as these projects have not yet been sited or designed, access routes have not been determined, and other key project components that would influence potential environmental impacts have not yet been determined. Accordingly, it would be speculative to conduct a project-specific analysis at this juncture. However, additional analysis, including that identified as part of the programmatic analysis of Impact 3.7-5 (refer to analysis beginning on page 3.7-27), would be conducted on a site- and project-specific basis to ensure that appropriate considerations and design measures are incorporated into the project to address karst hazard risks.

Comment I85-3

**Section 3.13 Population and Housing***Unsustainable planned increase in campus population and inadequate housing* – Housing costs in the Santa Cruz area, both rentals and purchases are already extremely high, even more so since the COVID‐19 pandemic (bringing more people to the area) and 2020 CZU fire (displacing thousands). The price margin is out of reach for most students, staff and faculty. Yet the market continues to increase, and likewise such extreme events which drive demand are also only forecast to increase. Increased campus population would only exacerbate these problems for existing residents. The LRDP does not adequately address this, with inadequate commitment to affordable housing on campus, and woefully inadequate commitments only to house new students and 25% of the increase in faculty and staff. Combined campus population increase and inadequate housing would result in highly significant negative impacts to area residents.

Response I85-3

The comment expresses opinions related to the potential demand for housing as a result of increased on-campus population. Impacts related to population and housing are evaluated and presented in Section 3.13, “Population and Housing,” of the Draft EIR. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, housing affordability, and other socioeconomic considerations, please refer to Master Response 2, specifically the discussions under "Housing” and “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I85-4

**Section 3.16 Transportation***Significant negative impacts* ‐ Traffic currently rates an “F” around the campus, and negatively impacts those of us who live and work nearby. The LRDP does not adequately define the areas impacted, such as neighborhood streets and roads between different campus locations, nor assess impacts nor assign mitigations to these. Limiting cars on campus and promoting use of alternative transportation (carpool spaces, bike paths, etc.) is not adequately addressed. Planned increases in campus population and inadequate on‐campus housing exacerbate transportation issues as this worsens traffic in the area simply by virtue of increased population, not to mention forcing more commuting.

Response I85-4

The comment expresses opinions related to the evaluation of transportation. Refer to Section 2.6.6 Circulation, Parking and Transportation Infrastructure, starting on page 2-21 of Chapter 2, “Project Description of the Draft EIR, for detailed descriptions of the 2021 LRDP Integrated Transportation Strategy, including restricting autos in the campus core, an extension of Meyer Drive to support improved campus shuttle circulation, proposed pedestrian and bicycle networks and Transportation Demand Management Programs, promoting alternatives to single occupant vehicles. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I85-5

**Section 3.17 Utilities and Service Systems
Wastewater***Inadequate assessment* ‐ It is not realistic to believe that the implementation of the LRDP as stated would not exceed the available capacity of existing wastewater infrastructure or require the construction or expansion of treatment facilities or drainage systems. The current system, even without increased demand, is already under stress with extreme weather events. This is not adequately addressed.

Response I85-5

The comment expresses concern that the existing wastewater infrastructure would be exceeded as a result of implementation of the 2021 LRDP. Based on available information regarding capacity and existing demand, adequate capacity is available within existing infrastructure for the treatment of the projected increase (0.19 million gallons per day) in wastewater generated within the LRDP area. Further, the Draft EIR, as part of the overall evaluation of development under the 2021 LRDP, includes an analysis of additional wastewater collection infrastructure (as stated on page 3.17-36). No additional or off-site infrastructure needs were identified as a result of 2021 LRDP implementation. No evidence is presented to suggest additional inadequate capacity, and no further response is possible.

Comment I85-6

**Water Supply, Impacts to Karst Aquifer***Potentially significant impacts* ‐ A huge concern for all nearby residents is the university’s unsustainable plan to increase university student and staff numbers when the local water supply cannot sustain current residents and has been forced to start “borrowing” or buying water from other districts. All climate change projections, from severe to mild, predict more extreme weather events, including drought for our region. Water supply for additional students/staff on campus has not been adequately addressed, and effects on not only residents but other wildlife in our watershed, particularly listed species such as salmonids in the San Lorenzo River from which the City water supply is pumped, must be considered.

Response I85-6

The comment raises concerns regarding potential impacts to water supplies as a result of increased on-campus population and demand. The Draft EIR includes an evaluation of the availability and sufficiency of water supplies to the LRDP area and evaluates potential alternative water supplies due to projected uncertainties/shortfalls in available water supplies, in Section 3.17, “Utilities and Service Systems,” of the Draft EIR. Refer to Response I69-4 and Master Response 7 regarding potential water supply impacts and the associated effects within the watershed. Further, potential impacts to wildlife are evaluated in Section 3.5, “Biological Resources,” of the Draft EIR.

Comment I85-7

**Conclusions**UCSC has been so unique in terms of its outstanding campus and the study of natural sciences, specifically due to its small size and the abundance of flora and fauna in a vibrant ecosystem accessible for instilling infinite capacity for reflection and a new awareness to those outside the sciences, and for observation and study by budding and existing scientists. By overpopulating and so extensively altering and harming the natural landscape of its campus the University runs a very real risk of damaging the culture and very programs which have made it so attractive to students and faculty and so important to preserve.

And outside of the campus, we should not turn a blind eye to the lessons of the past. The City of Santa Cruz findings of previous UCSC LRDPs (1988, 2005) have been largely negative, with huge adverse impacts to existing city and regional residents in terms of traffic, housing costs, water security, litter, noise and light pollution, neighborhood livability, public service and safety limitations, impeded emergency access, impacts to wildlands and the regional environment, and violations of state and federal environmental laws.

Thank you for the opportunity to comment. I would appreciate confirmation of receipt and acknowledgement that each section of my comments was recorded in this public process.

Response I85-7

The comment expresses concern for the level of growth anticipated under the 2021 LRDP, including historic opposition to further campus growth by the City of Santa Cruz. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I86 Jack Mazza

March 8, 2021

Comment I86-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I86-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I87 Alayne Meeks

March 8, 2021

Comment I87-1

As a long term resident of Santa Cruz County, an escapee from San Jose over 50 years ago who left because the beloved apricot orchards were giving way to housing and traffic, an employee of UC in 2000 to 2001, and someone who has seen a lot in over 70 years, please protect Santa Cruz Campus Natural Reserve. I once attended a lecture by one of the architects of the UC campus. He admitted in 1969 that they had made a big mistake by placing buildings on the tops of hills instead of in the ravines between those hills. He realized the value of the hilltops and open space that the university buildings now inhabited. And he bemoaned his lack of vision and foresight that contributed to that permanently destructive decision.

Where to place housing, paying attention to the resources that will allow growth anywhere on campus or in Santa Cruz County are issues we all, as inhabitants of this earth, will face in the future. Don't lack vision and foresight so needed as we problem solve for 2021 and beyond. Precious open space that already has an important function to the UC campus should not be destroyed to make way for buildings that can be placed elsewhere. Don't be one of those who bemoans your lack of vision in the future. You have it in your decision making power today to ensure a positive outcome for this amazing piece of property.

Response I87-1

The comment expresses the opinion that the Campus Natural Reserves should be protected, and buildings sited elsewhere within the campus. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I88 Melissa

March 8, 2021

Comment I88-1

NO NO

this area is already OVER BURDENED by the impact of students living in S.Cruz

The voters of S.Cruz have already spoken in regard to their disapproval of adding thousands more to the population

Response I88-1

The comment expresses opinions related to student enrollment and population. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, including growth projections, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I89 Mariam Moazed

March 8, 2021

Comment I89-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I89-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I90 Gabriela Navarro

March 8, 2021

Comment I90-1

I am currently an Environmental Studies Major at UCSC studying policy and am currently interning with Assembly member Mark Stone's office. Even though I am currently working in policy, I started my major with an ecological focus. I was lucky enough to participate in two field courses and the Forest Ecology Research Plot Internship that sparked my interest in conserving natural resources. I have opportunities like these because of the excellent research and dedication of the ENVS faculty and the amazing resource that is the UC Reserve. The UC Reserve offers a one of a kind outdoor classroom and laboratory that is used for research as well as classes and outdoor recreation. It is also a habitat for countless animals that need these wild outdoor spaces to migrate, eat, and make their homes. The natural reserves are the greatest resources and assets the UC system has, and while building infrastructure may be a short term priority, the long term well being of the campus depends on its ecological and academic health.

The world is slowly losing its natural habitats, and the UC has the opportunity to host one of the biomes that make California the most biodiverse state that people all over the world come to study. Environmental studies is one of the fastest growing fields of study around the world as young people invest in our planet's future and the growing green economy, so why not invest now in maintaining this world class research plot?

As a student and soon to be alumni, I urge you to keep UCSC a haven for ecologists and the wildlife of Santa Cruz. By giving a voice to the suggestions made by the faculty of your school as well as others who wish to protect the reserve, you will be showing us that our voices matter and that the reserve has inherent value to the school.

Response I90-1

The comment expresses the opinion that the Campus Natural Reserves should be protected. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I91 Veronica Ness

March 8, 2021

Comment I91-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I am a 4th year ENVS/BIO student. I would like to comment on the need to include in the LRDP and EIR, the Campus Natural Reserve as a permanently protected land that is unable to be used for alternative purposes.

 I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

I have had a lot of experience in the reserves and am proof that these reserves are a unique opportunity for learning that is otherwise impossible without the existing natural environment they hold. There is a consistent need to encourage the protection of natural environments and now more than ever with the negative impacts of climate change becoming more prevalent throughout our community and the world. Not only does protection help the world, it also fosters a unique experience for students of the University community to learn from the land that is unable to find at many other universities. Removal of this unique experience deters the integrity and reputation of the university as a place that fosters growth.

There can be no growth without thought and care taken towards each action. Denying future students the enrichment that reserves can provide is robbing not only future students’ of intellectual growth, but also the planet of an ecosystem and all of the species a home that relies on that ecosystem to survive. It is not a small undertaking destroying the landscapes around us for our own gain. It does not foster a positive change and reputation towards the school if it would destroy its own landscape for the increase of a student population that shouldn’t occur. In order to help the university community, alternative methods besides building need to made such as admitting less students and thinking in unique ways to solve complex problems, which is a quality that the university teaches strongly. In order to live by the doctrine of the school, it is required to maintain the landscape we live and grow on and deter unnecessary building.

I hope more consideration and forethought is taken after reading this letter.

Response I91-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I92 Sophie Noda

March 8, 2021

Comment I92-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

As an environmental studies and biology student, I had many classes that brought me to the Campus Natural Reserve to learn about ecology in an up-close and hands-on way. This experience was invaluable to my education, and contributed greatly to my success as an early-career ecology today. Learning about natural history was so important to my environmental studies and biology education, and I know it will have a hefty contribution to future and current students. Additionally, having spent a lot of personal time hiking and running in the CNR, I know it holds value in its beauty and recreational purposes. As an avid birder and botanist, I also know that it is the home of many birds, insects, and plants, and I think it is our duty to protect that home for years to come. How many other students in the world can say they saw a Pileated Woodpeckers just a fifteen-minute walk from their science library? Probably not many. For all these reasons and more, I am asking that you include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I92-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I93 Kelsey Pennington

March 8, 2021

Comment I93-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality oflife for students. The Campus Natural Reserve protects that unique feel and quality oflife for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I93-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I94 Kristen Sandel

March 8, 2021

Comment I94-1

I appreciate the chance to comment on the 2021 UCSC LRDP DEIR, and while I have concerns about many of the proposed expansion plans, I am choosing to specifically comment here on two areas.

Section 3.13 Housing: "The Student Housing Office guarantees housing for both incoming first-year students and incoming transfer students," (3.13-2) " ... the Student Housing West Project, which at buildout in 2024 would result in 3,072 student beds (a net increase of 1,972) beds on the main residential campus) ... " (3.13-2) I do not understand the University's reasoning here, because though you are guaranteeing housing for first-year and transfer students and 100% of students above 19,500, what about the remainder? This seems to only assure housing for the 10,000 estimated new students but does not address the rest, appearing to simply substitute one group of students for another without significantly increasing the overall housing available on campus. How will the University ensure adequate housing for the entirety of its expanded population on campus, particularly given that it is currently housing only about 50% of its student body, at prices which many find unaffordable ($1333 per mo., per student for a 3 occupant unit)?

Response I94-1

The comment expresses a preference for additional on-campus housing for more than the increase in student enrollment above 19,500 FTE anticipated under the 2021 LRDP. The additional 8,500 beds provided under the 2021 LRDP will combine with the existing on-campus housing stock and proposed projects to offer a variety of housing types to students. The campus maintains a variety of different housing types, from colleges that serve first year and continuing students, to apartments and suites that serve continuing students, graduate students, and transfers. Therefore, the additional 8,500 beds are not earmarked for first year students only. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I94-2

I also note that, in Section 3.10 (Hydrology and Water) you have simply side-stepped the question of impacts on karst aquifers, stating "Potential impacts on groundwater ... under the 2021 LRDP include 1) reduced spring flows, and lowering of aquifer water levels ... as a result of potential groundwater extraction in the event that groundwater pumping is implemented to reduce demand for water from the City's water supply," (3.10-5) but then conclude that no mitigation is necessary as " ... no groundwater extraction is planned for the upper/north campus aquifer ... " This fails to address the question of ensuring adequate water supply for an expanded population at all, by positioning the city of Santa Cruz as majority supplier of water to the campus and thus responsible for any problems which arise. If UCSC's population grows to a possible 33,000 people, it will be a significant draw on the area's limited water supply, for which you offer no mitigation at all. Please explain the University's reasoning here.

Response I94-2

The comment expresses concern that there will be an impact to the karst aquifers and a significant impact on water supply due to the increase in on-campus population. Impact 3.10-5, beginning on page 3.10-5, evaluates potential impacts to groundwater that may occur as a result of development under the 2021 LRDP. It evaluates the potential for increased levels of impervious surfaces to affect groundwater recharge and groundwater quality, but concludes that impacts would be less than significant with mitigation through proper design and monitoring. Based on available information, groundwater supplies within the south campus subarea could sustainably supply water to the LRDP area (with appropriate monitoring) such that no net deficit in aquifer volume would occur. Refer to Master Response 10 for further information, which notes that the data indicates that ongoing efforts by UC Santa Cruz to maintain the health of the karst system from a water quality perspective has been effective.

With respect to the overall impact of increased water demand, the Draft EIR includes an evaluation of the availability and sufficiency of water supplies to the LRDP area and evaluates potential alternative water supplies due to projected uncertainties/shortfalls in available water supplies, in Section 3.17, “Utilities and Service Systems,” of the Draft EIR. Refer to Response I69-4 and Master Response 7 regarding potential water supply impacts and the associated effects within the watershed.

Letter I95 Ajay Shenoy

March 8, 2021

Comment I95-1

As a member of the ACCTP, I am supportive of most aspects of the LRDP. The campus transit plan is exciting and commendable. I am especially impressed by the goal of housing all additional students on campus. I believe expanding enrollment, and with it the size of the faculty, is crucial to ensuring all Californians have access to an affordable and world-class education.

Response I95-1

The comment includes introductory remarks and general support of the project. This comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I95-2

However, I want to urge you to consider increasing the share of new employees housed on campus beyond the current target (30%) by building more densely within areas zoned for employee housing. Given the general lack of housing in the City of Santa Cruz, new employees would likely have to commute long distances from outside the city. It is unclear what public transit options would be available to these employees given that many would have to live in Watsonville or the communities in the Santa Cruz mountains. The additional VMT per employee acknowledged in Table 3.16-7 would increase both traffic congestion and greenhouse gas emissions.

The simplest solution would be to build denser on-campus housing for employees. The university's past practice of building single family homes and two-story condominiums has not been an efficient use of its land. Given the sheer length of the waitlist for employee housing, it seems reasonable that smaller units built more densely would still be in high demand while housing more employees. Housing built on-campus would naturally integrate into the proposed on-campus transit plan, reducing the VMT. It would also support the university's broader mission by making employment more attractive. My own department has been turned down on many occasions by promising researchers who were deterred by the cost of housing in the region.

I hope you consider the benefits of denser and more ambitious employee housing, and revise upward your targets for the percentage of new employees housed on campus above 50%.

Response I95-2

The comment includes suggestions for increased employee housing. The comment includes a request for the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I96 Daniel Simoni

March 8, 2021

Comment I96-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality oflife for students. The Campus Natural Reserve protects that unique feel and quality oflife for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I96-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I97 Jenna Sparks

March 8, 2021

Comment I97-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it. The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal—it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I97-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I98 Kelly Trombley

March 8, 2021

Comment I98-1

I am writing to comment on the Notice of Preparation for the EIR for the 2020 LRDP. I much appreciate that the area of the Campus Natural Reserve (CNR) was nearly doubled in the new LRDP. However, the boundaries of the CNR are subject to change during each LRDP process and this LRDP includes no mention of what will happen to the lands of the CNR at the end of this LRDP period. **For the sake of the entire UCSC community, it is important to permanently protect the CNR, and now is the time to do it.**

While I attended UCLA, I spent many visits to friends at UCSC enjoying this incredible campus resource. It has left me with a lifelong appreciation for UCSC and the surrounding community. I now work in parks, exploring the intersection of public land, climate resilience and public safety. It is clear these spaces are critical to a healthy future as we meet increasing needs for mental health, clean air and healing community spaces accessible to all.

The CNR is a unique and valuable campus resource that provides many benefits, from ecosystem services to recreation and quality of life for students. The Campus Natural Reserve protects that unique feel and quality of life for students of being able to quickly access the outdoors. The Campus Natural Reserve, however, is not just a pretty space for recreation and renewal-it is also a unique, world-class teaching resource and a living laboratory for research. Many faculty conduct cutting edge ecological research on the Campus Natural Reserve, and it is critical for research projects to know that the Campus Natural Reserve boundaries will not be changed, or the Reserve developed, as they pursue long-term ecological research. Please include permanent protection for the Campus Natural Reserve in the final LRDP and EIR.

Response I98-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I99 Matthew Waxman

March 8, 2021

Comment I99-1

I have listed below, numbered, issues and problems with the 2021 LRDP. I request that the EIR address each bullet-point item, all of which are impacts.

I have also added, below each numbered item, the EIR categories associated and for which the items need to be contextualized and responded to.

Response I99-1

The comment includes introductory remarks and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-2

*Something must be done to provide the quality and quantity of spaces needed to respect the holistic student experience now and in the future.*

When alumni reflect on UCSC, they think of how the campus experience benefited their lives. But when alumni learn of what has happened over recent years, they often ask: where did the passion for public education go? This is not empty nostalgia.

* *Why does the University no longer prioritize, design, and steward the kinds of resources and living-learning, indoor-outdoor environments that nurtured the student experience for decades?*

Response I99-2

The comment expresses the opinion that UC Santa Cruz does not support/respect the student experience and does not address the adequacy of the EIR analysis. No further response is necessary. However, it is worth nothing that questions about resources to support the student experience are system-wide UC issues and in many cases are issues confronting almost all universities in higher education today.

The LRDP is fundamentally a land use plan. It describes a building program that will ultimately support living-learning environments such as the colleges, with additional square footage to account for deficits of space in both academic and student support to better bolster the student experience. It describes land uses for development adjacent to land uses that protect natural space, where new development can ultimately be designed to connect indoor spaces with the campus’ extraordinary natural environment. It describes approximately 1,400 acres, or 70 percent of the main residential campus, that is designated as open space categories, largely protected from development. However, the implementation of capital projects, including specific design, is not prescribed under the 2021 LRDP.

As explained on page 163 of the 2021 LRDP, “While the LRDP identifies land use areas for academic, housing, and other uses, project implementation will continue to be guided by the Physical Design Framework and the Capital Financial Plan. The campus typically conducts area studies, which investigate specific regions of the campus to provide planning guidelines and test the capacity for development, to guide future planning of individual projects. All future projects will continue to be reviewed by the UC Santa Cruz Design Advisory Board, a group of design professionals and campus staff appointed by the Chancellor.”

Comment I99-3

* *What about the actual experiences of today's and tomorrow's students who are given an increasingly sub-par educational 'product' at massive cost?*

Response I99-3

The comment expresses concern regarding the cost of attending UC Santa Cruz compared to the experience and does not address the adequacy of the EIR analysis. No further response is necessary. For further information regarding the student experience (including the ability for students to provide input on the 2021 LRDP), refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-4

* *What does it mean when we realize students are getting nothing but crumbs compared to what majority white students were given in the past?*

Response I99-4

The comment expresses concern regarding the current level of education but does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-5

UCSC is barely able to provide the bare minimum at the same time as the University has become more diverse and no­longer majority white, recognized as a Hispanic Serving Institution and embracing first-generation and transfer students.

* UCSC only built 30% of facilities planned under the last long-range plan despite maxing out enrollment growth.
(2005 LRDP p61, 2021 LRDP p101)
* UCSC has the lowest classroom and seminar space per student of all undergrad programs across the entire UC­system (Kresge EIR p212).
* Before COVID, classroom use was so overtaxed class times were shortened, and living spaces so overtaxed dorms were at 127% occupancy (2018 Housing Market Study p3).
* Services and programs needed for on-campus student organizing, creativity, and community-building, continue to be underfunded, lack physical space, or have been cut.
* UCSC gets 2.3% of UC-wide funding, less than all campuses except Merced, and even less than UCOP.

*The 2021 LRDP is UCSC's proposed solution for the future of the campus. It will shape the student experience for the next 20 to 50 years. Providing access to education is key. But having a plan to grow is not good enough -- it matters* ***how*** *it impacts students.*

*Unfortunately, UCSC's 2021 LRDP uses a fragmented approach to planning, lacks nuance and care, and compromises how the campus itself is beneficial to students.*

***The 2021 LRDP does not respect the student experience.***

Response I99-5

The comment expresses general opposition towards the 2021 LRDP. This comment expresses opinions on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, as the comment relates to plan development and the student experience, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-6

Here is why:

**1. Planning Process: the student voice was excluded**

*Please address these impacts to planning and policy for EIR section 3.11 Land Use and Planning*

* Like all planning, the 2021 LRDP is embedded with the assumptions and biases of those involved, and missing the concerns of those absent.
* There were zero students and zero alumni on any of the planning committee's workgroups that hashed out the plan's details. The "housing and campus life" workgroup had no students, no alumni, no faculty, no college provosts, and no community members (2021 LRDP p18-31).
* Planning committee members and students were prohibited from sharing any information from the committee process with their constituents.
* Meetings were scheduled at times when students were not available because of school.
* Committee members were prohibited from talking about Student Housing West and the East Meadow. And calls to study a Habitat Conservation Plan and permanent protection of the Campus Natural Resources were repeatedly ignored.

Response I99-6

The comment expresses opinions related to the 2021 LRDP planning process. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. With respect to statements made in this comment regarding Student Housing West, which included undergraduate and graduate housing on a site on Heller Drive and family student housing and a childcare center on Hagar Drive, was approved under the 2005 LRDP. The 2021 LRDP Planning Committee’s purpose was to provide feedback and engagement on the 2021 LRDP. Regarding an HCP, see Section 3.5, “Biological Resources” Of the Draft EIR, particularly Mitigation Measure 3.5-2a, which begins on page 3.5-46 of the Draft EIR. UC Santa Cruz has pro-actively initiated discussions with USFWS to begin preparation of a campus-wide HCP. Refer also to Master Response 12 regarding long-term habitat protection and the HCP process.

Regarding student involvement in the planning process, both undergraduate and graduate students were members of the 2021 LRDP Planning Committee that guided decision-making. The 2021 LRDP Planning Committee met approximately 19 times between April 2017 and November 2019. Student feedback included the preference to keep housing as close as possible to the academic core to reduce the distance and changes in elevation to student resources. This feedback led in part to the strategy of a compact development footprint of the 2021 LRDP land use map. The LRDP Executive Committee also included students, with representation from the president of the SUA and the president of the GSA. Their responsibilities included bringing information back to their respective student groups for feedback throughout the process. The Executive Committee met approximately 14 times throughout the planning process. In addition to the formal committees, multiple outreach events were conducted as public workshops and open houses. These were all held during the academic year, in various locations that would be convenient for a diverse group of stakeholders, including locations on campus so students could attend easily. In total, nine public workshops and open forums were held for the campus and community, in March 2018, December 2018 (online), October 2019, and December 2019. A list of these events is included in the appendix of the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-7

**2. Faculty and Staff to Student Ratio: there will be fewer faculty and staff for students**

*Please address these impacts for EIR section 3. 13 Population and Housing*

* The 2021 LRDP proposes to increase enrollment by 8,500 students living on-campus by 2040, nearly double the amount of students living on-campus pre-COVID.
* Mapping this growth over time, from 2003 to 2040, we get a 99% increase in students; but faculty and staff only increase 23%. This means the faculty and staff to student ratio will have been cut in half as the campus grows. (2021 LRDP p95, SHW EIR p?.2-6)

Response I99-7

The comment requests that the EIR evaluate potential changes in faculty/staff to student ratios. This is a social issue and not an environmental impact of the 2021 LRDP. However, both faculty/student and staff/student ratios will improve under the 2021 LRDP. Additionally, refer to Master Response 2, specifically the discussion under “Housing Affordability and Other Socioeconomic Considerations.” No further response can be provided.

Comment I99-8

**3. Academic Planning: physical plan not motivated by education**

*Please address these impacts for EIR section 6 Alternatives*

* While the prior 2005 LRDP had a special faculty-driven process integrated with its physical plan that proposed three enrollment scenarios based on faculty and student academic needs, the 2021 LRDP had no such academic process despite a misleading reference to former EVC Tromp's 2018 academic plan.
* The 2021 LRDP was not motivated by academic planning, had a single enrollment target, and does not evaluate how the campus can implement growth incrementally.

Response I99-8

The comment states that the 2021 LRDP process was not motivated by academic planning and did not include a “special faculty-driven process” that was provided as part of the 2005 EIR. In general, this comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response can be provided. Refer to Master Response 9 regarding an evaluation of incremental increases in campus enrollment and size. For comments on the 2021 LRDP project, refer to Master Response 2.

Comment I99-9

**4. Campus Academic Core: student experience will be of big buildings on axial roads**

*Please address these impacts for EIR section 3.16 Transportation, section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3. 18 Wildfire*

* Because UCSC only built 30% of facilities for current students, they will need to increase academic and student support space on campus 148% beyond the current level to meet the needs of 28,000 students. (2021 LRDP p 101)

Response I99-9

The comment requests that the EIR evaluate the potential impacts of additional academic and support space at UC Santa Cruz under the 2021 LRDP. The Draft EIR evaluates potential physical environmental impacts, including potential impacts related to the development of academic and support space, associated with implementation of the 2021 LRDP, as requested by the comment. In general, this comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary.

Comment I99-10

* While the prior 2005 LRDP emphasized different disciplinary zones of the academic core, nuanced network of pedestrian paths responding to student experience and topography, and the connection of academics to the colleges; the 2021 LRDP abandons each of these and instead consolidates new academic zoning along two super-block orthogonal pedestrian axes through the core (2021 LRDP p168-173).

Response I99-10

The comment expresses an opinion regarding the manner in which potential new land uses would be distributed across the LRDP area under the 2021 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

As it relates to planning considerations for the areas referenced in this comment, the 2021 LRDP anticipates new expansion north of the Academic Core, extending Science Hill further north, and south of the Academic Core, as well as developing on infill sites within the Academic Core itself. These areas of expansion, along with infill sites, are described diagrammatically on page 114 of the 2021 LRDP in the Physical Planning Principles, which describe concepts to guide growth. Planning considerations for northern expansion of Science Hill are included in Section 5.4 on p172 and for the area south of the academic core in Section 5.2 page 164.)

Comment I99-11

* McLaughlin Drive is to be lined with buildings, creating what they call a new "main street" to move large volumes of students along a single artery. This kind of conventional, centralizing axis is modeled after what you find at UCLA's Bruin Walk or UT Austin's Speedway, but has zero relationship to the unique UCSC landscape context.

Response I99-11

The comment expresses an opinion regarding the manner in which potential new land uses would be distributed across the LRDP area under the 2021 LRDP and is noted. In addition, buildings already exist adjacent to McLaughlin on the north side and the south side. While some sites along McLaughlin may be developed for academic, support or housing, it is anticipated that buildings will be distributed on infill sites and the many other areas with these land use designations. comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary.

For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-12

**5. Environment: plan undervalues how ecology complements the student experience**

*Please address these impacts for EIR section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3.2 Agricultural and Forestry Resources*

* The 2021 LRDP land-use concept does not show the environment weaving through the Academic Core, even though the prior 2005 LRDP emphasized this experience. While subtle, this is important as embedded assumptions shape future administrative values.

Response I99-12

The comment requests that the EIR evaluate the potential impacts to the environment of development within the Academic Core under the 2021 LRDP. The Draft EIR evaluates the potential physical environmental impacts of development under the 2021 LRDP, including potential impacts to land use and planning (Section 3.11), aesthetics (Section 3.1), and agriculture and forestry resources (Section 3.2) in accordance with CEQA requirements. The land use map on page 118 of the 2021 LRDP describes the Academic and Support land use designation in dark blue, with the Natural Space land use designation for the natural drainages that bisect the campus in the north south direction. No further response is necessary. For comments on the 2021 LRDP project, please refer to Master Response 2.

Comment I99-13

* While the prior 2005 LRDP designated the environment that weaves through the Academic Core as "Protected Landscape," the 2021 LRDP actually gets rid of this land-use category entirely, and replaces it with a new vague­sounding zone called "Natural Space." If intent is to protect landscape, why did they remove the word "Protected"?

Response I99-13

The comment expresses concern regarding the change in land use designations within the Academic Core from Protected Landscape (under the 2005 LRDP) to Natural Space (under the 2021 LRDP) and is noted. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, the “Natural Space” land use designation is nearly identical [in extent] and intent as the “Protected Landscape” designation included in the 2005 LRDP. While the intent of a land use may be reasoned by the land use designation title alone, the supporting text provides a more accurate definition of each use. As stated in the land use designation definition on p 122, “The principal use is to preserve the landscape in its natural state, including the Great Meadow and existing ravines and drainages throughout the campus… The purpose of the Natural Space designation is to maintain special campus landscapes for their scenic value and maintain special vegetation and wildlife continuity zones that are intrinsic to the campus’s identity.” In other words, its status as protected is described in its definition. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-14

* The 2021 LRDP gives UCSC the ability to build roads through "Campus Natural Reserves" and "Natural Space" (2021 LRDP p 122-123).

Response I99-14

The comment states that the 2021 LRDP allows for the development of roads through Campus Natural Reserve and Natural Space. This comment does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-15

* The 2021 LRDP proposes moving endangered species habitat at the base of the campus (2021 LRDP p 121) for building employee housing but does not show how meaningful alternatives could have also worked.

Response I99-15

The comment states that the 2021 LRDP proposes development of habitat for special status species but does not include an evaluation of alternatives. This comment does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. Mitigation Measure 3.5-7, specifically addresses potential alternatives to development of Inclusion Area D. As noted on page 3.5-74 of the Draft EIR, Inclusion Area D is designated as a preserve, per the Ranch View Terrace HCP, however no Ohlone tiger beetle or California red-legged frog have been sighted in this preserve prior to or since its establishment. Consequently, and in coordination with USFWS, UC Santa Cruz would evaluate potential alternative locations for the preserve acreage to better provide habitat for the target species as part of a campus-wide HCP. Refer to Master Response 12, regarding long-term habitat protection. Potential areas for preservation are shown in the Draft EIR (e.g., on page 3.5-57 and with respect to Ohlone tiger beetle), but selection of appropriate locations is dependent on coordination with USFWS (as required by Mitigation Measure 3.5-7) as part of a campus-wide HCP. If an appropriate site and modification of the Ranch View Terrace HCP (i.e., designation of an alternate preserve) are not approved by USFWS, the existing preserve would be maintained.

Comment I99-16

* The 2021 LRDP does not commit to limiting auto traffic in the campus core and instead only says roads "may be" restricted (2021 LRDP p 131).

Response I99-16

The comment expresses the opinion that the 2021 LRDP does not include a strong enough commitment to reduced vehicle traffic. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-17

**6. Housing: plan separates frosh/soph from upper-division and transfer students**

*Please address these impacts for EIR section 3.11 Land Use and Planning, section 3.1 Aesthetics, section 3.13 Population and Housing, and section 3. 15 Recreation*

* The 2021 LRDP says there will be two new pairs of colleges but their tenants will only be frosh and sophomores who enter from high school. Upper-division and transfer students will be separated to live in unaffiliated apartments (2021 LRDP p 100).

Response I99-17

The comment requests that the EIR evaluate the potential impacts associated with the type of students for whom housing would be provided. There are no environmental impact differences associated with the types or class level of students assigned to certain spaces and the comment does not suggest any. No further response can be provided.

Comment I99-18

* It is a mistake for UCSC to segregate transfer students, who should be welcomed more, not less, into human-scale college communities.

Response I99-18

The comment expresses concern regarding transfer students and reflects the commenter’s opinion that transfer students would be “segregated” and should be more integrated into UC Santa Cruz. There are no environmental impact differences associated with the types of students assigned to certain spaces and the comment does not suggest any. The 2021 LRDP describes the land use designation of Colleges and Student Housing but does not include specific programs or projects at this time. The 2021 LRDP does not state that housing for transfer students will be segregated from other housing. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-19

* For a precedent of unaffiliated housing, look at Student Housing West. The 3,000 bed complex was not planned synergistically but as an island of outsourced housing, despite overwhelming need for integrated academic and student support spaces. It will lock UCSC into a 30+ year contract with a private developer-operator where nearly 50% of apartment beds are singles, the most expensive.

Response I99-19

The comment provides opinion on Student Housing West, which was proposed under the 2005 LRDP and is not part of the 2021 LRDP. This comment does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-20

**7. Housing: what was intimate community will now be alienating bigness**

*Please address these impacts for EIR section 3.11 Land Use and Planning, section 3.1 Aesthetics, section 3.13 Population and Housing, and section 3. 15 Recreation*

* The 2021 LRDP does not specify how many students will live in colleges versus unaffiliated apartments. Nor does it clarify the square-feet needed for each.

Response I99-20

The comment requests additional detail regarding the level of students to be housed in colleges versus apartments. The additional 8,500 beds provided under the 2021 LRDP will combine with the existing on-campus housing stock and projects that are planned but not yet operational (See Table 4-2 on page 4-3 of the Draft EIR) to offer a variety of housing types to students. The campus maintains a variety of different housing types, from colleges that serve first year and continuing students, to apartments and suites that serve continuing students, graduate students, and transfers. The 2021 LRDP, in and of itself, is a land use plan that does not actually propose any specific development or govern enrollment decisions. Therefore, it would be speculative to estimate the number of students that would reside in colleges versus unaffiliated apartments at this stage in the process. Please refer to Master Response 2, specifically the discussion under "Housing,” for a description of the housing assumptions and calculations for the 2021 LRDP that were reflected and carried forth in the Draft EIR’s analysis. Further, the type and design of specific housing does not alter the environmental impacts of the LRDP EIR, which evaluates the provision of this housing. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-21

* When we examine the overall square feet given, the areas zoned for housing, and compare them to the current Kresge renovation and Student Housing West, it appears UCSC is proposing the bulk of housing to be an addition of two or three Student Housing West-scale super-block complexes for holding around 5,000-6,000 students.

Response I99-21

The comment reflects the commenter’s opinion regarding how and where new student housing may be provided. The 2021 LRDP, in and of itself, is a land use plan that does not actually propose any specific development, including specific housing projects, or govern enrollment decisions. The Colleges and Student Housing land use designation continues the pattern of student housing as an expanded ring around the academic core, in close proximity to academic and student support facilities, and clustered adjacent to existing colleges. This comment does not address the contents of the EIR and no further response can be provided. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-22

* The plan says apartments are to be "in close proximity" to colleges but not connected; falsely claiming existing infill apartments that were built as affiliated with the colleges are actually not affiliated (2021 LRDP p 71 ).

Response I99-22

The comment expresses concern regarding specific wording related to the development of apartments under the 2021 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. The 2021 LRDP has been revised to clarify that the infill apartments are indeed affiliated with their adjacent colleges. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2, specifically the discussions under “Planning Context” and "Plan Development.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-23

* The 2021 LRDP gives information on two of the areas for housing -- construction below Oakes and construction on the hill between Cowell and the East Field -- but provides no details on the other areas represented as islands for housing in the north campus.

Response I99-23

The comment expresses concern regarding the lack of potential on-campus housing development details provided in the 2021 LRDP. Details of housing development are not provided because specific housing projects are not currently proposed as part of the 2021 LRDP. The campus has prepared numerous area studies, which provide general guidelines for a regional planning scenario to help guide capital projects in a specific area. Several areas of the LRDP area do not yet have area studies; land use area concepts were included in Chapter 5 for these areas. As stated on page 163, “This section highlights key physical planning considerations in these areas related to future housing and academic uses.” Therefore, the EIR evaluates the land uses programmatically, which reflects this stage of land use planning. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, including the level of detail provided in the 2021 LRDP, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-24

* UCSC does not address past students' own desire for academically-focused residential communities, as a University survey even showed (2014 Housing Market Survey p3.11 ).

Response I99-24

The comment states that the 2021 LRDP does not provide adequate ”academically-focused residential communities” based on public input received. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. However, the 2021 LRDP provides for four new colleges — or two new college pairs, which is how the campus has traditionally expanded. The new colleges affirm the campus’ commitment to the residential-college structure, offering undergraduates the transformative experience of a small liberal arts college with the rigor of a major research university. No further response is necessary. For comments on the 2021 LRDP project, including the degree of public input received during development of the 2021 LRDP, please refer to Master Response 2, specifically the discussion under “Public Engagement Opportunities and Participation.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-25

**8. Great Meadow: the top is being cut off by a road that goes to parking**

*Please address these impacts for EIR section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3.14 Public Services*

* Context: Why was UCSC built in the forest and not the meadows? Before UCSC was a campus, its previous owners clear-cut the land. UCSC's landscape architect decided that instead of exposing buildings in the meadows with a conventional lawn and centralized hierarchy, the student experience would have a symbiotic relationship to the forests growing back and the meadows being cared for over time.

Response I99-25

The comment expresses concern regarding the placement of new land uses, including the extension of Meyer Drive, and their effect on visual conditions at UC Santa Cruz. The Draft EIR already provides an evaluation of the potential development within the central and lower campus subareas of the main residential campus, including an evaluation of aesthetic, land use, and public services impacts (e.g., Section 3.1, “Aesthetics”). No further response is necessary. For historical context purposes, the original 1963 LRDP Illustrative Plan (2021 LRDP page 40) envisioned a roadway extended across the top of the Great Meadow. Successive LRDPs in 1971, 1978, 1988 and 2005 show a conceptual roadway alignment across the top of the Great Meadow. The 2021 LRDP proposal for filling in a gap in this historical roadway network is to provide for improved campus circulation around the academic core, by enhancing campus transit and shuttle circulation. The proposed extension of Meyer Drive to Hagar Drive is not intended to serve the East Remote Parking Lot. The 2021 LRDP states, “Automobile access could be limited on a portion of the extension between the Arts Area to Hagar Drive to prioritize transit, bicycle, and pedestrian circulation.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-26

* The 2021 LRDP proposes to build in the Great Meadow, stretching Meyer Drive as a new east-west road pointing toward a single destination, the east parking lot.

Response I99-26

The comment states that the 2021 LRDP proposes development within the Great Meadow. Refer to Response I99-25.

Comment I99-27

* By cutting off the entire top of the Great Meadow, the new road moves the development boundary deeper into the Meadow and parcels it exclusively for a single-zoned function, academic core.

Response I99-27

The comment states that the 2021 LRDP proposes development within the Great Meadow. Refer to Response I99-25.

Comment I99-28

* The 2021 LRDP abandons how the prior 2005 LRDP sensitively added academic core space at the top of the Meadow paired with protected landscape to steward their relationship.

Response I99-28

The comment expresses the commenter’s opinion regarding the level of development within the central and lower campus subareas of the main residential campus, compared to the 2005 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. For further information regarding the land use designation for the area raised in this comment, refer to Response I99-13. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-29

* Both the 2021 LRDP's new road through the Meadow, and its proposal to move the facilities operations hub to the bottom of the Meadow, will impact the value of the meadow as a public asset and add a lot of streetlights.

Response I99-29

The comment expresses the commenter’s opinion regarding the level of development within the central and lower campus subareas of the main residential campus, compared to the 2005 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. In addition, the land use designation for the area at the bottom of the Meadow was re-designated as Campus Support under the 2005 LRDP in 2016. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I99-30

* By contrast, the prior 2005 LRDP also had an east-west road, but planned it to decrease environmental impact and increase meaning to student experience. That prior plan put the road within the forest, to link together spaces that benefit students: the ARCenter, McHenry Library, Hahn Student Services, and East Field House. The 2021 LRDP, on the other hand, does not use the new road to link together existing spaces of student value. The goal, like McLaughlin Drive, is to increase the flow of people above all else.

Response I99-30

The comment expresses an opinion of the extension of Meyer Drive compared to an east-west road contemplated as part of the 2005 LRDP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I100 Matthew Waxman

March 8, 2021

Comment I100-1

COMMENT on false information in Mitigation Measures for Land Use and Planning section 3.11:

Land Use and Planning section 3.11 says there are no Mitigation Measures needed because there is less than significant impact.

This is false.

EIR Table 3.11-2 lists acreage numbers for land-use zoning comparing 2005 LRDP and 2021 LRDP. These numbers show total acreage in aggregate, but it does not describe or show visually, how these changes in acreage also changes the physical adjacencies between different land-use zones from the 2005 LRDP land-use zones.

Please study and include mitigation that illustrates, with overlay to land-use map and photographic documentation, to address how changes to physical location of land-use in the 2021 LRDP significantly impacts the way current campus 2005 LRDP land-use zones create benefits and functional utility to educational experience through complementary land­use adjacencies.

Example 1: 2021 LRDP rezones the entire top of the Great Meadow as a single land-use category - Academic core. This replaces the way the same area was zoned in the 2005 LRDP, with a smaller patch of Academic core and larger patch of Protected Landscape.

The 2021 LRDP removes a complementary relationship between Academic Core and Protected Landscape to become solely Academic core. This will dramatically impact the qualitative relationship and benefit of Protected Landscape and the Great Meadow for student and faculty Academic experience, and impacts the community's value of the campus meadow as a public asset.

Example 2: the Meyer Drive extension in the 2021 LRDP serves to connect to a single function - a parking lot. This dramatically contrasts from the 2005 LRDP which ran through the forest edge and had been planned to use adjacency between different functions to bring benefit by linking Arts Area, McHenry library, Hahn parking lot, and Athletics Recreation Center.

2021 LRDP fails to address the impact of changes to land-use adjacencies, and fails to address the impact to student, faculty, and community experience by removing complementary land-use zoning and replacing it with mono-functional zoning.

Response I100-1

The comment states that the Draft EIR improperly concluded that impacts would be less than significant in Section 3.11, “Land Use and Planning.” As shown on page 3.11-7 and consistent with Appendix G of the State CEQA Guidelines, the significance criteria evaluated as part of Section 3.11, “Land Use and Planning” are 1) if the project would physically divide an established community or 2) if it would cause a significant environmental impacts due to a conflict with any land use plans, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. First and foremost, as the 2021 LRDP would replace the 2005 LRDP upon adoption, the 2005 LRDP is not considered applicable to the 2021 LRDP. Furthermore, impacts associated with land-use adjacencies (e.g., noise) are evaluated throughout the Draft EIR where appropriate. Therefore, within the context of CEQA requirements, the Draft EIR’s conclusions related to potential land use and planning impacts are considered appropriate, adequate and in accordance with CEQA. Statements made related to student, faculty, and community experience are not attributable to physical environmental impacts (as they relate to CEQA) but were considered during development of the 2021 LRDP. Refer to Master Response 2 for further clarification.

Comment I100-2

COMMENT on the Planning\_process which is about a significant impact to the baseline project and alternatives, and is relevant to both Section 3.11 Land use and Planning and section 6 Alternatives:

2021 LRDP covered the planning process with fourteen pages. Despite this, Section 3.11 Land-Use and Planning does not provide commentary on the planning process, Given that there was no faculty, no alumni, no community members, no graduate students, and no undergraduate students on the Housing and Campus Life workgroup of the 2021 LRDP Committee, and that the outcome of the planning process is a Regent approved policy, the 2021 LRDP, please address the impact to the outcome of the 2021 LRDP policy decisions of there having been only University administrative directors on this workgroup determining policy decisions.

Response I100-2

The comment states that the Draft EIR, specifically Section 3.11, “Land Use and Planning,” does not include commentary on the planning process. A brief description of the planning process was provided in Section 2.4.2, “LRDP Planning Process” on page 2-8. Section 3.11, “Land Use and Planning” which evaluates the potential physical environmental impacts of 2021 LRDP implementation based on appropriate significance thresholds per the State CEQA Guidelines (see Response I100-1). For further information regarding the planning process and development of the 2021 LRDP, refer to Master Response 2. Regarding student involvement in the planning process, refer to Response 199-6. No further response within the context of CEQA is possible.

Letter I101 Claudia Webster

March 8, 2021

Comment I101-1

I concur completely with Matthew Waxman's comments made in his 2021 LRDP Comments.

In particular, I would like to reiterate and reinforce his comments (see #1 below) regarding the **faulty process**. However, it was not just the "Student Voice" that was ignored.

This is something I have direct knowledge of.

The Planning Process was flawed from its inception. As a handful of people were making long range decisions for the entire campus, one person, in particular, Vice Chancellor Latham, had an oversized influence on ALL that has occurred. VC Latham was able to determine who sat on these committees, and who remained on the committees. The ability to disagree did not exist. Having that power over the LRDP enabled her to determine the fate of the entire campus. That is wrong.

People who were brand new to campus, were placed on the LRDP committee. These people had not even been properly introduced or oriented to campus. I know this, because one member told me they did not even know where the East Meadow was, where the Quarry Amphitheatre was, where the lower Quarry was, and so on.

Almost all of the original administrative decision-makers have retired. One remains. The campus now has an almost completely new administration, who have unfortunately been stuck with the decisions of the previous years. The new administration was not present during the time these constructs were ram-rodded thru. The process was SO faulty and misguided, there seems to be no way out. The current administration is not fully informed because the truth is hard and inconvenient to hear.

The Trustees, including the chair, were purposely kept in the dark, as was the public regarding development plans for the campus. (This fact was cited in exit interviews) Indeed, the very name of the housing project (SHW) was used to purposely misguide people. When confronted about the misleading nature of the name, the administration refused to add "/E" to make the name accurate.

The Regents were also fed incorrect information. As I actually attended "informational" meetings and Regents meetings, it was clear that some people, speaking for the then administration, told Regents flat out that the process of developing the campus was followed. It was NOT. Meetings were held where there was NO INFORMATION made available. There WERE no plans to look at. There was nothing definite to consider. Yet, it was all "going through" with a off-hand remark as if all "boxes were checked."

Further, the administration representatives hand picked groups to present to, while withholding information to the general public and trustees. (YIMBY, for example). Student "representation" was hand-picked, coached, financed, and catered to (literally and figuratively).

The decisions made were not in keeping with what is best for UC Santa Cruz.

Response I101-1

The comment provides opinion that the 2021 LRDP, as drafted, and planning process was “faulty.” This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Regarding Student Housing West, refer to Master Response 8 regarding Student Housing West. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I101-2

This University is UNIQUE. It has been, and should remain, a place where SOCIAL JUSTICE and ENVIRONMENTAL JUSTICE (See Waxman# 5 below ) are the priorities. How can that be, when CEQA is blatantly ignored? Professors, at the time, specializing in this area, formally wrote to the administration pointing out that flouting CEQA was exactly what they were doing. But with the power and money that were at their fingertips, the administration chose to ignore their own experts. Why bother teaching California Environmental Law to UC students when the law is shown to be irrelevant?

University House, which has been condemned for a number of years sits on what has been known as a "protected viewscape." In the new LRDP the whole term "protected" seems to have disappeared. When questioned about University House, we know only that it is locked off from everyone. This is a complete and utter misuse of valuable space.

Childcare has been relegated to a huge, oversized, inappropriate facility. The Design Advisory Board resoundingly rejected the placement and size. They were ignored. The administration's own Childcare Committee recommended a "Necklace" approach: many small childcare centers throughout the campus. The past administration ignored them, as well.

Buildings have been wrongly used for faculty housing, remaining locked at all hours for their living privacy. Some had kitchens larger than we have in our own home! (Visual Arts Research Facility, for example).

In short, this "process" was not just faulty, but corrupt. It should not be accepted in this manner for this reason alone.

**What happened to "Fiat Lux"?** This LRDP was conducted in the "cover of darkness" and should be resoundingly rejected.

Response I101-2

The comment expresses concern regarding the 2021 LRDP development process. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. The comment does not raise any specific issue regarding the environmental analysis in the EIR, so no further response can be provided. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I101-3

Matthew Waxman's comments below:

**1. Planning Process: the student voice was excluded**

* Like all planning, the 2021 LRDP is embedded with the assumptions and biases of those involved, and missing the concerns of those absent.
* There were zero students and zero alumni on any of the planning committee's workgroups that hashed out the plan's details. The "housing and campus life" workgroup had no students, no alumni, no faculty, no college provosts, and no community members (2021 LRDP p18-31).
* Planning committee members and students were prohibited from sharing any information from the committee process with their constituents.
* Meetings were scheduled at times when students were not available because of school.
* Committee members were prohibited from talking about Student Housing West and the East Meadow. And calls to study a Habitat Conservation Plan and permanent protection of the Campus Natural Resources were repeatedly ignored.

**5. Environment: plan undervalues how ecology complements the student experience**

* The 2021 LRDP land-use concept does not show the environment weaving through the Academic Core, even though the prior 2005 LRDP emphasized this experience. While subtle, this is important as embedded assumptions shape future administrative values.
* While the prior 2005 LRDP designated the environment that weaves through the Academic Core as "Protected Landscape," the 2021 LRDP actually gets rid of this land-use category entirely, and replaces it with a new vague-sounding zone called "Natural Space." If intent is to protect landscape, why did they remove the word "Protected"?
* The 2021 LRDP gives UCSC the ability to build roads through "Campus Natural Reserves" and "Natural Space" (2021 LRDP p 122-123).
* The 2021 LRDP proposes moving endangered species habitat at the base of the campus (2021 LRDP p 121) for building employee housing but does not show how meaningful alternatives could have also worked.
* The 2021 LRDP does not commit to limiting auto traffic in the campus core and instead only says roads "may be" restricted (2021 LRDP p 131 ).

**6. Housing: plan separates frosh/soph from upper-division and transfer students**

* The 2021 LRDP says there will be two new pairs of colleges but their tenants will only be frosh and sophomores who enter from high school. Upper-division and transfer students will be separated to live in unaffiliated apartments (2021 LRDP p 100).
* It is a mistake for UCSC to segregate transfer students, who should be welcomed more, not less, into human­scale college communities.
* For a precedent of unaffiliated housing, look at Student Housing West. The 3,000 bed complex was not planned synergistically but as an island of outsourced housing, despite overwhelming need for integrated academic and student support spaces. It will lock UCSC into a 30+ year contract with a private developer-operator where nearly 50% of apartment beds are singles, the most expensive.

**7. Housing: what was intimate community will now be alienating bigness**

* The 2021 LRDP does not specify how many students will live in colleges versus unaffiliated apartments. Nor does it clarify the square-feet needed for each.
* When we examine the overall square feet given, the areas zoned for housing, and compare them to the current Kresge renovation and Student Housing West, it appears UCSC is proposing the bulk of housing to be an addition of two or three Student Housing West-scale super-block complexes for holding around 5,000-6,000 students.
* The plan says apartments are to be "in close proximity" to colleges but not connected; falsely claiming existing infill apartments that were built as affiliated with the colleges are actually not affiliated (2021 LRDP p 71 ).
* The 2021 LRDP gives information on two of the areas for housing -- construction below Oakes and construction on the hill between Cowell and the East Field -- but provides no details on the other areas represented as islands for housing in the north campus.
* UCSC does not address past students' own desire for academically-focused residential communities, as a University survey even showed (2014 Housing Market Survey p3.11 ).

**8. Great Meadow: the top is being cut off by a road that goes to parking**

* Context: Why was UCSC built in the forest and not the meadows? Before UCSC was a campus, its previous owners clear-cut the land. UCSC's landscape architect decided that instead of exposing buildings in the meadows with a conventional lawn and centralized hierarchy, the student experience would have a symbiotic relationship to the forests growing back and the meadows being cared for over time.
* The 2021 LRDP proposes to build in the Great Meadow, stretching Meyer Drive as a new east-west road pointing toward a single destination, the east parking lot.
* By cutting off the entire top of the Great Meadow, the new road moves the development boundary deeper into the Meadow and parcels it exclusively for a single-zoned function, academic core.
* The 2021 LRDP abandons how the prior 2005 LRDP sensitively added academic core space at the top of the Meadow paired with protected landscape to steward their relationship.
* Both the 2021 LRDP's new road through the Meadow, and its proposal to move the facilities operations hub to the bottom of the Meadow, will impact the value of the meadow as a public asset and add a lot of streetlights.
* By contrast, the prior 2005 LRDP also had an east-west road, but planned it to decrease environmental impact and increase meaning to student experience. That prior plan put the road within the forest, to link together spaces that benefit students: the ARCenter, McHenry Library, Hahn Student Services, and East Field House. The 2021 LRDP, on the other hand, does not use the new road to link together existing spaces of student value. The goal, like McLaughlin Drive, is to increase the flow of people above all else.

Response I101-3

The comment restates comments previously provided and addresses as part of Comment Letter I99. Refer to the responses to Comment Letter I99 above for responses to this comment.

Letter I102 Zoe Arkin

March 9, 2021

Comment I102-1

The proposed LRDP plans on increasing student enrollment by nearly 50% without including adequate resources for students and does not fully consider the fact that this dramatic increase in student enrollment will result in environmental degradation and exacerbate the current housing crisis.

Response I102-1

The comment expresses concerns related to student enrollment and housing. The comment expresses concerns related to the merits of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Refer also to Master Response 9 regarding plan implementation and phasing of development. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment I102-2

In addition to this, students are not being centered in this decision process as this comment period is very short and does not allow for students to adequately go through the entire LRDP and EIR to be able to make well-educated comments. The comment period should be extended and students should have the ability to and be encouraged to be involved with this commentary as well as with the implementation process.

Response I102-2

The comment requests extension of the public review period to provide comments. State CEQA Guidelines Section 15105 states that the public review period shall not be less than 45 days but may be extended if warranted or under “unusual circumstances.” With respect to the 2021 LRDP Draft EIR, notices were provided via email to interested parties (agencies, organizations, and individuals who had previously requested to be noticed) and posted in the Santa Cruz Sentinel at the initiation of public review. Approximately two weeks later, an updated notice was issued to the same parties (as well as any parties that were identified after the initiation of public review) with a similar notice in the Sentinel. UC Santa Cruz, in acknowledgement of the importance of the project to the community, provided a 60-day public review period to allow the public and interested agencies additional time to review and provide comments. UC Santa Cruz believes it has provided sufficient time to review this EIR, and received extensive comments which seems to suggest that commenters had sufficient review time.

Comment I102-3

The University of California, including Santa Cruz, needs to move away from merely carbon neutrality, but rather carbon­free. the LRDP or the EIR does not take this into consideration, since the UC being carbon-neutral allows for the University to utilize offsets as much as they want rather than actually changing the power grid to renewable energy. This is extremely important especially if UCSC is planning on increasing its student enrollment. More students = more power demand = more infrastructure = more everything.

Response I102-3

The comment expresses interest in a “carbon-free” campus, versus the potential use of carbon credits. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter I103 Ecology and Evolutionary Biology Graduate Students, including the undersigned: Jessie Beck, Theadora Block, Tim Brown, Melissa Cronin, Beth Howard, Niko Kaplanis, Miranda Melen, Mark Morales, Calvin Munson, Rachel Pausch, Regina Spranger, Daniel Wright

March 8, 2021

Comment I103-1

We are writing to urge UCSC campus administrators and the UC Regents to permanently protect the UCSC Campus Natural Reserve (UCSC CNR) by adding the reserve to the UC Natural Reserve System. The campus reserve is an iconic feature of UCSC and the Santa Cruz region at large. It protects a variety of threatened species, habitats, and cultural resources in a region that has seen immense habitat loss and degradation of these resources. It is also the cornerstone of a number of large swaths of protected open space, providing key connectivity to over 9000 acres of habitat. Permanently protecting this land is crucial to preserving the region’s natural history and represents an opportunity to add to the legacy of our institution.

The UCSC CNR is a crucial part of the student experience of UCSC, providing important outdoor recreational opportunities to the surrounding Santa Cruz community. In addition, it is invaluable to the teaching and research mission of the University of California. As teaching assistants, we regularly use the UCSC CNR to introduce UC students to field ecology, which cannot be fully experienced indoors. The hands-on learning opportunities the UCSC CNR provides are invaluable to our field classes and the undergraduate experience. UCSC CNR acts as an outdoor classroom and our living laboratory, something that is unique to our campus within the UC system. Undergraduates may lack access to vehicles and have limited time to travel outside of class due to home obligations or work. Therefore, the UCSC CNR is essential to providing equitable access for field courses.

Permanent protection recognizes the importance of the UCSC CNR and assures it will persist into the future, for both the University and local community. The current long-range development plan process provides a unique opportunity to accomplish this permanent protection. We strongly urge Chancellor Larive to take advantage of this opportunity.

Response I103-1

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

### Public Hearings

Letter PH1 UCSC Public Comment Hearing

February 3, 2021

Comment PH1-1

KAREN HOLL: I am Karen Holl. H-o-l-l is my last name. I am a professor in the environmental studies department. And I served on both the 2005 and 2021 LRDP advisory committees.

 My two comments, I have made at several LRDP committees meetings and I submitted here as written comments on the NOP. However, neither was addressed in the meetings. So I am repeating them here.

 First, the EIR should not only consider a growth envelope of 28,000 students, but it should also address what resources are needed for the campus to increase enrollment --

 THE COURT REPORTER: I'm sorry. You are going to have to speak a lot slower.

 KAREN HOLL: Well, I am going to speak because I need to get my 30 seconds. I will send you my transcript.

 Should address what -- if these conditions -- sorry. Enrollment in specific increments such as 22,000, 24,000, et cetera. If those conditions are not met, enrollment should not increase.

 The 2005 LRDP Committee carefully reviewed the environmental impacts needed -- construction and mitigation to grow to an enrollment of 18,500 students. The campus has now nearly reached that enrollment figure, but much of the proposed housing, class, or lab space and mitigation for cumulative environmental impacts has not happened.

 I compared the proposed new assignable square footage from the 2005 LRDP with the numbers of what has been constructed, and, in fact, only 12 percent of the proposed academic and support space and 45 percent of the housing proposed has actually been constructed despite the fact that enrollments have reached 18,500 students. This means that student is overcrowded, class times have been shortened, and campus lands have become increasingly degraded. And to my knowledge, there is currently no available public funding for academic building construction, and the budget situation is even worse now with the additional COVID-related deficits.

I know the LRDP has a plan to allow for growth rather than a mandate for growth, but as the last LRDP shows, the student population can grow without the resources outlined in the LRDP being available.

 Therefore, I consider it essential that the 2021 LRDP EIR include discussion of specific intermediate student-population limits beyond which UCSC cannot grow without adequate resources.

 The aesthetically pleasing and thoughtful LRDP that the consultants produced is meaningless if we do not have the funding to implement it.

Response PH1-1

The comment provides opinions regarding enrollment growth. Refer to Master Response 9 regarding an evaluation of incremental increases in campus enrollment and size. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-2

 My second concern regards permanently protecting at least some portion of the Campus Natural Reserves, which falls under several EIR topics. The CNR is critical resource for the campus teaching and research mission as noted in the Draft LRDP. I appreciate that the area of the CNR was nearly doubled in the new LRDP. However, for faculty to invest in long-term research projects that involves students, they need to know that certain areas of lands are permanently protected. However, every time I've asked about permanent protection of the CNR during the planning process, I've been told, "Not now. We'll discuss it later."

 In the Final LRDP Committee meeting and in my correspondence to the Planning Office staff, I was told that this issue would be addressed during the EIR process. So I was anticipating that permanent protection would be addressed in the Draft LRDP and EIR, but it wasn't, which I consider a major oversight for a document that will guide the next 20 years of campus planning.

 I know that the UCSC reserves director, Gage Dayton, and others are meeting with the Chancellor in March to discuss this topic, and I feel strongly that permanent protection of the CNR does need to be addressed in the final version of the LRDP.

Thank you.

 And I will be happy to provide a transcript of the exact wording.

Response PH1-2

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection and preparation of a campus-wide HCP. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-3

ANDY SCHIFFRIN: Will do.

 First, I want to thank you for the opportunity to speak on the LRDP's Draft EIR.

My name is Andy Schiffrin, A-n-d-y S-c-h-i-f-f-r-i-n. And I teach a class entitled "Environmental Assessment" at UCSC.

I'll keep my comments brief here.

In reviewing the Draft EIR, I found many inadequacies in the document in terms of the requirements of CEQA. Perhaps the most glaring is that the entire analysis is built on the assumption that the objective of housing 100 percent of the new students and up to 25 percent of the new faculty and staff will be attained; however, there is no substantial evidence -- none at all, actually -- provided that supports this assumption, and there is no recognition, also, of the need to tie the provision of housing to enrollment increases.

Response PH1-3

The comment states that the Draft EIR contains many inadequacies, including the Draft EIR lacking substantive evidence to support the assumption that the housing objectives will be attained, and not tying the provision of housing to enrollment increases. CEQA requires the consideration of a proposed project, and requires that the impact evaluation is based on substantial evidence, However, there is no such requirement regarding whether a project would be constructed as proposed. It is implausible that an applicant would provide evidence, beyond the proposal itself, to prove the project would be built. Regardless, CEQA provides for numerous checks regarding the adequacy of impact analyses and how they apply to a project as it is developed. As subsequent development is proposed under the 2021 LRDP, if approved, the development would be compared to the impact analysis in the EIR to determine if it is within the scope of the EIR, or if additional CEQA analysis is required. This process is detailed in CEQA Guidelines Section 15168(c) (use of the program EIR with later activities). Refer to Master Response 9 regarding phasing and the use of interim targets/milestones.

Comment PH1-4

The Population and Housing chapter analyzes the potential of environmental impacts of housing 100 percent of the students on campus, but the proposed mitigation measures are inadequate.

Mitigations must be action forcing and must avoid or reduce the significant impacts of a proposed project. Simply planning to house the students and to address the need to house the students is not an adequate mitigation measure. It does not reduce the impacts.

 As proposed, these are not adequate mitigation measures. The mitigation measures need to ensure that the housing will be provided and when they'll be provided in order to avoid both significant off-campus and on-campus impacts.

Response PH1-4

The comment requests the inclusion of mitigation measures that require the provision of housing and when they will be provided. The exact timing of development within the LRDP area, including housing, cannot be determined at this time because the type and timing of development is variable and affected by a number of factors. Please see Response PH1-3 as well as Master Response 9 regarding the timing of development and the need to conduct additional CEQA analysis as development under the 2021 LRDP is brought forward.

Comment PH1-5

A second major inadequacy of the Draft EIR concerns its treatment of the significant impacts of the development in the North Campus subarea. The Draft EIR identifies the danger of wildfires as a potentially significant impact of the LRDP; however, given the particular wildfire danger in this subarea based on its location in a designated high-fire-hazard-severity zone with no new road access and no secondary access, housing 3,700 students as well as academic support facilities there is not responsible. And the Draft EIR doesn't adequately analyze these dangers or provide meaningful mitigation measures. Simply considering the future preparation of a Vegetation Management Plan with general performance standards as sufficient for reducing the impact to a less than significant level is simply not adequate under CEQA.

 I urge the university to take these concerns seriously and revise the EIR to adequately respond to them.

 While I have many other specific issues with the Draft EIR, time is short. So I will end here.

Response PH1-5

The comment expresses concern related to the wildfire analysis, including that mitigation measures are not adequate. For a further discussion of wildfire, including wildfire risks, please refer to Master Response 4 and Section 3.18, “Wildfire of the Draft EIR.” As stated on page of the 3.18-17 of the Draft EIR, Mitigation Measure 3.18-2 would require UC Santa Cruz to prepare and implement a campus-wide vegetation management plan consistent with California Government Code Sections 51179 and 51182, and implement a policy framework for managing fuel loads and maintaining defensible space consistent with Public Resources Code Section 4291. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-6

JOANNE BROWN: Hi. My name is Joanne Brown, J-o-a-n-n-e B-r-o-w-n.

 I am a resident of Santa Cruz County and live in the Santa Cruz Mountains with a master's degree in biology with a focus in ecology.

 My comments are on the Biological Resources section. And I'll be submitting additional comments in writing.

 Landscape within the boundaries of the LRDP is rich in biodiversity. It includes sensitive natural communities, 15, in total, wildlife-movement corridors for a number of species, including mountain lions, wildlife nursery sites, environmentally sensitive habitat areas, at least seven special-status plant species, at least 19 special-status wildlife species.

 The EIR does not address the permanent loss of habitat for its special-status species from construction activities in the resulting permanent changes. The proposed mitigations do not afford real protection to help ensure the survival of special-status species over time in this area.

 For wildlife, the primary focus of mitigation efforts is during the breeding season. There's little effort planning for long-term protection and preservation of habitat for these species outside of the breeding season.

 In areas impacted by new construction, the EIR does not afford protection to intact habitats nor address negative impacts on surrounding natural areas outside the boundaries of the LRDP. These permanent changes to the landscape will affect all species of wildlife therein, not just special-status species.

 Rather than implementing mitigation efforts after habitats are destroyed, why not initially plan to protect the sensitive natural communities, sensitive habitat areas, and special-status species that currently or potentially occur within LRDP boundaries? Protecting the biodiversity and natural beauty that occurs within the boundaries of the LRDP will be a gift to generations of students, educators, and our community. These unique habitats offer opportunities for ecological research and long-term environmental studies.

 Although UCSC is not subject to municipal regulations of surrounding local governments, I would hope that UCSC decision makers feel a moral obligation to do their part by adhering to municipal regulations that protect our locational environment and wildlife, especially considering the current environmental crises we are experiencing: fires, floods, debris flows, and resulting loss of wildlife habitat, including wildlife nurseries and corridors.

Response PH1-6

The comment states that the Draft EIR does not address the permanent loss of habitat for special status species as a result of 2021 LRDP implementation, the mitigation measures for wildlife should also focus more on the time period outside of the breeding season, there is no protection to surrounding natural areas outside of the 2021 LRDP area boundaries, requests proactive protection of sensitive habitat, and requests that UC Santa Cruz adhere to municipal regulations. Refer to Response I29-8 regarding impacts to special-status species and sensitive habitat. With respect to potential impacts outside of the breeding season, as stated on pages 3.5-42 through 3.5-65, implementation of Mitigation Measures 3.5-1a, and 3.5-2a though 3.5-2n would reduce potential impacts by requiring species specific reconnaissance-level surveys to determine the likelihood of presence and implementation of measures to avoid injury or mortality of the species if detected, incidental take authorization. and habitat compensation. Please refer to Master Response 2, specifically the discussion under “Adherence to Local Policies,” regarding the application of local requirements on development within UC Santa Cruz.

Comment PH1-7

Several questions for consideration:

 What percentage of recent biological research for the LRDP was conducted in the field as compared to online?

 How can a plan implementing wildlife and environment for the next 20 years be realistic unless it is based on current data collected in the field?

Response PH1-7

The comment requests information regarding the level of surveys conducted for the 2021 LRDP and expresses concern regarding a perceived need for field surveys as part of the 2021 LRDP EIR’s analysis. Refer to Response I29-47.

Comment PH1-8

 As a result of the CZU Complex fires, over 100,000 acres were burned, resulting in massive habitat loss for wildlife in the Santa Cruz Mountains.

 How has the increased necessity of protecting wildlife habitat in the Santa Cruz Mountains been addressed in the LRDP?

Thank you.

Response PH1-8

The comment asks for information regarding how the 2021 LRDP considered habitat conservation priorities in light of the CZU Lightning Complex Fires. Refer to Response I29-43.

Comment PH1-9

 ABRAHAM BORKER: Hi. Thanks. My name is Abraham Borker, A-b-r-a-h-a-m B-o-r-k-e-r. I am the program director of the UC Santa Cruz Doris Duke Conservation Scholars Program and a former lecturer of the Ecology and Evolutionary Biology Department.

 And I believe that -- I want to come here to advocate for the Campus Natural Reserve being considered part of the UC Natural Reserve system.

 Our Scholars Program, a nationally recognized program, just strengthened conservation by accelerating and connecting a diverse community of emerging conservation leaders at UC Santa Cruz largely because of our outdoor classrooms and the biological integrity of our campus. This program comes with millions of dollars of funding, raises the reputation of the university, and is an essential part of our community, and without our natural reserves and our outdoor classrooms, it would not be possible.

So I implore you to consider protecting the Campus Natural Reserve as a UC natural reserve to ensure that, as the EIR suggests, it will get permanent protection and leverage the resources of the largest most effective network of outdoor laboratories and classrooms. It would ensure that future generations of UCSC students, staff, and scientists all benefit from the threefold Page 39 mission of the UC reserves in research, teaching, and service.

 And I want lots of people to talk. So I will end my comments there. Thanks for having me, and thank you for hosting this.

Response PH1-9

The comment expresses the opinion that the Campus Natural Reserves should be permanently protected and is noted. Please refer to Master Response 12 regarding long-term habitat protection.

Comment PH1-10

CHRISTOPHER CONNERY: Okay. Thanks very much.

I am Chris Connery, C-h-r-i-s-t-o-p-h-e-r C-o-n-n-e-r-y.

 A few comments mainly about the meadows.

 I'll note that the 1963 Long-Range LRDP had a principle that has been adhered to up until this point of protecting the meadows, of not building on the meadows. Sometimes the meadow -- the Great Meadow refers to what now includes the Great Meadow and the East Meadow. Sometimes these are referred to as two, sometimes as one.

Problem is with the current LRDP. The NOP shows student housing along the part of Student Housing West that is planned for the East Meadow as a fait accompli. This is an open question whether that project will be built. There's several -- there's litigation ongoing about that, and that has not been settled. At this point, that portion of the East Meadow should be shown as natural space or campus resource land.

 I want to re- -- and then going to what's now referred to as the "Great Meadow," I want to read something that Chancellor Pister said in 1991 when he decided not to build the Meyer Drive Extension on the Great Meadow.

 "We totally relocated the Meyer Drive Extension. By the way, it didn't take me more than a couple of days to realize the stupidity and, in a sense, the error in trying to put Meyer Drive through the Great Meadow."

 That was 1991. There should be -- that -- the potential permanent roadway should be eliminated.

Response PH1-10

The comment expresses the opinion that no development should occur within the East Meadow and is noted. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, please refer to Master Response 2. Regarding the Student Housing West project, this project was approved under and is consistent with the 2005 LRDP, it is not part of the 2021 LRDP. Refer to Master Response 8 for more information regarding the Student Housing West project. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-11

 And I would just like to conclude by saying that the aesthetic impact of developing the meadows is woefully underplayed in the current EIR. And the encroaching development that's already happening in the East Meadow, the so-called "temporary construction zone," which has been there for ten years, now includes semipermanent buildings. This is below the East Remote Parking Lot. There should be no development below the Eastern Remote Parking Lot all the way down to Hagar.

 And the campus should reaffirm its commitment to protecting the meadows, which have not only biological and environmental, but also cultural historical values.

Response PH1-11

The comment expresses concern related to the aesthetics impact discussion of the EIR, however, does not provide specific details of the EIR analysis for which an informed response can be provided. The comment also expresses the opinion that no development should occur within the East Meadow. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-12

GILLIAN GREENSITE: Thank you very much. And thank you for the opportunity. And thank you for the court reporter.

 I have a number of issues with the Draft EIR, but given the time, I will just focus on a couple, and I will submit others in writing by the due date.

Much has been made of housing all new students on campus. I think what's being forgotten is the other students who will be living off campus. And using your numbers that a build-out -- there could be 17,000 students and staff looking for off-campus housing compared to the 10,000 currently who live off campus. And you've made no study in the EIR of the impacts of that extra 7,000 students looking for off-campus housing. In fact, what the EIR says, it cites the vacancy rate in Santa Cruz, 5.6 percent, and says that that vacancy rate plus the new developments that are being built off campus will take care of that. In fact, their quote is "Housing is generally available for all of those new --" not new like first year, but "additional students that all of this build-out would bring." I feel that's an enormous lack in an EIR. You only study or say you will study unplanned growth.

Response PH1-12

The comment states that the EIR does not evaluate an additional 7,000 students looking for off-campus housing and understates the lack of housing in the local community. Section 3.13, “Population and Housing” of the Draft EIR assesses the potential impact of the 2021 LRDP on the local housing market and determines that impacts would be significant and unavoidable. Within Chapter 4, “Cumulative Impacts,” the EIR evaluates project impacts in combination with other development in the area, including additional on-campus housing through Student Housing West, and concluded that, with cumulative development, all of the growth in students enrollment would be accommodated on campus. It is unclear where the commenter interpreted that an additional 7,000 students would look for campus housing. Based on the 2018/19 baseline conditions, the 2021 LRDP would result in an increase of 9,482 students, not 17,000. Refer to page 2-10 of the Draft EIR for further clarification.

Comment PH1-13

And, similarly, the impact on recreation facilities seems woefully inadequate. You say that the on-campus land will be offset by off-campus and that --provisions -- and the impact is none or less than significant because city -- additional students will pay on city fees. Well, there's no additional fees paid for surfers in the surfing lineups. So I found that very inadequate.

Response PH1-13

The comment expresses concern regarding impacts to recreational facilities. As noted in Section 3.15, “Recreation” of the Draft EIR, UC Santa Cruz would provide appropriate recreational facilities for student enrollment and impacts to recreational facilities were determined to be less than significant. No further response is possible.

Comment PH1-14

You also are not looking at the issue of displacement. And, in fact, you say it's not relevant. I disagree, and I think others would disagree. All of the new development which is going in in Santa Cruz, which apparently will be for students given that that's what you say is adequate provisions, leads to the displacement of our low-income workers. I feel that really should be examined.

Response PH1-14

The comment expresses concern regarding displacement of residences. The Draft EIR (on page 3.13-9) evaluates the potential for development under the 2021 LRDP to physically displace substantial numbers of people and existing housing, and determined that implementation of the 2021 LRDP would not result in significant impacts. Further, as noted in the Draft EIR (e.g., Chapter 2, “Project Description” of the Draft EIR), the majority of student enrollment would be accommodated (i.e., 100 percent above 19,500 FTE) on campus such that displacement of substantial numbers of low-income workers is not anticipated.

Comment PH1-15

I feel the Westside Research Park impact is inadequately researched. It is opposite a monarch overwintering site.

 There's many others, but I can see my time's running out.

Response PH1-15

The comment expresses concerns related to the evaluation of Westside Research Park impacts. The overwintering monarch site noted by the commenter is associated with Natural Bridges State Park and is acknowledged. However, implementation of the 2021 LRDP would not involve the disturbance of Natural Bridges State Park, including the removal of trees that could serve as habitat for monarchs. The overwintering monarch site was considered but because no direct impacts to the site would occur, impacts were appropriately not identified. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-16

Lastly, then, what I would say is on the public services, you mention nothing about safety.

I'm sorry. I didn't spell my name, and I see time is running out. Shall I do that now?

JOLIE KERNS: Sure. If you want to take a couple of minutes to wrap up, that's fine, and you can spell your name at the end of your comment.

GILLIAN GREENSITE: Thank you very much.

So I think in terms of student safety, I worked at university for 30 years, in charge of rape prevention education, and to have no comments in terms of whether it's police security or other resources with this expansion of the campus, I believe, is an oversight.

Response PH1-16

The comment expresses concern regarding the potential increase in demand for public safety services. Public safety and the need for public-safety-related service is included as part of the analysis of public services impacts, within Section 3.14, “Public Services.” More specifically, Impact 3.14-2 evaluates the potential need for additional police service facilities to maintain on-site security and safety and impacts associated with their development. As noted on page 3.14-11 of the Draft EIR, the 2021 LRDP includes the potential colocation of a new UC Santa Cruz Police Department (PD) facility, which is carried forward through the Draft EIR’s analysis.

Comment PH1-17

And I would just add that the Biology section in terms of the critical species has very little detail. You omit where the current burrowing owls are along Hagar Drive, and it's very vague. There's no baseline documentation or data.

Response PH1-17

The comment expresses an opinion against the baseline conditions selected for the Biological Resources section of the EIR. For a discussion of selected baselines, please refer to Master Response 1. Additionally, and as noted on page 3.5-1 of the Draft EIR, the EIR’s analysis of potential biological resources impacts is based on review of recent biological surveys and database information as well as an overview survey, and considered information presented in public comments provided during public review of the NOP for the 2021 LRDP EIR. The specific locations of certain individual animals (e.g., burrowing owls) were considered, including location information available through the California Natural Diversity Database. However, presentation of specific locations of burrowing owls was not considered necessary to provide an appropriate programmatic analysis of the potential impacts to burrowing owls from 2021 LRDP implementation. Potential impacts to burrowing owls are evaluated in Section 3.5, “Biological Resources,” on pages 3.5-50 through 3.5-52 of the Draft EIR. As state on page 3.5-52, implementation of Mitigation Measures 3.5-1a and 3.5-2e would reduce potential impacts on burrowing owl by requiring reconnaissance or protocol-level surveys for individual projects under the 2021 LRDP to confirm whether the species may occur and, if so, implementation of measures to avoid injury or mortality of burrowing owls and destruction of active burrows if detected, and compensation if burrows cannot be avoided. As a result, the EIR’s analysis of impacts to biological resources is considered appropriate, adequate, and in accordance with CEQA requirements.

Comment PH1-18

And, lastly, I'll just say that the aesthetics under "visual impact" are going from the current 2 million assigned square feet to 5 million ASF in terms of buildings is very poorly depicted as an impact, and it needs much more impact since your conclusion is the new development is consistent with existing, quote, esthetically compatible facilities. Well, I assume Student Housing West is not included in that, but if that is the yardstick for future development, then it is -- I don't think it could be objectively called "esthetically compatible."

I'll leave it there. Thank you for the extra time. My name is Gillian, G-i-l-l-i-a-n. And the last name, Greensite, G-r-e-e-n-s-i-t-e. Thank you very much.

Response PH1-18

The comment reflects the commenter’s opinion that the anticipated level of development would not be aesthetically compatible. As part of the Draft EIR’s analysis, visual simulations were prepared to assess the degree to which views and aesthetic conditions may change as a result of 2021 LRDP implementation. As shown in Section 3.1, “Aesthetics” and due to intervening topography and vegetation, and the proposed compact footprint that limits development within infill areas and adjacent to existing academic and college areas, the development anticipated under the 2021 LRDP would largely be screened from view and as a result, impacts were determined to be less than significant.

Comment PH1-19

I don't have any professional qualifications as many of the people who have spoken previously have mentioned, but I've -- I was a student. I graduated --I am an alumni of UCSC from the very earliest times. I graduated in 1970, and I've lived in Santa Cruz continuously since then. So I have a great interest in the campus and what occurs up there. I use it often. I attend events, and I hike on the campus frequently.

And I have several things that I would like to say. And I don't know how to fit them into an EIR. I really don't understand how to do that.

Number one is the development of the East Meadow. With the housing stuck down in the corner where it is so far away from the central campus is not fair to the people who might live there. They are very, very far from any facilities that they would be using. It is very poor planning.

Response PH1-19

The comment expresses an opinion against development within the East Meadow and is noted. This comment does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. Regarding the Student Housing West project, this project was approved under and is consistent with the 2005 LRDP, it is not part of the 2021 LRDP. Refer to Master Response 8 for more information regarding the Student Housing West project. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-20

And, also, it does not fit in with any sense of aesthetics. To interrupt the beautiful view as you drive onto the campus, I think, is just terrible. And others who know about the biological value of that meadow have spoken to that, and I certainly agree with them, but I can't say anything like they have.

Response PH1-20

The comment reflects the commenter’s opinion regarding views of potential 2021 LRDP development from within the campus and the biological value of the on-campus meadows and is noted. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. Refer to Response PH1-18 regarding aesthetic impacts and Response PH1-6 regarding potential impact to special-status species and sensitive habitat. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-21

And the water issue is completely not specified in what you were talking about. You are going to add all of these people to the community, and you are just saying, well, the water -- the City of Santa Cruz will have to take care of that when we are probably facing water restrictions this summer. As we speak, we are 7 inches below normal and only six weeks of rainfall to make that up. And we will not make that up. We will have water restrictions this summer, I am sure.

Response PH1-21

The comment expresses concerns related to water supply. Regarding current water demands, as stated on page 3.17-12 of the Draft EIR, according to the City of Santa Cruz’s 2015 UWMP, UC Santa Cruz’s demand for potable water was projected to constitute 5.9 percent of the City of Santa Cruz Water Department supply in 2020. Please refer also to Master Response 7 regarding potential water supply impacts. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-22

And about the campus reserves, I don't understand the Campus Natural Reserve system because I have a map that shows that, and when I go to those places, they are crisscrossed with mountain bike trails. Any animals that might have lived there were squashed years ago. You have not enforced any protection on the Campus Reserve now. So all of this conversation and talk in the EIR about the Campus Reserve is just hollow.

Response PH1-22

The comment expresses opinions related to protection of the Campus Natural Reserves and is noted. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-23

I welcome development of MBEST. It is the first time I have ever heard it mentioned. I've been aware of it. Some people are aware of it. And that is where campus growth needs to go, down in Marina, where they have dozens of acres, hundreds of acres. I think it's 1600 acres of flat, buildable land.

Thank you for providing this opportunity for me to speak. And I am off now.

Response PH1-23

The comment expresses the opinion that alternative growth should occur at UC MBEST and is noted. The comment does not address the adequacy of the EIR analysis, and no further response is necessary. However, for additional information related to alternatives, please refer to Master Response 3 of this document and Chapter 6 of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-24

FABRA CONSTANTINE: Hi, everyone. Thank you for the ability to speak tonight.

I work personally with students. I am an independent education consultant. What an independent education consultant does is we work daily with students who have goals to get into colleges. And I do currently have students that are attending UCSC, and I stay in contact with them. And they are telling me of the problems they are experiencing because of the high cost to get second-, third-, fourth-, and fifth-year housing within Santa Cruz. The pricing is very high. They are upset about it. They are emotionally drained. They feel they might not even be able to complete their degree because of what's been going on with campus. There's food insecurity.

There's graduate students complaining and actually petitioning, doing everything they can for the campus to understand this is not the campus to increase enrollment. There's other areas of California. Big state, lots of land. They would definitely welcome, welcome with open arms, students to the Humboldt area, even taking over the Cal State campus there, down in Marina, even Merced, or spread it out in the other eight SUC's. No reason to plop 10,000 more in an area that is not conducive for higher education.

These students need to complete their degrees, and they need to do it in a place that offers them what will help them further their lives. Not so much debt, not so much stress, not so much being in war with the community. We don't like what we see the students have to go through. It's not fair to them. It's not the way they should be launched for their careers.

Response PH1-24

The comment expresses concerns related to housing and enrollment at UC Santa Cruz and is noted. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project and a discussion of housing affordability, please refer to Master Response 2, specifically the discussions under “2021 LRDP Planned Development” and “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-25

There is so much you just went through on the EIR. We are not ignoring that. These are definite problems. We don't want these problems. We don't really want UCSC to expand at all. And it's already been a voted measure, and it passed gloriously because this community is not welcoming 10,000 more students.

So you have to start really looking at other places to expand. It makes no sense. It would be much more even affordable. Wasting your time on this is ridiculous. The wisdom that could be done to really take care of the needs of the baby boom that I know is coming and you are planning for does not make sense to do it here. You really have to start again, start from scratch, be in an area that makes sense, that will actually help your students. That's the goals of the UC's. Bring up those first-gen students and do things that further them, Page 49 not saddle them with debt. Because the debt doesn't necessarily come from tuition. The debt comes from the housing problem. They cannot buy food. This is an expensive area. It is not conducive.

Thank you for the very important meeting tonight, and I hope you pay attention. Thank you.

Response PH1-25

The comment expresses preference for the development of additional university facilities at another location due to costs and community opposition and is noted. For additional information related to alternatives, including offsite alternatives, please refer to Chapter 6, “Alternatives” of the Draft EIR, which discusses several off-site alternatives and provides a more-detailed evaluation of the use of MBEST, and Master Response 3. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-26

Faye Crosby, F-a-y-e C-r-o-s-b-y.

I'd like to echo the comments made by many of the previous speakers and, in particular, pick up on what Chris Connery has said and also Kathy Haber.

I'd like to speak against the -- any kind of building going on in the East Meadow, that little corner where Hagar Drive takes up. I know that you know there's a lawsuit going on. But preserving the aesthetic and the beautiful view of the campus seems to be just as important as -- it seems to be a very important part of the education of the student.

Response PH1-26

The comment expresses the opinion that no development should occur within the East Meadow and is noted. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. Regarding the Student Housing West project, this project was approved under and is consistent with the 2005 LRDP, it is not part of the 2021 LRDP. Refer to Master Response 8 for more information regarding the Student Housing West project. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-27

So -- and I'd like to say that there sometimes are false dichotomies. One of them crept into what you said, Jolie Kerns. You talked about balancing an educational mission versus environmental stewardship in your really well-prepared and lovely presentation. We are all grateful for the time to speak. But that shows that even a person as intelligent and dedicated as you sees a false dichotomy between education on the one hand of many students and a protection of this beautiful and sacred environment. I think education would include protecting the environment.

Response PH1-27

The comment expresses the commenter’s opinion regarding the relationship between UC Santa Cruz’s educational mission and environmental stewardship and is noted. The comment does not address the adequacy of the EIR analysis. No further response is necessary. As described in the land use designations in Section 4.3 of the 2021 LRDP, the intent of the Campus Natural Reserve “is to protect natural features and processes for the purposes of teaching, learning, and research, as integral to the academic mission.” Also refer to Master Response 12 regarding long-term habitat protection within the LRDP area. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-28

So another false dichotomy that I'd like to address, because no other speaker has, is the false dichotomy that has erupted on the campus between the need for child care on the one hand and the need to preserve the aesthetic beauty and educational soaring function of the East Meadow and also the Great Meadow. There are many places where child care and family-student housing can be placed. In fact, Ranch View Terrace II, which has already been environmentally vetted, could be a place where you could have the debouching of the students from family-student housing currently. They could be relocated there, and then they could be relocated someplace else.

Response PH1-28

The comment expresses opposition to development within the East and Great Meadow and prefers Ranch View Terrace II as a location. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. Regarding the Student Housing West project, this project was approved under and is consistent with the 2005 LRDP, it is not part of the 2021 LRDP. Refer to Master Response 8 for more information regarding the Student Housing West project. For comments on the 2021 LRDP project, refer to Master Response 2. For further description of alternatives analyzed in the EIR, including alternative sites, refer to Master Response 3. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-29

You spoke about going to MBEST. And MBEST might be a great place to put graduate students and then take over what we have now as current graduate-student housing and use that as a place to have the eleventh college and put the twelfth college up where we had a park for RVs.

Response PH1-29

The comment expresses opinions related to alternative sites for development, including UC MBEST. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. For additional information related to alternatives, including offsite alternatives and specifically development at MBEST (UC Monterey Bay Education, Science, and Technology Center), please refer to Master Response 3 of this document and Chapter 6 of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-30

So creative rethinking is very important. And let us avoid false dichotomies. The real dichotomy is between a quality education for students today and tomorrow and the future and just cramming in one more student, one more student, one more student to meet some sort of goal dictated from on high. Let's give a real education, not just an education in name.

Response PH1-30

The comment includes conclusory remarks and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-31

Waxman, W-a-x-m-a-n.

 Land Use and Planning Section 3.11 says there are no mitigation measures needed because there is less than significant impact. This is false. EIR Table 3.11-2 lists acreage numbers for land-use zoning comparing 2005 LRDP and 2021 LRDP. These numbers showed total acreage in aggregate, but it does not describe or show visually how such changes in acreage also change physical adjacencies between different land-use zones from the 2005 LRDP.

Place study include mitigation that illustrates with overlay to land-use map and photographic documentation to address how changes to physical location of land use in 2021 LRDP significantly impacts the way current campus 2005 LRDP land-use zones create benefit and functional utility to educational experience through complementary land-use adjacencies.

 Example 1: 2021 LRDP rezones the entire top of Great Meadow, a single-use category, academic core. This replaces the way same area was zoned in 2005 LRDP with smaller patch of academic core and larger patch of protected landscape. 2021 LRDP removes complementary relationship between academic core and protected landscape, replaces with academic core only. This will dramatically impact qualitative relationship and benefit of protected landscape that the Great Meadow brings to student and faculty academic experience and impact to the community-based value of Campus Meadow as public asset.

 Example 2: Meyer Drive Extension in 2021 LRDP functions to connect to a single function: a parking lot. This dramatically contrast in 2005 LRDP, which ran through forest edge and had been planned to use adjacencies between different functions to bring benefit by linking the arts area, McHenry Library, Hahn parking lot, and Athletics & Recreation center.

Response PH1-31

The comment states that the Draft EIR improperly concluded that impacts would be less than significant in Section 3.11, “Land Use and Planning.” Refer to Response I100-1, which addresses this concern.

Comment PH1-32

2021 LRDP fails to address the impact of changes to land-use adjacencies and fails to address the impact of student, faculty, and community experience by removing complementary land-use zoning from 2005 LRDP and replaces it with mono-functional zoning.

Response PH1-32

The comment states that the Draft EIR failed to address the impact to adjacent land uses and changes in the community experience compared to the 2005 LRDP. Refer to Response I100-1, which addresses the same comment.

Comment PH1-33

I request that you -- these -- in these commenting, you incorporate by reference Appendix B of the Notice of Preparation comments starting at page 57, comments prepared for the -- on behalf of the Habitat and Watershed Caretakers by the Law Offices of Stephan C. Volker. I request you incorporate this by reference in my comments here. It starts at 57, and it goes -- I don't know where his last attachment goes to. But I request you incorporate that.

Response PH1-33

The comment requests incorporation of comments provided in response to the EIR Notice of Preparation. The comment does not address the adequacy of the EIR analysis. NOP comments are provided prior to the preparation of the Draft EIR and cannot be considered comments on the contents of the subsequently drafted Draft EIR. Further, NOP comments, including the letter submitted by the Law Offices of Stephan Volker (beginning on page 57 of Appendix B, as noted by the commenter), were considered during preparation of the Draft EIR, as required by CEQA. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-34

My comments are related to the fact that the Environmental Impact Report has an improper baseline. It's based on the 2005 LRDP as opposed to what CEQA requires, which is that it be based on the current conditions at the time NOP was filed. And at the time NOP was filed, the pandemic was known. In the time the comments were made, the alternative educational methods of online learning were in place and have been in place since then, and now that is the current baseline. And as a result of that flawed baseline, I believe that your alternative analysis is inadequate because the no-project alternative is not correct because it uses the wrong baseline. And your -- you also did provide some -- an alternative for online learning, but that analysis is inadequate because it's, again, based on the wrong baseline.

 And so I request -- my request is that you --that you correct that, you redo the analysis, and if it requires you to do a supplemental EIR, so be it.

Response PH1-34

The comment expresses an opinion against the baseline conditions selected for the EIR. For further discussion of selected baseline, please refer to Master Response 1. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-35

And then my -- the other issue that I am concerned with is this -- I am looking at the land-use map for the 2005 Long-range Development Plan amended March 2019, and the East Field Great Meadow is designated as protected landscape. In the current -- it's called "natural space" and is no longer protected. I object to that, and that should be justified somehow. What does that have to do with teaching, research, or public service? So I request that be protected in perpetuity.

Response PH1-35

The comment requests permanent protection of the East Meadow. The comment does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, please to Master Response 2. In addition, as described in the land use designations in Section 4.3 of the 2021 LRDP, “the purpose of the Natural Space designation is to maintain special campus landscapes for their scenic value and maintain special vegetation and wildlife continuity zones that are intrinsic to the campus’ identity.” The land use does not allow development except for supporting uses such as carefully sited paths, roads and unobtrusive research uses, which do not impinge on the overall character. Refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-36

And I want to, first of all, recognize everything everybody said about the details of the LRDP and the EIR that are flawed and need attention.

Response PH1-36

The comment states that details of the EIR are flawed, however, does not provide specific details of the EIR analysis for which an informed response can be provided. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-37

But I would actually rather speak holistically and fundamentally to what is being planned for the future of this campus and how it is just fundamentally flawed. This is not a campus that's built to be the size of UCLA or competitive in the ways that some of the other UC's are.

 A number of years ago -- I want to say it was maybe 2015 -- at a UC Regents meeting, George Blumenthal submitted a report to the UC Regents, something about the campus's long-term plan. And the Regents said, "Oh, thank you, George. We really appreciate your work. And how do you plan to implement this?" And Chancellor Blumenthal looked at the Regents and said, "Well, you tell me to write your reports, and then you give me no money to implement anything. You tell me how I am supposed to get this done."

 And this has consistently been the situation of our campus. We don't have the resources. We don't have -- we can't build on our campus. We don't have adequate access to water, and the grade is prohibited, and we have protected lands around us. This is not a situation where we should be growing by 10,000 people. We just shouldn't be doing it. It is not at all sustainable, and we all know it.

 At what point -- what will it take for our administration to tell the Regents, actually, no. You need to open another UC campus and keep UC Santa Cruz the way it is, which actually should resemble a small liberal arts school. We don't have the resources.

Response PH1-37

The comment includes conclusory remarks and expresses general concerns about the project, water access, the grade and protected lands. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For further information related to water, including details related to the water supply analysis, refer to Master Response 7. With respect to funding mechanisms, refer to Master Response 2, specifically the discussion under “2021 LRDP Planned Development.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-38

As a graduate student, I want to know what is the plan for grad students? When we say 100 students living on campus, what about grad students?

 We asked for a cost-of-living adjustment last year, which was one of the few ways that I can think of to try to make education on this campus more sustainable. Because we are not actually supporting the people who are educating the vast majority of the students here. There really is no way out. We can submit as many reports as we like and try to plan as many buildings that will take, you know, years and years to build, and by the time they are built, the cost will have ballooned to the point that students can't afford to live there as tuition will continue to increase for undergraduates and as graduate student payment stagnates.

So I just want to say that students are not for this. A few years ago, the SUA at UC Santa Cruz, the undergraduate student union, voted to freeze enrollment. That is unprecedented. Because undergraduates, more than anyone, want so badly for the UC's to represent the demographics of California.

 We can't do it. This can't fall on Santa Cruz. We are not other campuses. And our administration just has to put its foot down and stop this growth, which is not supported.

Response PH1-38

The comment expresses general opposition of the project and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-39

JOE SERRANO: Thank you, madam. Again, this is Joe Serrano, J-o-e S-e-r-r-a-n-o. I am the executive officer for the Local Agency Formation Commission of Santa Cruz County, better known as LAFCO. We are a state agency that oversees the boundaries of cities and special districts. And we encourage smart growth and the efficiencies of delivering municipal services. So what does that mean? We are the ones that determine the most logical service provider of municipal services, such as water, sewer, fire protection.

Based on our analysis, it seems that the main campus, half of it, is in the city of Santa Cruz, and the remaining half is in unincorporated county territory. And under state law, when there's developments that need municipal services such as water, they need to get LAFCO's approval.

Response PH1-39

The comment includes introductory remarks and addresses approval through LAFCO for water and sewer services. For a detailed discussion of LAFCO involvement, including the 2008 Cooperative Settlement Agreement, please refer to Master Response 9. Also refer to responses to comments submitted by LAFCO as part of Letter L3, which was received by UC Santa Cruz on February 3, 2021 during public review of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-40

So my commission has adopted a comment letter that we will be sending out indicating that there are five proposed projects that are just outside the city limits. Should the university move forward with developing those five projects, they would need to get LAFCO's approval to receive water from the City. So what my comment letter identifies is possible governance options for the university to fulfill that State requirement.

Response PH1-40

The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. It is unclear which five projects the comment is referring to, as discussed further in Master Response 11, Level of Detail, the Draft EIR is a program level document and does not identify specific development projects. Please refer to Response PH1-39, above, regarding LAFCO approval. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-41

That being said, I do want to commend the university and its staff in doing this type of long-range planning. As you could hear from the other commenters, it's not easy. Planning for the future is difficult. But if you emphasize on the comments that you are receiving and be as transparent as you can, there can be ways to prepare for the future.

And I know housing for -- affordable housing in general, but, housing, it's difficult to plan. So I do commend the university for looking on areas to develop. And LAFCO is here to help, and we want to identify possible government options for the university. But, again, should the university move forward with developments outside the city limits, LAFCO approval would be required.

 On that note, I look forward to working with the university. And I do appreciate the comments from the residents and faculty and everyone else because it's -- in order for us to plan for the future, everyone needs to have skin in the game; everyone should provide their emphasis on the development of this plan.

 With that, I am more than happy to answer any questions, but I do thank you for the opportunity to provide comments. Thank you.

Response PH1-41

The comment contains concluding remarks and states again that the university developments outside of the city limits would require LAFCO approval. Please refer to Response PH1-39, above. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-42

CHRISTOPHER CONNERY: Yeah. Yeah, I would.

 I just wanted to bring up one more thing, which is that the LRDP would be a great occasion to do a campus-wide habitat conservation plan. This addresses issues that many commenters tonight have raised, and it's something that the Fish & Wildlife Service has advocated for many, many years, and the university has refused to do so. I think that with a campus-wide -- a whole campus, including into all potentially planned buildable areas --if we had a holistic habitat conservation plan, we could have more informed discussions and reasonable discussions about many of these issues.

Response PH1-42

The comment provides a suggestion for the project to include preparation of a campus-wide habitat conservation plan. The comment includes a suggestion for the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. As noted in the responses to Comment Letter F1, UC Santa Cruz has proactively initiated discussions with USFWS to begin preparation of a campus-wide HCP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-43

KAREN HOLL: All I wanted to say was that I wanted to echo Chris's point. And I did read the Biological Resources section and have more detailed comments that I'll put in there, but it wasn't that clear, and it has been done piecemeal in the past, like, with Ranch View Terrace. And I really agree with Chris that as a biologist myself who works on endangered species, that we really need to do this in a more coordinated manner as opposed to a development-by-development process for managing the concerns. So I am glad to hear that this conversation is happening.

Response PH1-43

The comment supports previous comments related to conservation within the campus. The comment addresses the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-44

DARROW FELDSTEIN: Thanks very much. My name is Darrow Feldstein. That's D-a-r-r-o-w F-e-l-d-s-t-e-i-n. I am an alumnus of UC Santa Cruz Environmental Studies Department, and I was the past assistant steward of the Upper Campus Natural Reserve.

 And I also want to just add my comment to echo Karen and Chris on this desire for a more complete and thorough conservation plan. And as someone who has commented on the LRDP hearings for the last decade or so, I just want to share my deep, deep desire for permanent protection of the Campus Natural Reserve and also for the natural spaces that are now written into this 2021 plan.

Response PH1-44

The comment supports previous comments related to conservation within the campus and provides a suggestion for the project to include preparation of a conservation plan and permanent protection of the Campus Natural Reserve. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-45

 And there were a couple places in the plan that I wanted to address. One is just protection of the Upper --the Great Meadow. I recognize -- I think that that's not in the plan to develop, but I am just going to put my word in that I ask that that stays protected, as well as I believe there was a little bit of development for a road around -- connecting, like, Crown/Merrill up to the sort of northern part of the campus, as well as one that was on the west side of fuel brick road (phonetic), I believe it is, that heads down into the ravine that goes over to Empire Grade. And so just wanting to really suggest that there is protection for all of those places and just that those comments that have all been stated before are honored.

Thank you for your time.

Response PH1-45

The comment expresses the opinion that no development should occur within the Great Meadow. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, for comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-46

It's when is the next hearing? And so we have another hearing tomorrow night from 5:00 to 7:00. So I just wanted to reiterate there is another opportunity to provide comments if you would like to attend tomorrow night as well.

Response PH1-46

The comment includes remarks that another public hearing will occur for public comments to be provided. The comment is informational and does not address the adequacy of the EIR analysis. No further response is necessary.

Comment PH1-47

I am actually hoping, in the available time that we have, that you could explain to us, from your points of view, whether this is all just pro forma or whether there's really a hope that our campus could stand up against dictates coming from on high, from central, to have our campus expand.

I think many of us have spoken against the idea of just automatically getting to some larger number. I know that when the campus started originally, it thought it would be at 27,000 by this time, but I also know from the administrative roles that I had on the campus that sometimes UCSC can't say, oh, we want to do this, we want to do that.

Are you able to comment at all about this process? Are we just all flapping our lips, but somebody up high is going to decide it? Or how will these very brilliant comments by so many people here be taken into account?

Response PH1-47

The comment requested clarification regarding the 2021 LRDP process. Following receipt of all comments during public review of the Draft EIR, UC Santa Cruz considered the comments and provided the responses herein. After preparation of the Final EIRUC Santa Cruz could consider modifications to the 2021 LRDP. The 2021 LRDP and the Final EIR will then be submitted to the UC Regents for consideration. All public comments received during the public hearing will be included as part of that package for consideration.

Comment PH1-48

But I just had a question. I didn't know if, tomorrow, during the public comment period, I would be able to share my screen and do sort of like a short three-minute presentation on my comments, like a visual presentation.

Response PH1-48

The comment includes a question related to the format of the public hearing and does not address the adequacy of the EIR analysis. No further response is necessary.

Comment PH1-49

HUNTER GIESMAN: Yeah. That's not a problem. I was just wondering, that way I could prepare for the next public comment.

 And when I submit my comment in writing, is there any way that I could include illustrations? When it comes to the writing, is it just like a pdf submission or --

Response PH1-49

The comment includes a question related to whether and how illustrations could be provided as part of public EIR comments and does not address the adequacy of the EIR analysis. No further response is necessary.

Comment PH1-50

I apologize. This actually is a question. I wanted to understand, based on Faye's question, is the EIR, the process -- like, to my understanding the EIR is where you are evaluating the environmental impacts, but you are not actually evaluating whether or not it's a project that the UC wants to do or should do or will do. It's just limited to the environmental impacts. And so I am thinking, in my comments that I want to submit, that's where I should focus.

 Am I correct in that, or is there actually a component of this where I, you know, might be advocating for a different position?

Response PH1-50

The comment asks about the EIR process and is correct that the EIR is only intended to evaluate the impacts of the 2021 LRDP but is not intended to provide support for or opposition to the project. This comment does not address the adequacy of the EIR analysis. No further response is necessary within the context of CEQA. However, refer to Master Response 2 for more information regarding the planning process, and public engagement opportunities and participation. The planning process for the 2021 LRDP is also described in Section 1.3, “Process and Participants,” of the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-51

RON GOODMAN: Okay. So it is an appropriate place to say I do or don't support the growth plan in general, in addition to specific environmental, like, you know -- like, because it impacts students' education? That's, like, a relevant thing to include in a response to the Draft EIR?

Response PH1-51

The comment includes a question related to the submission of public EIR comments and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-52

RON GOODMAN: So when you respond to comments, if I, you know, make a comment that says, you know, doing this will cause, you know, this hydrological damage, there will be a response that explains either here's why it doesn't or here is how that is going to be mitigated and you have this requirement in the EI -- in the Draft EIR to respond to those types of comments? If I make a comment that is -- you know, I think this, you know, badly impacts student education or helps student education -- I am not actually saying either one, you know, of those two -- do you also respond into that in the comments, or is the response to that, you know, out of scope of the Draft EIR?

Response PH1-52

The comment states that the 2021 LRDP will impact hydrology and water quality and asks further questions concerning the EIR process and public comments. does not address the adequacy of the EIR analysis. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. No further response is necessary.

Comment PH1-53

MATTHEW WAXMAN: Okay. Thank you.

 The 2021 LRDP covers its funding process with 14 pages. Section 3.11, Land Use and Planning, does not provide commentary on the planning process despite the fact that the planning process results in ultimately an approved regental policy that would become the 2021 LRDP.

 Please provide commentary on the consequence and impact to the location of land-use zones, specifically that of housing and residential zoning, given that there were no community members, no faculty, no graduate students, no alumni, and no undergraduate students on the Housing and Campus Life Work Group of the 2021 LRDP Committee.

Response PH1-53

The comment requests additional information regarding the planning process to be included as part of Section 3.11, “Land Use and Planning.” Refer to Response I100-2.

Comment PH1-54

GILLIAN GREENSITE: Yes. Sorry. I did it on mute and some other place. It didn't work. Sorry about that. This is very quick.

 Couple of areas in a map on a table which I didn't include before because of time, but it may be helpful to correct it earlier rather than later. One is on page 70, Figure 2:20. I think it's the LRDP. It's the map of the existing and planned development, and it omits the current family-student housing. So that would be good to correct that, especially if Regents are looking at things.

Response PH1-54

The comment provides suggestion to modify an image provided in the 2021 LRDP. The comment does not address the adequacy of the EIR analysis. No further response is necessary. However, because both the Student Housing West project and the Kresge College Renewal project are approved projects, they have been included on the map. The map’s title reflects this, “Existing and Planned Development – Student Housing.” Refer to Master Response 8 for more information regarding Student Housing West. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH1-55

And the second one is in the EIR -- DEIR. It's Table 3.13-11. It is Baseline and Projected On-campus Housing and Demand. And I think -- I won't go into what's incorrect in there, a typo or something, but when somebody looks at it, you'll see exactly what's incorrect in there.

Response PH1-55

The comment suggests an error/typo is presented in Table 3.13-11 of the EIR. The number shown in the total projected demand not provided on campus has been removed based on this comment but does not result in a change to the Draft EIR’s analysis or conclusions. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter PH2 UCSC Public Comment Hearing

February 4, 2021

Comment PH2-1

MS. BORGES: My name is Maria Borges, M-A-R-I-A, B-O-R-G-E-S. And I am a UCSC alumni, and a resident and taxpayer of Santa Cruz County. And so I would just like to say the whole reason that I attended UCSC was to be around the nature and natural beauty that the campus had to offer. The best part of my time at UCSC was not the buildings or even the professors or activities that the school had to offer, but rather spending time getting to know the native plants and wildlife, and so if these areas are destroyed by construction projects in order to build new buildings, then it's getting rid of the very reason why I and many other students decided to attend UCSC in the first place. My stance is that the no action plan is the only acceptable plan for development at UCSC. The mitigation ideas that are being proposed do not consider the importance of protection for the entire ecosystem within the boundaries of the LRDP. Permanent loss of habitat is not considered, which would lead to the loss of endangered species and many native animals over time. UCSC needs to take a holistic approach that involves environmental stewardship of the natural areas on their property.

In addition, I'm not just concerned with preserving the scenic beauty of the campus, but I'm here to speak up for the native animals and plants that live on campus. According to UCLA's Belinda Waymouth, it is less costly to protect natural areas than to restore them later on. The LRDP is shortsighted when considering longevity of the ecosystem on campus that we humans are also a part of.

 It is time that people start valuing things that are more important than making profits. Connection to nature helps to reduce stress for students, and if the natural places on campus are destroyed, it will be a great loss for future students of UCSC, and of course for all of the animals that call those places home, including burrowing owls, California red-legged frogs, mountain lions, bobcats, white tailed kites, golden eagles, and many, many more. Thank you very much.

Response PH2-1

The comment includes concerns of development, loss of habitat, and the scenic beauty of the UC Santa Cruz campus and states a preference for the No Action Plan. Generally, the comment addresses the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. However, contrary to statements made in this comment the Draft EIR’s impact analysis (and associated mitigation) consider the potential loss of habitat consistent with CEQA requirements. Refer to Impacts 3.5-2, 3.5-3, and 3.5-4, beginning on page 3.5-42 of Section 3.5, “Biological Resources” of the Draft EIR, which includes a detailed discussion of 2021 LRDP impacts on sensitive habitats and species and provides mitigation measures for significant impacts.

For comments on the 2021 LRDP project, refer to Master Response 2. In addition, refer to Response I29-8 regarding impacts to special-status species and sensitive habitat. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-2

JOSHUA AYALA: So my name is Joshua Ayala, J-O-S-H-U-A, A-Y-A-L-A. I am currently finishing up my undergrad here at UCSC, and my comments, or questions, I'd say, are more water based. So with the potential expansion of new students, expanding student population of about, I believe it was 8,500 over the next 20 years, how well does the Environmental Impact Report and the Long Range Development Plan to the effects seen with the increased effect of climate change in precipitation events being more essentially rapid in dumping water in a shorter amount of time versus our historical precedence of longer rain events, we're having more severe events, which generally lead to more runoff, which leaves less usable water for the city within the watershed. And so I would like to know if the plan has any considerations for developing groundwater, and if that development like energy costs, where a water treatment plant is going to need to be built, so I would like to see, from a cursory glance, there has been not that much in terms of groundwater development in the Environmental Impact Report. So I would like to see a little bit more of that. But I understand that it's going to take time and research and study, which the report does mention. Thank you.

Response PH2-2

The comment states concerns regarding water supply and requests that the EIR consider whether the use of groundwater could offset some of the increased demand for water under the 2021 LRDP. The Draft EIR, as part of Impact 3.16-1, includes an evaluation of potential alternative water supplies, including the potential use of groundwater, consistent with the commenter’s request. As explained in Master Response 11, Level of Detail, the 2021 LRDP EIR in intended to be used in conjunction with review of individual 2021 LRDP projects, consistent with CEQA’s tiering provisions. Accordingly, it would be speculative to conduct a project-specific analysis regarding the use of groundwater supplies at this juncture. Should UC Santa Cruz elect to pursue the use of groundwater as a potable water supply source, additional planning and design (as well as subsequent analysis under CEQA) would be required. For additional information regarding water supply, refer to Master Response 7.

Comment PH2-3

FAYE CROSBY: Faye Crosby, F-A-Y-E, C-R-O-S-B-Y.

 UCSC is one of ten campuses and must operate in a fashion consistent with rules and regulations. You have made it clear that we don't have an option not to prepare an LRDP. And by regional regulations, we don't have an option to not prepare an EIR. But perhaps for the LRDP, we do have the option to ask the Regents to pause the process.

 You have been striving for transparency and public participation. Last night and tonight you have been fantastic in how you're running these meetings, with public participation, and you have tried to have a lot of materials available to us. But I, for one, have not been able to discern who sets the timelines, nor is it clear to me, perhaps it is to others, how to pause the process. Yet, I would propose that a delay seems appropriate. Both the LRDP and the EIR must be based on good data. It would seem to me that some data were lacking at the beginning of the LRDP.

 In 2015-2016, UCSC lagged far behind our sister campuses in terms of assignable square footage per student, and classroom and residential space. And it may be that we have caught up in the five years, but maybe not. If we haven't, what would be the impact, the environmental impact, say, in terms of water, of meeting the standard, the UC-wide standard, of having the appropriate ASF per student.

 There's some other data that could not have been ready at the beginning because circumstances now have changed our world. So some answers would be to questions like: What are the UC-wide system possibilities for distal learning; what would the post-pandemic demand look like for undergraduate education statewide; what are the state's needs, now that we know them, for training post-grad students in health sciences and in environmental sciences; what are the effects of the fires of 2020 on water usage and on the soil in the areas abutting our campus and some other campuses; what have the fires done in terms of water usage?

 Answers to questions like these seem to be important if we are going to have good data, and we must base our conclusions and our recommendations on good data.

 So I hope that somebody knows who has the authority to request and who has the authority to grant a pause in the LRDP process. Thank you very much.

Response PH2-3

The comment expresses the opinion that the 2021 LRDP process should be paused until better data is available. For information related to the EIR’s selection of baseline conditions refer to Master Response 1. Regarding the 2021 LRDP schedule, the current LRDP projects a total student population to 19,500 by 2020. Based on this timeline, work began on the next LRDP in 2017 to develop a physical framework to guide campus development beyond 2020. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-4

NADIA PERALTA: Thank you. Nadia Peralta, N-A-D-I-A, Peralta, P-E-R-A-L-T-A.

 So my comment piggybacks on some of what has already been spoken this evening.

 I don't discredit or doubt the good effort that you all have put into having these meetings for the community, but once again, they follow a similar model and esthetic flow of really not offering like a quality alternative to what you frame as inevitable in this project. And I think that there is actually way more community support against the LRDP than there is for it. And I actually think that the City of Santa Cruz, the residents, the alumni, and the current students have the capacity to organize on behalf of a delay, a significant delay or halt. And I think that to avoid all of that energy on both sides that it would take, I really encourage you to listen to the people that continue to show up to these meetings to express concerns about all of the significant mitigation and impacts that you laid out for us for.

Response PH2-4

The comment expresses opposition of the project and does not address the adequacy of the EIR analysis. No further response is necessary. However, during the planning phase from 2017 to early 2020, the University included a robust public engagement process for input on the plan, and had broad representation from undergraduate students, graduate students, faculty, staff, alumni and community members on various committees. This process is described in Section 1.3, “Process and Participants,” of the 2021 LRDP; the Appendix includes specific dates of meetings, workshops, open forums, etc. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-5

For me, personally, as a community member and an alumni, the ones that stick out significantly are the water and its impact on the sensitive hydrology and the karsts of hydrology that drains into the High Street neighborhood. And I don't see enough info about how that's going to affect the various creeks and streams that go through that neighborhood and down into Santa Cruz; and as well as the impacts on tribal resources.

Response PH2-5

The comment provides general statements regarding the need for more information related to water, hydrology, and tribal cultural resources. The comment does not provide specific instances within the Draft EIR where the EIR’s analysis is deficient; however, the EIR provides an appropriate programmatic assessment of the potential impacts to the aforementioned resources as a result of 2021 LRDP implementation. Potential impacts related hydrology are evaluated in Section 3.10, “Hydrology and Water Quality,” and impacts to tribal cultural resources are evaluated in Section 3.4, “Archaeological, Historical, and Tribal Cultural Resources.” Karst topography is evaluated in Section 3.17-18, “Geology and Soils,” of the Draft EIR. No further response is possible.

Comment PH2-6

It's extremely unfortunate and historical and deliberate that California tribes are not recognized, including the (inaudible) speaking Ohlone people, whose territory this is, they were absolutely decimated in the mission system.

 Currently, we have the (inaudible) tribal band, who on top of all of the things that Chairman (inaudible) handles, I'm sure that this will be of significance importance. And I would really think it would be transformational in the year 2021 for the UC to be actually considering the impacts of colonization and an ongoing -- just a repetition of historical trauma to go ahead with this plan in its current form, and all the impacts that it might have on -- like Maria pointed out, the wildlife, as well as tribal historical artifacts.

 There's so much more that can be said, but I really appreciate how many people are coming together for this, and I really hope to not see this become a fight and actually something that you listen to.

Response PH2-6

The comment expresses concern for impacts to tribal cultural resources. The Draft EIR evaluates potential impacts to tribal cultural resources in Section 3.4, “Archaeological, Historical, and Tribal Cultural Resources,” as requested by the commenter. Further, UC Santa Cruz has been and continues to coordinate with the Amah Mutsun Tribal Band (see Comment Letter O10 and associated responses) on matters related to tribal cultural resources within the LRDP area that could be affected by 2021 LRDP implementation.

UC Santa Cruz recognizes the history and presence of indigenous peoples and their enduring relationship to their traditional homelands. The traditional territory of the Amah Mutsun encompasses all or portions of the modern Counties of San Benito, Monterey, Santa Clara, San Mateo and Santa Cruz, including what is now the UC Santa Cruz campus. Historically comprised of more than 20 politically distinct peoples, the modern tribe represents the surviving descendant families of these historic groups. Campus leaders have worked closely with the Amah Mutsun Tribal Band in topics of shared interest, including campus land use. From the beginning of the 2021 LRDP planning process, the Amah Mutsun Tribal Band has been part of land use discussions. Chairman Lopez of the Amah Mutsun Tribal Band joined the first 2021 LRDP Planning Committee meeting to share his knowledge and information from surrounding California tribes. The 2021 LRDP Planning Committee also included a student representative appointed by the Amah Mutsun Tribal Band to provide feedback and perspective on planning considerations and land use decisions.

It was during the first 2021 LRDP Planning Committee meeting that Chairman Lopez brought forth concerns about the symbolism of the mission bell on the residential campus. He explained that the bells are constant reminders of the disrespect the tribe encounters, and they are deeply painful symbols that celebrate the destruction and erasure of his people. Campus leaders, working in partnership with Chairman Lopez, undertook a process that resulted in the [removal of the bell in 2019](https://news.ucsc.edu/2019/06/mission-bell.html). Campus leaders continue to listen and work with Chairman Lopez to assist the Tribe in their efforts of cultural revitalization, recuperation of dormant cultural knowledge, and environmental justice.

During preparation of the Draft EIR, UC Santa Cruz contacted the Amah Mutsun Tribal Band to initiate formal consultation under AB 52. Through that process, UC Santa Cruz consulted with Chairman Lopez regarding potential tribal cultural resources, including sharing resource surveys and discussion of the specific approach to mitigations. This outreach is documented in Section 3.4, “[Archeological, Cultural, and Tribal Cultural Resources](https://lrdp.ucsc.edu/2021/files/deir/3.4_Cultural_Resources_DEIR.pdf),” on page 14 of the Draft EIR. The information from these discussions informed the analysis and mitigations included in the Draft EIR.

Comment PH2-7

RICK LONGINOTTI: My name is Rick Longinotti.

I have a question Erika and Jolie, and I don't know if in this format you're able to answer a question. Are you able to answer a question?

Response PH2-7

The comment includes a question about providing public comment and does not address the EIR analysis. No further response is necessary.

Comment PH2-8

RICK LONGINOTTI: Well, I'll put my question in the record and maybe I'll email you and you can respond to it. The question is: You know, it seems like a given that the University California Santa Cruz accepted 8,500 more students, and that decision was made at a higher level; the Regents, presumably. So I wonder if there was an environmental review of the Regents' decision about how to allocate student enrollment, the growth of student enrollment. Because if there was not an environmental review on that decision, then I wonder how valid the current EIR would be just for the University of California Santa Cruz growth, because it's based on a decision that's not under the purview of this environmental review, so if there was no environmental review, how can this one be valid? Does that make sense?

Response PH2-8

The comment includes a question for the UC Regents and does not address the adequacy of the EIR analysis. No further response is necessary. However, the potential addition of 9,482 students over the next twenty years, as stated in the LRDP, is a projection. For comments on the 2021 LRDP project, refer to Master Response 2. Refer also to Master Response 9 regarding plan implementation and phasing of development. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-9

SUE TERENCE: Sue Terence, S-U-E, T-E-R-E-N-C-E, and I'm a resident of Santa Cruz.

 First of all, I would like to say, the UC system has a number of campuses, but they're all in the southern half of the state more or less. I believe UC Davis is the farthest north, and half the state is north of that. So I guess my first comment would be: Why aren't we dispersing the campuses in a more equitable way for the population of California?

Response PH2-9

The comment includes a question related to the UC system and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-10

 And then to bring it closer to home, I support that you're trying to make this whole process make the UCSC campus sustainable in terms of all the concerns you have talked about. I wish the same were true for the city. This expansion plan will mean thousands of students will be looking for housing in the city of Santa Cruz and the environs. 25 percent, you say, will be housed on campus, of the new students and staff. The other 75 percent will continue to make prices for rentals in this town go up and up and up. So our efforts to create an affordable housing in the city, which we're all in support of, are kind of futile, because we find these prices going up.

 You have outlined the physical and environmental effects on the campus in saying you are going to avoid slopes, you're going to have parking on the perimeter, you're going to retain new corridors, you're going to retain the transit access and open space designations, and maybe one of the biggest luxuries is that you get to have an EIR, at all.

 I live half a block from a proposed development at Branciforte and Water Street. They proposed 151 units on a bluff, basically 100 percent slope, and no open space, terrible traffic concerns that will be exacerbated greatly. 151 units on less than an acre of land, and we find ourselves up against no possibility, almost, of an EIR because of the state laws that are being imposed.

 So I ask that you look at the cumulative effects on the entire community and not just the campus. This is a problem we need to work on together. Thank you.

Response PH2-10

The comment expresses concern related to increased demand for off-campus housing by students and the cumulative effects the 2021 LRDP will have on the community. With regard to the level of off-campus housing demand by students, as noted on page 3.13-12 of the Draft EIR, 982 students (as well as 1,992 faculty/staff) are projected to seek housing off-campus, which could result in additional demands within the local community. The Draft EIR concludes that impacts would be significant and unavoidable. However, within Chapter 4, “Cumulative Impacts,” the off-campus demand for student housing would be reduced to less than significant within the cumulative context, because proposed development on campus (Student Housing West) and the local community (including the City of Santa Cruz), would provide more options to offset the increase in demand.

Comment PH2-11

ELAINE SULLIVAN: Thank you. It's Elaine, E-L-A-I-N-E, Sullivan, S-U-L-L-I-V-A-N. I'm a current faculty member at UCSC.

Great. And so I wanted to comment that the new LRDP states that its goal is to maintain the integrity of natural spaces, which it says, quote, our valued as scenic resources. It also suggests for the goal is to preserve existing historic view sheds and to limit the expanding into areas of existing core use of campus.

 I wanted to mention that the choice of construction for housing in the East Meadow area contradicts all of those stated goals. That area was designated in the 2005 LRDP as campus resource land, that was supposed to be maintained in its original state. Over the past two years, community members in the form of the East Meadow Action Committee have organized and come together and formally and repeatedly objected to new construction in the East Meadow. Our participation and opinions have been completely ignored, as the LRDP includes the East Meadow construction as a foregone conclusion.

 So I would like to object to the LRDP as it stands, and especially the development of housing in the East Meadow area. Thanks.

Response PH2-11

The comment expresses the opinion that no development should occur within the East Meadow and objects to the LRDP. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. To the extent that this comment is referring to the Student Housing West project, this project was approved under the 2005 LRDP. Please refer to Master Response 8 for more information. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-12

SARA BASSLER: My name is Sara Bassler. That's S-A-R-A, Bassler, B-A-S-S-L-E-R.

 I'm a member of the Santa Cruz -- I live in Santa Cruz, the city of Santa Cruz. And I had a couple comments. One, you said 100 percent of students would be housed over, I think, 19,500, and currently there's approximately 18,500 students. So that still leaves a thousand students who would be unhoused; plus any students who would be unable to afford housing on campus would look for housing in our community. And as already mentioned, that's in very short supply.

Response PH2-12

The comment expresses concern regarding the availability of housing for students beyond the 8,500 students for which additional on-campus housing would be provided. Refer to Section 3.13, “Population and Housing” of the Draft EIR, which evaluates the potential need for off-campus housing as a result of 2021 LRDP implementation. The comment does not raise any concerns regarding the adequacy of EIR analysis. No further response is necessary.

Comment PH2-13

 And then my other comment is on water. You mentioned that UCSC is a customer of Santa Cruz City water, and that there would be times where the city would have to secure a new water source. And I don't know if the EIR addressed how realistic it would be for the city to find a new water source, considering water is already in short supply. And what would happen if the city is unavailable to secure a new water source, or if they were able to secure new water source, what the cost would be to other customers of Santa Cruz city water. Thank you.

Response PH2-13

The comment expresses concerns related to water supply. For additional information related to water supply, please refer to Master Response 7 and Impact 3.17-1 in Section 3.17, “Utilities and Service Systems,” of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-14

 BRETT HALL: Thank you very much. My name is Brett Hall, B-R-E-T-T, H-A-L-L, and I am on the staff at the UCSC Arboretum. I'm director of the California Native Plant Program, and we have been working in biodiversity conservation, specifically, plant conservation, for well over four decades. And so we Page 49 come to the LRDP kind of with a lot of that in mind. And we are particularly interested in the long-term conservation of the campus natural reserve, especially. And I know that there are significant areas that have been very thoughtfully mapped to promote the campus natural reserve. And I would like to recommend, which is the recommendation of many faculty and groups of people working hard on the environmental concerns on campus, is to make that permanent protection and put it in the UC Natural Reserve system. So I wanted to lodge that.

 And then also, on a couple other notes, I have been through about four different Long Range Development Plans now on the campus, and I think it was in 1988, about 40 acres of arboretum land was put jointly with the campus natural reserve, and that was preserved, as well, in the 2002, I think it was, or 2005 Long Range Development Plan, and I see also that it is here, and I very much appreciate that. However, there is no specific language that conveys the management, other than in the LRDP it says the Campus Natural Reserve will continue to be managed in consultation with Campus Natural Reserve committee, and where there are common borders with the UC Santa Cruz Arboretum. The Campus Natural Reserve is located primarily on the west side of campus.

 And I would like to encourage the language that's in the proposal for a permanent Campus Reserve, which says that the West Meadow features the well-developed California Conservation Garden, and the UCSC Arboretum project that the Arboretum would maintain oversight and management of through a memorandum of understanding with the UC Natural Reserves. Additionally, the seasonal pond and Cowell Reservoir, within the campus, or within the Arboretum's core is included in the proposed Campus Natural Reserve, due to its importance as a breeding ground for the California red-legged frog.

 So I'm just promoting these different ways of making sure there's specificity going forward.

 And one last thing is, now to the east, towards the edge of the great meadow, an additional 20 or so acres are going from the Arboretum to the Natural Reserve, under joint management, I suppose, but primarily under the oversight of Arboretum. And I would like to see more specificity and language that really describes the management and relationships and leadership, that the Arboretum continue to prevail in those plans.

Thank you very much, and thanks for your process here.

Response PH2-14

The comment provides suggestions for protection management of the Campus Reserve and requests permanent protection. Please refer to Master Response 12 regarding long-term habitat protection. In addition, the text for the Campus Natural Reserve land use designation on pages122 and 123 of the 2021 LRDP have been revised. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-15

MORGAN BOSTIC: Yes. My name is Morgan Bostic, M-O-R-G-A-N, B-O-S-T-I-C. And I'm a recent UC Santa Cruz graduate, and I'm also the advocate for the Santa Cruz City/County Task Force on UCSC growth plans, which is a working group of city and county elected officials that was formed in response to local ballot Measure U, which was passed in 2018, by 77 percent of the voters, and which contained specific policies to restrain UCSC growth and ensure the mitigation of all of its impacts.

 Among other imperatives, Measure U directs the city council to participate in reviewing and commenting on the EIR in an effort to ensure full mitigation of all of adverse impacts, of any proposed growth on the Santa Cruz community, particularly, in the areas of housing and traffic, public transportation, and public services, like water and public safety.

 Over the past two months, the task force has initiated a public campaign informing the community about the details of the growth plans, and has been encouraging members of the public to participate, either on their own or through a task-force-sponsored working group.

 While there are numerous inadequacies with the EIR, many of which were mentioned eloquently by so many community members earlier tonight, and at the meeting yesterday, we were focusing our comments tonight only on a few of them.

Response PH2-15

The comment provides introductory language and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-16

 First, the analysis of the impact of the entire plan are based on the university actually housing

100 percent of their additional student growth on campus and after 25 percent of faculty on campus. However, there is no evidence to justify this assumption, and there are no mitigation measures proposed that require UCSC to meet these objectives.

 In addition, there is no mitigation measure that requires UCSC to tie (inaudible) growth to the provision of housing and other critical infrastructure. According to data located in the Student Housing West Environmental Impact Report, UCSC has, in reality, only built five and a half percent of the infrastructure they said they would need to support the current level of enrollment at UCSC under the 2005 LRDP.

Response PH2-16

The comment states that the Draft EIR improperly evaluates the 2021 LRDP and require (through mitigation) the provision of housing and infrastructure with enrollment increases. Refer to Response PH1-3 and Master Response 9 regarding phasing of development. Further, the Draft EIR includes an evaluation of available infrastructure to accommodate the demands associated with implementation of the 2021 LRDP and includes mitigation where appropriate. The comment does not provide specific examples of where infrastructure would be deficient, and no further response is possible.

Comment PH2-17

Instead, students have been without lounges, without social, academic, and recreational space, and cramped in converted housing rooms.

According to UCSC's CAPS director, there has been an increasing demand for mental health resources as a direct result of no private space and the stress of housing conflicts. UCSC students have some of the highest level of dissatisfaction of any UC campus, which can be directly connected to the lack of infrastructure and resources that were said to be necessary to support a 19,500 student enrollment, but were not provided. Many of those commitments resemble those of the 2021 LRDP.

Without mitigations requiring UCSC to provide the housing that it's proposed, requiring students to live on campus and ensuring that rates are affordable, and/or time enrollment growth, to the provision of housing, the analysis of the impacts and the mitigation measures proposed are inadequate under CEQA. Thank you so much.

Response PH2-17

The comment expresses concern regarding stresses associated with finding appropriate housing for students and states that the EIR should include a phasing analysis that ties enrollment growth to housing. The concerns regarding stress surrounding housing are noted but do not address the adequacy of the EIR’s analysis. Regarding potential phasing analysis within the Draft EIR, refer to Master Response 9.

Comment PH2-18

JOHN AIRD: I'm John Aird. I have been involved in the university, I think, since I was born, since my father founded the Department of Neurology at UC San Francisco. And I'm also a Berkeley graduate, and I have been involved in this community for the last

40 years, and in particular, through the last Long Range Development Plan, and was one of the leaders with the CLUE organization, the Coalition for Limiting University Expansion.

 Let me just comment on three things here that I found disturbing, and I don't know exactly how this fits in, Jolie, with your program here, but one is just the question of feasibility. Let's just think about this. In 60 years, this university has added 3,750,000 square feet of facilities, in 60 years. And as Morgan just outlined, in the last 20-year program, 2005, 2020, the facility development fell far short of what was outlined in that plan and what was required to support the students in a quality education.

 This plan proposes five million six-hundred twenty-nine million square feet (phonetic), 150 percent more over the next 20 years than was done in the previous 60.

Now, I mean, it's great to have a plan, but somewhere there has got to be a truth serum in terms of whether it's going to actually happen. Where is the funding for this?

 The reason that the chancellor said that the university was not able to keep pace with student enrollment and what was committed in term of facilities, was there wasn't funding. Well, the state doesn't have funding now. And certainly coming out of the economic situation that we find in this state, and in the city, and in the county, I don't see where the funding is going to come from.

 I totally support the expression that was made by somebody earlier, that this plan be put on a hold pattern until we catch up, and both in the community and at the university. Again, as the chancellor said, there is a deficit here that needs to be addressed on both sides.

Response PH2-18

The comment expresses opposition of the project, asks about funding, supports the plan being put on hold, and does not address the adequacy of the EIR analysis. Refer to Master Response 2 for further information regarding the 2021 LRDP’s planned development and public participation/engagement. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-19

So I'm disappointed that the one major recommendation that CLUE made was not considered among the alternatives, which was, that a moratorium on future enrollment increases be made until this catch-up has actually occurred. And I would hope -- and it wasn't even addressed. That particular alternative, which was our major alternative, was not even addressed at all.

Response PH2-19

The comment expresses concern related to a suggested project alternative that was not addressed. For additional information related to alternatives evaluated in the EIR, including alternatives suggested during and outside of the NOP comment period, refer to Master Response 3. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. Regarding potential phasing of development, refer to Master Response 9.

Comment PH2-20

Finally, I think that it goes without saying, that if you blow by the interests of – the expression -- this community of 80 percent or almost 80 percent of the views of this community, at the very least, you need to adopt a pattern in which any growth has the facilities to support that growth in place before the growth occurs, and then you can go to phase 2 and so forth. Again, it's very much along the lines that the Chancellor Blumenthal had suggested in our earlier meetings. Thank you very much.

Response PH2-20

The comment expresses opinions related to growth within the campus. This comment expresses an opinion on the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. Regarding phasing of development, refer to Master Response 9. Refer to Master Response 2 regarding planning context, and public engagement opportunities and participation. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-21

My name is Matt Wetstein, W-E-T-S-T-E-I-N, and I serve as the president of Cabrillo College, so I want to make sure my comments are as an individual, but I wear that hat as part of my employment.

 So obviously housing and transportation issues are critical to residents of this county. And in my work, I serve on a housing and college affordability task force for the community college system. And housing and security is a grave concern for students in my sector. We know, for example, that 20 percent of students attending Cabrillo College report that they have been homeless or suffered housing insecurity in the last 12 months. So the impact of UCSC plans for housing are critical in driving housing availability and rental prices for students and for all people in this community.

 So I'm grateful that the LRDP had a vision for housing 100 percent of students above 19,500. I wonder if the university would consider the need to house 100 percent of students from outside the area above the current level of 18,500.

 I also want to thank you for your consideration of the impact of staff housing and the costs that are borne by our employees in the higher ed sector. The idea of creating space for 25 percent of new faculty and staff is an innovative approach; I'm hopeful that can be delivered upon, and certainly something that I would be looking at in my role at the college that I lead.

 You have a difficult challenge. You're trying to balance housing and transportation demands in a beautiful campus setting. It's such a unique campus, and as many of the commenters have said tonight, we're all hopeful that that character and that protection of balancing the beauty of the campus can be weighed at the same time with providing more housing to our community.

So thank you for hosting these sessions, and I appreciate your willingness to take our comments.

Response PH2-21

The comment includes remarks related to student and staff housing, asking if the university would consider the need to house 100 percent of the students from outside of the area above the current level of 18,500. The comment does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-22

That's R-O-B-E-R-T, S-I-N-G-L-E-T-O-N.

 And honestly, after hearing the president, Matthew Wetstein's comments, I feel for the position that the campus is in, having to do the long range planning, knowing that a lot of the enrollment goals and the educational mission of the University California system dictates how many students are there, and they have an obligatory mission to provide for the educational well-being of the top 10 percent of California. We're a growing state. We have 40 million people. That's a big mission for the UC to take on. And so individual campuses oftentimes don't get to dictate how many students are, essentially, mandated that they enroll to provide for this educational quality.

 So the university is doing a great job at balancing the needs and providing for that mission, providing for that educational opportunity, in the best way possible, given the constraints that have been put on them.

 Obviously, everyone cares about maximizing and balancing the beauty of the campus. As an alum myself, I thoroughly enjoyed the meadows, the forest, the caves, everything that makes our campus a special and magical place to go to school. But at the same time, housing is a huge issue. Housing and security is a major issue. Affordability is a huge issue. The impact on the collective Santa Cruz community is big. So I just support the university moving forward with developing the infrastructure and housing that it essentially has to because of the mandated mission of the University California system. And I think you are doing the best job with what you got. So I just want to say that. Keep it going.

Response PH2-22

The comment expresses support towards proposed infrastructure and housing within the campus. This comment addresses aspects of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-23

It's true that UCSC is part of a larger system,

and that following the plan for higher education, we are requested as a UC system to take the top -- at one point it was the top 12 percent, now it's to take a look at the top 9 percent. It keeps shifting. But there's no mandate that it has to be on any particular campus. And different campuses have talked about being landlocked, for example -- or at least talked about being landlocked.

 There are different ways to look at distributing the student growth. As you have mentioned, Merced has a very small campus, and so one way to absorb the increasing demand, the appropriate increasing demand, is to redirect students to Merced. They may not want go to Merced, but they want a UC education, and it can be provided there as well. It's the job of the Regents to not only balance everything on each campus, but to balance among the campuses.

 For many years, UCSC got short tripped. For example, nine other campuses were connected by fiber optic connections, and we were not; the idea being that it was too expensive to bring it here. During his chancellorship, George Blumenthal changed that; he did it quietly and discreetly.

Our campus does not have to lie down and be railroaded by the needs of some people in the higher-than-our-campus administration. A collegial relationship might be one in which we ask to have the Regents pause and look at everything in the way that they want to.

 Now, the lawsuit about the East Meadow brought the Regents to task, because they didn't look appropriately at information that they should have been looking at. So it's in the tradition of just asking the Regents to just take our campus seriously, and allow us the same privileges as the other nine campuses. We do have a mission to educate the wonderful students of the great state of California, but it doesn't all have to be done in Santa Cruz. Thank you.

Response PH2-23

The comment includes remarks related to distributing student growth amongst other UC campuses, including UC Merced. The comment addresses the nature of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. As noted in Response O4-7, all universities in the UC system have LRDP’s that are developed independently by each campus to accommodate additional students, including the LRDP at UC Merced (as updated in 2019). No further response is necessary. For information regarding alternatives, refer to Master Response 3 and Chapter 6, “Alternatives,” of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-24

TED BENHARI: My name is Ted Benhari, B-E-N-H-A-R-I. I live in Bonny Doon. I'm advisor to the Rural Bonny Doon Association, signatory to the comprehensive settlement agreement from the 2005 LRDP.

 Obviously, UCSC is a great university, though not quite as great these last few years as it's been in the past, but a great asset for our community, in terms of the economics and culture and all the rest of it.

But our community has very limited resources. And the amount of resources that UCSC presently uses is pretty much the capacity of the community, and any further growth will just have enormous impacts. Certainly the people before me who have talked about the impacts on housing, when you say that we will have 8,500 more students, we all know that that really means a lot more bodies than 8,500, because these are full-time equivalents. So we might have 10,000 more actual people living here. The faculty and staff also, they bring families with them. So overall, we're probably talking about 15,000 to 20,000, perhaps more actual people coming here to live, than the number that you state, as large as they are.

Response PH2-24

The comment expresses concern related to housing and further growth within the community. The comment addresses aspects of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. However, pages 2-10, 3.13-4, 3.13-11, and 3.15-10 the of Draft EIR include the conversion of FTE to headcount. As noted in in Chapter 2, “Project Description,” of the Draft EIR the existing campus population of approximately 22,350 (2018 – 2019 academic year) includes 2,800 three-quarter-average FTE employees, which represents 3,657 headcount employees. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-25

Also, I would like to state specifically that the impacts on Empire Grade, which comes up into Bonny Doon, is one of the main, if not the main, transportation route for Bonny Dooners. It's a very dangerous road. The Cave Gulch area just above the West Entrance is prone to slippage into the gulch. It's constantly being repaired. To put more traffic on that area is not only dangerous for the many bicyclists, who more and more are using that route, but the commuters, and the trucks that come down from the Felton Quarry, it's just not a very feasible transportation route, and suddenly you're adding a new entrance to the university that will bring people to the new areas that you're coming to, to prefer over the other two areas. So you're talking about just a horrible increase in traffic on a very narrow and dangerous road.

Response PH2-25

The comment expresses concerns related to increased traffic and safety concerns along Empire Grade. For a discussion related to the scope of the transportation analysis and congestion analysis please refer to Master Response 6. With respect to transportation safety, the 2021 LRDP includes numerous transportation improvements, including additional connections for bicycles and pedestrians, that would allow for further separation of bicycles and pedestrians from vehicles, including along Empire Grade. Further, the use by bicycles and pedestrians of Empire Grade, north of the proposed west entrance to the main residential campus, is not anticipated to be substantial as part of the 2021 LRDP; rather, bicyclists and pedestrians are anticipated to use Empire Grade south of Heller to reach essential services and for commuting purposes. Figure 2-9 on page 2-27 of the Draft EIR identifies additional bicycle facilities intended to improve road safety, such that the anticipated increase in alternative transportation needs at UC Santa Cruz would not result in significant transportation safety impacts. Refer to the Draft EIR’s evaluation of potential conflicts with alternative transportation programs, plans, and policies (including safety-related policy) provided in Impact 3.16-1, beginning on page 3.16-30 of the Draft EIR. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-26

I would also like to point out that the campus reserve, people think of it as kind of a natural reserve that's permanently there to help the environment and animals and plants to live there, but you guys just keep changing the borders of it. And the animals and the plants can't read your signs about where the natural reserve is now located. You can't just tell them, "Okay, we have got these acres over here, why don't you guys move over here." It has a huge impact on the animals and plants. And this new change will just have more and more of an impact on it.

Response PH2-26

The comment expresses an opinion related to the boarder of the Campus Natural Reserve. Please refer to Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-27

So I know that these comments that all of us have made have nothing to do with what's going to be in the actual EIR and the things you have to address, but it's just basically us pointing out the real problems with this and griping about the other things. But it's just a tremendous growth in an area that already is seeing enough growth. And education is vitally important, but it needs to take into account that there are other places in California where people can get educated. And you also have to take into account the fact the state has much less money than it did before. You guys didn't build anything under the 2005 LRDP, so in a way, this is all just an exercise in futility to just proceed with this at this time. It should be delayed until everything is clear financially and from any other respects.

Response PH2-27

The comment expresses concerns related to growth and provides the opinion that the 2021 LRDP planning process should be delayed. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-28

MARTHA ZUNIGA: My name is Martha, M-A-R-T-H-A, Zuniga, Z-U-N-I-G-A. I'm on the faculty here at UCSC. I have been here -- next month will be my 31st anniversary.

 I have two comments. One of them is, I don't understand when you say that 100 percent of the new student FTEs will live on campus. Does that mean you will somehow force them to live there the whole time that they're here? Because most undergraduates find the campus housing very expensive, and as soon as they can find students to live with, they move off campus. So I don't understand how they're going to be forced to live on campus their entire time here.

Response PH2-28

The comment poses a question related to student housing on campus and does not address the adequacy of the EIR analysis. To clarify, the additional 8,500 beds proposed under the 2021 LRDP will combine with the existing on-campus housing stock and proposed projects to offer a variety of housing types to students. The campus maintains a variety of different housing types, from colleges that serve first year and continuing students, to apartments and suites that serve continuing students, graduate students, and transfers. The 2021 LRDP, in and of itself, is a land use plan that does not actually propose any specific development, govern enrollment decisions, or include initiatives to force students to reside on campus. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-29

Secondly, if they do live on the campus the entire time, I just don't see how the traffic is going to work unless we have little pods that allow us to fly over all these people.

Response PH2-29

The comment expresses concerns related to traffic but does not address the contents of the EIR Section 3.16, “Transportation,” of the Draft EIR provides a discussion of transportation impacts under the 2021 LRDP. No further response can be provided. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-30

But the third thing I want to comment on is --somebody else alluded to it -- I have been here 31 years. There is no doubt the quality of the education has eroded, and even students who just graduated last year are thanking their lucky stars that they were freshmen when they were freshmen, because they see what the freshmen have available to them now, is so much diminished, relative to what they had.

 So we're fooling ourselves if we think we can just keep growing, growing, growing, and somehow magically we're going to be delivering quality education to these students, and maintaining a beautiful environment, and harmony with the university and with our community. Just I think that's not possible. So I support the comments that have been made before, we need to hit pause here and really look seriously at what we're trying to do. Thank you very much.

Response PH2-30

The comment expresses concerns related to campus growth and suggests that the 2021 LRDP planning process be delayed. This comment provides an opinion regarding the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-31

SABRA COSSENTINE: Thank you very much.

 I agree with the intelligent comments that were just made by the last speaker. And this speaks, because I'm very familiar with college campuses, because I'm a college admission advisor, and I work independently with students. And I know what housing costs throughout the many different universities in the United States.

 And already UCSC, is on the high side for housing. The housing meal plan is so high that the students can get into housing in the city for substantially less. Even though it's cramped conditions at times, they feel they need to save the money; they have no choice, and they're very willing to do that.

 So the housing will definitely affect our community. It won't work. We don't have enough housing now. And what the problem is, you can't require them to live on campus. Most UCs have one year, maybe two years of required housing on campus, so because there is so much that you're in competition with other campuses, it makes no sense to increase here where you already have so many problems. You can easily put a thousand students on the other -- or even a clue to our campus; nine campuses, 1,000 for each campus, 9,000, you will meet what your goal is. There is no reason to even spend all the money you want to spend, even including this meeting and the many, many hours that have been spent on this plan just don't do it, and save yourself enough money to accommodate the needs of the students, because that's what you're there for, is to educate and help our students have an excellent education; not make plans that are outlandish in a community that's already voted they do not want your 10,000 students here. It makes no sense. Use the amazing brains that are involved with upper division education and find another solution. This is a very bad solution. Thank you for your time.

Response PH2-31

The comment expresses concerns related to housing and alternatives to increasing the student population as planned. The comment addresses aspects of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-32

CATHERINE SOUSSLOFF: Hi. This is Catherine Soussloff, C-A-T-H-E-R-I-N-E, S-O-U-S-S-L-O-F-F, professor emeritus of History of Art and Visual Culture at UCSC, and presently professor of Art History at the University of British Columbia, but resident in Santa Cruz since 1987.

 I just want to understand what will happen to the written comments; if you can answer that question. Rather than giving my oral comment, I would like to submit a written comment, but where will those go and who will read them? Thanks.

Response PH2-32

The comment requests further information about what happens to written comments received. In accordance with CEQA requirements, all verbal comments from the public hearings and all written comments received via the project email address have been reviewed formal responses have been prepared, and the comments and responses have been included as part of the Final EIR. The comment is does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-33

CATHERINE SOUSSLOFF: Just to clarify that, if you don't mind, because I'm not clear still, you will be responding to me directly or to the commenters directly, or you will be responding in writing that will go forward to the next stage at the Regents or at the Office of the President, which do you mean?

Response PH2-33

The comment requests clarification regarding how responses to comments received will be handled. Refer to Response PH2-32.

Comment PH2-34

MORGAN BOSTIC: I just want to know when these live stream recordings will be posted online. Thank you. Or when you expect they'll be available.

Response PH2-34

The comment includes a question regarding access the recordings of the public hearings. The public hearings were not recorded but a court reporter did provided a transcript of the proceedings, which is included herein as part of the Final EIR.

Comment PH2-35

MARTHA ZUNIGA: I have a follow-up to the previous question. How will we know when you have posted your responses and so forth? How do we find that out?

Response PH2-35

The comment includes a question related to the public comment process and when responses will be publicly available. In accordance with CEQA requirements, the Final EIR is being made available at least 10 days prior to consideration by the UC Regents for certification. The Final EIR will be posted to the UC Santa Cruz website.

Comment PH2-36

MARTHA ZUNIGA: I must be on the mailing list because I got the announcement. Is that true, or is that not a fair conclusion?

Response PH2-36

The comment requests clarification related to the 2021 LRDP project mailing list. Any commenters who registered for the public hearing have been included within UC Santa Cruz’s database for future notifications regarding the 2021 LRDP.

Comment PH2-37

CANDACE BROWN: Yes. My name is Candace Brown, and I have lived in this community for 47 years, and I came to Santa Cruz as a university student.

 The university has quadrupled during that time period. When I was there, transportation was readily available. We also had to hop on banana slug transportation. Housing was plentiful, and it didn't seem to have any impact on the housing market downtown. There was some traffic up to the university, but most people took the bus, and it was readily available.

 Now, students have to wait for buses. They miss when they have to run up to campus. Housing is so dire, that there's -- before the pandemic, there was quadruple or quintets. That kind of density is causing some mental illness, my understanding, up at campus. The housing downtown has become so unaffordable that many lower income families are being driven out of town. I would invite you to check out urbandisplacement.org. Research by Karen Chappell of University of Berkeley, who is tracking this traumatic impacts, and also Beacon Economics, who did a study about the fact that low-income families are being gentrified out of this town.

 Most of the growth, according to the water advisory committee is as a result of the university growth in the last 40 years. They actually tracked that and were able to account for all the growth of the city, for the town, as a result of the university.

 So any shifts in transportation, infrastructure, budgetary shortfalls, we're housing --the fact that Santa Cruz is now in the top five of the world in unaffordability relative to wage is something you just cannot ignore.

 So also to look at the fact that the original agreement, which is supposedly a binding agreement, said you couldn't even grow to triplet, and yet that was exceeded. And so I don't quite understand why the university or Regents think that they would take seriously any kind of agreement with the university when you haven't even met the housing needs of existing students.

 Now hundreds of students are living out of their cars. This is before the pandemic. And they're not allowed to live up in campus in their cars, so they're spread throughout the communities, which is problematic. This is a very serious and dire situation.

 And then there is a proposed proposition of building 3,000 more units, but that won't even catch up to the housing needs of today.

 Yes, water is lower. Yes, traffic trips are lower. But there's so many other aspects that are impacted in our town, that are seriously impacted. I would hope -- also it doesn't account for the fact that the graduate student population has grown, and I don't believe was in the original agreement.

 There have been opportunities to buy older hotels and convert them to housing, which has not been done. Up in Scotts Valley, there is an opportunity to buy a hotel, which by the way, is potentially on the market again, I think 170 units. The university does nothing to address these issues, and yet imposes that upon the community. We simply cannot continue with this kind of behavior. Thank you.

Response PH2-37

The comment expresses concerns related to housing. UC Santa Cruz did review the website and research referred to by the commenter, and no potential physical environmental impacts issues were identified as part of the research. This comment focuses on aspects of the project, the 2021 LRDP, and does not address the adequacy of the EIR analysis. No further response is necessary. For comments on the 2021 LRDP project and socioeconomic considerations, refer to Master Response 2, specifically the discussions under "2021 LRDP Planned Development” and “Housing Affordability and Other Socioeconomic Considerations.” The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-38

SARA BASSLER: Sarah Bassler. I just had a question of how you get on the mailing list, because I think I found out about this in the paper?

Response PH2-38

The comment requests clarification related to the 2021 LRDP project mailing list. Any commenters who registered for the public hearing have been included within UC Santa Cruz’s database for future notifications regarding the 2021 LRDP.

Comment PH2-39

HUNTER GIESEMAN: Okay. Hello. My name is Hunter Gieseman, H-U-N-T-E-R, G-I-E-S-E-M-A-N. And I'm a junior transfer student here who currently lives on campus.

 Before I start, I would like to say that UC Santa Cruz is my dream university. It took me six applications to be here, so I'm really happy to be here and talk with everyone today about the future of our beautiful campus.

 So yeah, going forward, my comment today was bringing up something that I notice hasn't been voiced by any of my peers, to my knowledge. I'm really surprised, considering, like, the impact it has on our campus pollution. It's one of the most overlooked forms of pollution that we see every day but is overlooked by most. So what I'm talking about is light pollution. This affects all of our wildlife. It disrupts our circadian rhythm for both humans and animals. And it can cause run-ins with wildlife on all of our roadways, all of this while increasing pollution in our night skies.

 So I actually first thought of this when I moved in on campus, and I currently live here. But I have a chronic disability that has flare-ups, making it really painful to walk sometimes, like any micro movements that I do. So while I walk around campus in the afternoon, and at night I bring a flashlight, but I still have trouble seeing the paved walkways, even --well, actually, especially where there are lights. So it makes it hard to avoid trip hazards and slips hazards like branches and bumps along the paved pathways. And I have slipped and fallen during some of my chronic flare-ups, and thankfully nothing has caused me to go to the hospital.

 But I'm calling for an addition on the current EIR Draft on page 3.1-3 or page 137 of the PDF, specifically, the section, "Exterior Lighting Standards." I'm happy that it implements down-lighting and all outdoor lighting to prevent light pollution on our campus, but the section is actually missing one of the most important elements of light pollution itself.

 So what I'm proposing is creating a limit for outdoor lighting in Kelvin and CRI, and to retrofit current outdoor lighting to be shielded and directional to their intended light area. The one meter addition I'm calling for in this section is warmer Kelvin at other lower than 3,000 in Kelvin, so that would create like a warm white light that a lot of us are used to. And high CRI, which is color rendering, or color accuracy index, for all new outdoor lighting and lighting replacements on campus.

 So these two factors do not affect the brightness at all; it just makes it more color accurate to see anywhere. And since they're warmer, it doesn't have as much of an impact on your sleep rhythm, your circadian rhythm.

I have about a minute left. Can I keep ongoing?

Response PH2-39

The comment provides suggestions for revisions to campus lighting standards, including warm lighting. Refer to Response I72-1, regarding consideration of IESNA color temperature standards (referred to as outdoor lighting in Kelvin) As stated in Mitigation Measure 3.1-4, consistency with the IESNA Lighting Handbook, is required. This includes specific considerations for color rendering index (CRI) which is the measurement of light in relation to how it affects the appearance of color. However, as stated in IESNA position statement, “PS-08-15,” the CRI has shortcomings that limit the ability to fully represent how humans perceive color. The IESNA Technical Memorandum, “TM-30-15,” provides design guidance or criteria for best practices for evaluating light source color rendition. Accordingly, future lighting would be designed consistent with IESNA recent recommendations.

Comment PH2-40

HUNTER GIESEMAN: Okay.

 So most of us are probably familiar with the high energy volt, because they have a lot of washed out colors and fresh blue lights since they have been replaced on our campus, especially older CFLs. But thankfully LED technology has greatly surpassed an energy efficient color accuracy.

 So my purpose, 3,000 or lower Kelvin. And the other proposals that I will submit through e-mail would make it much easier for us to notice any sort of trail hazards. It would create an environment where animals don't walk up to them as much or, like, they're not attracted to them, because the blue light has an effect where it actually attracts animals to the source of light, creating, like, a lot of collisions or potential for collisions.

 So yeah, I'm going to be submitting these with illustrations to help you guys implement these guidelines.

 And before I leave, I want to emphasize that my proposed additions in this EIR could apply to any version of campus development, whether there is growth or there is no growth on campus.

 So I would like to ask my peers to help echo my additions, to require warm white LEDs at 3,000 Kelvin or below, and retrofit current outdoor streetlights that are built on campus to be shielded or directional so that they do not shine directly into the sky and lighting up their intended area of where we walk.

 Because if you notice the sphere lights, they light up everything above it, but they don't really light up the ground that we have. So I'm sure many of you have also tripped or have done some things similar. But yeah, it doesn't just affect any students with disabilities, it's something that affects everyone.

 So thank you for everyone who is here tonight. And I really look forward to the future of our wonderful campus and community. And I ask everyone here remembers my comment any time you see outdoor lighting on our campus. LED light bulbs have a 20-plus-year lifespan, so any replacements that we have, and new development of these lights, are very permanent, so we have to get it right the first time. So it's like a lot of other environmental problems where it's really expensive changing it later, once we have realized our mistake.

But thank you everyone.

Response PH2-40

The comment suggests the use of warm white LEDs (3,000 Kelvin or below) and shielding and directional considerations for on-campus lighting. Refer to Response I72-1 and Response PH2-39.

Comment PH2-41

JOHN AIRD: I guess my comment is simply that what many have stated this evening and last evening, and at your earlier outreach meetings that were held last year, sort of echo the same issues as to how you balance the resources of the community and the resources of the University with what appears to be a pretty arbitrary target of 28,000.

 And I don't want to be disagreeable, but I was a little bit shocked when Erika said that one of the reasons that Alternative 2 was rejected was because it didn't meet the objective, quote, of 28,000.

 I thought the whole point here was to provide feedback which might lead to some change of direction, some modification of plan. I don't see it. And at least at this point, I hope that in the intervening time, as you're looking at the comments you've received, that you will go back and look at the other alternatives and the comments that have been made concerning this icing of this, and the capability of both the campus to keep its unique flavor, as well as this community and to support it. Thank you.

Response PH2-41

The comment expresses concerns related to public feedback. The comment also expresses concern related to rejection of Alternative 2. With respect to the consideration of Alternative 2 (Reduced LRDP Enrollment), the commenter is referred to Chapter 6, “Alternatives,” which identifies the alternative as the environmentally superior alternative (other than the No Project Alternative), consistent with CEQA requirements. For further information about the 2021 LRDP process, as well as information related to evaluation of EIR alternatives, please refer to Master Response 2 and Master Response 3, respectively. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment PH2-42

HUNTER GIESEMAN: Hunter Gieseman. Just a quick question. And people asked it earlier, but I was busy, like, writing down what I was going to say.

But so when are you guys going to publish the transcript for this? And are you going to have a video published as well and sent to everyone? And what would the timeline on that be?

Response PH2-42

The comment requests clarification regarding how the verbal comments received during the public hearings will be provided. The public hearings were not recorded but a court reporter provided a transcript of the proceedings. Based on the transcript produced for each hearing, the Final EIR includes written responses to each of the comments received. The comment does not address the adequacy of the EIR analysis. No further response is necessary.

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