



UNIVERSITY OF CALIFORNIA SANTA CRUZ

2021 Long Range Development Plan

Final Environmental Impact Report

Public Comments, Responses, MMRP, and Final Revisions

State Clearinghouse Number 2020029086

September 2021

Final Environmental Impact Report
(Public Comments, Responses, MMRP, and Final Revisions)
for the

University of California, Santa Cruz
Long Range Development Plan
State Clearinghouse No. 2020029086

Prepared for

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September 2021

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LIST OF ABBREVIATIONS

2021 LRDP	2021 Long Range Development Plan
AB	Assembly Bill
AEP	California Association of Environmental Professionals
AMBAG	Association of Monterey Bay Area Governments
AQI	air quality index
asf	assignable square feet
CAL FIRE	California Department of Forestry and Fire Protection
Cal OES	California Governor's Office of Emergency Services
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CFP	Capital Financial Plan
CGP	Construction General Permit
CIP	Capital Improvement Program
CNR	Campus Natural Reserve
CSA	Cooperative Settlement Agreement
CSH	Colleges and Student Housing
CZU	San Mateo–Santa Cruz Unit
eBike	electric bike
EO	Executive Order
EOC	Emergency Operations Center
EOP	UC Santa Cruz Emergency Operations Plan
ESA	federal Endangered Species Act
ESHA	Environmentally Sensitive Habitat Area
EV	electric vehicle
Final EIR	final environmental impact report
FTE	full-time-equivalent
FWS	fall-winter-spring
GHG	greenhouse gas
gpm	gallons per minute
GSA	Graduate Student Association

gsf	gross square feet
HCP	habitat conservation plan
IESNA	Illuminating Engineering Society of North America
LAFCO	Local Area Formation Commission
LCP	Local Coastal Program
LOS	level of service
MBARD	Monterey Bay Air Resources District
mgy	million gallons per year
MGY	million gallons per year
MMRP	mitigation monitoring and reporting program
MTCO _{2e}	metric tons of carbon dioxide equivalent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OPR	California Governor's Office of Planning and Research
P3	Public Private Partnerships
PM ₁₀	respirable particulate matter
PRC	Public Resources Code
ROG	reactive organic gases
SB	Senate Bill
SCC	Santa Cruz County
SOV	single-occupant vehicle
SqCWD	Soquel Creek Water District
SUA	Student Union Assembly
SWMP	Storm Water Management Program
SWPPP	storm water pollution prevention plan
TDM	Transportation Demand Management
UC MBEST	UC Monterey Bay Education Science & Technology
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
Water Department	City of Santa Cruz Water Department
WSA	Water Supply Assessment
ZEV	zero emission vehicle

1 INTRODUCTION

On January 7, 2021, the University of California, Santa Cruz (UC Santa Cruz) released for public review the draft environmental impact report (Draft EIR) for the proposed 2021 Long Range Development Plan (2021 LRDP). The Draft EIR was prepared under the Board of Regents of the University of California Regents' (UC Regents') direction in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000–21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387). The UC Regents is serving as the lead agency under CEQA for consideration of certification of the EIR and has principal responsibility for deciding whether to approve the 2021 LRDP.

1.1 PUBLIC REVIEW AND RESPONSES TO COMMENTS

In accordance with Sections 15087 and 15105 of the State CEQA Guidelines, the Draft EIR was circulated for public review and comment to responsible agencies, as well as members of the public, for 60 days (January 7, 2021, through March 8, 2021) (beyond the normal 45-day review period that is required under CEQA). UC Santa Cruz also held online public sessions on Wednesday, February 3, 2021 and Thursday, February 4, 2021 from 5:00 p.m. to 7:00 p.m., to receive comments on the Draft EIR. Comment letters received on the Draft EIR and a transcript of oral testimony provided at the public hearing are provided in their entirety in Chapter 2, "Comments and Responses to Comments."

Responses to each of the comments received are provided in Chapter 2 of this document as part of the final environmental impact report (Final EIR). Although some of the comments have resulted in changes to the text of the Draft EIR (see Chapter 4, "Corrections and Revisions to the Draft EIR"), none of the changes constitute "significant new information," which would require recirculation of the Draft EIR. "Significant new information" is defined in Section 15088.5(a) of the State CEQA Guidelines as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances has arisen from comments on the Draft EIR; therefore, recirculation is not required.

The Draft EIR, Final EIR, and associated appendices are available for review online at: <https://lrdp.ucsc.edu>.

As required by State CEQA Guidelines Section 15088(b), at least 10 days before consideration of the Final EIR for certification, UC Santa Cruz provided a written response (hard or electronic copy) to each public agency that submitted written comments on the Draft EIR.

1.2 MODIFICATION SINCE ISSUANCE OF THE 2021 LRDP DRAFT EIR: STUDENT HOUSING WEST

On March 18, 2021, the UC Regents reapproved the Student Housing West Project (State Clearinghouse No. 2005012113), which was identified as a cumulative project in Chapter 4, "Cumulative Impacts," of the 2021 LRDP Draft EIR. The reapproved project is the same one described in the 2021 LRDP Draft EIR. The project had been previously

approved in 2019 by the UC Regents; however, project implementation was delayed due to a legal challenge to the EIR. As noted on page 4-7 of the 2021 LRDP Draft EIR, the Superior Court had previously upheld the adequacy of the Student Housing West EIR but overturned the approval based on issues with the UC Regents' findings. The 2021 LRDP Draft EIR described the Student Housing West as a "Planned but not Operational" project and it was included in the cumulative analysis. The treatment of the Student Housing West Project within the Draft EIR for the 2021 LRDP is still considered appropriate, and its reapproval does not alter the conclusions of or necessitate revisions to the 2021 LRDP Draft EIR.

1.3 ORGANIZATION OF THE RESPONSES TO COMMENTS

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR (State CEQA Guidelines Sections 15086 and 15087).

Sections 15088(a) and (c) of the State CEQA Guidelines also require a lead agency to evaluate comments on environmental issues received from persons who reviewed the Draft EIR and to prepare written responses to comments raising significant environmental issues. The Final EIR is the mechanism for responding to these comments. Responses are not required for comments regarding merits of the proposed project or regarding issues not related to the project's environmental impacts. Several of the comments on the Draft EIR state the commenter's preference about whether the 2021 LRDP should be modified or approved, or provide general statements concerning the content of the Draft EIR. Detailed responses are not warranted or required by CEQA for comments that do not address the environmental issues related to the proposed plan. Such instances are noted in the responses. The UC Regents will be able to review all comments, including those that do not warrant a response under CEQA, before considering certification of the Final EIR or approval of the proposed 2021 LRDP.

Each comment has been reproduced according to the type of commenter (state agency, local/regional agency, organization, individual, commenter at public hearing) with responses following each comment. In some instances, clarifications of the text of the Draft EIR may be required. In those cases, the text of the Draft EIR is revised and the changes compiled in Chapter 4, "Corrections and Revisions to the Draft EIR." The text deletions are shown with ~~strikeout~~, and additions are shown with underline.

1.4 PROJECT DECISION PROCESS

This document and the Draft EIR, as amended through responses to comments, together constitute the Final EIR, which will be considered by the UC Regents prior to a decision on whether to approve the project. If the UC Regents decide to approve the project, the UC Regents, as required by State CEQA Guidelines Section 15090, must first certify that the Final EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the UC Regents and UC Santa Cruz, and reflects their independent judgment and analysis. The UC Regents would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot be mitigated to less than significant) would result from implementing the 2021 LRDP and the UC Regents chooses to approve the 2021 LRDP, the UC Regents would need to adopt a statement of overriding considerations, under State CEQA Guidelines Section 15093, explaining reasons the UC Regents believe the proposed plan should move forward despite these environmental effects. A mitigation monitoring and reporting program, which is required by State CEQA Guidelines Section 15091(d), has been included as part of Chapter 3, "Mitigation Monitoring and Reporting Program" of this Final EIR and will be adopted by the UC Regents in conjunction with any project approval.

2 RESPONSES TO COMMENTS

This chapter of the final environmental impact report (Final EIR) contains the comment letters received during the public review period for the Draft EIR, which concluded on March 8, 2021. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared to address comments on environmental issues received from reviewers of the Draft EIR.

2.1 COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. Comment letters have been organized according to the type of commenter and then numbered in the order (by date) they were received by University of California (UC) Santa Cruz and alphabetically. In addition, comments were provided during the Draft EIR public online sessions on February 3, 2021 and February 4, 2021.

Table 2-1 List of Commenters

Letter No.	Commenter	Date
FEDERAL		
F1	U.S. Fish and Wildlife Service, Ventura, California Leilani Takano, Assistant Field Supervisor	Feb 25, 2021
STATE		
S1	California Department of Fish and Wildlife, Bay Delta Region Gregg Erickson, Regional Manager	March 1, 2021
S2	University of California San Diego Scripps Institution of Oceanography Richard D. Norris, Director	March 1, 2021
S3	University of California-Santa Cruz Alex Jones, Campus Natural Reserve Manager	March 6, 2021
S4	University of California, Santa Cruz Natural Reserves Wilton W. Webster Jr. Presidential Chair	March 8, 2021
S5	California Coastal Commission Colin Bowser, Coastal Planner	March 8, 2021
S6	California Department of Transportation, District 5 Chris Bjornstad, Associate Transportation Planner	March 8, 2021
LOCAL/REGIONAL		
L1	Santa Cruz Task Force on UCSC Growth Plans	January 11, 2021
L2	Santa Cruz Task Force on UCSC Growth Plans	January 14, 2021
L3	Santa Cruz Local Agency Formation Commission Joe A. Serrano, Executive Officer	February 3, 2021
L4	County of Santa Cruz, Board of Supervisors Ryan Coonerty, Supervisor	February 12, 2021
L5	Association of Monterey Bay Area Governments Heather Adamson, Director of Planning	February 18, 2021
L6	Santa Cruz County Regional Transportation Commission Ginger Dykaar, Senior Transportation Planner	March 3, 2021

Letter No.	Commenter	Date
L7	Santa Cruz City-County Task Force on UCSC Growth Plans Morgan Bostic, Advocate	March 5, 2021
L8	Monterey Bay Air Resources District Christine Duymich, Air Quality Planner II	March 8, 2021
L9	City of Santa Cruz, Planning and Community Development Department Matthew VanHua, Principal Planner - Advance Planning	March 8, 2021
L10	Santa Cruz Metropolitan Transit District Pete Rasmussen, Transportation Planner	March 8, 2021
L11	Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans Morgan Bostic, Advocate	March 8, 2021
L12	Santa Cruz County, Planning Department Kathleen Molloy, Planning Director	March 8, 2021
L13	Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans Morgan Bostic, Advocate	March 8, 2021
L14	Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans	March 8, 2021
ORGANIZATIONS		
O1	League of Women Voters of Santa Cruz County Barbara Lewis, President	February 23, 2021
O2	Springtree Home Owners Association Ron Goodman, Board Member	March 2, 2021
O3	Valley Women's Club, Environmental Committee for the San Lorenzo Valley Nancy Macy, Chair	March 3, 2021
O4	Campaign for Sustainable Transportation Rick Longinotti, Co-chair	March 2, 2021
O5	UC Santa Cruz, History of Consciousness Department James Clifford, Professor Emeritus	March 6, 2021
O6	Sierra Club, Santa Cruz County Group of the Ventana Chapter Micah Posner, Executive Committee Chair	March 8, 2021
O7	Habitat and Watershed Caretakers	March 8, 2021
O8	Coalition For Limiting University Expansion	March 8, 2021
O9	Santa Cruz Waldorf School Nadia Peralta	March 7, 2021
O10	Amah Mutsun Tribal Band of Costanoan/Ohlone Indians Valentin Lopez, Chairman	March 8, 2021
INDIVIDUALS		
I1	Susan Arnold	January 7, 2021
I2	Jesse Brennan	January 7, 2021
I3	Benjamin H. Garner	January 7, 2021
I4	Craig Hunter	January 7, 2021
I5	Cliff Nelson	January 7, 2021
I6	David	January 8, 2021
I7	Matt Lumadue	January 9, 2021
I8	Dianne Brumbach	January 10, 2021

Letter No.	Commenter	Date
I9	Marisa Herzog	January 13, 2021
I10	James Lee Jones Jr	January 18, 2021
I11	Amber Yale	January 20, 2021
I12	Matt Lumadue	January 23, 2021
I13	Michael A Riepe	January 25, 2021
I14	Geoff Lightfoot	January 27, 2021
I15	Sabra	February 2, 2021
I16	Tsim Schneider	February 2, 2021
I17	Faye Crosby	February 3, 2021
I18	Alex Krohn	February 3, 2021
I19	Janelle Maguire	February 3, 2021
I20	Mary McMillan	February 3, 2021
I21	Jarmila Pittermann	February 5, 2021
I22	Leonna Heavens	February 8, 2021
I23	Lisa Segnitz	February 12, 2021
I24	Matty Lums	February 23, 2021
I25	Christopher Gentry	February 20, 2021
I26	Matty Lums	February 23, 2021
I27	Adam Millard-Ball	February 28, 2021
I28	Maria Borges	March 1, 2021
I29	Joanne Brown	March 1, 2021
I30	Mark F Massoud	March 1, 2021
I31	Karen Holl	March 5, 2021
I32	Daniel Schmelter	March 2, 2021
I33	Karen Stout	March 2, 2021
I34	Chris Wilmers	March 2, 2021
I35	Haley Burrill	March 3, 2021
I36	Greg Gilbert	March 3, 2021
I37	Alex Krohn	March 3, 2021
I38	Andrew Mathews	March 3, 2021
I39	Ingrid Parker	March 3, 2021
I40	Kelly Pettit	March 3, 2021
I41	Ronnie Lipschutz	March 4, 2021
I42	Ronnie Lipschutz	March 3, 2021
I43	Michael Loik	March 4, 2021
I44	Chad Noyes	March 3, 2021
I45	Janet Parkins	March 4, 2021
I46	Tsim Schneider	March 4, 2021
I47	Elaine Sullivan	March 4, 2021

Letter No.	Commenter	Date
148	Tiffany Theden	March 5, 2021
149	Martha Brown	March 7, 2021
150	Mark Carr	March 7, 2021
151	Dan Costa	March 7, 2021
152	Jennifer Gonzalez	March 7, 2021
153	Kathleen Kay	March 7, 2021
154	Bonnie Stibbe	March 7, 2021
155	Rachel Aichele	March 8, 2021
156	John Aird and Ted Benhari	March 8, 2021
157	Bijan Ashtiani-Eisemann	March 8, 2021
158	John Balawejder	March 8, 2021
159	Sandra Baron	March 8, 2021
160	Sarah Bennett	March 8, 2021
161	Fay Bohn	March 8, 2021
162	Mark Boolootian	March 8, 2021
163	Amanda Cameron	March 8, 2021
164	Ryan Carle	March 8, 2021
165	Jennifer Chebahtah	March 8, 2021
166	Christian Cormier	March 8, 2021
167	Eduardo Izquierdo	March 8, 2021
168	Kiran Favre	March 8, 2021
169	David Fierstein	March 8, 2021
170	Jacob Ferrall	March 8, 2021
171	Litzia Galvan	March 8, 2021
172	Hunter Gieseaman	March 8, 2021
173	Maria Gitin Torres	March 8, 2021
174	Courtney Golts	March 8, 2021
175	Gillian Greensite	March 8, 2021
176	Eric Grodberg	March 8, 2021
177	Brett Hall	March 8, 2021
178	Virginia Jansen	March 8, 2021
179	Jazmine Jensen	March 8, 2021
180	Brian Johnson	March 8, 2021
181	Elise Knittle	March 8, 2021
182	Chris Lay	March 8, 2021
183	Athena Lynch	March 8, 2021
184	Lucy Malamud-Roam	March 8, 2021
185	Julie Mascarenhas	March 8, 2021
186	Jack Mazza	March 8, 2021

Letter No.	Commenter	Date
I87	Alayne Meeks	March 8, 2021
I88	Melissa	March 8, 2021
I89	Mariam Moazed	March 8, 2021
I90	Gabriela Navarro	March 8, 2021
I91	Veronica Ness	March 8, 2021
I92	Sophie Noda	March 8, 2021
I93	Kelsey Pennington	March 8, 2021
I94	Kristen Sandel	March 8, 2021
I95	Ajay Shenoy	March 8, 2021
I96	Daniel Simoni	March 8, 2021
I97	Jenna Sparks	March 8, 2021
I98	Kelly Trombley	March 8, 2021
I99	Matthew Waxman	March 8, 2021
I100	Matthew Waxman	March 8, 2021
I101	Claudia Webster	March 8, 2021
I102	Zoe Arkin	March 9, 2021
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
PUBLIC HEARINGS (ONLINE) ON THE DRAFT EIR		
PH1	February 3, 2021	—
PH2	February 4, 2021	—

2.2 MASTER RESPONSES

Several comments raised similar issues. Rather than responding to each individual comment separately, master responses have been developed to thoroughly address the comments comprehensively and, where possible, avoid repetition. Master responses are provided for the following topics:

1. Baseline
2. Comments on the Project and Other Non-Environmental Issues
3. Alternatives
4. Wildfire
5. Greenhouse Gas Emissions Analysis and Mitigation
6. Transportation
7. Water Supply
8. Student Housing West
9. Phasing and Implementation
10. Hydrology and Water Quality
11. Level of Detail
12. Long-Term Habitat Protection

A reference to the master response is provided, where relevant, in responses to the individual comments.

2.2.1 Master Response 1: Baseline

Several comments questioned the EIR's selection of baseline conditions for the 2021 Long Range Development Plan (2021 LRDP) EIR. Concerns were raised, in part, because the COVID-19 pandemic resulted in economic closures or restrictions, including at UC Santa Cruz, which may have affected traffic and related (air quality, greenhouse gases, noise) conditions. Baseline conditions in the EIR reflect enrollment and staffing during the 2018/2019 academic year, which is the academic year immediately preceding issuance of the Notice of Preparation (NOP) (February 2020) and the last full academic year prior to the COVID-19 pandemic. In general, and as supported by State CEQA Guidelines section 15125(a)(1), baseline conditions will normally constitute those conditions that exist "at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions when the project becomes operational, or both, that are supported with substantial evidence."

Restrictions and stay-at-home orders related to the outbreak of COVID-19 were imposed during the public review period for the NOP. The student body and most UC Santa Cruz employees did not return to the LRDP area on a daily basis, beginning in March 2020. These conditions were both unusual—this is the first pandemic of this kind or magnitude in 100 years—and temporary. It is expected that campus operations, and the economy in general, will return to pre-pandemic levels during the next academic year (2021–2022). Consequently, it would be misleading to base the analysis of project impacts by comparing operations under the LRDP to those that occurred during the unusual conditions imposed by the pandemic and would underestimate or underreport typical or normal existing conditions.

Several comments stated that the Draft EIR improperly evaluated impacts by not evaluating an existing conditions baseline during the pandemic and emergency conditions when few students were on campus, and that this minimizes the impacts of the 2021 LRDP. (Under this theory, the impacts of the LRDP would be compared to a nearly vacated campus instead of a campus with the student and faculty population in effect prior to the pandemic.) This is not an accurate reflection of the requirements of CEQA, as indicated by the language of the Guidelines and the discussion above and would overstate the impacts of the 2021 LRDP. The NOP was issued prior to the pandemic, and, therefore, under the typical approach of using a baseline reflecting conditions at the time of the NOP, the baseline would be a fully operating campus. Even if the NOP were issued during the pandemic, the Guidelines (see above) and CEQA case law (specifically *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* [2013] 57 Cal.4th 439) allows for an EIR to omit comparison to an existing conditions baseline if the lead agency finds that the information would be "misleading or without informational value." Where conditions fluctuate, the lead agency has discretion to select a baseline that accurately reflect conditions over a period of time, even if it does not precisely align with conditions at the time of (or immediately preceding) issuance of the NOP (*North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94.)

In this instance, the pandemic and its associated emergency condition have resulted in substantively different baseline environmental conditions than have ever occurred on the UC Santa Cruz campus. It is anticipated that emergency conditions will end, and various stay-at-home orders will be lifted such that the LRDP area would return to a more typical level of operation, which is most recently demonstrated by the 2018/2019 academic year. For this reason, use of the 2018/2019 academic year as a baseline is consistent with the requirements of CEQA and affords the most accurate analysis of Project environmental impacts. To the contrary, use of the current pandemic conditions as baseline would be misleading, and would result in an analysis lacking in informational value to decision makers. Therefore, the 2021 LRDP EIR's analysis provided the information needed to make an informed decision, evaluated appropriate baseline conditions, and is consistent with CEQA.

2.2.2 Master Response 2: Comments on the Project and Other Non-Environmental Issues

Several comments were received during public review of the Draft EIR that indicated a preference for or opposition to the proposed project or elements of the project, which is the 2021 LRDP. In accordance with Section 15088 of the State CEQA Guidelines, UC Santa Cruz is required to “evaluate comments on environmental issues received from persons who reviewed the [D]raft EIR and shall prepare a written response... to comments raising significant environmental issues received during the noticed comment period.” Comments related to the proposed project or elements of the project, as well as the project’s merits, are generally not considered comments on issues related to physical environmental conditions or impacts disclosed and evaluated as part of the Draft EIR and, therefore, do not warrant a response under CEQA. If the comment raises a significant environmental issue, that issue is addressed as required by CEQA. Notwithstanding this CEQA requirement, any comments submitted on the Draft EIR that address the project or project elements will be part of the overall EIR record, which will be provided to the UC Regents for their review in their deliberations over whether to approve the 2021 LRDP. Where a comment raises a preference for or against the project or an element of the project, that fact is noted in the response, or the commenter is referred to this master response.

The following provides some additional background information regarding the 2021 LRDP’s planned development, growth projections, the role of public outreach, housing affordability and socioeconomic considerations, additional information regarding the application of local plans and policies to the 2021 LRDP and on-campus development, and the 2008 Cooperative Settlement Agreement (CSA).

2021 LRDP PLANNED DEVELOPMENT

Consistent with the overall mission of the UC, UC Santa Cruz needs to continually adapt, both academically and structurally, to serve higher education needs for eligible California high-school graduates and community college transfers. Each campus in the UC system prepares an LRDP to guide campus development in anticipation of potential growth of student enrollment and new university-added programs and to accommodate the demand. Much like a city or county general plan, the 2021 LRDP does not mandate growth or the provision of new facilities, but instead provides a structure under which such growth can be provided. In general, enrollment growth at each campus is driven by a directive to absorb a reasonable proportion of the increasing enrollment in the UC system as a whole. Varying factors affect whether campus population levels may increase, decrease, or remain unchanged, such as physical capacity, availability of and interest in specific academic programs, and the individual decisions of potential students.

The 2021 LRDP provides a guide to the land development patterns and associated physical infrastructure that could be built to support a forecasted level of enrollment and employment growth. Its approval does not constitute a commitment to any specific project, construction schedule, or funding priority, nor does it constitute a commitment by UC Santa Cruz to enrollment growth or a certain amount of development. All capital projects at UC Santa Cruz undergo subsequent environmental review at the project level after which they may be approved for construction; construction schedules are developed once a project is approved and in the design phase. Funding priorities for the campus are delineated in the Capital Financial Plan (CFP), which is a proposed ten-year budget and schedule for all projects over \$750,000. The CFP is publicly available online at: <https://cpsm.ucsc.edu/capital-planning/cfp.html#:~:text=The%20Capital%20Financial%20Plan%20is,an%20assessment%20of%20space%20needs>.

The 2021 LRDP is fundamentally a land use plan that provides the physical space for resources and the student experience. It is not a tuition plan, or financial plan, or an academic plan. It describes a building program for residential space and non-residential space, including square footage to account for needs in both academic and student support space to better support the student experience. It considers the compatibility and complementary nature of land uses, including connecting indoor spaces with the campus’ extraordinary natural environment.

As explained on page 163 of the 2021 LRDP, “[w]hile 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.”

The 2021 LRDP land use plan designates approximately 1,400 acres, or 70 percent of the main residential campus, as open space, largely protected from development. The implementation of capital projects, including specific design, is not prescribed under the 2021 LRDP.

2021 LRDP GROWTH PROJECTIONS

The 2021 LRDP’s growth assumptions are based on campus population projections, demonstrated need for additional public university capacity in California, and an understanding of campus needs and goals beyond current enrollment levels, inclusive of the projected enrollment of 19,500 full-time-equivalent (FTE) students under the 2005 LRDP.¹ The 2021 LRDP planning effort addresses anticipated growth in on-campus student population from an estimated 18,518 FTE students (on-campus, fall-winter-spring [FWS] three-quarter average) for the 2018–2019 academic year to a potential enrollment of 28,000 FTE students (on campus, FWS three-quarter average) by the 2040–2041 academic year. UC Santa Cruz faculty and staff are also anticipated to increase from approximately 2,800 FTE (three-quarter average) to approximately 5,000 FTE (three-quarter average) in the same timeframe.² UC Santa Cruz plans to provide on-campus housing for 100 percent of the increase in student enrollment beyond 19,500 FTE students and up to 25 percent of the additional anticipated 2,200 FTE faculty/staff members. To accommodate the increased campus population, the 2021 LRDP proposes the renovation of existing facilities and the construction of an additional 3.1 million assignable square feet of academic and support building space.

The use of three-quarter average FTE enrollment is appropriate and valid for the purpose of evaluating impacts and conditions at UC Santa Cruz. Higher fall-quarter enrollment and fluctuations in campus enrollment are common and are attributable to graduating students and students who enroll but then pursue other interests. However, the difference in enrollment from quarter-to-quarter (within the same academic year) does not directly correlate to greater demand/use or intensity of factors throughout a year. Using an annualized average to assess environmental impacts is appropriate because it represents, for many environmental resources, a reasonably conservative estimate of the annual contribution of a population increase to an environmental impact. Examples of these include water use, operational air quality emissions, and other utility-related items.

The potential population projection of 28,000 was largely determined by four factors. First, 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. Second, demand for a UC Santa Cruz education is high. Application numbers have doubled over the last fifteen years; in Fall 2020 for example, over 48 percent of applicants were turned away. Fall 2021 applications were 11 percent higher than Fall 2020, demonstrating a continuation of increased demand for a UC Santa Cruz education. Third, demand is forecasted based in part on enrollment growth at UC Santa Cruz over the last 20 years. Finally, it reflects the original vision for the campus described in the 1963 LRDP, which anticipated accommodating 27,500 students by 1990. The LRDP’s population projection and accompanying development program would allow UC Santa Cruz to balance growth with physical and financial resource constraints, e.g., limited land resources to accommodate new facilities, a significant seismic upgrade program, and the need for student housing, driven by high demand and limited availability in Santa Cruz and surrounding communities.

Other commenters disputed the existence of a State mandate to accept undergraduate enrollment. The California Master Plan for Higher Education (originally adopted by the Legislature in 1960 and periodically reviewed) assigns UC

¹ An FTE student is a three-quarter average (Fall, Winter, and Spring quarters) measure of (1) an undergraduate student who enrolls for 45 credit hours per academic year; or (2) a graduate student (master’s level or doctoral student not yet advanced to candidacy) enrolled in 36 hours per year; or (3) a graduate doctoral student who has been advanced to candidacy. The LRDP campus population forecast accounts for students studying at the main residential campus and the Westside Research Park.

² An FTE faculty/staff member is defined as the three-quarter average (Fall, Winter, and Spring quarters) of one on-campus position, continuously filled for the entire period and which may be comprised of a combination of part-time positions or one full-time position.

the primary mission of providing undergraduate and graduate instruction in the liberal arts, sciences, and professional education. The Master Plan directs UC to draw its entering freshmen from the top one-eighth (12.5 percent) of public high school graduates and to accept all qualified community college students. Such students are considered “eligible” for admission to UC as a whole, but are not guaranteed admission to any particular campus. Consistent with this direction, even during challenging budget times, UC has continued to offer a seat on at least one of its nine undergraduate campuses to every California resident undergraduate applicant who meets the UC’s minimum requirements. In years when enrollment growth is funded in the State budget, UC spreads its California resident enrollment growth across all campuses of the UC, rather than concentrating it on campuses that are in less demand from out-of-state students. In fall 2016, through an agreement with the State, UC enrolled more than 7,400 additional California residents, the largest year-to-year jump in California resident enrollment since the end of World War II. Those students were allocated amongst the individual campuses, including UC Santa Cruz. The allocation of California resident enrollment takes place on an annual basis, and results from a year-long iterative process between University of California Office of the President and the campuses, wherein the parties engage in a collaborative effort to develop annual and multi-year enrollment projections, based on input by the State and the UC Regents around systemwide resident enrollment targets. These projections ultimately result in offers of admission by UC Santa Cruz to individual students, 50 percent of which are anticipated to be accepted (the large majority of which are expected to attend in the fall). The campus publishes its annual fall census each year in October, 5 weeks into the semester.

At the same time that it gives highest priority to California residents, UC also recognizes that nonresident students enhance the educational experience of California residents, based on diversity of experience, cultures and backgrounds. Revenue from nonresident enrollment (and associated higher tuition) is critical to the University’s ability to provide a high-quality education to California students, particularly as the UC has received less funding in recent years to support continued growth compared to historical levels. At UC Santa Cruz, additional revenues from nonresident tuition have been specifically directed at improving the educational experience for all undergraduates. Nonresident enrollment also makes UC more affordable for California financial aid recipients. In 2017, the UC agreed to cap out-of-state student enrollment at 18 percent of total undergraduate enrollment (UCOP 2017).

HOUSING

With respect to housing, the 2021 LRDP recognizes that varying housing typologies will meet the evolving needs of different students. When projects are implemented, various unit types, program adjacencies and siting options are studied to determine the best mix of factors to serve the project at hand. The 2021 LRDP anticipates housing projects of varying size and scale that will best meet the evolving needs of the campus at the time they are implemented. For example, housing typologies for first year students, who benefit from more social engagement, will likely differ from those of graduate students, who may desire more privacy and autonomy in their living arrangements. To provide some historical context, UC Santa Cruz built additional college-affiliated housing at several colleges in 2003 to offer more independent living arrangements, such as apartments and suites, for continuing students, beyond the first year. Depending on the size and scale of each college, and the evolving needs of future students, additional college-affiliated housing adjacent to existing colleges is allowable under the land use designation of Colleges and Student Housing (CSH). The campus tries to balance the type of housing it provides with the evolving needs of the students.

Additionally, CSH would support the continued growth of the colleges, which are academically focused residential communities. The CSH land use designation also includes both academic and student support uses, as well as residential, to support the campus’ unique living-learning environments of the colleges. This land use designation would help ensure that academic facilities are in close proximity to where students are living.

The 2021 LRDP proposes an expansion of existing employee housing sites at the main entrance to campus, as well as Employee Housing land use designations near the Cave Gulch neighborhood and at Westside Research Park, to accommodate 25 percent of new employees, based on demand. Similar to existing on campus employee housing, new units may vary in size and type, from apartments, condominiums, and townhomes to single family homes or duplexes. For Employee Housing, one bed refers to the employee bed and is equivalent to one unit. In other words, 550 beds is actually 550 units, many of which would provide more bedrooms for employee dependents.

The campus has multiple funding mechanisms at any given time that are available for housing, academic, student support and other types of projects, including Campus Funds, Private Donor, External Financing, Federal Grants, Gift Funds, Division Funds, Public Private Partnerships, University Fee Reserves and General Funds from State. With an on-going revenue stream, the campus anticipates that several funding sources for housing would be available to be used for implementation including External Financing and Public Private Partnerships (P3). Projects under this financing and delivery model are guided like any other project on campus by compliance with our Physical Design Framework and review by the Design Advisory Board.

Beyond housing, academic, and support facilities, the 2021 LRDP includes numerous components that were designed to specifically align with community concerns and increased sustainability. In particular, the 2021 LRDP proposes to fill gaps in the existing roadway system, restrict vehicular access around the academic core, prioritize transit, and envisions dedicated corridors for pedestrians and bicycles, to support on-campus housing developments.

PUBLIC ENGAGEMENT OPPORTUNITIES AND PARTICIPATION

The planning process began in the fall of 2017 and involved extensive public outreach and opportunities for input, as described in further detail below. In some instances, comments from the public expressed disagreement with the project or project elements, and some of these comments resulted in project changes or modifications. The proposed land use map for the 2021 LRDP, which was released to the public in December 2019, was developed with consideration of this input. UC Santa Cruz has endeavored to balance its obligations to accommodate an increasing number of UC students with community concerns.

Part of plan development involved conducting an extensive public outreach program to obtain input on the merits of various components and features of the plan. This effort included the formulation of several technical workgroups on various topics, including housing, water, transportation, infrastructure, and sustainability. Staff, faculty, and community members with technical knowledge of specific subjects were included in the workgroups, as the purpose of these workgroups was to provide technical expertise and work through technical details regarding the proposed land use map. The five workgroups collectively met approximately 20 times total throughout the process.

During the planning process, students also provided feedback on preliminary land use scenarios, circulation, housing, sustainability, and infrastructure through participation on committees, during open houses and public workshops, scoping meetings, and online visioning activities. Their input was considered vital to the concepts included in the land use plan. As an example, the LRDP Planning Committee guided decision-making and steered the project. The members of the planning committee are appointed to represent a spectrum of perspectives from the constituents they represent so that those voices can be heard and translated into tangible planning efforts. For that reason, the planning committee included staff, faculty, students, community members and alumni with different perspectives to contribute to the development of the plan. As with any planning effort, it was an iterative process where ideas were discussed and tested before being finalized to present to the public. Between April 2017 and November 2019, the committee met approximately 20 times. Input from students on the committee was critical and valued, and it shaped the planning process and the plan itself in several ways. One example of feedback received and incorporated into the 2021 LRDP included the desire to keep housing as close as possible to the academic core to reduce the distance and elevation change to student resources. This led directly to the clustered and compact development footprints shown on the 2021 LRDP's land use map, where development of academic, student support, residential space would continue to be in close proximity to one another. The committee also provided feedback on student circulation patterns, especially gaps in the pedestrian network, which informed the pedestrian plan. Their ideas on outreach and engagement led directly to the visioning activity in December 2018, an online engagement tool for public feedback. Graduate student representatives were vocal about the lack of graduate student resources for commons and other facilities, which informed the building program. Alumni were also included on the LRDP planning committee. Their feedback especially with regard to maintaining the college structure for student housing was incorporated into the plan.

With respect to the LRDP Executive Committee, a range of interested parties provided input, including the president of Student Union Assembly and the president of Graduate Student Association. 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. Students provided feedback on preliminary land use scenarios, circulation, housing, sustainability, and infrastructure through participation on committees, during open houses and public workshops, and online visioning activities. A list of these events is included in the appendix of the 2021 LRDP.

The planning team also worked closely with the Campus Natural Reserve throughout the process with the goal of creating a plan that is mutually beneficial in supporting the campus' mission while recognizing the unique asset of the natural environment as one of the campus' key academic and student wellness resources. In other words, weaving the natural environment with the academic function of UC Santa Cruz was considered essential to reflect the health and wellness benefits of open space as part of the UC Santa Cruz experience. The plan largely avoids development in areas deemed high priority for research and conservation and is one of multiple reasons why the plan focuses on infill development.

This working relationship and shared goals with the Campus Natural Reserve has also resulted in nearly doubling the acreage of protected land under the Campus Natural Reserve land use designation in the 2021 LRDP compared to the 2005 LRDP. UC Santa Cruz has had numerous conversations with Natural Reserve faculty and staff regarding permanent protection of some of the areas of the Campus Natural Reserve.

HOUSING AFFORDABILITY AND OTHER SOCIOECONOMIC CONSIDERATIONS

Social and Economic Considerations

The State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15000 et. seq.) establishes the scope of analysis of social and economic impacts of a project and their indirect effects. These provisions, which are described below, provide a framework for considering many of the comments received on social and economic effects of the project, including issues such as student housing affordability, job opportunities, property values, and other socioeconomic impacts.

CEQA is concerned solely with whether a project may have adverse physical environmental effects. Accordingly, State CEQA Guidelines Sections 15064(e) and 15131 provide that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." Section 15064(e) further states, "Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Section 15131 adds that "an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from a project to physical changes caused in turn by the economic or social changes."

In evaluating the environmental impacts of a project, an EIR must evaluate indirect physical effects, in addition to the direct effects of a project. Direct effects are effects that are caused by a project and occur at the same time and place. An indirect environmental effect is a change in the physical environment that is not immediately related to a project, but that is caused indirectly by a project. CEQA does not require the analysis of generalized social and economic effects, such as job opportunities and property values, as suggested by many of the comments. A lead agency is also not required to analyze conclusory statements regarding social and economic impacts that are not supported by substantial evidence in the record.

Housing Affordability

With respect to student housing, in particular, several comments were received regarding the inability of students to afford on-campus housing due to perceived high rental rates. To the extent that this could be considered a physical environmental impact, displacement of students from on-campus housing as a result of high rental rates would need to occur such that additional housing was necessary elsewhere (refer to thresholds of significance identified in

Section 3.13, "Population and Housing," of the Draft EIR). High vacancy rates on campus would reflect that this type of problem was occurring. This is not the case; based on recent data, on-campus housing has an occupancy rate of 96 percent, which represents effectively full occupancy. Further, as of September 2021, there is currently a waiting list for on-campus housing. With respect to how on-campus rental housing prices are set, UC Santa Cruz establishes on-campus rental rates based on a number of factors, including demand, housing affordability, and programming and operational costs. That is not to suggest that housing affordability may not be a concern to some students or to UC Santa Cruz, however the potential economic effect of on-campus rental rates is not resulting in direct or indirect physical environmental effects, as that housing is fully utilized. The high demand for housing and low vacancy in the City of Santa Cruz and surrounding communities are described in Section 3.13, "Population and Housing," and the potentially associated environmental effects of high demand for housing are evaluated in Section 3.13.

The 2021 LRDP leaves open many options for achieving increased on-campus student housing affordability. As noted below in Master Response 9, the 2021 LRDP does not specify a sequence or timing requirement for implementing UC Santa Cruz housing projects and does not impose density requirements, building size, or other factors that could influence construction costs and the associated rental rates of future student housing projects. UC Santa Cruz will continue to evaluate all affordability options for each housing project and is committed to delivery on-campus housing that provides affordable housing options for UC Santa Cruz students that want to live on campus. Items such as site selection, building program, building design, funding mechanisms, and other options are all items that will be considered for campus housing projects. The 2021 LRDP does not preclude the consideration of housing affordability options.

ADHERENCE TO LOCAL POLICIES

Several comments were received regarding local community concerns with respect to local policies, including official statements and adopted resolutions by the City of Santa Cruz and Santa Cruz County. As noted in Section 3.0.1 at the beginning of Chapter 3, "Existing Environmental Setting, Impacts, and Mitigation," of the Draft EIR:

UC Santa Cruz is part of the UC, a constitutionally created entity of the State of California, with "full powers of organization and government" (Cal. Const. Art. IX, Section 9). As a constitutionally created State entity, the UC is not subject to the regulations of local non-state agencies, such as those that may be found in the *City of Santa Cruz General Plan* or land use ordinances, for uses on property owned or controlled by the UC that are in furtherance of the UC's educational purposes. Although there is no formal mechanism for doing so, UC Santa Cruz may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus.

UC Santa Cruz seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the campus and its surrounding community. To foster this process, UC Santa Cruz communicates with City of Santa Cruz, Santa Cruz County, and community organizations; sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts; and considers community input.

2008 COOPERATIVE SETTLEMENT AGREEMENT

Several comments were received expressing continued support for the 2008 Cooperative Settlement Agreement (CSA) and expressing the commenters' opinions that the 2008 CSA prevents UC Santa Cruz from further growth within the 2021 LRDP area. Comments regarding the parties' obligations under the CSA are not comments regarding significant environmental issues related to the proposed 2021 LRDP, and therefore UC Santa Cruz is not required to provide a response in this Final EIR. For informational purposes, below is a summary of UC Santa Cruz's obligations under the CSA.

As noted on page 1-6 of the 2021 LRDP EIR, the CSA was entered into in 2008 by UC Santa Cruz, the City of Santa Cruz, the County of Santa Cruz, and a variety of other parties to resolve several lawsuits challenging the 2005 LRDP EIR. (See *City of Santa Cruz et. al. v. Regents of the University of California et. al. Santa Cruz County Superior Court Case No. CV155571, consolidated with Case No. CV155583.*) Among other things, the CSA addressed enrollment,

capping on-campus FWS three-quarter average undergraduate enrollment at 17,500 FTE and projecting a total on-campus three-quarter average enrollment (undergraduate and graduate) of 19,480 FTE by the 2020-2021 academic year. The CSA was specifically tied to the projections of the 2005 LRDP and required UC Santa Cruz to provide 7,125 beds for enrollment up to 15,000 FTE and beds for 67 percent of new student enrollment above 15,000 FTE. In 2018/2019, UC Santa Cruz provided 1,291 beds in excess of requirements under the CSA. Therefore, UC Santa Cruz is exceeding its housing obligation under the CSA. In addition, and with respect to other conditions under the 2008 CSA, UC Santa Cruz used 167.1 million gallons per year (mgy) in 2018, less than the 206 mgy permitted under the 2008 CSA. UC Santa Cruz (in cooperation with Santa Cruz Metro Transit District) also provided four reticulated buses onto campus routes, which factored into the reduction in average daily trips generated by the campus being well below the 28,700 trip-limit established in the 2008 CSA.

The CSA also required UC Santa Cruz to apply to the Santa Cruz County Local Area Formation Commission (LAFCO) for a Sphere of Influence amendment for extraterritorial water and sewer services for the north campus subarea. UC Santa Cruz did so in 2008, but specifically stipulated that the application to LAFCO was not an admission that UC Santa Cruz is subject to LAFCO jurisdiction, and that such application did not change the underlying agreements between the City and UC Santa Cruz. To date, UC Santa Cruz has complied with its obligation under the CSA, including submittal of an application to LAFCO. Since the submittal of the application in 2008, it had not progressed, leading to LAFCO setting aside the application in 2020. For further information, refer to specific responses related to the future need for a LAFCO application as part of the responses to Letter L3 (LAFCO), below.

Further, per the terms of the CSA, it will remain in effect until the UC Regents approve a new LRDP for the LRDP area. Therefore, upon adoption of a new LRDP (e.g., the 2021 LRDP) for UC Santa Cruz's main residential campus and Westside Research Park, the terms of the CSA would no longer apply.

2.2.3 Master Response 3: Alternatives

Several comments raised concerns regarding the alternatives analysis in the Draft EIR, including suggestions that the Draft EIR's description and analysis of alternatives were too general or vague. This master response describes the process by which UC Santa Cruz developed and selected the alternatives, and then explains the EIR approach to comparing these alternatives.

CONSIDERATION OF A REASONABLE RANGE OF ALTERNATIVES

State CEQA Guidelines Section 15126.6 states that "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." (emphasis added) There is no ironclad rule as to what constitutes the number of alternatives that constitute a "reasonable" range. In addition, an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative pursuant to State CEQA Guidelines Section 15126.6(f)(3).

Each EIR is required to consider the "No Project" alternative. When the project involves the revision of an existing land use or regulatory plan, a policy, or ongoing operations, the No Project alternative will be defined as the continuation into the future of the existing plan, policy, or operation. The existing plan, policy, or operations should be assumed to continue and to apply to other projects implemented during the timeframe of the analysis. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines Section 15126.6(e)(3)(A)). In this case, the No Project Alternative is required to consider buildout of the 2005 LRDP.

An overarching consideration is that alternatives must be potentially feasible. Feasible is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic,

environmental, legal, social, and technological factors.” (CEQA Guidelines Section 15364). Note that an EIR can consider potential feasibility, but the determination of whether an alternative is, in fact, feasible, is up to the decision makers. Another important consideration is the degree to which selection of an alternative would reduce or eliminate significant environmental impacts. As noted in the Executive Summary of the Draft EIR, 11 significant and unavoidable impacts (including cumulative impacts) associated with implementation of the 2021 LRDP were identified, including air quality, historic resources, noise, population and housing, and utilities (water supply) impacts. Additionally, the EIR identified mitigation that would be required to reduce several other impacts to less than significant levels.

Chapter 6, “Alternatives,” of the Draft EIR considered 11 total alternatives. Several alternatives were developed to aim at reducing impacts associated with the location of project elements, as well as the magnitude of impacts associated with the numbers of students. Other alternatives considered suggestions provided in comments on the NOP, and other comments received outside of the NOP process, including correspondence between the City of Santa Cruz and UC Santa Cruz related to the City’s water service boundary. Seven of those alternatives, including higher density development, offsite alternatives, and distance learning were rejected and not further analyzed or considered because they were deemed infeasible or did not attain most of the project objectives. Four alternatives were considered and analyzed in detail in the EIR. The No Project alternative is included, as required.

Therefore, based on stated CEQA requirements and the justification provided for those alternatives carried forward for evaluation and those rejected and not evaluated as part of the Draft EIR, a reasonable range of alternatives to the 2021 LRDP has been identified and considered. No comments were received that identify or suggest additional alternatives that would avoid or mitigate any potentially significant environmental impacts of the 2021 LRDP while attaining most of the project objectives, or those that would offer substantial environmental advantages, or be more feasible than the alternatives analyzed in the Draft EIR (State CEQA Guidelines Section 15204[a]). Further, no claims of deficiencies supported by substantial evidence were made concerning the discussions of the four alternatives considered in detail and the seven alternatives rejected from further consideration in the EIR. Thus, the range of alternatives in the EIR meet CEQA standards and allow the decision makers and the public to make an informed comparison of the environmental effects of the various alternatives to the 2021 LRDP.

2.2.4 Master Response 4: Wildfire

Several comments were received that raised concerns about the analysis of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development. Per CEQA requirements, the evaluation of impacts is focused on whether a project would exceed a threshold of significance, which (per CEQA Guidelines Section 15064.7) is defined as “an identifiable quantitative, qualitative or performance level of a particular environmental effect...” The analysis provided in the Draft EIR is qualitative in nature but does provide an assessment in accordance with the thresholds of significance based on Appendix G of the State CEQA Guidelines of whether development under the 2021 LRDP would substantially exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire, itself. As shown below and as provided in the Draft EIR, the EIR’s determination of a less-than-significant impact with incorporation of mitigation is supported by substantial evidence.

WILDFIRE HISTORY IN SANTA CRUZ COUNTY

Information regarding wildfires in the Santa Cruz area is presented in Section 3.18, “Wildfire” of the Draft EIR (see pages 3.18-9 through 3.18-12 of the Draft EIR). The following additional information is provided as further context and was considered during the analysis of the 2021 LRDP’s potential environmental impacts. As shown in Table 2-2, Santa Cruz County has experienced 20 major wildfire events since 1954. The largest of the historical wildfire events was the CZU Lightning Complex fire in 2020, which affected approximately 64,000 acres in Santa Cruz County (86,500 acres overall.) (Data was downloaded from the California Department of Forestry and Fire Protection [CAL FIRE] in 2020).

The CZU Lightning fire also represents 77 percent of the total acreage burned in Santa Cruz County since 1954. Other major events included the CZU Lockheed fire in 2009 (which burned 7,800 acres) and the SCU Summit fire in 2008

(which burned almost 4,000 acres). No other fires since 1960 exceed 1,500 acres. In addition, 95 percent of the total wildfire acreage within Santa Cruz County has occurred within high or very high fire hazard areas.

With respect to the LRDP area, no recorded wildfires have occurred within the LRDP area or the City of Santa Cruz (Fire Safe Council of Santa Cruz County 2021). Four of the recorded wildfires occurred within a 5-mile radius of the northern boundary of the main residential campus and include the CZU Lightning Complex (2020), the CZU Martin (2008), the CZU Newell Creek (1954), and CZU Rincon (2018) fires. Of those fires, none were determined to have started within an existing developed area (i.e., with residential, commercial, or educational uses).

Table 2-2 Wildfire History in Santa Cruz County (1954 – 2020)

Year	Fire Name	Total Acres Affected	% of Acreage within High or Very High Fire Hazard Zones
1954	CZU Newell Creek	166.09	0%
1959	CZU Newell Creek #2	1,326.83	97%
1961	SCU Austrian Gulch	45.30	100%
1962	CZU Lincoln Hill	1,355.59	100%
1980	CZU Big Basin #7	377.85	100%
1984	CZU Rocha VMP Escape #2	1,168.09	26%
1985	SCU Lexington	736.13	100%
2002	SCU Croy	15.75	8%
2008	CZU Castle	19.17	100%
2008	CZU Martin	482.79	100%
2008	SCU Summit	3,878.96	87%
2008	CZU Trabing	594.26	100%
2009	CZU Lockheed	7,783.06	100%
2009	CZU Loma	669.38	100%
2016	SCU Loma	8.08	100%
2017	CZU Bear	317.20	100%
2018	CZU Bear	9.02	0%
2018	CZU Rincon	15.65	89%
2019	CZU Deer	9.37	100%
2020	CZU Lightning	63,668.57	96%
Total		82,647.15	95%

Notes: CZU = Santa Cruz Unit; SCU = Santa Clara Unit

Source: data downloaded from California Department of Forestry and Fire Protection in 2020

POTENTIAL FOR 2021 LRDP TO EXACERBATE WILDFIRE RISK

UC Santa Cruz has reduced the amount of land for development in the North Campus by approximately 53 acres in comparison to the 2005 LRDP. Although, the majority of the North Campus will remain undeveloped in the 2021 LRDP as part of the Campus Natural Reserve, the designation of new land use areas as part of a university campus within a high or very-high fire hazard zone could have the potential to exacerbate wildfire risks. The Draft EIR appropriately evaluates the potential additional risk associated with adding development to the campus. The degree to which fires have been associated with university uses and fires have occurred within or adjacent to the LRDP area, as well as existing programs, practices, and requirements to reduce wildfire risk, are considered as part of the Draft EIR's assessment of the potential for the 2021 LRDP to exacerbate wildfire risk to campus and other nearby residents

and uses. The Draft EIR, as explained in Impact 3.18-2 provided a detailed assessment of existing programs and policies and considered the location of the LRDP area with respect to historic fires. These included measures implemented by the UC Santa Cruz Environmental Health and Safety department, the responsibilities and actions of the Designated Campus Fire Marshall (as they pertain to the proper storage of potential combustible or otherwise flammable materials), compliance with applicable erosion control standards, the UC Santa Cruz Emergency Operations Plan evacuation procedures for Stage 1 (building) and Stage 2 (campus-wide) emergencies and Standardized Emergency Management System, and CruzAlert (the UC Santa Cruz emergency notification system). Refer to pages 3.18-14 through 3.18-16 of the Draft EIR for further clarification. Furthermore, the potential development and improvements associated with the 2021 LRDP would occur within the LRDP area, as currently envisioned. No offsite improvements that could contribute to additional wildfire risk are anticipated as part of the 2021 LRDP.

The Wildland Fire Response Procedures and the Campuswide Evacuation procedures provide the actions that students and employees should take during a campuswide evacuation. UC Santa Cruz is currently updating these procedures and working with the City of Santa Cruz and Caltrans to discuss congestion concerns, including a mutual aid agreement with the Santa Cruz Metropolitan Transit District for the provision of additional transit during an evacuation. The updated campuswide evacuation procedures, which will be released this winter, are being prepared in accordance with the National Fire Protection Association (NFPA) standards, particularly Standard 1600 (Standard on Continuity, Emergency, and Crisis Management), Standard 1616 (Standard on Mass Evacuation, Sheltering, and Re-Entry Programs), Standard 1620 (Standard for Pre-Incident Planning), and Standard 1660 (Standard on Community Risk Assessment, Pre-Incident Planning, Mass Evacuation, Sheltering, and Re-Entry Programs). The current evacuation procedures also meet NFPA standards. These campuswide evacuation procedures will be evaluated annually by the Office of Emergency Services and the Campus Fire Marshall to determine if any modifications are needed.

In addition, several other existing tools and procedures would be employed by UC Santa Cruz in the event of a wildfire at or near the LRDP area. These include:

1. **UC Santa Cruz Wildland Fire Response Procedures.** As part of UC Santa Cruz's Emergency Procedures, which are managed and implemented by the Office of Emergency Services, UC Santa Cruz provides numerous sources of information and notifications for the on-campus population, including those of the local community departments, as well as procedures in the event of an evacuation and/or shelter in place. In addition, UC Santa Cruz provides guidance for the campus population, especially on-campus residents regarding personal emergency kits and available on-campus respirators. In August 2021, UC Santa Cruz released a new application for students and in-person trainings for staff and faculty to continue to educate the on-campus population about wildfire prevention and response, as well as other emergency procedures in the event of an earthquake or active shooter.
2. **Title 19 Inspections.** As part of its obligations under California Fire Code, the Office of Emergency Services also conducts Title 19 inspections for vegetation near structures and other facilities and provides reports to UC Santa Cruz Grounds Services, who then addresses any necessary vegetation removal/trimming to adhere to California Fire Code requirements.
3. **CalFire Vegetation Management.** In July 2021, UC Santa Cruz renewed its agreement with CalFire to provide vegetation management services within the LRDP area, especially within the north campus subarea. UC Santa Cruz also maintains existing fire roads and a hydrant system within the north campus, as well as the fire breaks that were established by CAL FIRE during the CZU Lightning Complex fire in 2020. Along Empire Grade, CalFire provides and maintains shaded fuel breaks through the removal of dead and smaller vegetation by hand on a year-round basis to reduce the potential for vehicular traffic to contribute to wildfire risks.
4. **Other Vegetation Management.** Additionally, UC Santa Cruz regularly engages with a local cattle rancher to provide and manage cattle for on-campus grazing of certain areas of campus as part of its commitment to vegetation management. Cattle are typically present on campus beginning in mid-July through November before moving off campus to other locations.

5. **Design and Construction of New Facilities.** Existing development within the campus was constructed using fire-resistant building materials, and new development would continue to implement the same (and updated) standards. This includes the design and construction of Class A roof coverings, per the American Society for Testing and Materials standards, which represents the highest rating achievable and are considered effective against severe fire exposure.
6. **UC Santa Cruz Emergency Operations Center.** UC Santa Cruz also maintains an Emergency Operations Center (EOC) that is responsible for managing and maintaining communications, response, and recovery during major events and emergency situations, including wildfires. The on-campus EOC also provides a consistent point of contact to the Santa Cruz County EOC for resource needs outside of the campus to both Santa Cruz County and UC EOC.
7. **Secure in Place Locations, Largely Proximate to Existing Housing Areas.** In the event that certain students, staff, residents, and other visitors may not be able to evacuate the LRDP area, UC Santa Cruz offers several shelter-in-place locations across campus, and campus population are directed to generally seek locations without windows but with reinforced walls (e.g., concrete versus drywall). Campus also offers several assembly locations throughout campus to which on-campus population may be directed, including the Core West Parking Structure, Performing Arts Parking Lot, OPERS and the East Meadow, and the West Remote Parking Lot.
8. **University of California Air-Quality-Index-based Decision-Making Matrix for Wildfire Smoke Events.** In May 2019, UC formed the Systemwide Air Quality Protocol Working Group to evaluate operational- and health-related issues and develop recommendations for how UC campuses should respond to various conditions and potential unhealthy air quality due to smoke from wildfire events. The working group compiled an air quality index (AQI) based decision matrix for wildfire smoke events, which was recommended for implementation at all UC campuses. As evidenced by procedures implemented as part of UC Santa Cruz's response to the CZU Lightning Complex fire, UC Santa Cruz implements the decision matrix and stages the level and type of response/requirements, based on AQI values (UC Santa Cruz 2021).
9. **National Significant Wildland Fire Potential Outlook – National Interagency Coordination Center.** UC Santa Cruz regularly reviews predictive data provided regarding the potential for wildfires in the area and considers the need to adjust wildfire procedures/preparedness based on information provided by the National Interagency Coordination Center.

In addition, and based on comments received, Mitigation Measure 3.18-2 has been amended to include the use of fire resistant/drought tolerant landscaping within 100 feet of new/modified structures within high or very high fire hazard zones. Refer to Chapter 4, "Revisions to the Draft EIR" for further clarification.

The EIR's analysis presents a program-level, qualitative analysis of development under the 2021 LRDP based on evidence, consistent with CEQA requirements. The EIR's analysis is adequate and a less-than-significant impact with mitigation conclusion is considered appropriate and supported by evidence due to compliance with existing regulations and procedures that significantly reduce wildfire risk, coupled with the proposed mitigation to reduce ignitable materials in the proposed development areas and campus-wide and continue the lack of wildfires within the LRDP area.

2.2.5 Master Response 5: Greenhouse Gas Emissions and Mitigation

Several comments stated that the Draft EIR's analysis of potential greenhouse gas emissions and impacts related to climate change lacked specificity and should include more on-site measures. In addition, several comments raised concerns that assumed compliance with UC policies was not appropriate.

As described in Impact 3.8-1 of the Draft EIR, UC Santa Cruz has committed to meet and exceed State-mandated GHG reduction goals and meet UC sustainability goals (as established by the UC Sustainable Practices Policy) of net zero GHG emissions by 2050, and the 2021 LRDP will comply with these mandates. With respect to comments regarding the requirement to comply with UC policy, UC sustainability goals and the measures identified in the UC Sustainable Practices Policy were reviewed during preparation of the Draft EIR. Based on the wording (i.e., the use of

shall and will versus could and may) of specific measures, the EIR determined which measures would be considered requirements and which were considered good practice/guidance or had exceptions and therefore could not be relied upon. For example, UC policy generally requires that new development would be all-electric, however, UC policy also allows for exceptions to be determined on a project-by-project basis. Therefore, the Draft EIR, as noted on page 3.6-12, assumes that some projects under the 2021 LRDP could pursue the allowable exceptions. The Draft EIR appropriately assesses whether mitigation measures would be required in addition to UC policy (and other plans, policies, and requirements) based on the specific wording of the policy or measure in question.

For example, UC Santa Cruz has prepared the UC Santa Cruz Climate and Energy Strategy, which also contains many goals and policies related to GHG reduction. As UC Santa Cruz continues to develop, progress toward achieving its net zero goals will be periodically evaluated as part of UC Santa Cruz's GHG inventory process through implementation of its UC Santa Cruz Climate and Energy Strategy and the broader Campus Sustainability Plan. If additional energy needs are identified that are best fulfilled by onsite renewable energy projects, such projects would be proposed, designed, and subject to future environmental review. UC Santa Cruz has the ability to achieve these goals by various means, including installing solar panels on new buildings, retrofitting existing buildings/structures, or installing solar arrays on UC Santa Cruz-owned land. However, specific renewable energy projects are not contemplated in the 2021 LRDP, and therefore, were not evaluated in the Draft EIR and were not assumed in the analysis.

In addition, Mitigation Measure 3.8-1 includes various prescriptive measures that would reduce GHG emissions associated with new/renovated buildings, vehicle emissions, water-related emissions, and waste-related emissions. More specifically, the measure requires that all new buildings be electric only, all existing structures using natural gas pursue conversion to full electrification, pursuit of renewable diesel or other zero-carbon-fuel construction vehicles, and alternative wastewater treatment opportunities on a project-by-project basis. Because project-specific design of individual projects under the 2021 LRDP is not included as specific projects are not being proposed at this time, it is not possible to determine, with any certainty, the degree to which each new/renovated building could implement each of the measures outlined. However, consistent with CEQA Guidelines Section 15126.4 (specifically, 15126.4(a)(1)(B) and 15126.4(c)) and case law, the Draft EIR identifies specific performance measures that can be achieved through implementation of a combination of the measures identified.

As UC Santa Cruz implements the 2021 LRDP, the university will continue to monitor its level of implementation of Mitigation Measure 3.8-1 and its compliance with the UC Sustainable Practice Policy. In the event that onsite measures do not achieve the identified performance standard (of 6,907 metric tons of carbon dioxide equivalent) (MTCO_{2e}), UC Santa Cruz (as required by Mitigation Measure 3.8-1) shall purchase carbon offsets for the remaining GHG emissions, either through the California Air Resources Board's (CARB's) Cap-and-Trade Program or through the purchase of other credits that are real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations Section 95802(a). As drafted, this mitigation commits UC Santa Cruz to reducing emissions by a specified amount, prioritizes on-site reduction efforts, and provides specific criteria and protocols that must be met with respect to offsets purchased. This mitigation is consistent with recent case law (see *Golden Door Properties, LLC v. County of San Diego* [2020] 50 Cal.App.5th 467) as it requires the purchase of real, permanent, additional, quantifiable, verifiable, and enforceable credits and approval of the purchase by a CARB-accredited verification entity.

2.2.6 Master Response 6: Transportation

Several comments requested inclusion of a traffic congestion analysis with a quantification of potential increases in traffic volumes along local and regional roadways and identification of existing and project level of service (LOS) for those roadways. However, pursuant to CEQA and the State CEQA Guidelines, as amended in 2018, CEQA documents can no longer base a significance determination on a congestion-based analysis, such as LOS or delay.

When California Senate Bill (SB) 743 was signed into law in 2013, it required the Governor's Office of Planning and Research to develop new CEQA guidelines establishing criteria "for determining the significance of transportation impacts" that use vehicle miles traveled (VMT), or a similar metric, instead of measures of congestion or delay, such as LOS. The legislation includes the following language, which was added as Section 210999(b)(2) to CEQA:

“Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment...” (Public Resources Code [PRC] Section 21099[b][2], emphasis added)

In late 2018, amendments to the CEQA Guidelines were adopted, including Section 15064.3, “Determining the Significance of Transportation Impacts,” which implemented CEQA Statutes Section 21099. It focuses on VMT, and includes the statement that, except for roadway capacity projects (example, adding lanes to a freeway), “a project’s effect on automobile delay shall not constitute a significant impact.” The 2018 amendments to the CEQA Guidelines further state:

Applicability. The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.

The EIR was released for public review in December 2020, after the mandate to not allow consideration of traffic congestion as a significant effect. Consistent with the requirements of CEQA, an analysis of potential LOS conditions with implementation of the 2021 LRDP was not included. Further and with respect to requests to include an LOS analysis for disclosure purposes, CEQA places a high priority on focusing on the significant environmental effects of a project and reducing paperwork. Section 15143 of the CEQA Guidelines states that EIRs “shall focus on the significant effects on the environment.” Section 15006 provides a litany of means by which the length of a document should be managed. As a result, inclusion of a technical discussion of LOS conditions in and around the LRDP area was not considered in line with the CEQA Guidelines or in accordance with CEQA requirements.

2.2.7 Master Response 7: Water Supply

Several comments were received related to the EIR’s analysis of water supply, including that the EIR should provide an evaluation of alternative water supplies and that the EIR’s analysis should be amended to reflect compliance with SB 610. Effective January 1, 2002, SB 610 amended state law to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 sought to promote more collaborative planning between local water suppliers and cities and counties. The statute requires detailed information regarding water availability to be provided to the city and county decision-makers prior to approval of specified large development projects. The purpose of this coordination is to ensure that prudent water supply planning has been conducted, and that planned water supplies are adequate to meet existing demands, anticipated demands from approved projects and tentative maps, and the demands of proposed projects.

SB 610 amended California Water Code sections 10910 through 10915 (inclusive) to require local agencies to identify any public water purveyor that may supply water for a proposed development project and request a Water Supply Assessment (WSA) from the identified water purveyor. The purpose of a WSA is to demonstrate the sufficiency of the purveyor’s water supplies to satisfy the water demands of the proposed development, while still meeting the water purveyor’s existing and planned future uses. This requirement is included as Section 15155 of the CEQA Guidelines.

As stated in Section 15155 of the CEQA Guidelines, a WSA is required for those projects where a city or county are the lead agency. As a state-entity, the provisions of Section 15155 do not apply to the UC Regents, the lead agency for this project. Notwithstanding this lack of applicability, the analysis presented in the Draft EIR satisfies the requirements of Section 15155 of the CEQA Guidelines in that it evaluates the sufficiency of the City’s water supplies in both normal and drought conditions to determine the water supply impacts of the 2021 LRDP in Section 3.17, “Utilities and Service Systems” of the Draft EIR.

Consistent with Section 15155(f), the 2021 LRDP EIR identifies uncertainties surrounding the long-term availability of water supplies, especially under drought conditions in Section 3.17, “Utilities and Service Systems” of the Draft EIR. As a result, the EIR also discloses and evaluates the potential environmental impacts of curtailing development if sufficient water is not available and the impacts of alternative water sources, including pumping of available groundwater supplies (e.g., via the existing groundwater well within the lower campus area of the main residential campus.) As a result, the

EIR's evaluation of potential water supply impacts associated with the 2021 LRDP is considered appropriate and in accordance with CEQA requirements, even though not specifically applicable to UC Santa Cruz.

2.2.8 Master Response 8: Student Housing West

Several comments stated that the 2021 LRDP improperly considered the development and operation of Student Housing West, as the project was reapproved in March 2021 by the UC Regents. Student Housing West is a separate project and is not part of the 2021 LRDP, nor was it approved while the 2021 LRDP was in effect as it has yet to be approved by the UC Regents. It was approved under the 2005 LRDP, which is in effect until a new LRDP is adopted by the UC Regents. Further, the location and sizing of each component of Student Housing West (e.g., graduate student housing in the East Meadow) was included in the 2005 LRDP's land use plan, as amended in March 2019 as it is a planned but not operational project. Therefore, it is analyzed appropriately and in accordance with CEQA requirements as a cumulative project within the 2021 LRDP EIR.

State CEQA Guidelines identify two basic methods for establishing the cumulative environment in which the project is to be considered: the use of a list of past, present, and probable future projects (the "list approach") or the use of adopted projections from a general plan, other regional planning document, or certified EIR for such a planning document (the "plan approach"). The Draft EIR analysis utilized both the list and plan approach, using whichever is more appropriate to accurately evaluate potential cumulative impacts for a particular resource. Within the context of the programmatic evaluation of physical environmental impacts associated with implementation of the 2021 LRDP as presented in the Draft EIR, the development of Student Housing West is clearly identified and analyzed as a cumulative project, proposed within the 2005 LRDP (Table 4-2 on page 4-7 of the Draft EIR). As stated in several locations (e.g., page 2-15 of the 2021 LRDP EIR), Student Housing West was approved in 2019. The project approval was rescinded in 2020 following litigation. It was considered again and re-approved in March 2021. It is a reasonably foreseeable campus development project that is not part of the 2021 LRDP and is therefore appropriately addressed as part of the cumulative context (as shown in Chapter 5, "Cumulative Impacts"). The reapproval and implementation of Student Housing West is not tied to the consideration or approval of 2021 LRDP and vice versa. As a result, and contrary to several comments received, the 2021 LRDP EIR's treatment and consideration of Student Housing West as it relates to the environmental impacts associated with implementation of the 2021 LRDP are considered valid, appropriate, and in accordance with CEQA requirements.

2.2.9 Master Response 9: Phasing and Implementation

Several commenters raised concerns regarding the manner in which the plan would be implemented and whether a phased evaluation of the 2021 LRDP was necessary.

PLAN IMPLEMENTATION

Several comments were received regarding the manner in which the 2021 LRDP would be implemented and how campus decided how to evaluate impacts and impose mitigation measures as presented and evaluated in the Draft EIR. As noted in Master Response 2, above, the project under CEQA is the 2021 LRDP, a long-term land use plan for the LRDP area. The 2021 LRDP will guide development of the campus through 2040, based on reasonable projections of academic and spacing needs for students entering the UC system and (in particular) desiring a UC Santa Cruz education. No specific development is proposed as part of the 2021 LRDP, and no project-level details have been developed regarding where, how, or when development under the 2021 LRDP would occur. As noted in Master Response 11, the 2021 LRDP EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable from a programmatic perspective.

As an institution of higher learning, UC Santa Cruz is committed to the development of new housing, academic, and support facilities to support its teaching, research, and public service missions. This commitment is carried forward into the project objectives expressed on page 2-8 and 2-9 of the Draft EIR. Implementation of the 2021 LRDP would

result in the expansion and improvement of on-campus facilities in response to anticipated increased enrollment. Outside of privately funded (i.e., P3) projects within the LRDP area, funding for various campus efforts is determined by the Capital Financing Plan (CFP), which reflects a prioritization of current campus needs and is approved by the UC Regents. As shown in the most recent CFP (2020-2026), UC Santa Cruz has prioritized seismic, safety, and infrastructure projects with the balance of the capital need for student services and housing (UCOP 2020a), in further demonstration of the campus's commitment to improving on-campus facilities. As part of that physical expansion, UC Santa Cruz has also committed to providing substantial additional on-campus housing, equivalent to or exceeding the anticipated net increase in student enrollment through 2040. UC Santa Cruz is also committed to providing annual updates to its adjacent partners (i.e., the City and County of Santa Cruz) regarding how implementation of the 2021 LRDP is proceeding with respect to these targets.

Furthermore, and consistent with CEQA requirements, UC Santa Cruz will evaluate project-specific impacts associated with subsequent and proposed development under the 2021 LRDP, including whether new or different impacts may occur. As necessary, UC Santa Cruz would initiate subsequent or supplemental review of potential impacts either on a project-level or programmatically as the 2021 LRDP is implemented. Finally, and with respect to mitigation measures, the mitigation measures of the EIR (upon adoption) would serve as binding commitments by UC Santa Cruz. The Mitigation Monitoring and Reporting Program and mitigation measures within it would be made conditions of approval for implementation of the 2021 LRDP and applied to subsequent projects under the 2021 LRDP, as appropriate. This includes the need to adhere to certain VMT performance standards, as well as protection of biological, cultural, and tribal cultural resources. Subsequent environmental documents would focus on issues specific to the future development project and would incorporate all feasible mitigation measures from the 2021 LRDP program-level EIR. If, at the time a specific development proposal is evaluated on a project level, the assumptions or conclusions in the LRDP EIR are found to be incorrect or insufficient, or mitigation in the LRDP EIR is deemed inapplicable or insufficient, CEQA requires that adequate analysis and mitigation be conducted for that particular project.

PHASING

Some commenters suggested that the EIR should include phasing, including interim projections of campus population and UC Santa Cruz on-campus housing between the 2018–2019 and 2040–2041 academic years. There is no phasing plan for the project. Much like a general plan for a city, the 2021 LRDP provides for land use designations and programs and policies aimed at guiding development of the campus over time, but only focuses on the impacts of development in the horizon year of the plan ("buildout"). This is for good reason: the development of campus will largely be based on future demand/demographics and market conditions for academic and housing needs, but the timing of each is unpredictable. It would be misleading and speculative to assume development would occur in phases when there is no way to predict what will be constructed at any given time and actual development will be determined by a variety of factors, including funding and constantly evolving student and academic needs. Consideration of impacts based on speculation is not required under CEQA (refer to Section 15144 of the CEQA Guidelines), and evaluation of a "phased" LRDP implementation would be of no informational value to stakeholders.

As noted in Master Response 2, UC Santa Cruz, based on historic campus population growth and UC systemwide projections for student enrollment, projects that it could reach a student enrollment of 28,000 by 2040–2041 (in 20 years). The 2021 LRDP provides a plan for potential growth in campus facilities to accommodate up to 28,000 students. Academic year 2040–2041 is not a horizon year for the plan but a reasonable forecast of when this growth will occur. The EIR properly determines the impacts of the 2021 LRDP based on the differences between baseline and total growth under the 2021 LRDP.

As development under the 2021 LRDP proceeds, UC Santa Cruz would be required to determine if subsequent development is within the scope of the 2021 LRDP Program EIR. This would include determining whether the future project was consistent with the LRDP; whether significant impacts were adequately addressed; and whether the project would make a considerable contribution to a new significant cumulative impact. If the sequencing of development results in a new significant impact, or a more severe significant impact when compared to this Program EIR, a subsequent CEQA document would be required to evaluate these impacts and disclose them to the public and decision makers.

2.2.10 Master Response 10: Hydrology and Water Quality

Several comments were received regarding the EIR's analysis of hydrology and water quality impacts, especially related to stormwater runoff and considerations related to karst topography characterized by sinkholes, underground streams, and caverns. The following master response addresses both considerations.

IMPACTS TO WATER QUALITY FROM CONSTRUCTION AND POST-CONSTRUCTION STORMWATER RUNOFF

Several commenters raised concerns and questions about potential water quality impacts to receiving waterbodies that may receive construction and post-construction stormwater runoff. Section 3.10.2 of 2021 DEIR (UC Santa Cruz Hydrologic Monitoring - Surface Water and Groundwater Quality) discusses current and historic water quality monitoring of springs, groundwater and/or surface locations on the campus. Historically (1989 through 2008) samples were collected to test the quality of groundwater, spring water, and surface water, including laboratory analysis for general mineral, physical, and inorganic content and semi- to non-volatile range hydrocarbons (diesel-kerosene-motor oil range) and compared against performance criteria (e.g., water quality standards, guidelines, and benchmarks). During this monitoring period, regulated metals were occasionally detected at concentrations below established stormwater parameter benchmark values. Since 2009, samples have been collected from six surface locations that receive stormwater runoff from developed areas at the UC Santa Cruz campus, which discharge to various receiving waters including the Moore Creek, Jordan Gulch and San Lorenzo-Pogonip Watersheds, Kalkar Quarry Pond and sinkholes that are linked to the karst aquifer. Samples of stormwater runoff are collected from these locations during the first significant precipitation event of the wet season and are laboratory tested for general indicator stormwater parameters, including pH, total suspended solids, specific conductance, and oil & grease. Three of the six locations are additionally analyzed for general mineral, physical, and inorganic content. During this monitoring period, magnesium, aluminum, zinc, and iron have been detected at concentrations that periodically exceed stormwater parameter benchmark values; however, the detected concentrations generally fall within the range of naturally occurring concentrations found in spring water emanating from undeveloped areas of campus and do not indicate substantial water quality degradation.

Groundwater from two wells (i.e., WSW#1 and Upper Quarry Well) is also sampled during the first significant precipitation event of the wet season and is laboratory tested for general mineral, physical, and inorganic content, and oil & grease. Thirty years of annual to semi-annual water quality data collected from WSW#1 has consistently confirmed good to excellent water quality. Annual to semi-annual monitoring of groundwater at the Upper Quarry Well that has been conducted since 2009 is of lesser overall quality with concentrations of arsenic, iron, aluminum, and manganese that exceed drinking water standards established in the Title 22 California Code of Regulations. It is noted that stormwater discharging from developed areas of UC Santa Cruz is intercepted by a sinkhole which is likely hydraulically connected to groundwater at the Upper Quarry Well. This is based on: 1) the sinkhole and Upper Quarry Well both being positioned within the north-south trending fracture zone that is Jordan Gulch, and 2) the proximity of the sinkhole and Upper Quarry Well to one another (approximately 800 feet apart). Ten years of first flush sampling of stormwater runoff that is intercepted by the sinkhole has consistently confirmed that concentrations of arsenic, iron, aluminum, and manganese are significantly less than concentrations of these metals detected in the Upper Quarry Well. This would suggest that the groundwater metal concentrations are likely a product of the aquifer's geologic composition rather than surface water inputs.

Ongoing water quality monitoring conducted by UC Santa Cruz confirms that surface water and groundwater quality has not been substantially degraded by UC Santa Cruz development. As described in Impact 3.10-2: Water Quality Impacts Related to Construction Activities, construction-related projects in the 2021 LRDP area would be required to comply with the State Water Resources Control Board 2009-0009-DWQ Construction General Permit (CGP). Compliance with the CGP requires development of a storm water pollution prevention plan (SWPPP) for projects disturbing 1 acre or more and the Campus Standards Handbook requires preparation of an Erosion and Sediment Control Plan for projects less than 1 acre. Compliance with the CGP and the Campus Standards Handbook would minimize erosion and sedimentation during construction. In addition, the design and operation of each new facility would adhere to UC Santa

Cruz Post-Construction Stormwater Management Requirements (UC Santa Cruz Post-Construction Requirements). As demonstrated by the results of on-going water quality monitoring, continued compliance with the GCP and UC Santa Cruz Post-Construction Requirements would result in a less-than-significant impact.

CONSIDERATION OF COUNTY OF SANTA CRUZ KARST PROTECTION ZONE STANDARDS

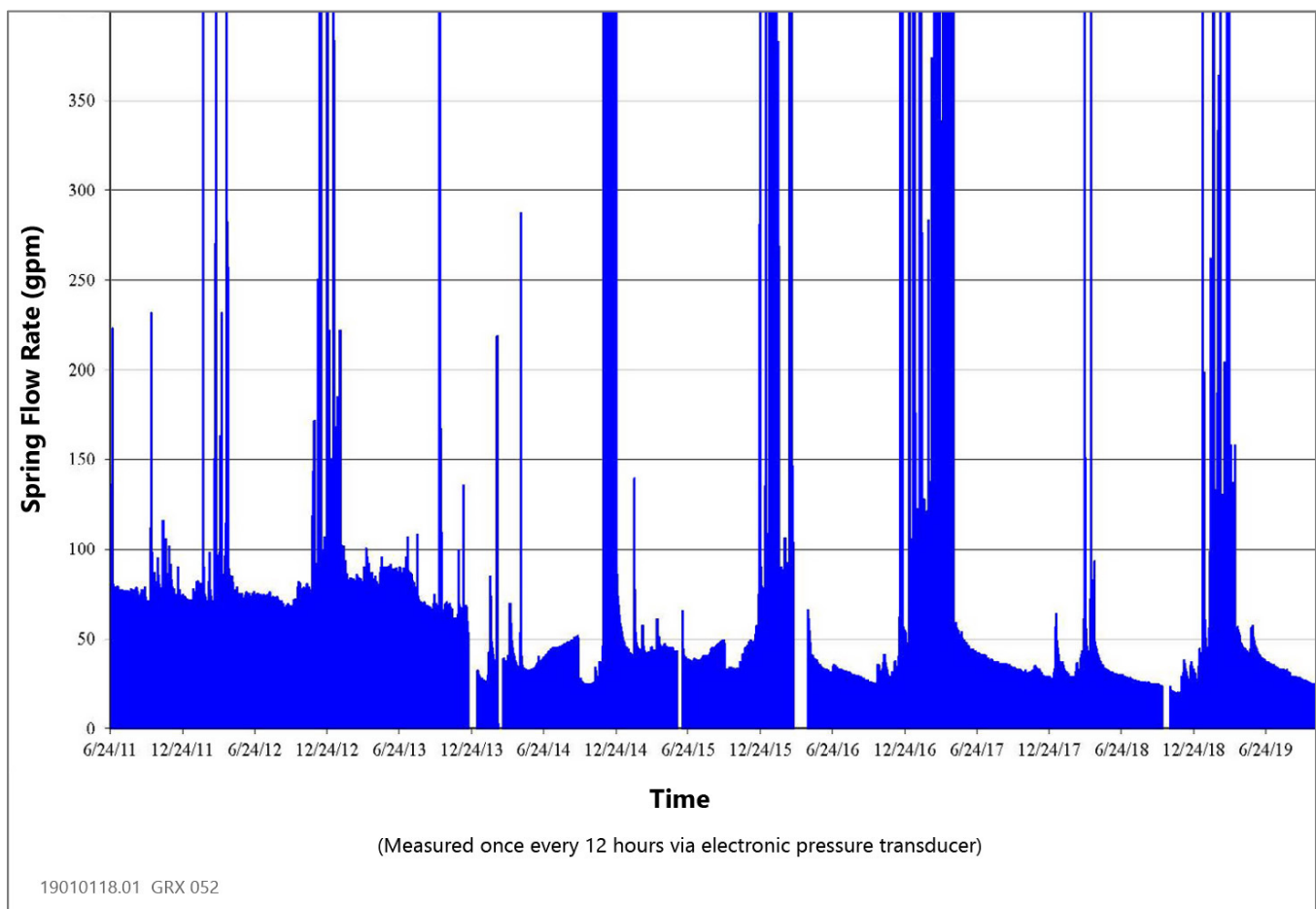
Several commenters suggested that the 2021 Draft EIR evaluate the relevancy and consistency of the project with the County of Santa Cruz Karst Protection Zone (KPZ) policies. As noted above, karst topography is characterized by sinkholes, underground streams, and caverns which are typically formed by the dissolution of bedrock over time. Karst topography is known to occur in several areas of Santa Cruz County, including the main residential campus. Karst geology on the main residential campus is characterized by an irregular surface resulting from subsidence of the bedrock and deposition of sediment into subterranean cavities within the marble bedrock. The County Water Advisory Commission provided recommendations to the Santa Cruz County Board of Supervisors that KPZ standards be adopted into the County Code and General Plan updates to provide explicit protection for karst terrain that include for example, minimum setback requirements for wastewater disposal systems, standards for discharge of runoff into karst features, and maintenance of pre-development stormwater quality and quantity. Incorporation of KPZ standards was adopted by the Santa Cruz County Board of Supervisors on September 13, 2016 and have recently begun to be implemented in the County Code. As noted on page 3.10-6, UC Santa Cruz, a constitutionally created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of the university's educational purposes. However, UC Santa Cruz may consider, for coordination purposes, aspects of local plans and policies of the communities surrounding UC Santa Cruz when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts. As noted on page 3.10-28, UC Santa Cruz is evaluating options for providing a more comprehensive, integrated, and consistent approach to maintain the health and functionality of the existing campus storm drain system, natural drainages, and karst system. As discussed above, ongoing water quality monitoring conducted by UC Santa Cruz confirms that surface water and groundwater quality has not been substantially degraded by UC Santa Cruz development. Of specific note, 30 years of annual to semi-annual water quality data collected from well WSW#1, which is completed in the karst aquifer on the lower portion of UC Santa Cruz campus, which is located at the Center for Agroecology & Sustainable Food Systems has consistently confirmed good to excellent water quality. This data indicates that ongoing efforts by UC Santa Cruz to maintain the health of the karst system from a water quality standpoint has been effective.

GROUNDWATER RESOURCES

Several comments raised concerns regarding the presentation of groundwater data and the need to characterize groundwater conditions by water year type. As part of preparation of the Final EIR, supplemental modeling of groundwater conditions by water year type was conducted and included as part of text edits to Section 3.10, "Hydrology and Water Quality." The following discussion summarizes those changes, which did not result in changes to the significance of the Draft EIR's conclusions. As such, the following analysis does not constitute substantial new information that would trigger recirculation, pursuant to CEQA Guidelines Section 15088.5.

As noted on page 3.10-26 of the Draft EIR, there are thirteen recognized springs, seeps or spring fed streams linked to the karst aquifer that have been mapped to outcrop on- and off-campus. Monthly to semi-annual monitoring of flows from these surface water locations has been conducted by UC Santa Cruz since 1984; currently, nine are being monitored for flow monthly. In 2011, UC Santa Cruz obtained permission from the City of Santa Cruz Water Department (Water Department) to access and retrofit an existing weir that has been used by the Water Department to measure Bay Street Spring flow rates since 1980. The weir is housed inside a manhole on Water Department property just east of Bay Street, adjacent to, and upstream of the Bay Street Spring monitoring station that had been monitored since 1984. The weir was retrofitted with a stilling well and an electronic pressure transducer was installed and secured to the inside of the stilling well. The transducer is calibrated to record the height of water flowing over

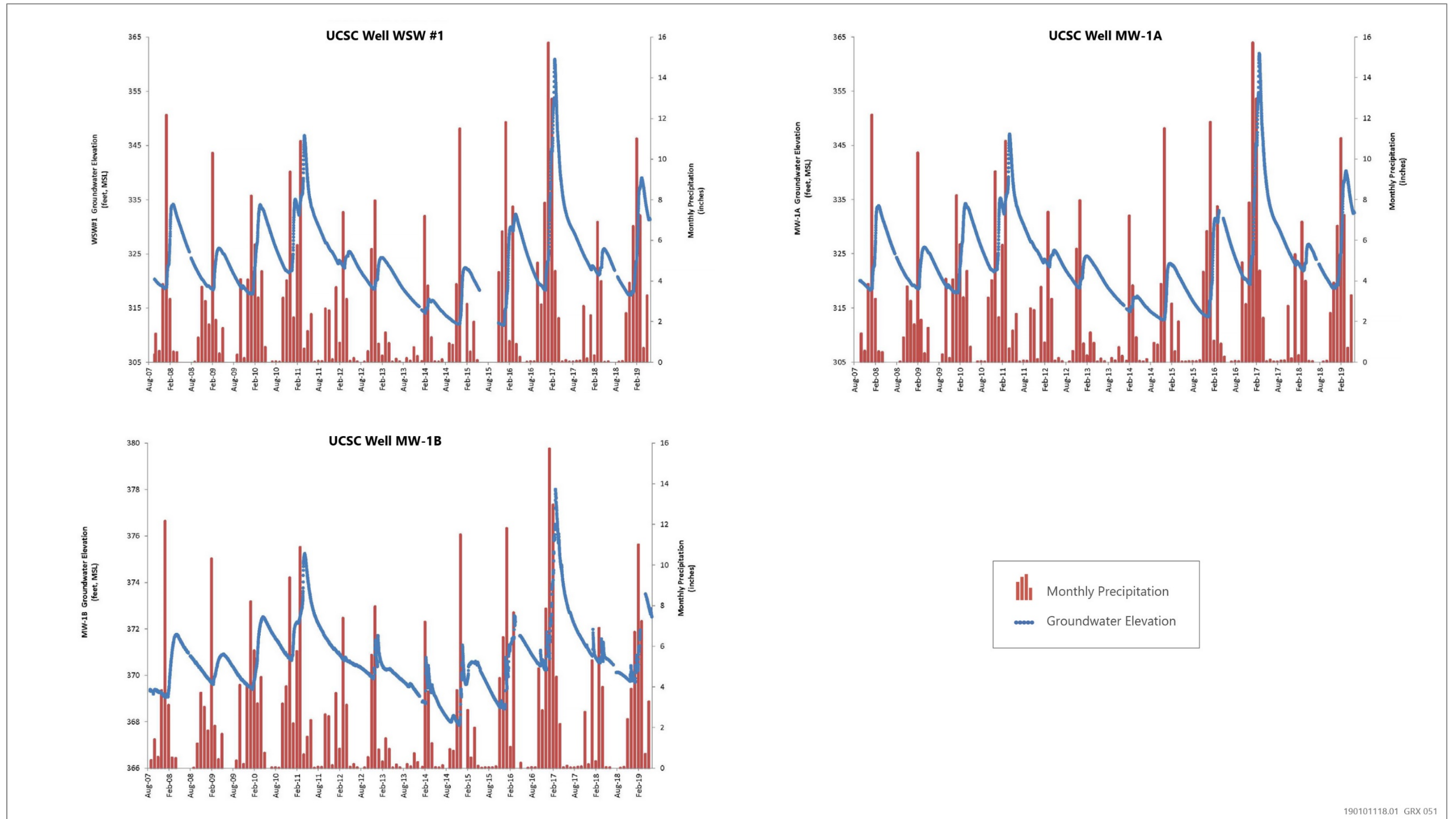
the 90-degree V-notch weir once every 12 hours to obtain high resolution spring flow monitoring data. A histogram of the continuous monitoring data that has been collected since June 2011 is shown on Figure 2-1. The high-resolution spring flow data confirms an almost immediate response to individual precipitation events and a strong seasonal trend of increased flow through the wet season, followed by a slow and steady period of reduced flow through the rest of the year during the drier months to base flow levels. Base flows are generally higher during wetter years and lower during the drier years. We note that construction related to the Bay Street Reservoir Replacement Project in 2013 (located ~500 feet north of the weir manhole) had periodically and briefly affected observed spring flow at the weir manhole location due to brief diversions of the sub-drain system that delivers the spring water to this location. Following a mid-December 2013 diversion of the sub-drain system that was conducted in connection with the Bay Street Reservoir Replacement Project flows at the weir manhole dropped by more than half of the historic base flow rate (i.e., from about 65 gallons per minute (gpm) to less than 30 gpm). This is observed on Figure 2-1. It is suspected that when the sub-drain was plugged for downstream retrofitting the backpressure likely ruptured the historic piping resulting in upstream flow loss to the subsurface. All data collected following this incident appears to be erroneous with respect to the long-term record; however, strong seasonal trends are still observed.



Source: Data provided by 2NDNATURE in 2021.

Figure 2-1 Bay Street Spring Flow Data

Further and with respect to aquifer storage capacity, UC Santa Cruz installed dedicated electronic pressure transducers in wells WSW#1, MW-1A, and MW-1B in 2007 (refer to Figure 3.10-5 on page 3.10-22 of the Draft EIR). The transducers are programmed to record water level data once every 12 hours to obtain high-resolution data of seasonal water level fluctuations in these wells. These transducers continue to record water levels to date. Hydrographs of water level fluctuations from wells WSW#1, MW-1A, and MW-1B along with superimposed monthly precipitation data are shown on Figure 2-2. The high-resolution data set confirms a strong seasonal trend of rapid



Source: Data provided by 2NDNATURE in 2021.

Figure 2-2 Temporal Water Level Fluctuation and Monthly Precipitation Data for On-Campus Wells

groundwater recharge and water level rise after the start of winter rainfall followed by a slow and steady period of groundwater decline through the rest of the year during the drier months. Water levels in wells WSW#1 and MW-1A fluctuate in tandem, with nearly identical response to aquifer recharge and drainage. Seasonal water level rise observed in these wells since 2007 has ranged from approximately 43 feet during the wettest period monitored (i.e., ~36.5 inches of precipitation between December and March of the 2016-2017 water year) to approximately 2.5 feet during the 2013-2014 water year when only approximately 14 inches of precipitation was recorded for the entire water year. Data collected from well MW-1B indicates a similar recharge pattern as that observed in nearby wells WSW#1 and MW-1A, yet on a much smaller scale and with a time lag (i.e., observed to be on the order of a few days to several weeks). As noted in the Campus Wells Section, MW-1B is evidently completed in a separate hydraulic fracture regime, and shows a distinctly higher water level (i.e., 40 to 50 feet higher), and no pumping influence from pumping in WSW#1 in 1989 or 2007. Groundwater elevations are generally higher during wetter years and lower during the drier years. Most notably, during both wetter and drier years, dry season base water levels observed for wells WSW#1 and MW-1A have only varied by approximately 10 feet, with the base level following the driest years ever recorded in California state history being the lowest observed for the continuous water level monitoring data set. This relatively small fluctuation in base water levels from wetter years to several consecutive years of drought suggests a significant aquifer storage capacity in this area of the karst, consistent with the conclusions of the Draft EIR. Therefore, with respect to the potential available capacity of groundwater within the lower campus, the Draft EIR's conclusions are supported by evidence, including supplemental modeling and water monitoring data, as provided above. Refer to Chapter 4, "Revisions to the Draft EIR" regarding clarifications made to the Draft EIR's analysis to reflect the additional and supporting analysis.

2.2.11 Master Response 11: Level of Detail

Several comments were received regarding the level of project detail provided in the Draft EIR regarding on-campus development under the 2021 LRDP. This response addresses comments pertaining to the level of detail, specificity, and approach to the program EIR's analysis of potential environmental impacts associated with implementation of the 2021 LRDP. As described on page 1-8 of the Draft EIR, the analysis presents a programmatic assessment of the potential impacts of the 2021 LRDP, focusing on the potential impacts of development that may occur to accommodate growth in UC Santa Cruz's student, faculty, and staff campus population while preserving and enhancing the quality of campus life. Initial areas for development of future campus buildings have been identified, however, as design and engineering of each structure/facility have yet to occur, individual development sites are not addressed in detail. Rather, 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. The EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on reasonable assumptions. The 2021 LRDP, in and of itself, is a land use plan that does not actually propose any specific development or govern enrollment decisions. The 2021 LRDP EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable from a programmatic perspective.

Under CEQA, a program EIR is defined (State CEQA Guidelines Section 15168) as one that addresses "a series of actions that can be characterized as one large project and are related either:

- (1) Geographically,
- (2) As logical parts in the chain of contemplated actions,
- (3) In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways."

A key reason for preparing a program EIR is to allow the lead agency to consider broad policy alternatives and program-wide mitigation measures early in the planning process when the agency has greater flexibility to deal with basic problems or cumulative impacts. Accordingly, a program EIR is distinct from a project EIR, which is prepared for a specific project and must examine in detail site-specific considerations. As stated on page 1-8 of the Draft EIR, 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. (State CEQA Guidelines Section 15146). "The level of specificity of an EIR is determined by the nature of the project and the 'rule of reason'" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 407). "[W]here an EIR covers several possible projects that are diverse and geographically dispersed, the agency has discretion to evaluate the potential environmental impacts of the individual projects in general terms in the EIR" (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 271, citing *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1170–1171). In addition, an EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain or where the design and siting details have not yet been established.

Here, the 2021 LRDP addresses land use development for the next several years within the LRDP area. Accordingly, the EIR analyzes implementation of the proposed 2021 LRDP at a program level, taking into consideration the potential environmental impacts that can reasonably be determined at this time. The 2021 LRDP makes reasonable predictions about, but does not mandate, the sequence and level of growth that would occur. It is intended to serve as a guide to the land development patterns and associated physical infrastructure that could be built to support a forecasted level of enrollment and growth. This approach is not dissimilar to city and county general plan efforts and is considered appropriate for a long-term planning effort like the 2021 LRDP.

The 2021 LRDP EIR is intended to be used in conjunction with review of individual 2021 LRDP projects, consistent with CEQA's tiering provisions. Program EIRs are commonly used in conjunction with the process of tiering. Tiering is the coverage of general matters in broader EIRs (such as on general plans or here an LRDP) with subsequent environmental analysis. Public Resources Code Section 21068.5; State CEQA Guidelines Sections 15152(a) and 15385. Tiering is proper when it helps a public agency to focus upon the issues ripe for decision at each level of environmental review and to exclude duplicative analysis of environmental effects examined in previous environmental impact reports. In addressing the appropriate amount of detail required at different stages in the tiering process, the CEQA Guidelines state that where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographic scale. See CEQA Guidelines Section 15152(c).

It is premature to consider any specific development proposal on a project-specific level 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. As discussed on page 2-8 of the Draft EIR, the programmatic analysis provided in the Draft EIR may be used during consideration and evaluation of project-level analysis of specific projects identified in this EIR. If, and when, individual projects are proposed for development, additional project-level studies and CEQA review will be conducted, as necessary. This may include the development of "within-the-scope" findings pursuant to State CEQA Guidelines Section 15168(c), tiered initial studies or EIRs, or other supplemental/subsequent environmental analysis, consistent with CEQA requirements. All subsequent analysis would require consideration of project-level impacts and consideration of alternatives and additional mitigation, where appropriate.

2.2.12 Master Response 12: Long-Term Habitat Protection

Several comments were received regarding the need for long-term habitat protection within the main residential campus of the LRDP area. As noted on page 2-19 of the Draft EIR, approximately 789 acres of the main residential campus would be designated as Campus Natural Reserve under the 2021 LRDP, an increase from 379 acres under the

2005 LRDP. The primary purpose of the Campus Natural Reserve is to preserve landscapes in their natural state; construction would be prohibited except as required for maintenance of the area as a teaching, learning, and research reserve. As a result, these lands (under the 2021 LRDP) would be considered protected habitat that would not be developed with academic, administrative, or housing uses. Further, as of July 2021 and as presented as part of an information item for the July 2021 UC Regents meeting, UC Santa Cruz intends to pursue a campus-wide habitat conservation plan (HCP), which was noted as a potential strategy for incidental take coverage under Mitigation Measure 3.5-2a. Development of a campus-wide HCP would further ensure the long-term protection of sensitive habitat within the LRDP area. UC Santa Cruz is currently coordinating with the U.S. Fish and Wildlife Service (USFWS) regarding their expectations for a campus-wide HCP, which would permanently set aside acreage currently designated in the Campus Natural Reserve (CNR) on the main residential campus. The HCP would conserve habitat for federally listed species, including the Ohlone Tiger Beetle and the California Red Legged Frog. As part of the HCP process, the campus will evaluate how to preserve areas with the Campus Natural Reserve for the conservation of wildlife species, research activities and for the preservation of tribal cultural resources. Once the determination regarding a campus-wide HCP is made and further coordination with USFWS has occurred (including a determination as to whether participation in the UC Systemwide Natural Reserve System would create conflicts with HCP implementation), UC Santa Cruz intends to consider whether the protected lands, as designated in the 2021 LRDP and to which the HCP would apply, could be independently designated as part of the UC Systemwide Natural Reserve System. However, the designation of Campus Natural Reserve lands as part of the UC Systemwide Natural Reserve System would not change the future and long-term protection of this acreage under the 2021 LRDP, as currently proposed.

2.3 INDIVIDUAL COMMENTS AND RESPONSES ON THE DRAFT EIR

The verbal and written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Comment letters in their original form are included in Appendix K of the Final EIR; individual comments are bracketed and numbered, and correspond to the comments presented in this section.

2.3.1 Federal

Letter F1 U.S. Fish and Wildlife Service, Ventura, California

Leilani Takano, Assistant Field Supervisor
Feb 25, 2021

Comment F1-1

We have reviewed relevant sections of the Draft Environmental Impact Report (DEIR) for the University of California Santa Cruz (UCSC) 2021 Long Range Development Plan (LRDP) (UCSC 2021). As it is not our primary responsibility to comment on documents prepared pursuant to the California Environmental Quality Act, our comments on the DEIR do not constitute a full review of project impacts. We are providing our comments based upon a review of sections addressing water resources, biological resources, and our concerns for listed species within our jurisdiction related to our mandates under the Endangered Species Act of 1973, as amended (Act).

Response F1-1

These are introductory remarks and do not require a response pursuant to CEQA Guidelines section 15088(a).

Comment F1-2

As discussed on a phone call between UCSC and U.S. Fish and Wildlife Service (Service) staff on January 4, 2021, the DEIR inaccurately characterizes the extent of suitable California red-legged frog (*Rana draytonii*) habitat in the LRDP area. Although existing campus infrastructure may reduce the potential for California red-legged frogs to disperse to portions of the campus that are completely isolated, we believe the majority of undeveloped terrestrial habitats within the LRDP area provides suitable upland or dispersal habitat for the California red-legged frog. This belief is due

to the existence of a California red-legged frog breeding pond within the LRDP area, the large extent of suitable and unsurveyed habitat north of the LRDP area, and the ability of California red-legged frogs to disperse distances of well over a mile. Based on this information, UCSC should include a California red-legged frog mitigation measure stating that UCSC would coordinate with the Service prior to any development occurring within the LRDP area, so that we may provide technical assistance on measures to minimize any adverse impacts to CRLF and its habitat.

Response F1-2

UC Santa Cruz acknowledges the comments and has edited the impact discussion for California red-legged frog on pages 3.5-43 and 3.5-44, Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47, and Figure 3.5-7 on page 3.5-45 of the Draft EIR to reflect the recommendations in this comment as follows:

Pages 3.5-43 and 3.5-44 of the Draft EIR were revised as follows:

California Red-Legged Frog

California red-legged frog is listed as threatened under ESA and is a CDFW species of special concern. California red-legged frog occurs along the Coast Ranges from Mendocino County south to Los Angeles County, and in portions of the Sierra Nevada and Cascade Ranges (CDFW 2008). This species is most abundant within the inner Coast Ranges from Point Reyes, Marin County to southern Santa Barbara County, and within eastern Contra Costa and Alameda Counties (Thomson et al. 2016). Habitat suitable for California red-legged frog is typically characterized by aquatic breeding area (e.g., pools within streams and creeks, ponds, marshes, stock ponds) within a matrix of riparian and upland refugia and dispersal habitat (USFWS 2002b). Adult frogs are nearly always associated with permanent bodies of water (Amphibiaweb 2020). During rainy weather, California red-legged frogs may move overland through upland habitat; however, in general, the species is rarely observed far from water (USFWS 2002b).

California red-legged frog is known to occur within numerous locations in the southwestern portion of the LRDP area (e.g., within Moore Creek), and is known to breed in the Arboretum Pond (Biosearch Environmental Consulting 2020, CNDDDB 2020). No other breeding habitat is known within the LRDP area (Biosearch Environmental Consulting 2020). There are several known occurrences of California red-legged frog within 1 mile of the LRDP area, and the nearest breeding pond outside of the LRDP area is in Upper Dairy Gulch at the Wilder Sand Quarry, approximately 1.2 miles southwest of the LRDP area (Biosearch Environmental Consulting 2020).

Adult and juvenile California red-legged frogs are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to upland refugia and foraging habitat, or to disperse to new breeding locations. The LRDP area contains upland refugia and dispersal habitat potentially suitable for the species within grasslands, coastal prairie, redwood forest, coastal mixed hardwood, coast oak woodland, northern maritime and shrub, riparian woodland and scrub, and some urban/developed and landscaped areas that contain ruderal grassland (Biosearch Environmental Consulting 2020). Additionally, the LRDP area contains approximately 970 acres of federally designated critical habitat for California red-legged frog (Figure 3.5-4).

Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the nonbreeding season and typically do not move more than approximately 500 feet into upland refugia habitats (Bulger et al. 2003; Fellers and Kleeman 2007). All known California red-legged frog observations on the UC Santa Cruz campus have been within 300 feet of aquatic habitats (Biosearch Environmental Consulting 2020). However, during migration to other suitable ponds in the region, California red-legged frogs may travel disperse long distances from aquatic habitat (i.e., greater than 1,600 feet) and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). California red-legged frogs breeding within the Arboretum Pond are expected to migrate to aquatic habitat suitable for the species within and outside of the LRDP area because the Arboretum Pond is not perennial (Biosearch Environmental Consulting 2020). California red-legged frog migratory and

dispersal movements from the Arboretum Pond to other aquatic habitats are expected to be primarily along Moore Creek both upstream and downstream, and overland to the southwest, west or northwest to aquatic habitats in the Wilder Creek watershed (Biosearch Environmental Consulting 2020, Figure 3.5-7). Movements to the east of the Arboretum pond are not as likely to occur ~~likely would not occur~~ due to the lack of aquatic habitat suitable for California red-legged frog in Jordan Gulch, the City of Santa Cruz, and the lower San Lorenzo River watershed, and the presence of developed areas which would likely impede movement (Biosearch Environmental Consulting 2020, Figure 3.5-7). Additionally, developed areas of the UC Santa Cruz campus contain numerous potential barriers to overland movements (e.g., buildings, retaining walls, decorative walls, parking lots, roads, paths), and while frogs may be able to cross roads, paths, and parking lots, the cumulative barriers and hazards presented by developed areas reduce the likelihood that California red-legged frogs would be present within these areas (Biosearch Environmental Consulting 2020).

Development of new land uses (e.g., buildings, impervious surfaces) under the 2021 LRDP is not planned within the UC Santa Cruz Arboretum and Botanic Garden, or within 500 feet of the Arboretum Pond, so project implementation is not expected to result in loss of breeding habitat for California red-legged frogs or impacts on individual California red-legged frogs while breeding in the Arboretum Pond. However, 2021 LRDP development is planned within grassland, redwood, and northern maritime chaparral habitats north and northwest of the Arboretum Pond near Empire Grade in lower and central campus, in areas that are likely used by California red-legged frogs for upland migration, dispersal, and refuge (Figure 3.5-6, Figure 3.5-7). Implementation of projects under the 2021 LRDP would include ground disturbance, vegetation removal, and land development in several habitats that may provide upland refugia and dispersal habitat suitable for California red-legged frog as described above (Table 3.5-4). These activities could result in loss of or injury to California red-legged frogs if present within upland refugia ~~migration~~ or dispersal habitat within the project site, as well as loss of habitat for the species. This would be a **potentially significant** impact.

Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47 was revised as follows:

Mitigation Measure 3.5-2a: Conduct Site-Specific Habitat Suitability Analysis for California Red-Legged Frog, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that aquatic or upland habitat determined to be suitable for California red-legged frog migration, dispersal, foraging, or refuge is present within a particular project site ~~(Biosearch Environmental Consulting 2020, Figure 3.5-7)~~, the following measures shall be implemented during the planning stages for each individual project under the 2021 LRDP:

- ▶ A qualified biologist will conduct a site-specific habitat suitability verification analysis to confirm the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in California red-legged frog life history and ecology, 2) be able to correctly identify California red-legged frogs and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW's CNDDDB. The habitat assessment will include, but will not be limited to:
 - Identification or verification of the vegetation communities present in the project site.
 - Consideration of known occurrences within the LRDP area;
 - Description of the project, including proposed project construction activities;
 - Analysis of the type and likelihood of impacts on California red-legged frog as a result of project implementation; and
 - Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of California red-legged frog and habitat.
- ▶ Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration.

- ▶ Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: injury or mortality of California red-legged frog; or disturbance of individuals or adverse effects on California red-legged frog breeding, upland refugia, or dispersal habitat.
 - If a qualified biologist determines that the individual project would have no substantial adverse effect on red-legged frog or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed.
 - For those areas where adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frog cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization for construction-related impacts (e.g., installation of exclusion fencing around the project construction site) and compensatory actions for habitat impacts, including purchase of credits at a conservation bank or creation of additional habitat at a minimum 1:1 mitigation ratio, as well as adaptive management strategies to ensure long-term conservation of mitigation lands. No actions that could adversely affect California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures are implemented.

To the extent the project may result in “take” of the species, UC Santa Cruz ~~may~~ shall pursue incidental take coverage by either pursuing consultation and biological opinion under Section 7 of the federal ESA (where there is some federal nexus) or by developing an HCP, which would require authorization by USFWS under Section 10 of the ESA. Such an HCP could provide long-term conservation and incidental take coverage for species listed under ESA with potential to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Typically, HCPs include the following:

- ▶ Measures that UC Santa Cruz will undertake to monitor, minimize, and mitigate for such impacts, the funding available to implement such measures, and the procedures to deal with unforeseen or extraordinary circumstances.
- ▶ Alternative actions to the taking analyzed by UC Santa Cruz, and the reasons why the alternatives were not adopted.
- ▶ Biological goals and objectives, which would define the expected biological outcome for each species covered by the HCP.
- ▶ Adaptive management, which includes methods for addressing uncertainty and also monitoring and feedback to biological goals and objectives.
- ▶ Monitoring for compliance, effectiveness, and effects.
- ▶ Permit duration which is determined by the time-span of the project and designed to provide the time needed to achieve biological goals and address biological uncertainty.

As shown in Chapter 4, “Revisions to the Draft EIR, Figure 3.5-7 on page 3.5-45 of the Draft EIR is revised to identify long-distance dispersal habitat, as requested by the commenter.

The above-listed revisions do 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 of the 2021 LRDP by the UC Regents for certification.

Comment F1-3

We are concerned that implementation of the LRDP could result in substantial effects to aquatic resources that federally listed species are reliant upon. Please refer our 2010 comment letter regarding the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service for the 374-acre portion of the UCSC North Campus (Service 2006) (attached). Concerns discussed in our 2010 comment letter remain relevant to the 2021 LRDP.

Response F1-3

The federally listed species referenced in the 2010 comment letter regarding the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service are California red-legged frog, Santa Cruz tarplant, tidewater goby, and Ohlone tiger beetle. Impacts on these species were analyzed in the DEIR (California red-legged frog [pages 3.5-43-3.5-47], Santa Cruz tarplant [3.5-38-3.5-42], Ohlone tiger beetle [3.5-56-3.5-59]) except for tidewater goby, because habitat suitable for the species is not present in the LRDP area. Impact 3.5-3 (pages 3.5-65 through 3.5-68) and Impact 3.5-4 (pages 3.5-69 through 3.5-70) discuss potential impacts on riparian habitat and state and federally protected wetlands, respectively, that may result from implementation of the 2021 LRDP. The mitigation approach for reducing impacts on aquatic resources to less than significant levels includes identification of these resources, avoidance, and compensation when impacts cannot be avoided. Master Response 7, "Water Supply," provides background for concerns regarding water supply. Further, as noted on page 3.17-24 of the Draft EIR, UC Santa Cruz is a customer of the City of Santa Cruz, and the level of water supplies contractually committed to UC Santa Cruz is dictated by the 1962 and 1965 agreements between the City and UC Santa Cruz related to the provision of potable water supplies to UC Santa Cruz by the City (refer to page 3.17-5 of the Draft EIR). Implementation of the 2021 LRDP does not include changes to these agreements or to the City's water system operations. Master Response 10, "Hydrology and Water Quality," describes ongoing groundwater quality and supply monitoring which has demonstrated that implementation of the 2021 LRDP would not result in hydrologic, water quality, or streamflow impacts on the San Lorenzo River, and impacts on salmonids in the river are not expected to occur. For additional detail, refer to Master Response 7 and Master Response 10.

Comment F1-4

As discussed between UCSC and Service staff on January 4, 2021, we recommend that UCSC pursue the development and implementation of a campus-wide habitat conservation plan (HCP). This year's release of the 2021 LRDP provides a logical opportunity to begin drafting a campus-wide HCP. A campus-wide HCP would provide an efficient approach to permitting development associated with the 2021 LRDP while taking into account landscape-level needs of the federally listed species that utilize UCSC lands. An HCP provides the most efficient approach to meet both UCSC's and the Service's goals.

Response F1-4

This comment is consistent with Mitigation Measure 3.5-2a, which begins on page 3.5-46 of the Draft EIR. The campus looks forward to working with USFWS to permanently set aside acreage currently designated in the Campus Natural Reserve on the main residential campus into a campus-wide Habitat Conservation Plan. For additional detail refer to Master Response 12.

Comment F1-5

We appreciate the opportunity to provide comments on the DEIR for the UCSC 2021 LRDP. If you have any questions regarding our comments, please contact Chad Mitcham at chad_mitcham@fws.gov or Karen Sinclair at karen_sinclair@fws.gov.

Response F1-5

This comment includes closing remarks and does not require a response pursuant to CEQA Guidelines Section 15088(a).

2.3.2 State

Letter S1 California Department of Fish and Wildlife, Bay Delta Region

Gregg Erickson, Regional Manager

March 1, 2021

Comment S1-1

The California Department of Fish and Wildlife (CDFW) has reviewed the draft Environmental Impact Report (EIR) prepared by the University of California, Santa Cruz for the UC Santa Cruz Long Range Development Plan (Project) located in Santa Cruz County. CDFW is submitting comments on the draft EIR regarding potentially significant impacts to fish and wildlife resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (e.g., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

Lake and Streambed Alteration Program

Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code, section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

Response S1-1

This comment introduces the California Department of Fish and Wildlife (CDFW) and its role as a trustee and responsible agency, is introductory in nature and do not require a response pursuant to CEQA Guidelines section 15088(a).

Comment S1-2

PROJECT DESCRIPTION AND LOCATION

The 2021 Long Range Development Plan (LRDP) would serve as the long-term planning document that guides physical campus growth through 2040 on two of the three UC Santa Cruz campus properties located in the City of Santa Cruz: (1) the UC Santa Cruz main residential campus and (2) the Westside Research Park, located at 2300 Delaware Avenue. Together, the main residential campus and Westside Research Park constitute the LRDP area or plan area for the 2021 LRDP. It does not address planning or growth on the third campus property, the Coastal Science Campus, which is governed by a separate Coastal LRDP (State Clearinghouse No. 2001112014). In addition, the LRDP area does not include the Scotts Valley Center, the Silicon Valley remote satellite campus, nor the UC

Monterey Bay Education, Science, and Technology Center (MBEST), which was transferred to UC Santa Cruz by the U.S. Army and is located approximately 26 miles south of the main residential campus.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the University of California, Santa Cruz in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on biological resources.

Response S1-2

The information referenced by the comment appears on page 2-1 of the Draft EIR. This comment does not raise an issue with the analysis in the Draft EIR; therefore, no additional response is required.

Comment S1-3

COMMENT 1: Pertains to Section 3.10 Hydrology and Water Quality

Issue: This section addresses impacts that could occur in the immediate LDRP project footprint including overdraft and contamination of karst aquifer system. The karst aquifer underlies multiple local watersheds inclusive of the San Lorenzo River. This section does not address whether contamination or overdraft issues to karst aquifer could transmit outside of the immediate project footprint. The San Lorenzo River is a fully appropriated waterway and listed under Clean Water Act 303(d) list for several contaminants, temperature and sediment.

CDFW is working with the City of Santa Cruz and NOAA Fisheries on a Habitat Conservation Plan authorized under section 10(a)(1)(B) of the Federal Endangered Species Act. If this Habitat Conservation Plan is authorized, the City would agree to provide minimum bypass flows below their water diversions on the San Lorenzo River to protect Central California Coast Coho Salmon and Central California Coast steelhead trout.

Recommendation: CDFW recommends expanding the discussion already provided in Section 3.10 and addressing whether project could transmit hydrologic or water quality impacts to the San Lorenzo River, and if impacts to Coho Salmon and steelhead trout could result. The Project draft EIR should further address whether contaminants stemming from LDRP could enter the karst aquifer and be transmitted to the San Lorenzo River as reemerging streamflow. CDFW also recommends the Project draft EIR consider whether drafting of groundwater by UC Santa Cruz from the karst aquifer could potentially impact streamflow in the San Lorenzo River.

Response S1-3

The comment recommends the inclusion of additional information regarding potential hydrologic and water quality impacts to the San Lorenzo River, as well as potential impacts to the karst aquifer and resulting effects on streamflow in the San Lorenzo River. As discussed in Master Response 10, samples have been collected from six surface locations that receive stormwater runoff from developed areas at the UC Santa Cruz campus since 2008. These locations discharge to various receiving waters including the San Lorenzo-Pogonip Watersheds and sinkholes that are linked to the karst aquifer. Samples of stormwater runoff are collected from these locations during the first significant precipitation event of the wet season and are laboratory tested for general indicator stormwater parameters, including pH, total suspended solids, specific conductance, and oil and grease. The detected concentrations generally fall within the range of naturally occurring concentrations found in spring water emanating from undeveloped areas of campus and do not indicate substantial water quality degradation. Further, regarding impacts associated with groundwater extraction, implementation of Mitigation Measure 3.10-5a would require that campus-implemented pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality or offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and defines average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. If extraction contributes to a net deficit, UC Santa Cruz would terminate or reduce groundwater extraction. As demonstrated through monitoring (see Master Response 10) and through implementation of mitigation measures, implementation of the 2021 LRDP would not be expected to result in hydrologic, water quality, or streamflow impacts on the San Lorenzo River, and impacts on salmonids in the river are not expected to occur.

Further, as noted by the commenter, it is understood that the City, which provides water to UC Santa Cruz, 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. 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 ensure that the City can 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 that evaluates the water rights change petition.

Comment S1-4

COMMENT 2: Pertains to Section 3.17 Utilities and Service Systems

Issue: Pertains specifically to section 3.17-1: Impacts on Water Supply. The draft EIR brings up a serious sustainability issue that the city's water supplies are already inadequate to meet current service demand, and any UC Santa Cruz expansion will result in additional demand and take from the city's water system. There is a discussion of drought and critical dry year shortfalls in this section. This section does not address potential climate change impacts which may further impact city supply. The draft EIR brings up potential water prospecting projects that the city could specifically undertake to increase water supply, and potential environmental impacts, although the description and impacts presented do not appear to be comprehensive. Our agency is concerned that any prospecting for additional water will undoubtedly put strain on additional groundwater or surface water systems, and result in impacts to associated biological communities.

Response S1-4

Section 3.8, "Climate Change," of the Draft EIR includes a discussion of potential implications of climate change on water supply (see pages 3.8-16 and -17 of the Draft EIR). Also, Section 3.17 does include a discussion of potential climate change impacts that could be associated with each of the water supply alternatives, beginning on page 3.17-25. With respect to the water supply alternatives evaluated in Section 3.17, "Utilities and Service Systems," the Draft EIR provides a programmatic analysis of the 2021 LRDP, including a programmatic evaluation (consistent with CEQA requirements [refer to Section 15155 of the CEQA Guidelines], even though UC Santa Cruz is not subject to these requirements; see Master Response 7) of potential water supply alternatives due to the projected water supply shortages that may occur with (and without) implementation of the 2021 LRDP. Further, as noted on page 3.17-24 of the Draft EIR, UC Santa Cruz is a customer of the City of Santa Cruz. The level of water supplies contractually committed to UC Santa Cruz is dictated by the 1962 and 1965 agreements between the City and UC Santa Cruz related to the provision of potable water supplies to UC Santa Cruz by the City (refer to page 3.17-5 of the Draft EIR). Due to the potential for water curtailment (see page 3.17-30 of the Draft EIR), UC Santa Cruz provided an evaluation of the potential impacts associated with the use of groundwater supplies in the Jordan Gulch area. Based on available data, the EIR includes an evaluation of potential impacts associated with a sustainable withdrawal (i.e., the withdrawal of water supplies that would not affect the overall depth to groundwater, aquifer capacity, or other regional considerations) of groundwater supplies from the Jordan Gulch area. Should UC Santa Cruz elect to pursue the use of available groundwater supplies, a more detailed, project-specific analysis that reflects the desired yield, proposed facilities, and local/regional considerations (including groundwater and surface waters) prior to implementation. Please also refer to Master Response 10. If UC Santa Cruz pursues groundwater extraction in the Jordan Gulch area, the university will coordinate with CDFW and other appropriate regulatory entities, as appropriate, to ensure that the project-specific analysis appropriately evaluated potential impacts, including those to biological communities.

Comment S1-5

COMMENT 3: Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures

Issue: The draft EIR identifies that Project tree removal activities could impact monarch butterfly overwintering colonies or suitable overwintering habitat. Mitigation measure 3.5-2h proposes tree removal will be delayed until monarchs have left the areas, as determined by a qualified biologist. In addition, UC Santa Cruz will prepare and implement a site-specific plan for the monarch overwintering colony, following feasible recommendations from

Protecting California's Butterfly Groves Management Guidelines for Monarch Overwintering Habitat (Xerces 2017). It is unclear from the Project draft EIR which recommendations would be considered feasible. Recommendations include replacing removed trees with native trees in strategic locations to provide additional wind protection.

CDFW is concerned loss of trees used by Monarchs for overwintering will contribute to extirpation of Western Monarch populations. Tree planting is unlikely to be sufficient to mitigate loss of suitable trees for Monarch overwintering to a less-than-significant level. Loss of mature trees used by monarch butterflies for over-wintering will cause temporal loss of over-wintering habitat until replacement trees grow to a mature size and assume Monarchs would utilize replacement trees.

Evidence the impact would be significant: The data gathered from the Western Monarch Thanksgiving Count show that western overwintering monarchs are at an all-time critical low level and have significantly declined to approximately two percent of their numbers since 1997 (Xerces Society Western Monarch Thanksgiving Count, 2019). The decrease in Western Monarch butterflies may be due to the loss of overwintering habitat and loss of its host plant (milkweed) (Pelton et al. 2019). According to the Xerces Society, "Western monarchs use the same sites each year, even the same trees, and need intact overwintering habitat, which provides a very specific microclimate and protection from winter storms," (Xerces Society, 2020).

Recommendations to minimize significant impacts: CDFW recommends the Project be planned to avoid removal of trees used by Western Monarchs for over-wintering.

Response S1-5

Impacts related to monarch overwintering colonies are appropriately determined to be less than significant with mitigation (i.e., Mitigation Measure 3.5-2h), which would require identification of overwintering monarch colonies in the 2021 LRDP area through focused surveys and protection/avoidance of monarch colonies identified during the focused surveys throughout the duration of the butterflies' presence at the colony.

In part to address CDFW recommendations, Mitigation Measure 3.5-2h has been edited to emphasize that projects, which may result in modification or removal of stands where a monarch overwintering colony has been identified, must first attempt to redesign the project to avoid modification or removal of the stand. If project redesign is not possible, UC Santa Cruz shall demonstrate that any modification or removal of vegetation within an identified monarch overwintering stand would maintain habitat function for monarch. In addition, the edits shown below also clarify the timing by which tree removal, if necessary, may occur. With implementation of this mitigation measure, as revised, implementation of the 2021 LRDP would protect overwintering monarchs and would maintain the habitat function of overwintering colony sites; therefore, 2021 LRDP implementation would not substantially reduce the habitat of monarchs or cause the population to drop below self-sustaining levels.

Specifically, Mitigation Measure 3.5-2h on page 3.5-56 of the Draft EIR was revised as follows:

Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that a monarch overwintering colony or suitable overwintering habitat is present within a particular project site, the following measures shall be implemented:

- ▶ 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.
- ▶ Within 14 days before the onset of project activities that include vegetation removal between October 1st and March 31st, a qualified biologist familiar with monarchs and monarch overwintering habitat will conduct focused surveys for monarch colonies within habitat suitable for the species in the project site and will identify any colonies found within the project site.

- ▶ Monarch overwintering colonies that are identified within a project site will be demarcated with flagging or high-visibility construction fencing to prevent removal of the stand of trees containing the overwintering colony and encroachment by heavy machinery, vehicles, or personnel. Monarch overwintering colonies shall be protected throughout the duration of their presence within a project site. Removal of the tree or stand of trees that contains the overwintering colony will not occur until the monarchs have left the area, as determined by a qualified biologist.
- ▶ If modification or removal of a stand ~~that contains an~~ where overwintering monarchs have been identified ~~overwintering colony~~ is required for project implementation, and the project cannot be redesigned to avoid modification or removal of the stand, vegetation management purposes, then UC Santa Cruz will prepare and implement a site-specific plan for the stand with the goal of maintaining habitat function for the monarch overwintering colony, following ~~feasible~~ recommendations from *Protecting California's Butterfly Groves Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017). Examples of management strategies that could be considered include:
 - remove or trim hazard trees;
 - selectively remove or trim trees to create a heterogeneous habitat that provides access to sunlight and shade for monarchs;
 - maintain suitable wind protection in the stand; and
 - replace removed trees with native trees in strategic locations to provide additional wind protection.

The above-listed revisions do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 as it would not change the significance of an impact or result in a considerably different mitigation measure. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment S1-6

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form, online field survey form, and contact information for CNDDDB staff can be found at the following link:

<https://wildlife.ca.gov/data/CNDDDB/submitting-data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

Response S1-6

This comment does not raise an issue with the analysis in the Draft EIR; therefore, no additional response is required.

Comment S1-7

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

Response S1-7

This comment does not raise an issue with the analysis in the Draft EIR; therefore, no additional response is required. Information regarding species identified in the 2021 LRDP area will be compiled in compliance with Public Resources Code section 21003(e). If a future project in the 2021 LRDP area has a potential impact on fish and wildlife, an assessment of filing fees will be determined at that time.

Comment S1-8

Thank you for the opportunity to comment on the Project's draft EIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or wesley.stokes@wildlife.ca.gov; or Mr. Craig Weightman, Environmental Program Manager, at craig.weightman@wildlife.ca.gov.

Response S1-8

This comment includes conclusory remarks and does not require a response pursuant to State CEQA Guidelines Section 15088(a).

Letter S2 University of California, San Diego

Richard D. Norris, Director

March 1, 2021

Comment S2-1

I am writing to urge UCSC campus administrators and the UC Regents to permanently protect the UCSC Campus Natural Reserve by adding the reserve to the UC Systemwide Natural Reserve System. The campus reserve is critical to the university's teaching and research mission, and is a signature element that differentiates UCSC from all the other campuses of UC.

Response S2-1

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. Refer to Master Response 12 for additional information 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 S2-2

Here at UCSD we have found that our most heavily used reserves are those close to campus that can function truly as outdoor laboratories. Research on student engagement shows that field classes have more impact than lecture courses on student decisions to stick with their choices in STEM fields and to feel empowered about their abilities to do inquiry-based research. Our near campus sites are important because they can be accessed in normal class periods and can be reached (in some cases) by walking, requiring no special logistics. Published research has shown that field experiences also create a sense of social place for students in majors like Earth Sciences and Ecology—an important component in UC's wider emphasis on increasing diversity in STEM.

Furthermore, in these liability-driven times, NRS reserves are protected field sites where liability can be controlled. Field sites, particularly those close to campus, are valuable not only for instruction in STEM, but also in many other fields from visual arts to expository writing.

UCSC should view the campus reserve as a general campus resource for instruction.

Response S2-2

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. However, the comment does not address the adequacy of the Draft EIR analysis, 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 S2-3

All this suggests that UCSD would be wise to make sure that open spaces in the Campus reserve are protected from future development. My campus, UCSD, is more urbanized than the UCSC campus, so we acutely feel the loss of open space for social well-being of students in addition to its loss for teaching and research. UCSC should not go down our path too far before protecting the Campus reserve as completely as possible.

I strongly urge Chancellor Larive to take advantage of this opportunity to permanently protect the UCSC Campus Reserve as a component of the UC-Natural Reserve System.

Response S2-3

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. Refer to Master Response 12 for additional information 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 S3 University of California, Santa Cruz Natural Reserves

Alex Jones, Campus Natural Reserve Manager

March 6, 2021

Comment S3-1

I am writing as Manager of the UCSC Campus Natural Reserve (CNR) with comments regarding the UCSC Draft Long Range Development Plan (DLRDP) and Draft Environmental Impact Report (DEIR) for the 2021-2040 Long Range Development Plan (LRDP). I am grateful for the continued opportunity to work with you on this topic and am pleased with the designation of the Campus Natural Reserve lands in the DLRDP and how hard UCSC planners and consultants worked to limit development within previously undeveloped areas. I am writing with the following comments pertaining to potential impacts to the CNR and other campus natural lands, as well as numerous other minor points and suggested edits, for your consideration.

Response S3-1

This comment includes introductory remarks and does not require a response pursuant to State CEQA Guidelines Section 15088(a). 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 S3-2**DLRDP 4.3 p.122-123 & DEIR p. 2-19**

I strongly support the expansion of the Campus Natural Reserve and see its proposal as a strong indication of the UCSC planners and consultants support of campus education, research, and stewardship. In addition to the areas noted in the 2021 DLRDP land use designation map, I advocate for the inclusion of the portions of the Great Meadow classified as Natural Space to be reclassified as Campus Natural Reserve. This will allow these areas to explicitly be prioritized for education, unobtrusive research, and careful land stewardship.

To ensure the integrity of this education and research resource long-term, I strongly advocate for the permanent protection of the Campus Natural Reserve, via inclusion in the UC Natural Reserve System or by other means. This will allow for long-term investment from faculty researchers and safe investment in programs, and secure access to intact natural lands that help fulfill the university's teaching and research missions. Campus Natural Reserve programs and lands annually support over 3000 students per year on course field trips within over 80 courses provide over 100 students with experiential internships. This is often the first real exposure students have to learning in the outdoors, just steps from traditional classrooms and residence halls. They gain marketable job skills, find direction for their studies, and grow in passion and commitment to being ecologically informed citizens. UCSC is unique among all UC campuses, and arguably universities worldwide, in having such a diversity of habitats on such an inspiring landscape. Permanent protection of the Campus Natural Reserve will allow UCSC to remain a leader in field education and research. In addition, permanent protection will the perpetual protection sensitive cultural/archaeological resources and endangered and other listed species.

Response S3-2

UC Santa Cruz acknowledges the advocacy for expansion of the Campus Natural Preserve and the importance of the Campus Natural Preserve for UC Santa Cruz. Refer to Master Response 12 for additional information 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 S3-3**DEIR Mitigation Measures 3.5-3b7 & 3.5-7**

Permanent protection of the Campus Natural Reserve could be one avenue to pursue when seeking to mitigate for

unavoidable loss of sensitive natural communities and /or to replace Inclusion Area D and amend the Ranch View Terrace Habitat Conservation Plan to allow for the construction of proposed Employee Housing.

Response S3-3

Refer to Master Response 12 regarding long-term habitat protection and the intent of the campus to prepare 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 S3-4

DEIR Mitigation Measure 3.5-2a/2i

I strongly support the creation of a comprehensive, campus-wide Habitat Conservation Plan that would prescribe avoidance and minimization measures for impacts to Ohlone tiger beetle and California red-legged frog, monitoring requirements, and biological goals and objectives for the conservation and adaptive management of each species.

Response S3-4

UC Santa Cruz acknowledges the support for a comprehensive HCP, as discussed in Section 3.5, "Biological Resources." Refer to Master Response 12 regarding the intent of the campus to prepare a campus-wide HCP. This comment does not raise an issue with the analysis in the EIR; therefore, no additional 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 S3-5

DLRDP 2.2 p.61

"This condition is variable throughout the campus and is a geological feature unique to the State." There is karst elsewhere in the state, and definitely elsewhere in the world.

Response S3-5

UC Santa Cruz acknowledges the comment, and page 61 of the 2021 LRDP document has been revised to incorporate the edit. However, as this edit is not related to the analysis of the Draft EIR, no further response is necessary, and no edit to the Draft EIR has been made.

Comment S3-6

DLRDP 2.2 p.65 & 4.5 p.150; DEIR Impact 3.10-5

On the issue of potential groundwater extraction from the karst aquifer system in the central and lower portion of campus: The biological component of the karst system below campus has not been studied in detail but very well could include the same (and possibly other) rare, endemic, and special status species found in Empire Cave, including the following aquatic species: Empire Cave amphipod (*Stygobromus imperialis*), Mackenzie's amphipod (*Stygobromus mackenziei*), and rare isopods *Caecidotea* n. sp. and *Calasellus californicus*). This should be studied and evaluated prior to any attempt at pumping groundwater from karst systems on campus and appropriate related mitigation measures should be established to reduce potential impacts on sensitive aquatic karst and cave biota.

Response S3-6

The impact discussion for cave invertebrate species on page 3.5-54 of the Draft EIR acknowledges that special-status species associated with the Empire Cave have not been studied well and could occur in other karst caves in the 2021 LRDP area. Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR requires project-level reconnaissance-level surveys for sensitive species and habitats and would require a qualified biologist to determine whether special-status cave invertebrate species and karst cave habitat may be present on a project site. Regarding impacts associated with groundwater extraction, implementation of Mitigation Measure 3.10-5a would require that campus implement pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality or offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. In the event that extraction contributes to a net deficit, UC Santa Cruz

would terminate or reduce groundwater extraction. Thus, impacts on cave invertebrates within these systems would be avoided.

Comment S3-7

DEIR Mitigation Measure 3.5-2g

The “fencing” mentioned in this mitigation measure should be a bat-friendly cave gate, which should be implemented as soon as possible to protect the sensitive cave ecosystem from rampant vandalism and disturbance, as well as the safety of students and the general public. The LRDP should identify funding for the construction, installation, and maintenance of this gate. Empire Cave has been identified as the 3rd most biodiverse cave in California, but by far the most impacted (Elliot et al. 2017). A local caver has measured CO₂ levels upwards of 4% within the cave, which exceeds safe conditions (M. Davies pers. comm.), and the entrance ladder, combined with the substances people ingest as they party in the cave, presents a clear and present safety issue.

Response S3-7

Mitigation Measure 3.5-2g was revised to emphasize that any fencing installed at the opening of Empire Cave will be designed such that bats may enter and exit the cave unimpeded. The revised mitigation is included below and also in Chapter 4, “Revisions to the Draft EIR.” The Draft EIR represents a programmatic evaluation of the 2021 LRDP and presents feasible mitigation consistent with CEQA requirements. CEQA does not require identification of funding sources; however, the exact manner in which funding for fencing may occur could be achieved in several ways (e.g., funding contributions of future development under the 2021 LRDP for fencing, annual department funding, etc.), and would be determined after consideration of the 2021 LRDP by the UC Regents and if the 2021 LRDP and its associated mitigation measures are adopted.

Mitigation Measure 3.5-2g on page 3.5-55 of the Draft EIR was revised as follows:

Mitigation Measure 3.5-2g: Limit Human Disturbance of Cave Ecosystems

UC Santa Cruz shall continue to limit visitation of caves on campus and discourage activities by members of the public that could jeopardize the physical integrity, condition, or scientific value of the caves, through exclusion of access to the caves with bat-friendly fencing (i.e., fencing that allows unimpeded ingress and egress by bats), appropriate signage and educational literature, Campus Natural Reserve website information, or other appropriate measures.

To provide clarification, the description of Coastal Prairie provided in Section 3.5.2, “Environmental Setting” on page 3.5-11 of the Draft EIR is revised as follows:

Coastal Prairie

The LRDP area contains approximately 107.9 acres of coastal prairie habitat, which is considered a sensitive natural community (Figure 3.5-2, Table 3.5-1). This habitat is present within portions of north and lower campus. Coastal prairie habitat is similar to other grassland habitat within the LRDP area, but with greater incidence of native grass species, including California oat grass and western panic grass (*Panicum acuminatum*). Coastal prairie habitat also supports a diverse assemblage of native forbs, including coyote thistle (*Eryngium armatum*), wild hyacinth (*Triteleia hyacinthina*), dwarf brodiaea (*Brodiaea terrestris*), and yampah (*Perideridia kelloggii*). Due to the coarse scale of vegetation mapping, some areas of the LRDP area mapped as grassland as shown in Figure 3.5-2, may meet the alliance requirements to be classified as coastal prairie.

Coastal prairie habitat in the southwest corner (west of Empire Grade) of the lower campus portion of the LRDP area and in the Marshall Fields complex in north campus is characterized by Mima mound habitat. Mima mounds are hillocks typically found in grassland habitat, the origin of which has been historically debated. Recent modelling studies support the “fossorial rodent hypothesis,” which suggests that Mima mounds are built by burrowing mammals (e.g., pocket gophers) over time to provide refuge from seasonally saturated soils or that they are the result of a combination of the biotic factors and abiotic factors, such as vegetation/erosion interactions (Cramer and Barger 2014, Gabet et al. 2014).

The above-listed revisions do 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 of the 2021 LRDP by the UC Regents for certification.

Comment S3-8

DLRDP 2.2 p.46

Second paragraph, left column: “fire and maintenance trails”—are you calling these trails and not roads because they are not paved? I would suggest calling them roads.

Response S3-8

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, page 46 of the 2021 LRDP document has been revised to incorporate the edit. 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 S3-9

DLRDP 3.2 p.92

Objective 4: I applaud this objective and hope to be an active participant in actualizing it. In order for UCSC to provide meaningful protection for habitats, sensitive species, outdoor classrooms, and field research areas, however, significantly more resources must be allocated to these ends. Providing permanent funding and personnel for stewardship programs and coordination, as well as proactive initiatives related to forest/other vegetation management and recreation management, will facilitate reaching this objective.

Response S3-9

UC Santa Cruz acknowledges the commenter’s support for Objective 4, as listed in the 2021 LRDP. This comment is noted but 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 S3-10

DLRDP 4.2 p.112

4. Integrate planning for long-term resilience: As part of this, UCSC should fund development and implementation of a recreation management plan and forest/other vegetation management plan (as in Mitigation Measure 3.18-2 for the latter), including necessary associated permitting that would enable vegetation management work. Without these plans and the means to support them, which would also include personnel, UCSC will not be able to adequately steward its lands in the long-term.

Response S3-10

As noted by the commenter, preparation and implementation of a vegetation management plan would be required with adoption of Mitigation Measure 3.18-2. As noted above in Response S3-7, the mitigation measures identified in the Draft EIR are considered feasible and would be required to be implemented if the 2021 LRDP is adopted. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary. Additionally, please note that UC Santa Cruz continues to coordinate with Natural Reserves staff to manage the trail system in the north campus. 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 S3-11

DLRDP 4.4 p. 138

Bicycle trails second paragraph: yes. UCSC should support this planning process and fund the implementation of a resulting recreation/trail management plan.

Response S3-11

UC Santa Cruz acknowledges the support for a recreation/trail management plan as part of the 2021 LRDP. This comment is noted but 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 S3-12**DEIR Impacts 3.15-1: Impacts on Campus Recreation Facilities**

The DEIR states that 1,419 acres of the residential UCSC campus functions as “passive recreational space.” This area includes the Campus Natural Reserve and adjacent undeveloped lands, where there is currently a very high level of use of a dense network of unauthorized trails. An increase of the FTE student population to a max of 28,000 would add significantly more outdoor recreation pressure to campus natural lands and increase erosion, impacts to sensitive natural communities (such as coastal prairie and redwood forest), and endangered and special-status species (Ohlone tiger beetle, coastal prairie flora). The DEIR should include mitigation measures to specifically address this issue, including the development of a comprehensive recreation and trail management plan for UCSC’s undeveloped lands, as well as funding to ensure its effective implementation. I understand that the new ratio of acreage to persons would still exceed the Quimby Act parkland dedication standards, but the reality is that the land is being significantly degraded in the absence of the long-term funding of recreation and trail management and enforcement. Page 3.15-12 states that “UC Santa Cruz will continue to maintain existing on-campus recreation facilities.” Though I’m not excited to say this, we need to define the Upper Campus ad-hoc trail system as a recreation facility, due to its high levels of recreational use, and by doing so we need to follow through with dedicated maintenance through adoption of a funded and sustainable management plan for the area.

Response S3-12

Regarding the potential increased use of undesignated trails, UC Santa Cruz acknowledges the commenter’s issues with trails in the upper campus. Page 138 of the Draft 2021 LRDP 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.” Chapter 2, “Project Description,” of the Draft EIR, specifically Section 2.6.6, Pedestrian Trails, further states, “Existing trail networks could be improved, and new connections provided within campus and to adjacent public lands surrounding the campus. Unpaved multi-use trail networks could include east-west connections in the north campus from Wilder Ranch State Park to Henry Cowell State Park via Pogonip City Park. North-south trail networks could connect through the Moore Creek Preserve and the Great Meadow, connecting routes north to the east-west trail network in the north campus. Additional trail improvements could include connecting the Spring Trail to Spring Street, and Highway 9. Trail corridors that provide access to campus research areas could be limited to pedestrians only, such as Red Hill Road gravel fire road in the north campus.”

Comment S3-13**DEIR Mitigation Measure 3.18-2**

A campus-wide Vegetation Management Plan needs to include dedicated funding for continued management activities, as well as the necessary permits to conduct particular kinds of vegetation removal (such as Timberland Conversion Permits for removing certain tree species from northern maritime chaparral, Timber Harvest Plans, and/or a Programmatic Timberland EIR). Without funding for those permits, we will be unable to do certain vegetation management prescribed within a campus-wide Vegetation Management Plan.

Response S3-13

The Draft EIR represents a programmatic evaluation of the 2021 LRDP and presents feasible mitigation consistent with CEQA. CEQA does not require identification of funding sources; however, funding for preparation of a campus-wide Vegetation Management Plan would be determined after consideration of the 2021 LRDP by the UC Regents and if

the 2021 LRDP and its associated mitigation measures are adopted. However, as noted in Master Response 9, upon adoption, the mitigation measures identified in the EIR become binding commitments, including dedication of funds to implement.

Comment S3-14

DLRDP 4.5 p. 151 and DEIR Mitigation Measure 3.5-1c

The Stormwater management at Emergency Response Center photo-----this area is now revegetated and has been colonized by invasive weeds. Large projects like these not only need invasive species BMP during construction (as outlined in DEIR Mitigation Measure 3.5-1c) but should include funding for longer term vegetation management to ensure we do not continue to allow post-construction landscapes to become invasive weed infestations that can spread to adjacent non-project related lands.

Response S3-14

The requested addition for the EIR to include a funding clause within Mitigation Measure 3.5-1c is not considered necessary due to the requirements associated with implementation of Mitigation Measure 3.18-2. As provided in the second bullet of Mitigation Measure 3.18-2 on page 3.18-17 of the Draft EIR, treatment actions resulting from the development and implementation of a campus-wide vegetation management plan will include eradication or control of invasive plants, as requested by the commenter. The comment's statements related to page 151 of the 2021 LRDP do not address the adequacy of the Draft EIR, and further response is not 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 S3-15

DLRDP 4.4 p. 130-131 & DEIR p. 2-23

Proposed roadway: "Northern entrance": As mapped, the proposed roadway leading from the North Perimeter parking lot to Empire Grade is sited south of the existing Fuel Break Rd (western extension) fire road (look at the proposed road with an aerial photo basemap). This would result in a need for serious earthwork and the removal of hundreds of trees. If this road is desired, it should follow the existing fire road alignment just north of the proposed road. It also doesn't precisely follow West Rd (fire road), which it should. Those things said, if this road is built I believe it should be gated and only used for emergency purposes. The road corridor and existing topography would only accommodate one-way traffic in most areas, and making it two-lane would have significant impacts on adjacent slope wetlands, Cave Gulch tributaries and upland habitats supporting California giant salamander (CA Species of Special Concern), redwood forest, and potentially northern maritime chaparral. For these reasons I do not believe this is a viable regular use vehicle corridor.

Response S3-15

The potential Northern Entrance is proposed as part of the 2021 LRDP, and as such, is evaluated as part of the Draft EIR. The location of the Northern Entrance was determined based on a planning level analysis and is diagrammatic; the actual alignment require additional design and siting study considerations prior to implementation, including the location of nearby sensitive resources and slopes. As shown on Figure 2-6 (page 2-22 of the Draft EIR), the alignment shown reflects preliminary siting consistent with the plan-level analysis in the Draft EIR, but may change as during the project-level design phase. The comment will be included in the record, and will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-16

DLRDP 4.4 p.131 & DEIR p. 2-21

East-West Extension of Meyer Drive—The alignment of this road, as mapped, follows along the southern edge of the paved portion of the East Remote parking lot to its terminus at Coolidge Dr. This alignment would pass over or very near a sinkhole and erosion gully. If you were to realign this road to the south you would pass near more karst hazards and also overwintering burrowing owl habitat.

Response S3-16

The East-West Extension of Meyer Drive from Heller Drive to Coolidge Drive is proposed as part of the 2021 LRDP, and as such, is appropriately evaluated as part of the Draft EIR. The location of the proposed roadway was determined based on a planning level analysis and is diagrammatic; the actual alignment would require substantial additional design and siting considerations prior to implementation, including the location of nearby sensitive resources, such as burrowing owl populations, and slopes. As shown on Figure 2-6 (page 2-22 of the Draft EIR), the alignment shown reflects preliminary siting, which may change as project design moves forward but is considered appropriate for the current plan/programmatic level of analysis in the Draft EIR. The comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment will be included in the record and will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-17**DLRDP 4.4 pp.136-137 & DEIR pp. 2-27, 2-28**

Proposed Bicycle Route: North connection segment of East-west connections—There are problems with this alignment that would become apparent if it is actually considered. There is severe erosion near the western end of the path, which itself appears to pass through areas of the Seep Zone. If this is built, careful siting to a) use existing paths and fire roads when feasible and b) restore eroded areas and c) design the contour trail in such a way to avoid future erosion issues. Importantly, if this is a paved trail, there will likely be erosion issues associated with it. If it is unpaved, UCSC would need to change its current policy that prohibits biking on trails such as these in Upper Campus, as well as establish a sustainable trail and recreation management plan. Having a dirt path in this area while maintaining our current ineffectual policy will only confuse things further.

Response S3-17

The North Connection bicycle route is proposed as part of the 2021 LRDP, and as such, is appropriately evaluated as part of the Draft EIR. The location of the proposed route was determined based on a planning level analysis and would require substantial additional design and siting considerations prior to implementation, including the location of nearby sensitive resources, slopes, and erosion control measures. As shown on Figure 2-9 (page 2-27 of the Draft EIR), the alignment shown reflects preliminary siting, which may change as project design moves forward but is considered appropriate for the current plan/programmatic level of analysis in the Draft EIR. The comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment will be included in the record, and will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-18

Proposed Bicycle Route: New Connection to Housing in Northeast segment of North-south connections: This route is highly problematic, as it passes through a seasonal wetland at the southern end and along a seasonal creek within the East Fork Upper Jordan Gulch drainage. The slopes are steep in most areas, and a contour trail along the slopes would be challenging in some areas.

Response S3-18

The New Connection to Housing in Northeast bicycle route is proposed as part of the 2021 LRDP, and as such, is appropriately evaluated as part of the Draft EIR. The location of the proposed route was determined based on a planning level analysis and would require substantial additional design and siting considerations prior to implementation, including the location of nearby sensitive resources, including wetlands, and slopes. As shown on Figure 2-9 (page 2-27 of the Draft EIR), the alignment shown reflects preliminary siting, which may change as project design moves forward but is considered appropriate for the current plan/programmatic level of analysis in the Draft EIR. The comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment will be included in the record, and will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-19**DEIR Mitigation Measure 3.5-3a**

The vegetation communities map for the 2021 DLRDP (DEIR p. 3.5-9) includes “grassland” and “coastal prairie” delineations identified during the 2005 LRDP planning process. I understand this was done due to lack of granularity in the more current vegetation data. The grassland vs. coastal prairie differentiation, however, is somewhat arbitrary, as our landscape position points to all of our grassland as being coastal prairie (despite some being heavily invaded by invasive grasses and forbs). As such, any development in habitats currently identified as grassland should include protocol-level vegetation surveys to determine whether or not these areas would qualify as coastal prairie or purple needlegrass grassland, both sensitive natural communities. If so, the third bullet point of Mitigation Measure 3.5-3b should be implemented. This is preferred over the previous two bullet points in MM 3.5-3b since it is very difficult to establish coastal prairie through restoration.

Response S3-19

Mitigation Measure 3.5-3a, which starts on page 3.5-66 of the Draft EIR, requires protocol-level surveys for sensitive natural communities if a qualified biologist determines during project-level reconnaissance-level surveys (Mitigation Measure 3.5-1a) that coastal prairie or public needlegrass grassland communities may be present. As described under Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR, a qualified biologist would assess whether sensitive habitats, including sensitive natural communities, may occur on a project site, which would include identifying dominant plant species present. The existing mitigation measures in the Draft EIR are sufficient to determine whether coastal prairie habitat is present on a project site.

To provide clarification, however, that coastal prairie habitat may be underrepresented in the vegetation mapping provided in Figure 3.5-2 on page 3.5-9 of the Draft EIR, the description of Coastal Prairie provided in Section 3.5.2, “Environmental Setting” on page 3.5-11 has been revised as follows:

Coastal Prairie

The LRDP area contains approximately 107.9 acres of coastal prairie habitat, which is considered a sensitive natural community (Figure 3.5-2, Table 3.5-1). This habitat is present within portions of north and lower campus. Coastal prairie habitat is similar to other grassland habitat within the LRDP area, but with greater incidence of native grass species, including California oat grass and western panic grass (*Panicum acuminatum*). Coastal prairie habitat also supports a diverse assemblage of native forbs, including coyote thistle (*Eryngium armatum*), wild hyacinth (*Triteleia hyacinthina*), dwarf brodiaea (*Brodiaea terrestris*), and yampah (*Perideridia kelloggii*). Due to the coarse scale of vegetation mapping, some areas of the LRDP area mapped as grassland as shown in Figure 3.5-2, may meet the alliance requirements to be classified as coastal prairie.

Coastal prairie habitat in the southwest corner (west of Empire Grade) of the lower campus portion of the LRDP area and in the Marshall Fields complex in north campus is characterized by Mima mound habitat. Mima mounds are hillocks typically found in grassland habitat, the origin of which has been historically debated. Recent modelling studies support the “fossorial rodent hypothesis,” which suggests that Mima mounds are built by burrowing mammals (e.g., pocket gophers) over time to provide refuge from seasonally saturated soils or that they are the result of a combination of the biotic factors and abiotic factors, such as vegetation/erosion interactions (Cramer and Barger 2014, Gabet et al. 2014).

The above-listed revisions do 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 of the 2021 LRDP by the UC Regents for certification.

Regarding the comment that restoration of coastal prairie habitat is difficult and would not be the preferred method, Mitigation Measure 3.5-3b includes success criteria for restoration or preservation, which would require the chosen method to be successful through monitoring of restored or preserved habitat. Thus, if restoration of coastal prairie habitat were to be unsuccessful, additional compensation (e.g., preservation) would be required.

Comment S3-20**DLRDP 4.5 p.158**

The UCSC Upper Campus area has very spotty cell service. When considering expansion of telecommunications services, UCSC should seriously consider broad coverage that would cover all Upper Campus. This is a safety issue for the general public and our UCSC student community.

Response S3-20

UC Santa Cruz acknowledges the commenter's opinion regarding on-campus cell service. This comment is noted but 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 S3-21**DLRDP 3.2 p.92 (& 3.3 pp.95-96/3.4 pp.100-105)**

Objective 1: During the 2005 LRDP period, the 19,500 FTE student enrollment figure identified in the 2005 LRDP was nearly reached and significantly outpaced the implementation of development identified in the plan that would enable UCSC to deliver on its mission of education and research. As a result, there has been a lack of classroom buildings, dormitory space, and other student resources that has impacted the quality of the UCSC student experience. A lack of funding and other resources has also led to increased impacts on campus natural lands, including the Campus Natural Reserve. Karen Holl, UCSC Professor of Environmental Studies, has proposed creating enrollment thresholds that are tied to specific development implementations and resource allocation, without which no further enrollment can occur. I support this idea and strongly encourage the campus to not grow its enrollment beyond its ability to support it---both with infrastructure and with the funding necessary to support programs that can ensure the sustainability of University support operations and effective land stewardship.

Response S3-21

UC Santa Cruz acknowledges the commenter's support for the establishment of enrollment thresholds as part of the LRDP. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary. However, please refer 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 S3-22**DLRDP 1.0 p.29**

Minor correction: Alex Krohn's job title is Assistant Director, Ken Norris Center for Natural History

Response S3-22

Page 29 of the 2021 LRDP document has been revised to incorporate the correct to Alex Krohn's job title.

Comment S3-23**DLRDP 2.0 p.36**

Aerial photo doesn't include the northern portion of Upper Campus (zooming out would allow for that). It would be useful to include the campus boundary on the image.

Response S3-23

This comment is noted but does not address the adequacy of the Draft 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.

Comment S3-24**DLRDP 2.1 p.37**

Capitalize "Tribal Band" at end of first paragraph, right column. The Land Acknowledgement is buried in this location and would be better to highlight earlier and larger.

Response S3-24

Page 37 of the 2021 LRDP document has been revised to include the requested edit. 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 S3-25**DLRDP 2.2 p.45**

Figure doesn't include Landels-Hill Big Creek Reserve, though I understand including it would dramatically change the scale of the map.

Response S3-25

This comment is noted but 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 S3-26**DLRDP 2.2 p.51**

Second paragraph, left column: "Campus Natural Reserve" (strike the "s" from Reserves).

Response S3-26

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, the 2021 LRDP document was revised to include the requested edit. 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 S3-27**DLRDP 2.2 p. 53**

First line right paragraph: There is a period missing after "(Festuca perennis)]"

Response S3-27

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, page 53 of the 2021 LRDP document was revised to include the requested edit. 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 S3-28**DLRDP 2.2 p.60**

Figure 2.16—in the Legend it says "Quartz Diorite (Graphite Rocks)" but I'm pretty sure it should say "Quartz Diorite (Granitic Rocks)"

Response S3-28

Page 60 of the 2021 LRDP document has been revised to include the requested edit. 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 S3-29**DEIR p. ES-48**

5th bullet point---"As noted in Mitigation Measures 3.5-2a and 3.5-2h"—it should say 3.5-2i, not 2h.

Response S3-29

Page ES-48 of the Draft EIR has been revised to correct the typo as follows:

- ▶ As noted in Mitigation Measures 3.5-2a and 3.5-2i, UC Santa Cruz may elect to pursue a comprehensive HCP, which shall be accomplished either by amending the Ranch View Terrace HCP or by incorporating and replacing the existing Ranch View Terrace HCP.

The above-listed revision 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 of the 2021 LRDP by the UC Regents for certification.

Comment S3-30

DEIR p. 3.5-21

Latin name for bank swallow is Riparia

Response S3-30

Page 3.5-21 of the Draft EIR has been revised on page to correct the typo as follows:

Bank swallow <i>Riparia riparia</i>	-	ST	Riparian scrub, riparian woodland. Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	<i>Not expected to occur.</i> There is one known historic (1950) occurrence of bank swallow approximately 1 mile east of the LRDP area, potentially associated with the San Lorenzo River (CNDDDB 2020). However, bank swallows are considered extirpated from Santa Cruz County (Remsen 1978).
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The above-listed revision 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 of the 2021 LRDP by the UC Regents for certification.

Comment S3-31

DEIR p. 3.15-11

- Last paragraph: "connecting...Spring Box Trail to Highway 9"---those are well off of UCSC property, on Pogonip, are they not?
- Missing a period after "North Campus" in that same paragraph. Sorry, can't help it.

Response S3-31

The statement on page 3.15-11 was revised as follows:

~~As shown on Figure 3.5-1, n~~New unpaved multi-use trail networks include east-west connections from Wilder Ranch State Park to Henry Cowell State Park and Pogonip City Park; and north-south trail networks through Moore Creek Preserve and the Great Meadow, connecting to the east-west trail network in the north campus. Additional trail improvements could include improved connections ~~ng~~ between the Spring Trail and ~~to~~ Spring Street within the LRDP area, ~~and Spring Box Trail to~~ The Spring Trail also provides pedestrian connection to Highway 9. Trail corridors that provide access to research areas would be limited to pedestrians only, such as Red Hill Road gravel fire road in the North Campus.

Page 2-25 was also revised for consistency:

Additional trail improvements could include improved connections ~~ng~~ between the Spring Trail and ~~to~~ Spring Street within the LRDP area, ~~and~~ The Spring Trail also provides pedestrian connection to Highway 9. Trail corridors that provide access to campus research areas could be limited to pedestrians only, such as Red Hill Road gravel fire road in the north campus.

The above-listed revisions do 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 of the 2021 LRDP by the UC Regents for certification.

Comment S3-32

Thank you for considering this long list of comments in your review of public comments for the Draft 2021 LRDP and EIR. I am happy to discuss any of these points further if desired.

Response S3-32

The comment provides a concluding statement and expresses appreciation for their consideration as part of the 2021 LRDP process. No further response is necessary.

Letter S4 University of California, Santa Cruz Natural Reserves

Gage Dayton, Admin Director
March 8, 2021

Comment S4-1

Thank you for the opportunity to provide comment and feedback on the DEIR and LRDP. Thank you also for your hard and thoughtful work that went into creating these documents. We greatly appreciate your collaborative approach in discussing ways to ensure we protect and enhance our natural resources and continue to support research and teaching on our natural lands. I feel that the focus of growth in and adjacent to developed areas (while maintaining contiguous open space) is a wise planning strategy. A direct result of your effort and thought that went into considering the importance and location of these natural and cultural "assets" is the increase of an additional approximately 380 acres to the Campus Natural Reserve.

While there will likely be modifications, I think that the plan does a good job of identifying important field teaching and research areas, sensitive species habitats, culturally important sites, and making sure that those areas are not included as developable lands as part of this LRDP. As you are well aware, I feel that it is time we provide permanent protection to these important outdoor research and teaching areas, protected species, and cultural areas. Below I have included some specific questions and comments to the DEIR and LRDP that I hope you will consider while drafting the final documents.

Response S4-1

UC Santa Cruz acknowledges the commenter's opinion on the project, the 2021 LRDP. See 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 S4-2

General comment on how expanded campus population can have significant impacts without triggering mitigation measures.

Expanded campus population without development can have direct impacts on environmental resources via increased use; however, without a development project, mitigation measures are often not required or implemented. An increased campus population has a direct impact on sensitive biological resources through increased use of undeveloped lands (both sanctioned [e.g. hiking and biking on fire roads, increased course and internship use, etc.] and unauthorized [e.g. creation and use of unauthorized trails, fire pits, dumping, etc.]). I think the DEIR should have specific conservation and management strategies/actions that are directly tied to campus population.

Response S4-2

The Draft EIR evaluates the potential physical environmental impacts associated with increases in campus population and on-campus development based upon projected growth. As noted in Chapter 2, "Project Description," the 2021 LRDP represents the physical development plan for the LRDP area through 2040 and does not specifically set enrollment targets/limits. Future projects considered for approval pursuant to the LRDP EIR will be subject to additional environmental analysis to evaluate specific impacts associated with each project at the time it is considered. Refer also to Master Response 9 regarding plan implementation and subsequent environmental review, including implementation of mitigation measures.

Regarding the potential increased use of undesignated trails, refer to Response S3-12. 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 S4-3**3.16 Transportation**

Figure 3.16-1 shows the vast network of informal and unauthorized trails throughout campus and surrounding areas; however, they are incorrectly identified as local streets. This should be changed to reflect that they are unauthorized trails (or whatever the appropriate title is). The impact of these trails is an example of how growth in campus population, without specific development projects, can have a potentially significant impact on environmental resources. I recognize that there are other groups that are using and creating these trails; however, it is our responsibility to steward and manage these lands.

Response S4-3

Figure 3.16-1 of the Draft EIR has been revised to address the comment. UC Santa Cruz acknowledges the commenter's issues with trails in the upper campus. Refer to Response S3-12 regarding the use of undesignated trails and the existing trail network on the main residential campus.

Comment S4-4**3.17-7 UC Santa Cruz Campus Sustainability Plan**

Campus sustainability plan Strategy 1.2 Action 1.2.B and 5.1.B for 2017-2022 specifically mentions creating a campus land use management plan. This plan is critical for a holistic approach to managing campus lands and I am glad to see it included in the DEIR. The plan needs to be campus wide and identify specific actions and methods for achieving them.

Response S4-4

UC Santa Cruz acknowledges the commenter's support for inclusion of Strategy 1.2 Action 1.2.B and 5.1.B of the Campus Sustainability Plan. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. 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 S4-5**3.18-9 Vegetation Management**

The vegetation management agreement with CalFire is a great example of a collaborative effort to manage campus lands to reduce wildlife risk and protect sensitive resources - this effort should be continued. However, the existing agreement is specific to a relatively small area of the campus (along Empire Grade, upper campus grasslands, and chaparral habitat). The effort should be expanded to consider fire risk and mitigation measures for the entire campus.

Mitigation measure 3.18-2 calls for the creation of a campus-wide vegetation plan two years post approval of the LRDP, this is an important step and commitment. It will be critical to not only address fire, biological, and ecological impacts of specific plan elements but to also clearly identify when and how it will be implemented.

Response S4-5

UC Santa Cruz acknowledges the commenter's support for Mitigation Measure 3.18-2. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. 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 S4-6**General comment about Arboretum and Campus Natural Reserve MOU**

We are working with the Arboretum on creating an MOU that maintains the Arboretum's longstanding management of the "jointly managed area" that would be designated as CNR in the 2020 LRDP.

Response S4-6

UC Santa Cruz acknowledges that UC Santa Cruz Natural Reserve staff are working with the Arboretum on a memorandum of understanding to jointly manage a small portion of the area north of the Arboretum identified as CNR in the 2021 LRDP. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. However, the 2021 LRDP will be revised to note that a small portion of the Campus Natural Reserve is jointly managed by the Arboretum and Natural Reserve staff. No further response is necessary.

Comment S4-7**Inclusionary Parcel D Table 2-3 and Employee Housing in general**

Page 2-15 states: "*However, a 12.5-acre parcel (Inclusionary Parcel D Preserve or Inclusion Area D) has an employee housing overlay, which would require an amendment to the existing Habitat Conservation Plan (HCP) for Ranch View Terrace if the parcel were to be developed in the future while also maintaining the conservation objectives of the HCP (e.g., no net loss of habitat and potential relocation to more appropriate habitat).*" I encourage reaching out to USFWS to discuss this option as are areas on campus where these two species occur that would be of higher conservation value. Placing housing, or other development, adjacent to the campus entrance and protecting higher quality and more intact habitat makes a lot of sense.

Response S4-7

UC Santa Cruz acknowledges the commenter's support for coordination with USFWS in the event that campus pursues development of faculty/staff housing at Inclusion Area D. UC Santa Cruz is in the process of coordinating with USFWS regarding potential areas of campus that may have higher conservation value. Refer to Master Response 12 regarding long-term habitat protection and UC Santa Cruz's intent to prepare a campus-wide HCP. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. 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 S4-8**Section 3.4-1: Tribal and cultural resources**

Mitigation measures 3.4.1 (Identify and protect unknown archaeological resources) and 3.4.2 (Protect tribal cultural resources).

The preferred method outlined in these mitigation measures, is avoidance and preservation - I agree completely. There are several very important and sacred cultural sites on campus that should be protected in perpetuity - these areas should not be developed and we should commit to permanently protecting them.

Response S4-8

UC Santa Cruz acknowledges the commenter's support for Mitigation Measure 3.4-1 and avoidance of sacred tribal cultural sites that may occur within the LRDP area. Please refer to responses to the comments from the Amah Mutsun Tribal Band (Letter O10) regarding Mitigation Measure 3.4-1 and the potential for tribal cultural resources within the LRDP area. Refer also to Master Response 12 regarding long-term habitat protection. 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 S4-9**3.5 Biological Resources Impact**

As with previous planning efforts, specific mitigation measures for impacts to species are project based rather than at a campus wide level. This approach makes it difficult to accurately assess and mitigate for cumulative impacts over time. Furthermore, it is based on development and is thus decoupled with increases in campus population. I feel a more appropriate approach to mitigate impacts to biological resources include:

1) Proactively engaging with resource agencies to explore the feasibility and benefits of an HCP. The DEIR mentions engaging with USFWS to discuss mitigation for specific projects as we have done in the past. This approach continues with the project by project mitigation that we, as a campus, have been following for the past several decades. An alternative approach is to engage in an HCP now that permanently protects resource rich areas of our campus, commits to management and stewardship of those areas (so that we can ensure resources are healthy and present going forward), and presents a more holistic way to managing our campus resources.

2) Create a campus habitat and resource management plan that ensures that specific mitigation measures are met and, importantly, that we take a proactive approach in resource management that helps minimize ongoing impacts (e.g. increased trails, camp fires, dumping, etc.) to our natural resources. We can accomplish this in a manner that increases support of our academic and research (e.g. the Coastal Science Campus and Younger Lagoon Reserve model).

Response S4-9

UC Santa Cruz acknowledges the comment's preference for proactive engagement with the resource agencies and a generally proactive approach to resource management within the LRDP area. The Draft EIR provides appropriate programmatic analysis of environmental conditions associated with 2021 LRDP implementation and the mitigation measures provided in the Draft EIR are intended to be applicable to various projects that may be proposed/considered as part of 2021 LRDP implementation. As a program-level analysis, the Draft EIR requires all projects under the 2021 LRDP to undergo project-level review, which requires site-specific analysis for future projects as the LRDP area builds out over time. Additionally, and as noted in Response S4-7, UC Santa Cruz is currently coordinating with USFWS regarding preparation of a campus-wide HCP as discussed in Master Response 12. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP and is noted. 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 S4-10

Mitigation Measures 3.5-2e

Calls for a Burrowing Owl Mitigation plan. Having a plan in place for this and other species that clearly articulates an approach for monitoring and protecting species would be useful. We should have a Campus Wildlife Management Plan as well as a Vegetation Plan.

Response S4-10

UC Santa Cruz acknowledges the commenter's preference for development of a campus wildlife management plan, as well as a vegetation plan, and to specifically have a monitoring and protection plan in place for Burrowing Owl and other species. As stated on pages 3.5-51 and 3.5-52 of the Draft EIR, Mitigation Measures 3.5-1a and 3.5-2e would require UC Santa Cruz to conduct reconnaissance or protocol-level surveys for individual projects under the 2021 LRDP to confirm whether the burrowing owls may occur and, if habitat suitable for burrowing owl is present within a project site, 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. Surveys and avoidance protocols would be conducted in accordance with Appendix D of the *CDFW Staff Report on Burrowing Owl Mitigation*. This comment does not address the adequacy of the Draft EIR analysis of potential impacts or of its mitigation measures associated with implementation of the 2021 LRDP and is noted.

Comment S4-11

Section 3.5.2 - Vegetation Communities

As you know, many of the acreages for vegetation communities were calculated at a very coarse scale and are not accurate. I think the 2005 LRDP maps represent a better, but still incomplete, estimate for campus natural lands. Rather than waiting to obtain accurate cover estimates when specific projects are initiated, it will be important that the Campus Habitat Management Plan (described in Mitigation measure 3.18-2) include a campus wide effort to assess actual vegetation community composition and coverage. Having an accurate and up-to-date map will enable

us to be more proactive in protecting resources and assessing potential project impacts early in the planning process before we are too heavily invested in a particular path.

Response S4-11

UC Santa Cruz acknowledges the commenter's desire for updated habitat mapping, which is included as part of implementation of Mitigation Measure 3.18-2. The comment is correct that the habitat information presented in the Draft EIR was based on publicly available information rather than campus-wide surveys, recognizing that this EIR is programmatic in nature and that the vegetation communities will require more fine-grained mapping when specific development is proposed. However, the current level of mapping is sufficient, at this scale, to identify the potential impacts of the 2021 LRDP as well as appropriate mitigation measures. No revisions or further response is necessary.

Comment S4-12

Permanent protection of the Campus Natural Reserve

Permanent protection of the Campus Natural Reserve would solve a lot of ongoing and future issues related to growth. Importantly, it would also provide permanent protection of research and teaching areas as well as our valued natural and cultural resources. Below are four of the many reasons why this is a good idea and why now is the time to do it.

1. It would ensure that our largest facility (our living laboratory and outdoor classroom) is available for research and teaching now and into the future. The Campus Natural Reserve hosts more individual students than any single built facility on our campus. It is used by all of our academic Divisions and over a dozen departments. It supports more undergraduate interns than any other unit on campus. Permanent protection would encourage and facilitate additional investment from faculty and spur additional research and academic use.

Response S4-12

UC Santa Cruz acknowledges the commenter's opinion that the Campus Natural Reserves should be permanently protected. Refer to Master Response 12 regarding long-term habitat protection. This comment does not address the adequacy of the Draft 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 S4-13

2. Campus Natural Reserve areas within the current draft LRDP boundary were in part chosen to protect sensitive biological resources. These sites include specific areas where protected species are known to occur as well as their upland habitat. Engaging with USFWS to create an HCP would ensure future protection and stewardship of these species while providing us with a clearer path forward for development. This approach is, in my opinion, a much more holistic and appropriate path forward as it prevents the need for project-by-project mitigation (which often miss cumulative impacts).

Response S4-13

UC Santa Cruz acknowledges the commenter's preference for creation of a campus-wide HCP in cooperation with USFWS. Refer to Master Response 12 and Response S4-9 regarding UC Santa Cruz's intent to prepare a campus-wide HCP. This comment does not address the adequacy of the Draft EIR analysis. No further response is necessary.

Comment S4-14

3. *"The land on which we gather is the unceded territory of the Awaswas-speaking Uypi Tribe. The Amah Mutsun Tribal Band, comprised of the descendants of indigenous people taken to missions Santa Cruz and San Juan Bautista during Spanish colonization of the Central Coast, is today working hard to restore traditional stewardship practices on these lands and heal from historical trauma."* Permanent protection of important archaeological and cultural sites and strengthening relations with the Amah Mutsun Tribal Band is simply the right thing to do. Doing so would make additional strides toward achieving the goals articulated in our Land Acknowledgment.

Response S4-14

UC Santa Cruz acknowledges the commenter's support for the protection of archaeological and tribal cultural sites that may occur within the LRDP area. Refer to Response S4-8. This comment 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 S4-15

4. The LRDP and DEIR recognize the value of open space for passive recreation. These open spaces are important campus and community resources. We are a community that values open space, recreation, and conservation. UCSC natural lands play an important role in all of those areas for the greater community.

Response S4-15

UC Santa Cruz acknowledges the commenter's support for preservation of open space for passive recreation opportunities. This comment 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 S4-16

Permanent protection of the Campus Natural Reserve as a UC Natural Reserve, combined with specific agreements and MOUs with groups and agencies such as USFWS and AMLT, is a mechanism to make this happen. There are other examples of UC Natural Reserves providing these functions and thus HCP and UC Natural Reserve designations are not exclusive of one another. I would greatly appreciate the opportunity to work with you to move this forward.

Response S4-16

UC Santa Cruz acknowledges the commenter's opinion that the Campus Natural Reserves should be permanently protected. 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 S5 California Coastal Commission

Colin Bowser, Coastal Planner

March 8, 2021

Comment S5-1

We received the above referenced Draft Environmental Impact Report (DEIR) for UC Santa Cruz's 2021 Long-Range Development Plan (LRDP). The LRDP would establish a framework for identifying land uses for academic, administrative, open space, housing, circulation, and other land uses at the Main Campus and at the Westside Research Park to support the University's academic mission through 2040. Less than five percent of the subject area is in the coastal zone. Pursuant to Section 30605 of the Coastal Act, the standard of review for the coastal zone components of the LRDP is the Chapter 3 policies of the Coastal Act.

Thank you for engaging with our office early in the environmental review process; doing so will help identify and address the proposed LRDP's potential impacts to coastal resources. As a preliminary matter, we continue to strongly support the University's efforts to protect its coastal resources while focusing on sustainably growing its campus within the community and its unique natural setting. The purpose of this letter is to identify potential Coastal Act consistency issues and propose avoidance and/or mitigation measures to address those issues during the CEQA review process. Our ultimate goal with this approach is to facilitate a streamlined environmental review process, including when the LRDP is submitted to the Commission for review.

Response S5-1

UC Santa Cruz acknowledges the comment which provides introductory information and the agency's understanding of their role and interest in the 2021 LRDP. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary.

Comment S5-2**Westside Research Park**

The DEIR states that over half of the Westside Research Park's land that is now designated for academic and support uses would be redesignated as mixed-use land for the purpose of building housing and commercial uses for University staff. In doing so, the housing and commercial site would be part of a "commuter mobility hub" and would have a "transit-oriented design." While future residents of any new housing in the Westside Research Park will use an array of transportation means, including cars, we emphasize the need to plan for car parking onsite for residents and commuting workers at the Research Park.

The Westside Research Park is located in the vicinity of Delaware Avenue. Delaware Avenue provides public street parking for several nearby outdoor recreation areas, such as Natural Bridges State Beach, the popular coastal bike trail on the City's westside, Antonelli Pond, and the public access trails at the Marine Science Campus. This onstreet parking is a critical component in providing public access for visitors to these recreation areas, and such public access is a priority under the Coastal Act. Thus, the Westside Research Park should provide sufficient onsite parking for Westside Research Park residents and commuters to ensure that the public parking along Delaware Avenue remains open and available for general public access use.

Response S5-2

As noted on page 2-17 of the Draft EIR, new residential (and mixed-use) land uses would include on-site parking to serve the uses. The degree of parking provided will be determined on a project-by-project basis and in accordance with transportation-demand-management and sustainability goals that are also aimed as State policies to reduce VMT. No further response is necessary.

Comment S5-3**Main Campus**

Coastal Act Section 30240 requires that environmentally sensitive habitat areas (ESHAs) be protected and that only resource-dependent uses, e.g. trails, are allowed in ESHA. Typically, the Commission has required buffers for development that is adjacent to ESHA. A portion of the new multi-story staff housing complex located on the western side of Empire Grade is located in the coastal zone, as is some of the proposed new natural gas pipeline tentatively planned to be located on the west side of Empire Grade extending from the southwestern part of the lower campus to the west side of the upper campus. A DEIR biological resources report map shows that proposed new housing development would be in an area with habitat suitable for a variety of sensitive species, including protected species such as Ohlone tiger beetles and California red-legged frogs. Per Coastal Act Section 30240, any such development in the coastal zone, i.e. housing and pipeline development, must be located outside of any such ESHA, and appropriate buffers must be required to protect adjacent ESHA.

Response S5-3

As development is proposed under the 2021 LRDP, UC Santa Cruz would evaluate potential buffers and/or other site-specific considerations (including applicable regulatory requirements) related to the placement of on-site structures so as to minimize, to the extent feasible, off-site impacts to nearby sensitive resources. No development is currently proposed west of Empire Grade, although some utilities within Empire Grade may be replaced/upsized as part of the 2021 LRDP. Nonetheless and as necessary, UC Santa Cruz would coordinate with the Coastal Commission for any development activities that could affect areas within the Coastal Zone as they are proposed during implementation of the 2021 LRDP.

Comment S5-4

Coastal Act Section 30251 protects important public views, including views of the meadow as seen from a variety of viewpoints in the City and County. The DEIR does not provide information on the proposed housing complex's exact size, location, and other important design and site details. This information is necessary to determine if the LRDP can be found consistent with the view protections required in Coastal Act Section 30251, especially with respect to important coastal views from Empire Grade (which is designated as a scenic road in Santa Cruz County's LCP) and views of the meadow along Empire Grade. Please provide more information on the housing complex's design,

planned location, site characteristics such as slope and geotechnical stability, and alternative locations considered in the main campus area for the housing complex.

Response S5-4

The Draft EIR provides program-level information regarding the currently envisioned development, including a view simulation of potential development in the area as seen from Empire Grade. Refer to Figure 3.1-15 on page 3.1-27 of the Draft EIR. As shown in this viewpoint, views of the meadow along Empire Grade are anticipated to be maintained and the potential development would be largely obscured by existing topography and vegetation. However, the program-level evaluation of the envisioned development, as shown in this simulation, reflects preliminary design. The exact size, location, and other design elements are not yet known. As appropriate, UC Santa Cruz would provide additional information as design and planning of housing within the main residential campus progresses and undergoes project-level analysis.

Comment S5-5

Finally, the DEIR describes that additional freshwater supply for projects envisioned under the LRDP will be provided by new or expanded ground wells that would draw drinking water from the nearby karst aquifer. Please describe how the planned for amount of water withdrawn from the karst aquifer would affect seasonal flows in nearby springs and streams that provide valuable habitat for a range of plant and animal species. In addition, please describe how climate change may affect how the aquifer recharges, especially given the potential for continued droughts over time, and how that will affect the aquifer.

Response S5-5

It is important to note that the Draft EIR evaluates the use of groundwater supplies as a potential alternative water supply, such as to reduce the demand for water from the City or in the event that the City does not provide water to some portions of the campus. Section 3.10, "Hydrology and Water Quality" includes an assessment of water supplies within the aquifer in question and determines a preliminary sustainable yield, which is reflected in the EIR's analysis. Refer also to Master Response 10 for additional information (evaluation of potential impacts by water year type).

Comment S5-6

Thank you for considering these comments as you refine the DEIR and continue the process of planning for UCSC's careful expansion. Please do not hesitate to contact me at the address and phone number above if you would like discuss any of these comments.

Response S5-6

The comment provides a closing statement and future contact information. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary.

Letter S6 California Department of Transportation, District 5

Chris Bjornstad, Associate Transportation Planner

March 8, 2021

Comment S6-1

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the UC Santa Cruz LRDP. The LRDP projects up to 28,000 Full-Time Equivalent (FTE) students and 5,000 FTE faculty, construction of an additional 3.1 million assignable square feet (asf) of academic and support building space, and approximately 2.5 million asf of student and employee housing space by 2040.

Response S6-1

The comment provides introductory information and the commenter's understanding of the primary components of the 2021 LRDP. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary.

Comment S6-2

1. Caltrans supports planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with our State partners and local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure are supported by Caltrans and are consistent with our mission, vision, and goals. To this point, UC Santa Cruz has an excellent opportunity to increase multi-modal use by improving its internal and external circulation through completion of pedestrian linkages/sidewalks and bicycle infrastructure on and adjacent to the campus.

Additionally, a great opportunity presents itself for UC Santa Cruz to partner with Santa Cruz Metro Transit District (SCMTD) to improve services to/from and around campus. The proposed LRDP would provide a framework over the next few decades to guide campus development student growth, and meaningful off-site multimodal improvements to address project specific impacts of the student population.

Response S6-2

UC Santa Cruz acknowledges Caltrans' support for the LRDP's consistency with State planning priorities and, incorporation of multimodal transportation enhancements, including a potential partnership with Santa Cruz Metro Transit District. This comment 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 S6-3

2. We appreciate the vehicle miles traveled (VMT) study developed for the LRDP includes many proposed transportation demand management (TDM) and parking management strategies as mitigation measures. That being said, this programmatic EIR will serve as a foundation for subsequent projects on campus. Caltrans believes the EIR should and can more strongly commit to the TDM mitigation strategy discussed in the transportation section in the EIR. There should be a more robust discussion of which mitigations are realistic, and a timeline for how and when they will be implemented. Additionally, funding sources and partner agencies should be more identified.

Response S6-3

As noted in Mitigation Measure 3.16-2 in the Draft EIR, UC Santa Cruz is required to prepare and implement a TDM program that reduces total campus VMT per capita and total employment VMT per employee to establish thresholds, which are 15 percent below baseline. The mitigation measure identified data sources to measure conformance to the stated VMT targets, required annually, and provides a list of TDM measures that are currently implemented and those proposed by the 2021 LRDP. If annual monitoring shows that the campus is not meeting the stated VMT thresholds, then UC Santa Cruz would be required to identify additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years. This allows the campus to document the effectiveness of its TDM Program on an annual basis and implement additional or enhanced TDM measures that will directly reduce campus VMT to the established thresholds (or below the thresholds). The TDM Program Elements in Mitigation Measure 3.16-2 include implementation timelines (Level 1 and Level 2) and identifies measures that require agency partnerships. UC Santa Cruz will develop the required TDM program, and adopt and initiate program implementation details within one academic year of LRDP approval, including timing, fund sources and potential partnerships to support delivery of specific TDM measures,

Comment S6-4

3. The only mitigation measure listed in the transportation section is implementing a TDM program and monitoring the program in order to lower project VMT below the significance threshold of 15% below baseline total VMT. However, the threshold is not guaranteed to be met even with the TDM program. Therefore, additional

mitigation measures pertaining to project safety and operational impacts to the State Highway System {SHS} could be required.

Response S6-4

As discussed in Impact 3.16-1, the 2021 LRDP already incorporates a number of multimodal transportation enhancements, including modifications and design for roadway, transit, pedestrian and bicycle facilities. As noted in Mitigation Measure 3.16-2 in the Draft EIR, the identified list of TDM measures is a potential list that is not limited to just those listed. The mitigation measure also includes detailed monitoring mechanisms and performance standards for campus-wide VMT to confirm that, with the implementation of the UC Santa Cruz's TDM plan, the VMT average of the campus remains below the significance threshold. If the annual monitoring shows that UC Santa Cruz is not meeting the required VMT thresholds, then the campus will be required to implement additional TDM considerations, which could include those listed in Mitigation Measure 3.16-2 or others that would address campus VMT. Therefore, the TDM Program, implemented per Mitigation Measure 3.16-2, is expected to be effective at addressing the identified VMT impacts and no further measures are identified. As a result and in addition to the multimodal improvements inherent to the 2021 LRDP that would reduce VMT, the project is unlikely to result in operational impacts on the State Highway System. For example, the 2021 LRDP includes a program of on-campus student and employee housing, which would help lower per capita VMT. With respect to safety and operations, the UC Facilities Manual requires UC Santa Cruz to comply with the Title 24 California Building Standards Code, Parts 1-12, and all amendments to provide clear and safe access to and from UC Santa Cruz facilities and ensure that ripple effects to the State Highway System do not occur. To the extent indicated in the UC Facilities Manual, UC Santa Cruz would also comply with state of the practice roadway design guidance such as the Caltrans Highway Design Manual and the California Manual on Uniform Traffic Control Devices.

Comment S6-5

4. Due to the impacts on the SHS from increases in enrollment and employment Caltrans encourages UC Santa Cruz to contribute to projects listed in the Santa Cruz County Regional Transportation Plan (RTP). Funding local transportation projects can assist in mitigating the increased operational and safety impacts to the SHS due to the significant VMT added from the LRDP.

Response S6-5

While RTP projects are not specifically identified in Mitigation Measure 3.16-2 in the Draft EIR, the mitigation measure does identify several TDM measures that are consistent with those identified in the 2040 RTP, such as:

- ▶ Work with local agencies to implement a series of off-campus bike circulation improvements (bike boulevards, secure bike parking at major transit stops, etc.).
- ▶ Work with appropriate agencies to identify and develop a Westside Santa Cruz multi-modal hub, to connect Westside shuttle service with expanded automobile and bike parking and (ultimately) regional access via the adjoining rail right-of-way.
- ▶ Work with appropriate agencies to identify and develop remote Park & Ride facilities with transit service

Mitigation Measure 3.16-2 includes a program measure for additional transit that would add express service from major regional destinations or provide fair share contribution to regional mass transit improvements. Additionally, UC Santa Cruz has a number of projects listed in the RTP, will continue to participate and identify projects for inclusion in future RTPs, and invites Caltrans to coordinate and identify transportation projects that have the potential to mutually reduce VMT and improve operations and safety to the SHS within the region. If, through the TDM Program monitoring it is determined that the campus is not able to meet the established VMT thresholds with UCSC-controlled TDM measures and improvements, the campus could consider contributions to RTP projects that are most likely to address campus VMT; though the focus of the TDM Program is to implement UCSC controlled measures first.

Comment S6-6

5. Please consider contributing funding to projects that will lead to fewer impacts along State Route (SR) 1 intersections based upon local concerns at the DEIR Scoping Sessions. The intersections with known operational

issues were located at Bay Street, High Street, and Western Drive. Examples from the RTP designed to reduce congestion on SR I include Bus Rapid Transit and the Hwy 1-West Area Alternative Access project.

Response S6-6

The transportation impact analysis for the 2021 LRDP was conducted consistent with CEQA requirements and does not include level of service (LOS) for impact determination. With revisions associated with SB 743, CEQA specifically precludes the finding of significant environmental impact based on LOS, this it would be directly contrary to CEQA's mandate to impose mitigation based on LOS; thus, the Draft EIR does not identify any improvements that would address intersection operations. While these projects are not specifically identified in Mitigation Measure 3.16-2 in the Draft EIR, the mitigation measure does identify several measures that are consistent with those identified in the 2040 RTP. Regarding the contribution of funds to projects along SR 1, as detailed in the 2021 LRDP and Draft EIR UC Santa Cruz supports transportation improvements that would result in an overall decrease to VMT, and have the potential to also improve intersection operations and safety. Please also refer to Response S6-5, regarding RTP projects.

Comment S6-7

6. Additionally, please contemplate contributing to RTP local bicycle, pedestrian, and transit projects as a part of the UC Santa Cruz TDM strategy to lower VMT by providing transportation alternatives. Many additional opportunities exist to further supplement the LRDP Project Characteristic of enhancing alternative transportation opportunities and increasing connectivity within the campus and to the city. Project examples in the RTP include the Bikes on Buses Expansion project and the Bike Parking Subsidy Program.

Response S6-7

While these projects are not specifically identified in Mitigation Measure 3.16-2 in the Draft EIR, the mitigation measure does identify several measures that are consistent with those identified in the 2040 RTP. Please also refer to Response S6-5, regarding RTP projects.

Comment S6-8

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or email christopher.bjornstad@dot.ca.gov.

Response S6-8

The comment provides a closing statement and future contact information. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary.

2.1.1 Local/Regional

Letter L1 Santa Cruz Task Force on UCSC Growth Plans

January 11, 2021

Comment L1-1

NOW IS THE TIME TO ACT

THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) &
DRAFT LONG RANGE DEVELOPMENT PLAN HAVE BEEN RELEASED

View The Documents

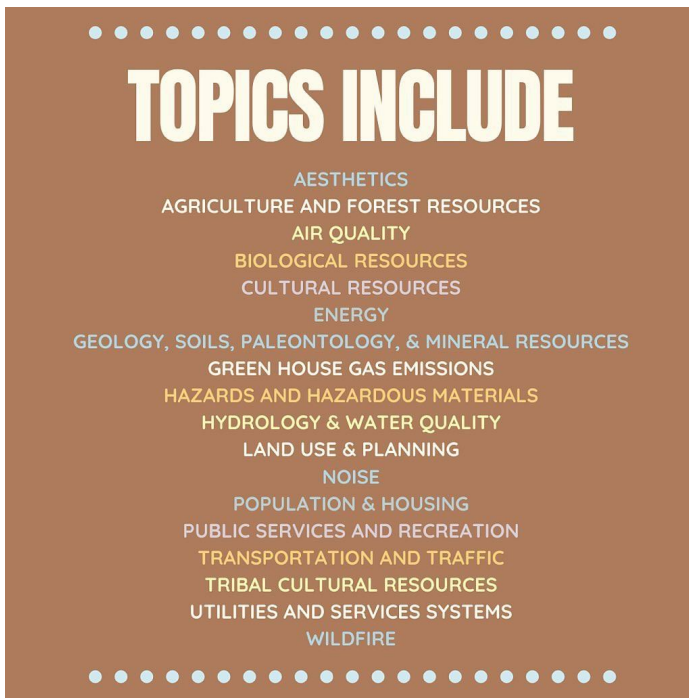
View the Draft Long Range Development Plan and Draft Environmental Impact Report (Volume 1 & Volume 2).
Explore the UCSC LRDP website here.

Get Involved

These documents are long (2,000+ pages), filled with legal-jargon, and make references many documents. We know that even for those incredibly dedicated and passionate about responsible UC growth, the task of reading through and proposing comments & alternatives can be intimidating. **Join your neighbors and peers in a topic-specific DEIR working group that will do that work collaboratively to evaluate the adequacy of the University's plans and provide written responses to the University.**


View the sections that will be covered by the university and sign up for a working group here. *(Note: your email will only be recorded if you choose to sign up for a working-group.)*





...and more!

Sign-up soon as groups will be planning their initial meeting shortly.

 **Upcoming Events**

February 2021: Draft EIR Public Hearings

- FEB
3

5-7PM
Information for Zoom Meetings will be posted by
February 1
- FEB
4

5-7PM
Information for Zoom Meetings will be posted by
February 1

Mark Your Calendar

February 3rd @ 5:00pm (zoom link TBD)

February 4th @ 5:00pm (zoom link TBD)

Under the 2020-40 LRDP the University will continue to grow faster than the City and the impacts of this growth will overwhelm the City’s housing, streets, and infrastructure.

As UCSC prepares the 2020-2040 Long Range Development Plan (LRDP), Santa Cruz cannot afford for history to repeat itself. Given the dueling and serious crises facing our community, we demand that UCSC enters a **legally-enforceable agreement** to:

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;
2. house any additional students, faculty, and staff on campus, and;
3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing Measure U)

WHAT INFO MUST UCSC INCLUDE IN THE LRDP EIR?

- A PROJECT DESCRIPTION
- AN ENVIRONMENTAL SETTING DESCRIPTION
- AN OUTLINE OF THE SIGNIFICANT ENVIRONMENTAL EFFECTS
- DESCRIBE THE UNAVOIDABLE SIGNIFICANT ADVERSE EFFECTS
 - THE GROWTH-INDUCING IMPACTS
 - THE CUMULATIVE IMPACTS
- MITIGATION MEASURES
- ALTERNATIVES
- THE FINAL EIR CONTAINS RESPONSE TO PUBLIC COMMENTS

TIPS FOR YOUR EIR COMMENTS

- EFFECTIVE COMMENTS ARE SUBSTANTIVE:
 - **THEY ADDRESS SPECIFIC IMPACTS**, POINT OUT ERRORS, INCONSISTENCIES, OMISSIONS OF DATA OR ANALYSES, CONCLUSIONS NOT BASED ON EVIDENCE, OR FAILURES TO PROVIDE DISCUSSION REQUIRED BY CEQA
- COMMENTS SHOULD BE BACKED BY FACTUAL SUPPORT OR PERSONAL EXPERIENCE
- UCSC MUST RESPOND ADEQUATELY TO SUBSTANTIVE COMMENTS PRIOR TO CERTIFICATION OF THE EIR

**UCSC must
respond to
substantive
comments>
before the EIR
is certified.**

FAILURE TO DO SO PROVIDES BASIS FOR LEGAL
CHALLENGE.

**SHARE
YOUR
COMMENTS
&
CONCERNS
WITH US.**

EMAIL US AT INFO@ACTONUCSCGROWTH.ORG WITH
HOW UCSC GROWTH WILL IMPACT YOU.

Response L1-1

The comment references the 2021 LRDP and EIR, as well as the associated public hearings. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Letter L2 Santa Cruz Task Force on UCSC Growth Plans

January 14, 2021

Comment L2-1

TIPS TO MAKE YOUR COMMENTS ON THE EIR MORE EFFECTIVE

Get Prepared

- Read the EIR (volume 1 & volume 2) - or just read strategically those subsections related to your interests/concerns;
- If you can, search online for articles, studies, reports, and even contact organizations that support or have expertise in subjects relating to your initial concerns;
- Look at the Executive Summary's impact table for environmental categories discussed;
- Outline/organize your letter (introduction, comments, conclusion, address, title of project, and attachments);
- Visit affected locations or use Google Maps to view the proposed project sites. Even if you know the area, refresh your memory;
- Decide on the main comment(s) or theme to express in your letter;
- **Questions to consider while reading:**
 - Does the EIR ask the right questions?
 - Does it provide enough information to describe the likely impacts of a project?
 - Is the EIR identifying and analyzing the feasible alternatives?

Write Your Comments

- Objectively evaluate the project, present your comments in a neutral tone, and be VERY specific. **Generalities can be dismissed with generalities.**
- Separate your concerns into clearly identifiable paragraphs or headings and keep a tight focus on each separate issue. Don't mix topics.
- Avoid saying "I support the UCSC growth, but..." – **just list your concerns, or your letter may be classified as a letter of support.**
- Consider ways to avoid impacts or enforceable ways to reduce the severity of impacts.
- Quantify your objections whenever possible
 - If a potential significant impact has not been adequately identified; **or**
 - If no mitigation has been proposed for a potentially significant impact; **or**
 - If the mitigation proposed doesn't appear to be sufficient or appropriate, **then:**
 - Whenever possible, present facts or expert opinions. If not, provide personal experience or your personal observations. Don't just complain.
 - Focus on correcting their discrepancies, lapses in logic, lack of evidence, old data, etc Include suggestions for making the Draft EIR better or offer specific alternatives and describe how your comments meet the requirements of the project and CEQA. Your goal should be to write something that causes them to respond in a future document based on the evidence you have given.

- Point out any inconsistencies in the document or the data. Point out outdated information or errors in logic. Focus on the sufficiency of the EIR in identifying and analyzing the possible impacts of the project on the environment and feasible alternatives.
- State your comment(s) with specifics and include attachments. Ask substantive questions.
- Whenever possible, present facts or expert opinions. If not, provide personal experience or your personal observations. **Don't just complain.**
- Focus on correcting their discrepancies, lapses in logic, lack of evidence, old data, etc
- Include suggestions for making the Draft EIR better or offer specific alternatives and describe how your comments meet the requirements of the project and CEQA. **Your goal should be to write something that causes them to respond in a future document based on the evidence you have given.**
- Point out any inconsistencies in the document or the data. Point out outdated information or errors in logic. Focus on the sufficiency of the EIR in identifying and analyzing the possible impacts of the project on the environment and feasible alternatives.
- State your comment(s) with specifics and include attachments. Ask substantive questions.

Send Them In!

Deadline: 5:00 pm on Monday, March 8th, 2021

Email your comments to eircomment@ucsc.edu

- Send your comments in as early as possible, so UCSC has time to consider your concerns.
- Address your comments to:

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

- Mention your expertise/experience briefly and **include a return address**
- If you are submitting on behalf of an organization, include the name of a contact person who would be available for questions or consultation along with your comments.
- Write a comment that includes a valid name and address. Submit it before the deadline. **Keep a copy of your comments.**
- If you would like, send a copy to the City-County Task Force via email at info@actonucscgrowth.org.

Content: Disclaimer: This information is intended to serve as a guide and is not intended to be legal advice. Please seek professional help from a lawyer if you have legal questions or concerns.

Sources: 1) Quick Tips for Effective EIR Comments, 2) How to Effectively Participate in the Environmental Review Process By Chatten-Brown & Carstens, Santa Monica, CA Website

Upcoming Events

February 2021: Draft EIR Public Hearings

FEB 3 5-7PM
Information for Zoom Meetings will be posted by February 1

FEB 4 5-7PM
Information for Zoom Meetings will be posted by February 1

Attend The Public Meetings

February 3rd @ 5:00pm (zoom link TBD)

February 4th @ 5:00pm (zoom link TBD)

What We Want

As UCSC prepares the 2020-2040 Long Range Development Plan (LRDP), Santa Cruz cannot afford for history to repeat itself. Given the dueling and serious crises facing our community, we demand that UCSC enters a **legally-enforceable agreement** to:

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;
2. house any additional students, faculty, and staff on campus, and;
3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing Measure U)

Response L2-1

The comment references the 2021 LRDP and EIR, associated public hearings, and tips for writing EIR comment letters from the Santa Cruz Task Force. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Letter L3 Santa Cruz Local Agency Formation Commission

Joe A. Serrano, Executive Officer
February 3, 2021

Comment L3-1

Thank you for this opportunity to comment on the Draft Environmental Impact Report ("EIR") for the University's Long Range Development Plan ("LRDP"), which is expected to replace the current version that was established back in 2005. The proposed 2021 LRDP envisions adding 8,500 student housing beds, up to 550 employee housing units, and approximately 3.1 million assignable square feet of academic and administrative building space. These developments are scheduled to be built within the campus area. However, it appears that five development projects are located outside the City of Santa Cruz's jurisdictional and sphere boundaries (refer to attached Vicinity Map). These boundaries are designated by the Local Agency Formation Commission of Santa Cruz County ("LAFCO"). Pursuant to State law, development of currently unincorporated territory would be subject to LAFCO's approval for the delivery of municipal services, such as water, at a future date.

Under the California Environmental Quality Act ("CEQA"), LAFCO is a Responsible Agency for this proposal, and will have regulatory authority towards future applications involving boundary changes for the delivery of municipal services. It is in this role that LAFCO is commenting on the Draft EIR.

Response L3-1

Please refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP.

Comment L3-2**1. Conformance to State LAFCO Law and Locally Adopted LAFCO Policies**

(Please provide an analysis in the Draft EIR)

LAFCO's statutory authority is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). Among LAFCO's purposes are: discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances (Government Code Section 56301). The Cortese-Knox-Hertzberg Act identifies factors that must be considered, and determinations that must be made, as part of LAFCO's review of boundary changes requesting the delivery of municipal services.

These state law provisions provide the statutory basis for LAFCO's locally adopted Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization ("LAFCO Policies") which guide LAFCO's review and consideration of requests for annexation and other boundary changes. The full text of the LAFCO Policies is available on LAFCO's web site: <https://www.santacruzlafco.org/policies-rules/>.

If the LRDP is approved, LAFCO will likely be requested to consider the approval of one or more applications requesting the delivery of municipal services for any of the five development projects located within unincorporated territory, in accordance with the Cortese-Knox-Hertzberg Act and local LAFCO policies. As a CEQA Responsible Agency, LAFCO would like to use the University's environmental document to fulfill CEQA clearance for such applications, and to support the evaluation of the proposal's consistency with the applicable LAFCO laws and policies, including the "LAFCO Water Policies" and "Standards for Evaluating Proposals." Such policies are included in this letter (refer to **Attachment 2**).

LAFCO requests that the Draft EIR evaluate the service provisions of all municipal services, specifically those development areas within unincorporated county land. The Draft EIR should also include an analysis of the LRDP's conformance to the full range of LAFCO's adopted policies and related state laws, to the extent such analysis is possible based on information currently available about future development in unincorporated territory.

Response L3-2

The approvals listed in this comment are not required for the 2021 LRDP; accordingly, LAFCO is not a responsible agency with regard to the LRDP EIR. As stated on page 3.17-5 of 2021 LRDP Draft EIR:

UC Santa Cruz does not believe that further compliance with state or local laws, including approval by the Local Agency Formation Commission (LAFCO), is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County.

At the time of the founding of the Santa Cruz campus, the City, the County of Santa Cruz and the UC Regents entered into agreements that include water-service commitments by the City to the Santa Cruz. Specifically, under a contract dated January 8, 1962 ("1962 Contract"), the City agreed to provide water service to the Santa Cruz Campus, including the portion of the campus that is situated outside the City's boundaries, in exchange for the UC Regents' agreement to locate its new campus in Santa Cruz. Section 6 of the 1962 Contract provides:

As may be necessary to provide for campus development, City shall provide, at no expense to University, any and all water lines and sanitary sewer lines up to the boundaries of said Campus Area...

Maps identifying the geographic boundaries of the new Santa Cruz campus were attached to the 1962 Agreement, and the Campus boundaries have not materially changed since it was executed. On February 8, 1965, after the City had taken steps to develop supplies to serve the Santa Cruz campus, the City and the UC Regents entered into another contract, which clarified and reaffirmed the terms of the 1962 Contract ("1965 Contract"). The 1962 and 1965 Contracts obligate the City to provide the entire UC Santa Cruz Campus, including the North Campus and other areas outside the City boundary, with water service.

The LAFCO process is not required or necessary for the City to provide water services under its obligations to the UC Regents. Government Code section 56133 in the Cortese Knox Act generally requires, with certain exceptions, LAFCO approval before a city can provide “new or extended services” outside its jurisdictional boundaries. However, there is a grandfathering exemption in subsection (e) of the statute, which provides that “[t]his section does not apply to an extended service that a city or district was providing on or before January 1, 2001.” That grandfathering provision is applicable here and, thus, LAFCO has no jurisdiction over the City’s obligation to provide water to the University.

In summary, because the City is legally obligated to provide water to the campus in its entirety, and has been doing so since the campus was first constructed, no LAFCO application is required to serve developments contemplated under the LRDP.

Further, local Santa Cruz LAFCO policies do not apply to the University in connection with the 2021 LRDP. As noted in Section 3.0.1 on page 3-1 of the 2021 LRDP Draft EIR, the University is a constitutionally created State entity.

Therefore, it is not subject to municipal regulations of local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of the university’s educational purposes. While UC Santa Cruz may consider, at its discretion, aspects of local plans and policies of the communities surrounding the 2021 LRDP area, it is not bound by those plans and policies in its planning efforts. Please refer to subsection “2008 Cooperative Settlement Agreement”, Master Response 2 regarding the 2008 Comprehensive Settlement Agreement terms related to LAFCO.

The 2021 LRDP EIR evaluates the environmental impacts of all development proposed under the 2021 LRDP, including development on unincorporated property, as well as the impacts of providing municipal services to those developments.

Comment L3-3

A more detailed, site-specific, and updated analysis to LAFCO laws and policies should also be anticipated as a required part of subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO. Addition of this information in current and future CEQA documents will help ensure that the Commission will have adequate information to act in its role as a CEQA Responsible Agency when future boundary changes for areas within the LRDP are submitted to LAFCO.

Response L3-3

Please refer to Response L3-2 regarding applicability of LAFCO laws and policies to the 2021 LRDP. The content of CEQA documents prepared for future, subsequent projects under the 2021 LRDP will be determined at the time those projects are proposed and considered for approval.

Comment L3-4

2. Consideration of Governance Options

(Please evaluate the proposed governance options)

Generally, LAFCOs were created to identify the most logical service providers for municipal services, including but not limited to water, sewer, fire, road maintenance, etc. Such determinations can be accomplished through various changes of organizations such as annexations, consolidations, and approvals of extraterritorial service agreements. These governance options allow cities, special districts, and county governments to provide municipal services to landowners throughout the county.

While the majority of the developments in the LRDP are already in the City of Santa Cruz, there are five development projects that are not. In order to comply with state law and local policies, LAFCO has identified four governance options for consideration by UCSC (refer to **Table A** on page 3).

Table A: List of Potential Governance Options

Options	Things to Consider	Benefits
1) Focus on developments within the city limits of Santa Cruz	Based on the 2021 LRDP, developments within the campus will be located in both the City of Santa Cruz and unincorporated county territory. State law requires UCSC to receive LAFCO approval in order to receive municipal services, such as water, from for areas outside City limits.	Under this scenario, UCSC will not need LAFCO approval if their proposed developments are all within City limits.
2) Consider an extraterritorial service agreement with the City of Santa Cruz	Based on the 2021 LRDP, there are 5 development areas that are located outside the City's jurisdictional and sphere boundaries. Such discrepancy would require LAFCO approval.	Under this scenario, UCSC can request an extraterritorial service agreement from LAFCO if it meets the statutory criteria outlined in GCS 56133 and the Commission's adopted policies. If so, this would allow the City to provide services, such as water, to the 5 areas without amending its City limits.
3) Consider annexation of the 5 areas into the City of Santa Cruz	Based on the 2021 LRDP, there are 5 development areas that include construction of new buildings and roadways, which are located outside the City of Santa Cruz.	Under this scenario, UCSC can request annexation of the 5 development areas to the City of Santa Cruz. This would allow UCSC to complete its LRDP within the City without building in two different jurisdictions.
4) Consider annexation of the remaining campus area outside the City of Santa Cruz	Based on the 2021 LRDP, the main campus includes approximately 2,000 acres. 1,059.60 acres are within the City of Santa Cruz, and the remaining 979.96 acres are located in unincorporated county territory.	Under this scenario, UCSC can request annexation of the campus not in the City of Santa Cruz. This will allow the City to provide municipal services for any future developments to the entire campus without additional LAFCO approval.

Response L3-4

Please refer to Response L3-2 regarding applicability of LAFCO laws and policies to the 2021 LRDP. Also, note that none of the scenarios described in the comment alter the environmental impacts of the project.

Comment L3-5**3. Conformance to the County Urban Services Line (USL)**

(Please address the LRDP's consistency with the USL)

Please include in the Draft EIR an analysis of the LRDP's consistency with the established USL, which does not appear to be discussed in the Draft EIR. The County of Santa Cruz's ("County") General Plan require the County to preserve a distinction between urban and rural areas, to encourage the location of new development in urban areas, and to protect agricultural land and natural resources in rural areas. These policies are supported by the establishment of a

rural services line (“RSL”) and the USL to define areas which are or have the potential to be urban and areas which are and should remain rural. The establishment of distinct urban boundaries serves the following purposes:

- a) To administer separate urban and rural growth rates and the allocation of residential building permits;
- b) To encourage residential development to locate in urban areas and to discourage division of land in rural areas;
- c) To develop and apply different policies governing urban and rural development;
- d) To provide a basis for a County’s Capital Improvements Program;
- e) To coordinate planning for the public services among the County, cities, special districts, and the LAFCO;
- f) To ensure that urban development proceeds at a pace consistent with the provision of urban public services; and
- g) To limit the extension of urban services to those areas within the rural services line in the Coastal Zone.

Implementation of the LRDP may require revisions to the established USL. Because such revisions would likely involve the potential for future sphere amendments or other boundary changes, and would directly pertain to LAFCO’s legislative purposes, LAFCO would like to have a role in any future modifications to the established USL.

Thank you again for this opportunity to comment on this important document. Please continue to keep us informed throughout your process. I would be happy to meet with you and your staff for more detailed discussions.

Response L3-5

State CEQA Guidelines Section 15125(d) requires an EIR to “discuss any inconsistencies between the proposed project and applicable (emphasis added) general plans and regional plans.” Appendix G(IX)(b) of the State CEQA Guidelines states that a significant impact would occur if a project would “conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project... adopted for the purpose of avoiding or mitigating an environmental effect.” As a state agency, UC Santa Cruz is not subject to municipal regulations of local governments for uses on property owned or controlled by the university that are in furtherance of the university’s educational purposes. Accordingly, UC Santa Cruz is not required to comply with or demonstrate consistency with County General Plan and policies with regard to the 2021 LRDP.

Letter L4 County of Santa Cruz, Board of Supervisors

Ryan Coonerty, Supervisor
February 12, 2021

Comment L4-1

I am writing today to encourage UC Santa Cruz to consider designating the UCSC Campus Natural Reserve as a permanent addition to the UC Natural Reserve System during the current Campus LRDP process.

As you know, UCSC and the Santa Cruz community have a long history of working together to benefit both the wider Santa Cruz community as well as the students and staff on campus. Since the establishment of the University, the UCSC campus has provided a wide array of recreation and learning opportunities for our community, particularly our K-12 students. Our community benefits from the outdoor recreation opportunities the Reserve provides; our experiences over the past year with COVID isolation have only further highlighted the need for access to nature and open spaces to maintain our community well-being. Additionally, the UCSC Campus Reserve plays a valuable role in protecting threatened wildlife and ecosystems while at the same time educating the public about their importance.

While I understand that the LRDP process intends to extend the current campus reserve designation, incorporating UCSC’s Natural Reserve into the UC Natural Reserve System would assure that the Reserve’s positive contributions extend far into the future, and will benefit the campus and the community for years to come.

Thank you for your consideration of this request.

Response L4-1

UC Santa Cruz acknowledges the opinion on the project, the 2021 LRDP, which does not address the adequacy of the EIR analysis. Refer to Master Response 12 regarding the potential for long-term habitat protection within the LRDP area.

Letter L5 Association of Monterey Bay Area Governments

Heather Adamson, Director of Planning

February 18, 2021

Comment L5-1

Thank you for the opportunity to review UCSC's Draft Environmental Impact Report (DEIR) for the 2021 Long Range Development Plan. The following comments are offered for your consideration.

In Chapter 3.8 (Greenhouse Gas Emissions and Climate Change), Chapter 3.13 (Population and Housing), Chapter 3.16 (Transportation), Chapter 4 (Cumulative Impacts), and Chapter 8 (References), AMBAG requests the following revisions:

Response L5-1

This comment includes introductory information and is noted.

Comment L5-2

Chapter 3.8 (Greenhouse Gas Emissions and Climate Change)

- On page 3.8-12, revise the paragraph to read: "The Association of Monterey Bay Area Governments (AMBAG) serves as the MPO for Monterey, San Benito and Santa Cruz Counties. In accordance with SB 375, AMBAG prepares has prepared a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) that integrates land use and transportation planning at a regional level to achieve GHG emission reduction targets from passenger vehicles. The most recent MTP/SCS is Moving Forward Monterey Bay 2040, which was adopted in June 2018. CARB set a target for the Monterey Bay Area of 5 percent reduction from 2005 per capita GHG emissions for the year 2035 ~~2030~~. The 2040 MTP/SCS demonstrates the region's ability to exceed the GHG emission reduction target set forth by CARB through transportation investments, strategic land use development, and performance measures (AMBAG 2018)."

Response L5-2

In response to this comment, Page 3.8-12 of the Draft EIR was revised as follows:

Association of Monterey Bay Area Governments

The Association of Monterey Bay Area Governments (AMBAG) serves as the MPO for Monterey, San Benito and Santa Cruz Counties. In accordance with SB 375, AMBAG has prepared a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) that integrates land use and transportation planning at a regional level to achieve GHG emission reduction targets from passenger vehicles. The most recent MTP/SCS is Moving Forward Monterey Bay 2040, which was adopted in June 2018. CARB set a target for the Monterey Bay Area of 5 percent reduction from 2005 per capita GHG emissions for the year 2035 ~~2030~~. The MTP/SCS demonstrates the region's ability to exceed the GHG emission reduction target set forth by CARB through transportation investments, strategic land use development, and performance measures (AMBAG 2018).

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant 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 more significant impacts. As such, recirculation of the Draft EIR is not required.

Comment L5-3*Chapter 3.13 (Population and Housing)*

On page 3.13-8: the DEIR states that "AMBAG produced regional growth projections through 2040 for the entire AMBAG planning area as well as counties and incorporated cities within its jurisdiction. Table 3.13-8 identifies AMBAG's growth projections for the City of Santa Cruz and Santa Cruz County. AMBAG projects that the city's employment growth rate would increase as the population levels rise through 2040. The city is expected to have higher population, housing, and employment percentage growth rates than the county based on AMBAG projections. As shown in Table 3.13-8, employment, population, and housing within the city are anticipated to increase by approximately 20-30 percent between 2015 and 2040, while countywide (incorporated cities and unincorporated area) is anticipated to increase by approximately 10-20 percent between 2015 and 2040. ***The AMBAG growth projections contradict the trends seen recently in both the city and the county.*** However, as shown in Table 3.13-5, substantial housing growth has been approved and is also newly proposed in the city, which would comport with a reversal of growth rates."

AMBAG requests that the sentence "The AMBAG growth projections contradict the trends seen recently in both the city and the county." be removed. This statement is untrue. AMBAG's growth projections are updated every four years and are prepared with considerable input from local jurisdictions. The recent trends that the DEIR refers to is the one year estimates from 2019 and 2020 do not reflect a long term trend. AMBAG's projections track to the long term trends seen over the past 20-30 years as shown in Tables 3.13-1 and 3.13.8.

Response L5-3

In response to this comment, Page 3.13-8 of the Draft EIR was revised as follows:

Growth Projections

AMBAG produced regional growth projections through 2040 for the entire AMBAG planning area as well as counties and incorporated cities within its jurisdiction. Table 3.13-8 identifies AMBAG's growth projections for the City of Santa Cruz and Santa Cruz County. AMBAG projects that the city's employment growth rate would increase as the population levels rise through 2040. The city is expected to have higher population, housing, and employment percentage growth rates than the county based on AMBAG projections. As shown in Table 3.13-8, employment, population, and housing within the city are anticipated to increase by approximately 20-30 percent between 2015 and 2040, while countywide (incorporated cities and unincorporated area) is anticipated to increase by approximately 10-20 percent between 2015 and 2040. The rate of growth seen recently in the city and county vary from The AMBAG growth projections. ~~contradict the trends seen recently in both the city and the county.~~ However, as shown in Table 3.13-5, substantial housing growth has been approved and is also newly proposed in the city, which would comport with a reversal of growth rates.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5 because it does not result in new or more significant impacts. As such, recirculation of the Draft EIR is not required.

Comment L5-4*Chapter 3.16 (Transportation)*

- On page 3.16-9, revise the sentence to read: "The 2040 MTP/SCS ~~MPT/SCS~~ also considers the UC Santa Cruz transit service to be a regionally significant local transit service (AMBAG 2018:2-10)."

Response L5-4

In response to the comment's request, the cited statement on page 3.16-9 of the Draft EIR was revised as follows:

As part of the 2040 MTP/SCS, AMBAG worked closely with stakeholders to develop a new growth forecast and an updated multimodal transportation network with land use patterns and strategies based on reasonably available revenues. AMBAG developed the 2040 MTP/SCS in close coordination with its three regional transportation planning agencies (RTPAs). Each of the three counties in the Monterey Bay Area has a

RTPA responsible for countywide transportation planning and implementation. The three RTPAs consist of the Transportation Agency for Monterey County, the Santa Cruz County RTC and the San Benito County Council of Governments. AMBAG also worked in close coordination with the region's transit operators, local jurisdictions, Caltrans, the Monterey Bay Area Air Resources District, state and federal resource agencies, local agency formation commissions and other special purpose public agencies. The regional growth forecast expressed and included as part of the 2040 MTP/SCS identifies a growth in student enrollment by 2040 to between 27,000 and 28,000 FTE (AMBAG 2018). The MTP/SCS also considers the UC Santa Cruz transit service to be a regionally significant local transit service (AMBAG 2018:2-10)

This correction of a typographic error is shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L5-5

Chapter 4 (Cumulative Impacts)

- On page 4-40, revise the sentence to read: "The cumulative (year 2040) model also includes land use growth consistent with AMBAG based on adopted growth plans the municipalities within the county that are used to estimate future (i.e., cumulative) transportation conditions."

Response L5-5

In response to this comment, Page 4-40 of the Draft EIR was revised as follows:

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As noted in Section 3.16, "Transportation," existing region-wide and project-generated VMT estimates were calculated using the SCC Travel Model. The model uses land use data and transportation network inputs, including highway, arterial, and transit systems, across the County to assign trips within the region's transportation network and estimates of daily person trips and associated VMT. The model also estimates the travel that occurs between Santa Cruz County and surrounding counties even though these areas are not included within the model's geographic boundary. The cumulative (year 2040) model also includes land use growth consistent with AMBAG based on adopted growth plans the municipalities within the county that are used to estimate future (i.e., cumulative) transportation conditions.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L5-6

- On page 4-40, revise the sentence to read: "Further, the AMBAG projections are used to develop various regional planning documents, including the sustainable community strategy required by SB 375 (Chapter 4.2 of CEQA) to provide for more efficient land use patterns that facilitate a reduction in regional VMT and per capita greenhouse gases over time."

Response L5-6

The statement referenced in Comment L5-6 appears on page 5-4 of the Draft EIR and not on page 4-40. In response to this comment, Page 5-4 of the Draft EIR was revised as follows:

Forecasts concerning growth in Santa Cruz county provide a wide range of predictions. Per a recent report published by the California Department of Finance (DOF), the county of Santa Cruz (County) is anticipated to experience a minor decrease in population between 2020 and 2040 (117 fewer residents or 0.04 percent compared to DOF's 2020 estimate of 273,999 residents) (DOF 2020), although countywide population would have minor fluctuations during that period, reaching a peak projected population of 276,168 in 2033. Other growth projections identify an increase in countywide population. The Association of Monterey Bay Area

Governments (AMBAG) identifies a countywide increase of 25,734 residents or 9 percent over the same period (AMBAG 2018). Per AMBAG's 2018 Regional Growth Forecast, approximately 8,000 of the projected increase in countywide population between 2020 and 2040 is associated with UC Santa Cruz. Based on projected increases in development within the County, including those listed in Table 4-1 of Chapter 4, "Cumulative Impacts," the AMBAG projections may more accurately reflect growth expectations. Further, the AMBAG projections are used to develop various regional planning documents, including the sustainable community strategy required by SB 375 (Chapter 4.2 of CEQA) to provide for more efficient land use patterns that facilitate a reduction in ~~regional VMT~~ and per capita greenhouse gases over time.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L5-7

Chapter 8 (References)

- On page 8-2 in Section 3.3. "Air Quality," please revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments.
 - Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

Response L5-7

In response to this comment, page 8-2 of the Draft EIR was revised as follows:

AMBAG. See Association Monterey of Bay Area Governments.

Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant 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.

Comment L5-8

- On page 8-29 in Chapter 5 "Other CEQA Sections," revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments.
 - Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

Response L5-8

In response to the comment, page 8-29 of the Draft EIR was revised as follows:

AMBAG. See Association Monterey of Bay Area Governments.

Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L5-9

- On page 8-29 in Chapter 6 "Alternatives," revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments.
 - Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDF.pdf. Accessed August 25, 2020.

Response L5-9

In response to the comment, page 8-29 of the Draft EIR was revised as follows:

AMBAG. See Association Monterey of Bay Area Governments.

Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDF.pdf. Accessed August 25, 2020.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR." The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Letter L6 Santa Cruz County Regional Transportation Commission

Ginger Dykaar, Senior Transportation Planner
March 3, 2021

Comment L6-1

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the UC Santa Cruz 2021 Long Range Development Plan (LRDP) which plans for future development within the UCSC Main Residential Campus and the Westside Research Park. The Santa Cruz County Regional Transportation Commission (RTC) serves as the Regional Transportation Planning Agency (RTPA) for Santa Cruz County. With a planned increase by 2040 in student enrollment of over 8,000 students and an increase in faculty and staff employment of approximately 2200, it is critical that land use and transportation decisions are consistent with environmental stewardship and long term sustainability. The LRDP supports many of the Santa Cruz County 2040 Regional Transportation Plan Goals and Policies as outlined below.

Response L6-1

The comment includes introductory information and is noted.

Comment L6-2

- RTC supports the LRDP strategy to provide housing for 100% of the additional FTE students. This is consistent with RTC's RTP Objective under Goal 1 to *"Improve people's ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers"* and RTP policy 1.5 *"Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations."*
- RTC supports the LRDP strategy to increase on-campus housing opportunities for faculty and staff at both the main campus and the Westside Research Park for up to 25% of the increase in faculty and staff. This is consistent with RTC's RTP Objective under Goal 1 to *"Improve people's ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers"* and RTP Policy 1.5 *"Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations."*
- RTC supports the LRDP strategy to provide compact, in-fill and clustered development of academic, administrative, and support facilities in the academic core and student housing around the periphery but close to academic core to provide convenient access and promote pedestrian circulation. This is consistent

with RTP Policy 1.5 *"Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations."*

- RTC Supports the LRDP strategy to develop an improved, more efficient roadway network and to support transit inner campus roadway loop for more efficient transit. RTC staff requests consideration of a transit, bike and pedestrian only infrastructure on the Meyer Drive Extension so as not to increase roadway capacity for automobiles except during emergencies. This is consistent with RTP Policy 1.3. *"Transportation Infrastructure: Improve multimodal access to and within key destinations"*, Policy 1.4 *"Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks,"* and Policy 2.3 *"Emergency Services: Support projects that provide access to emergency services."*
- RTC supports the LRDP strategy to promote Transportation Demand Management (TDM) practices to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTP Policy 1.1, *"Expand demand management programs that decrease the number of vehicle miles traveled and result in mode shift."*
- RTC supports the LRDP strategy to provide infrastructure to optimize trip- and vehicle-miles-traveled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTC Objective under Goal 1, *"Reduce smog-forming pollutants and greenhouse gas emissions"*; RTP Policy 1.3. *"Transportation Infrastructure: Improve multimodal access to and within key destinations"*; Policy 1.4 *"Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks"*; and Objective under Goal 2- *"Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit."*
- RTC supports bicycle and pedestrian infrastructure design that provides for safe travel and reduces the potential for conflict between bicyclists, pedestrians and vehicles. This is consistent with RTP Policy 2.4, *"Reduce the potential for conflict between bicyclists, pedestrians and vehicles"*.
- RTC supports the LRDP strategy to create parking/mobility hubs at peripheral locations with no net new commuter parking for a seamless transfer from one mode to another, promote a walkable campus, enhance alternative transportation opportunities, and increase connectivity within the campus and to the city. This is consistent with RTC Objective under Goal 1, *"Reduce smog-forming pollutants and greenhouse gas emissions"*; RTP Policy 1.3. *"Transportation Infrastructure: Improve multimodal access to and within key destinations"*; Policy 1.4 *"Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks"*; and Objective under Goal 2- *"Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit."*
- RTC supports the LRDP strategy to develop adequate transportation infrastructure to allow for quick response to emergencies including wildfires, mud slides and earthquakes. This is consistent with RTP Policy 2.3 *"Emergency Services: Support projects that provide access to emergency services."*

Response L6-2

UC Santa Cruz acknowledges the support of the LRDP strategies listed. The comment does not address the adequacy of the EIR analysis. Further response is not required.

Comment L6-3

- Page 3.16-33. The RTC does not support the fact that the LRDP is expected to have a significant impact related to vehicle miles traveled but given all the efforts that UCSC is doing to provide other options for travel, provide for housing on campus and travel demand management, it is unclear why there is a significant impact. A number of questions are provided below to suggest ways to provide more clarity in how the VMT analysis was determined.

Response L6-3

The comment does not provide specific comments that address the adequacy of the EIR analysis; responses are provided below to the subsequent questions noted in this comment.

Comment L6-4

- Chapter 3.8 - The RTC appreciates the work of UCSC in the LRDP to aim for a GHG reduction of 60% below the 1990 emissions by 2040 consistent with state targets and to mitigate for any impacts in order to reach this goal.

Response L6-4

UC Santa Cruz acknowledges this comment regarding GHG reduction goals, but the comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L6-5

- Page 3.8-22 – Please provide the VMT assumptions that were used to determine the various CO₂e amounts in the scope 3 table on page 3.8-22. Consider referring to the location in App D where this information is provided in detail.

Response L6-5

Information regarding how VMT estimates were used to calculate GHG emissions was provided on page 3.8-20 of the Draft EIR, consistent with the commenter's request. The VMT estimates used for calculating GHG emissions were derived from the Santa Cruz County Regional Travel Demand Model (as stated in greater detail in Appendix I). The future Scope 3 mobile source emissions shown in Table 3.8-3 on page 3.8-22 of the Draft EIR and due to LRDP growth were calculated by subtracting the forecasted Scope 1 mobile source emissions (2021 LRDP Growth) from the total mobile emissions calculated in CalEEMod. The CalEEMod runs modeled the net new VMT estimated by the EIR traffic consultant, which are shown in the second table on page 11 of Appendix D. Forecasted Scope 1 mobile source emissions due to 2021 LRDP growth were scaled up (i.e., increased) from existing Scope 1 mobile source emissions by the anticipated growth in enrollment and scaled back down (i.e., decreased) to reflect changes in emissions control technology, which is reflected in the model used for GHG emissions calculations, EMFAC 2017.

The Scope 3 emissions related to existing mobile sources were not calculated using VMT but were instead scaled down by the average vehicle emission factors between 2018 and future years, as modeled in EMFAC 2017.

Comment L6-6

RTC staff requests that the EIR provide more clarification on the following components of the DEIR LRDP;

- Page 4-20 states that Santa Cruz County is in an area of nonattainment for ozone. It is RTC staff's understanding based on the CARB website that Santa Cruz County is in an area of nonattainment-transitional and is being proposed for attainment under the state area designations to be approved in February, 2021. If this designation is revised, consider revising in the report.
<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>

Response L6-6

The comment is correct in identifying the non-attainment status of Santa Cruz County. In response to this and other comments, in Chapter 4, "Revisions to the Draft EIR," the text referring to the attainment status of ozone has been clarified in Table 3.3-3 on page 4-6 of Section 3.3, "Air Quality" and Section 4.0, "Cumulative Impacts." More specifically, the first row of Table 3-3 has been amended to reflect that, as of May 2021, Santa Cruz County is still designated as a non-attainment transitional area for ozone (CARB 2019), as follows:

Table 3.3-3 Ambient Air Quality Standards and Attainment Designations for North Central Coast Air Basin

Pollutant	Averaging Time	California Standards ² Primary ³	California Standards ² Attainment Status ⁴	National Standards ¹ Primary ³	National Standards ¹ Attainment Status ⁶
Ozone	1-hour	0.09 ppm (180 µg/m ³)	NNT	-	U/A
	8-hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)	

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L6-7

- Page 4-41, Table 4-4 states that the “service population” is 469,000 for cumulative conditions (2040) and 482,000 for Cumulative Conditions with LRDP. Please clarify how this service population is determined in order to understand how the VMT per capita is calculated. This amount seems too high to be total residents plus employees commuting from other counties plus UCSC student population. See also App I, page 7 table of “capita” equal to 403,000 for existing (countywide population, jobs, UCSC enrollment). Should these numbers be consistent?

Response L6-7

As shown on page 4-41 of the Draft EIR, the total service population under Cumulative Conditions consists of student enrollment, residents, and employees in Santa Cruz County. The cumulative service population includes all residents and workers within Santa Cruz County. The cumulative service population data, which reflects 2040 conditions, was extracted from the Santa Cruz County model that was initially developed in 2016 and is consistent with the regional travel model developed by the Association of Monterey Bay Area Governments (AMBAG). AMBAG develops the regional growth projections for the region's population, housing and employment.

Additionally, as detailed on page 4-40 of the Draft EIR the service population under Cumulative Conditions (2040) is based on land use growth consistent with AMBAG adopted plans in the municipalities within the county. As it pertains to how the VMT per capita is calculated, Table 4-4 on page 4-41 of the Draft EIR and the supporting text on the same page clearly demonstrate that the calculated regional VMT per capita is based on the total VMT in Santa Cruz County divided by the total service population (i.e., 5,750,000 VMT/469,000 service population=12.3 VMT per capita).

The Cumulative Conditions (2040) scenario discussed and analyzed in Section 4.3.16, “Transportation” of the Draft EIR and the Existing scenario shown in Table 6 on page 7 of Appendix I of the Draft EIR are two different scenarios; and thus, should not have consistent service populations. The Cumulative Conditions (2040) scenario discussed and analyzed in Section 4.3.16, “Transportation” of the Draft EIR is in fact analogous to the “Cumulative” scenario in Table 6 on page 7 of Appendix I of the Draft EIR; hence the consistent service population between the two scenarios (i.e., 469,000).

Comment L6-8

- Page 3.16-28 Table 3.16-4 states that the Total Campus VMT threshold is 7.7 VMT/capita. Please provide more detail for how this VMT/capita was determined.

Response L6-8

As shown in Table 3.16-6 on page 3.16-34 of the Draft EIR, the total campus VMT under existing conditions is 9.1 miles. Consistent with OPR guidance (OPR 2018a), a 15 percent reduction compared to existing conditions was selected. 9.1 miles multiplied by 85 percent equals 7.7 miles (9.1 miles x (1 - 0.15) = 7.7 miles). The last sentence in the second paragraph under “Total Campus VMT” on page 3.16-33 as well as Table 3.16-6 has been updated as follows to clarify how the 7.7-mile threshold was calculated:

Total Campus VMT

Table 3.16-6 below summarizes the baseline and growth assumptions for the analysis scenarios and Table 3.16-7 presents the total daily VMT generated by the UC Santa Cruz main residential campus and Westside Research Park (i.e. “Total Campus” VMT). The total campus VMT per capita was calculated using the total number of people living, working, and attending school at UC Santa Cruz. This includes faculty/staff living on campus, their associated family members (i.e., spouse and child(ren), students living on campus, any associated family members for on-campus student residents, students living off campus, non-UC employees (e.g., vendors), and visitors to campus.

As shown in Table 3.16-6Z, the implementation of the 2021 LRDP would result in a decrease in total campus VMT per capita from 9.1 to 7.9 miles, which represents a 13 percent reduction. The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus. However, the project-generated total campus VMT per capita would marginally exceed the significance threshold of 7.7 miles (15 percent below 9.1 miles or $9.1 \text{ miles} \times (1.0 - 0.15) = 7.7 \text{ miles}$) and the project-generated total campus VMT per capita impact would be significant.

It should be noted that the UC Santa Cruz 2017-2022 Campus Sustainability Plan includes a goal to reduce commute VMT by five percent by 2022. While the results in Table 3.16-6Z do not measure VMT between the years 2017 and 2022, it does indicate that the proposed 2021 LRDP would support the goal.

Table 3.16-6a 2021 LRDP Land Use Summary and Model Inputs Vehicle Trip and Total Vehicle Miles Traveled Summary

<u>Land Use/Campus Population</u>	<u>VMT Metric Applied¹</u>	<u>2019 Baseline</u>	<u>2019 Plus 2021 LRDP</u>
Land Use Summary			
Resident Students	Residential, Total Campus	9,283	17,783
Commuter Students	Total Campus	9,235	10,217
Total Enrollment		18,518	28,000
Resident Faculty and Staff	Residential, Employment, and Total Campus	270	828
Commuter Faculty and Staff	Employment, Total Campus	3,387	5,702
Non-UC Santa Cruz Employees (Commuters)	Employment, Total Campus	640	990
Total Employment		4,297	7,520
Faculty and Staff Housing	Residential, Total Campus	270	828
Non-UC Employee Housing	Residential, Total Campus	386	1,184
Total Faculty and Staff Household Population		656	2,012

1. VMT metric (residential VMT, employment VMT, or total campus VMT) in which each land use is accounted for.

Table 3.16-6b 2021 LRDP Vehicle Trip and SB 743 Vehicle Miles Traveled Summary

<u>SB 743 VMT Estimates Service Population</u>	<u>Land Use¹</u>	<u>VMT Metric Applied²</u>	<u>Calculation</u>	<u>2019 Baseline</u>	<u>2019 Plus 2021 LRDP</u>
Residents (Resident students + Total Faculty and Staff Household Population)	Resident Students + Total Faculty and Staff Household Population	Residential, Total Campus	A	9,939	19,795
Employees (Total Employment)	Total Employment	Employment, Total Campus	B	4,297	7,520
Students	Total Enrollment	Total Campus	C	18,518	28,000
Total Service Population (Residents + Employees + Enrollment Students)³			D (A + B + C)	32,754	55,315

Total Campus Vehicle Trips (from SCC Travel Model)	E	28,900	44,700
Average Trip Length in miles (from SCC Travel Model)	F	10.3	9.8
Total Campus Vehicle Miles Traveled (VMT) in miles (from SCC Travel Model) ²³	G (E x F)	298,000	439,000
Total Campus VMT per Capita in miles*	H (G/D)	9.1	7.9
VMT per Capita Threshold (15 percent below existing)	2019 Baseline H x (1.00-0.15)	7.7 miles	

¹ Land use/campus population inputs from Table 3.16-6.

² VMT metric (residential VMT, employment VMT, or total campus VMT) in which each land use is accounted for.

³ Service population is defined as those populations generating residential and commute activity; thus, resident students are captured both under “Residents” and “Students,” because resident students generate both residential and commute trips.

²⁴ Total campus vehicle trips multiplied by average trip length (rounded to nearest thousand).

³⁵ Total campus VMT divided by total service population.

These modifications are also shown in Chapter 4, “Revisions to the Draft EIR”. The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5 as they provide clarity and do not change the significance of any impacts. As such, recirculation of the Draft EIR is not required.

In addition, the second paragraph under “VMT Metric” on page 3.16-27 was amended as follows to clarify the definition of service population:

With regard to metrics, the advisory recommends use of a total VMT per capita metric, which is estimated based on the total VMT generated by a project divided by the project’s total service population. For VMT purposes, service population is defined as the sum of all residents and employees. Thus, residents who are also workers are counted twice using the service population metric.

Comment L6-9

- Page 3.16-27, when discussing VMT, please clarify whether it is total or VMT/capita.

Response L6-9

The text is referencing both total VMT per capita and home-based VMT per capita to clarify that total VMT per capita includes all VMT generated by the project, not just home-based generated (i.e., partial VMT). As noted in Chapter 4, “Revisions to the Draft EIR,” page 3.16-27 of the Draft EIR has been updated as follows:

With regard to metrics, the advisory recommends use of a total VMT per capita metric, which is estimated based on the total VMT generated by a project divided by the project’s total population. For residential land uses, the advisory suggests a metric based on home-based vehicle trips, and for office uses, it suggests a metric based on only home-based work vehicle trips.

This EIR uses all three metrics to evaluate the project impact analysis:

- 1) total project generated VMT per service population,
- 2) home-based project generated VMT per campus resident student, faculty and staff (residential VMT), and
- 3) home-based project generated employment VMT per faculty, and staff (employee VMT).

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L6-10

- Page 3.16-23, Planned Regional Transportation Improvements – Please consider adding the Highway 1 projects that are underway. See SCCRTC website for details <https://sccrtc.org/projects/streets-highways/hwy1corridor/>

Response L6-10

For the purpose of the analysis, the Draft EIR's analysis used the most recently available Santa Cruz County (SCC) Travel Model as provided by Santa Cruz County. The analysis involved basic validation of the campus travel characteristics as outlined in Appendix I to the Draft EIR, but did not review or update the model outside of the project area. Based on a review of what was included and what was not, the following summarizes which of the suggested projects are or are not included in the model.

- ▶ Soquel-Morrissey auxiliary lanes: not included
- ▶ 41st Ave-Soquel auxiliary lanes: included
- ▶ State Park-Bay/Port auxiliary lanes: included
- ▶ Freedom Blvd-State Park Dr auxiliary lanes: not included

It should be noted that auxiliary lanes typically improve vehicle flow and are not considered capacity enhancing; thus, the auxiliary lanes would have a negligible, if any, effect on the VMT estimates presented (US DOT 2017). Therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment L6-11

- Page 3.16-29 – If the 2.01 trips per commuter includes just the on/off campus auto trips –are any additional trips that commuter students (and staff) are making included in the changes in overall VMT for the county? If more people are living in county than would otherwise be the case due to LRDP, how is this additional VMT from more people being considered? Are the number of resident student trips all auto trips that a person makes to all destinations off campus since they live on campus? Please include more clarity in report.

Response L6-11

A travel demand model, including the SCC model, matches land use types to generate trips along the network. The VMT estimates for the project account for the trips and VMT being generated by the campus, which are the commute trips from households within Santa Cruz County and beyond. The households themselves, generate other non-campus trips within the model/County but are not directly linked to the campus, and those trips are accounted for in the cumulative analysis that evaluates total at county-wide VMT.

Comment L6-12

- Page 3.16-34, Table 3.16-6 – The service population seems like it is double counting the people living on campus – should it be 35.5k with LRDP? Please provide more details in this table so the VMT/capita can be readily calculated.

Response L6-12

As noted in Table 3.16-6, the total service population includes student and faculty residents, total employees, and total enrollment. The comment is correct in that resident students are counted twice, once under residents and again under total enrollment. This is similar to how resident faculty are counted twice, once as residents and again under total employees. The reason is that these populations generate both residential (home non-work based) and commute (home work-based) trips which is how service population is defined (service population includes resident and commuter students, resident and commuter faculty/staff, and non-UC employees). The methodology is applied consistently to 2019 Baseline and the 2019 Plus 2021 LRDP. Further and as noted above, Table 3.16-6 was refined to help the reader better understand how the VMT per capita was calculated (See Response L6-8).

Comment L6-13

- Table 3.16-7 – Please provide more details on how the campus numbers for VMT/capita were determined?

Response L6-13

The countywide "Residential VMT/Capita" and "Employment VMT/Capita" were calculated by applying the SCC model to extract the home-based VMT for all residential land uses and home-based work VMT for all employment land uses in the county, and dividing by the total countywide population or employment, respectively. The same methodology

was applied for the traffic analysis zones in the model that contain the campus – the residential and employment VMT was extracted and divided by the population and employment.

Comment L6-14

- Page 3.16-23 – Please revise to Bus on shoulder in place of Bus Rapid Transit

Response L6-14

As noted in Chapter 4, “Revisions to the Draft EIR,” the text on page 3.16-23 of the Draft EIR has revised as follows:

The study recommends Bus on shoulder on Highway 1; mass transit (rail or BRT) on the rail corridor; multi-modal improvements on the Soquel Drive/Freedom Boulevard corridor).

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L6-15

- Where in the document does it show the overall increase in total VMT in the county due to the increase in students, staff and faculty as planned in the 2021 LRDP?

Response L6-15

Within Chapter 4, “Cumulative Impacts” of the Draft EIR, the cumulative analysis in Section 4.3.16 discusses cumulative VMT applying the “boundary method.” As noted on page 4-40, the boundary method evaluates VMT that occurs within a selected geographic boundary (e.g., campus, city, county or region) and is a measure of the project’s effect on VMT. The selected regional boundary for this analysis includes Santa Cruz County. This captures all on-road vehicle travel on a roadway network for any purpose and includes local trips as well as trips that pass through the area without stopping. Based on the information presented in Table 4-4, the countywide VMT per capita would decrease from 12.3 miles to 12.1 miles with the 2021 LRDP, and overall increase in total VMT in the county would be 80,105 VMT.

Comment L6-16

- Appendix I, page 7, Table 6 - Please explain how the increase in VMT (existing plus project and cumulative plus project) was calculated. Is this 90,000 and 80,000 miles difference consistent with the VMT numbers calculated in Table 3.16-6? The difference in Table 3.16-6 shows 141,000 miles more with LRDP in 2019 for the total campus VMT.

Response L6-16

With respect to how the increase in VMT in Appendix I, page 7, Table 6 was calculated, the existing and cumulative conditions, including existing plus project conditions, reflect separate model runs under existing and future (i.e., cumulative) conditions. Cumulative conditions include planned roadway and other infrastructure improvements, including VMT-reducing measures within the County, that are imbedded within the SCC Model, as previously referenced. The information presented in Table 6 of Appendix I also takes into consideration countywide VMT with the LRDP under existing and cumulative conditions compared to the campus only VMT that is presented in Table 3.16-6 of the Draft EIR. The total campus and countywide cumulative VMT estimates applied two slightly different calculation methods. The countywide cumulative VMT is calculated by adding up all VMT on roadways within the county. The total campus VMT includes VMT for trips on county roadways, as well as for the portions of trips on roadways outside the county. They are consistent in that they were generated using the same inputs for the SCC Model; however, they aren’t directly comparable due to the different geographic scale upon which they are based.

Comment L6-17

- Is the mode share split with the LRDP similar to what is shown for existing in Figure 3.16-6 on page 3.16-24 provided in the document?

Thank you for considering comments from the RTC on the DEIR for the 2021 UCSC LRDP. If you have any questions about these comments, please contact Ginger Dykaar of my staff at gdykaar@sccrtc.org.

Response L6-17

The mode share split shown on Figure 3.16-6 matches what is shown in the 2021 LRDP (35 percent single-occupancy vehicle). The SCC Model maintains this baseline mode share split (as shown in Figure 3.16-6) with Existing plus 2021 LRDP, 2040 Existing plus project, and 2040 Cumulative plus project projections.

Letter L7 Santa Cruz City-County Task Force on UCSC Growth Plans

Morgan Bostic, Advocate

March 5, 2021

Comment L7-1

Thank you for the opportunity to comment on the 2021 Draft Long Range Development Plan's (LRDP) Draft Environmental Impact Report (DEIR).

Unfortunately, while the DEIR contains useful and relevant analysis regarding the potentially significant impacts of the LRDP, it is not adequate under the California Environmental Quality Act (CEQA) and requires extensive revision and recirculation in order to meet its requirements. As is documented below, in numerous cases the potentially significant impacts are understated, inadequate mitigation measures are proposed, feasible mitigation measures and alternatives are missing, and important, available data and evidence are not provided.

Response L7-1

UC Santa Cruz respectfully disagrees with the claim that the 2021 LRDP Draft EIR is "not adequate" under CEQA. The comment is general, so additional response is not provided. Detailed comments are specifically addressed below.

Comment L7-2

Among the many DEIR inadequacies, at least three are critical:

1. The DEIR's entire analysis of potentially significant impacts is based on the LRDP achieving its objective of housing 100% of the new student enrollment and up to 25% of new faculty and staff on campus. Yet, there is no evidence provided to justify this assumption and, further, the mitigation measures proposed for reducing its impacts to a less than significant level are inadequate under CEQA's requirements for such measures. As recommended below, these mitigation measures must be revised to require, as a feasible mitigation measure, the University to provide the planned on-campus housing and to tie the provision of this housing to enrollment increases.

Response L7-2

The 2021 LRDP would serve as the physical development and land use plan for UC Santa Cruz. State CEQA Guidelines Section 15378(a) defines "project" in part as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." For the purposes of CEQA the 2021 LRDP is the proposed project. As stated in on page 2-11 of the Draft EIR, the 2021 LRDP would provide for 8,500 student housing beds, approximately 550 employee housing units, and approximately 3.1 million asf of academic and support building space. The proposed building program would accommodate 100 percent of the increase in student enrollment beyond 19,500 FTE students and up to 25 percent of the additional anticipated 2,200 FTE faculty/staff members. Therefore, the Draft EIR's analysis of the building program complies with CEQA.

Regarding mitigation, consistent with State CEQA Guidelines Section 15126.4 the Draft EIR includes feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA. Regarding plan implementation, as discussed in Master Response 9 future projects considered for approval pursuant to the 2021 LRDP will be subject to additional environmental review, which will evaluate conditions at the time each project is considered. Refer also to Master Response 9 regarding phasing of development.

Comment L7-3

2. The analysis of the potentially significant impacts of development in the north campus subarea is deeply flawed. The LRDP proposes to locate housing for 3,700 of the 8,500 additional students (43%) as well as 200,000 assignable

square feet (asf) (8%) of additional academic support facilities in a State designated high-risk fire hazard area with no new road access provided (page 3.17-30-32). Yet, the DEIR finds that neither the campus Emergency Operations Plan, nor the Campus Evacuation Plan need to be revised in response to this proposal. Further, the potential impact for wildfires is found, without supporting evidence, to be less than significant. The DEIR asserts that simply adopting a vegetation management plan would reduce the potentially significant impact to less than significant. Finally, while the DEIR does consider the potential impacts of not locating development in this area, this option is not considered as a potentially feasible alternative.

Response L7-3

Refer to Master Response 4 regarding the Draft EIR's evaluation of the 2021 LRDP's potential to exacerbate wildfire risk due to on-campus development. As demonstrated in Master Response 4 and based on the analysis contained within Section 3.17, "Wildfire" of the Draft EIR impacts related to wildfire risk have been determined to be less-than-significant with mitigation. Conversely, the comment does not provide substantial evidence or valid reasoning on why the analysis is allegedly flawed. Regarding project alternatives, refer to Master Response 3. Further, Alternative 3, as evaluated in the Draft EIR, does evaluate development in other areas of the main residential campus, consistent with this comment, but was determined to not be the environmentally superior alternative.

Comment L7-4

3. While the DEIR recognizes six direct impacts and many cumulative impacts of the LRDP as significant and unavoidable, it inadequately fails to identify 21 others that should have been included.

Response L7-4

The comment does not state specifically what the commenter finds inadequate; therefore, no additional response can be provided.

Comment L7-5

- ES-1 – The DEIR states that the 2021 LRDP "embraces a compact academic core with housing around the periphery." This is incorrect and misleading. The 2021 LRDP proposes significant development, including academic facilities, in the north campus area outside the core. The Final EIR needs to correct this misinformation especially since many readers may only read the Executive Summary.

Response L7-5

As stated on page xi of the Draft 2021 LRDP, the "LRDP proposes a tight developable boundary, creating a compact footprint by continuing to build in clusters adjacent to existing development, thereby preserving the natural environment and open space for research, recreation, contemplation and wildlife habitat." Consistent with the Draft 2021 LRDP, the Executive Summary and Chapter 2, "Project Description," of the Draft EIR accurately describe the 2021 LRDP as, "embracing a compact academic core with housing around the periphery." The 2021 LRDP reduces the developable acreage in the north campus as compared to the 2005 LRDP. This comment does not raise issues related to the adequacy of the EIR analysis. No edits to the Draft EIR are necessary based on this comment.

Comment L7-6

- ES-2 – The DEIR indicates that the LRDP "plans to accommodate" 100% of the new enrollment of about 9,500 students and up to 25% of the additional 2,200 FTE faculty and staff. There is no mention of the need to tie this housing commitment to enrollment growth in order to mitigate the potentially significant impacts of this growth.

Response L7-6

Please refer to Master Response 9 regarding plan implementation and phasing of development, and response L7-2 regarding projected enrollment and growth. Consistent with State CEQA Guidelines Section 15126.4 the Draft EIR includes feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA. Refer to Master Response 11 for further information regarding the level of detail presented in the Draft EIR.

Comment L7-7

- The DEIR repeats the LRDP objectives of for housing students, faculty, and staff with no enforceable language or connection to enrollment growth.

Response L7-7

State CEQA Guidelines Section 15124(b) requires a project description to include a "statement of the objectives sought by the proposed project." Further, CEQA states the clearly written objectives, "help the lead agency develop a reasonable range of alternatives to evaluate in the EIR." The 2021 LRDP objectives are listed on pages 2-8 and 2-9 of the Draft EIR, and the ability of each project alternative to meet the 2021 LRDP objectives is evaluated in Chapter 6, "Alternatives," of the Draft EIR.

Comment L7-8

- The last sentence of page ES-4 identifies Alternative 3 as the environmentally superior alternative. Yet the second paragraph on page ES-5 states that Alternative 2 "would result in greater impact reductions and is thus considered superior to Alternative 3. These contradictory statements are confusing to the public and need to be corrected.

Response L7-8

UC Santa Cruz acknowledges the text error on page ES-4 of the Draft EIR. Page ES-4 was revised to clarify that Alternative 2 is the environmentally superior alternative consistent with Chapter 6, "Alternatives," as follows:

State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed in Chapter 6, "Alternatives," the No Project Alternative is environmentally superior for all environmental resource areas. As a result, this EIR must identify an alternative among the other alternatives that is environmentally superior. Based on the environmental analysis contained in this Draft EIR, the environmentally superior alternative would be Alternative ~~2~~3.

These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information as it simply corrects an error in the EIR and does not result in new or different (i.e., substantially more adverse) impacts.

Comment L7-9

- 1-1 – The LRDP is defined in State law as a "plan," not a guide, that is subject to CEQA: "a "physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education." The DEIR needs to clarify that the LRDP is legally binding document and any proposed increases to enrollment levels or significant policy amendments that could impact the environment are subject to review under CEQA prior to approval by the Regents.

Response L7-9

The UC Facilities Manual Volume 2, Chapter 3 defines an LRDP as a comprehensive plan that guides physical development such as the location of buildings, open space, circulation, and other land uses (UCOP 2020b). Therefore, page 1-3 of the Draft EIR accurately states that the 2021 LRDP provides a guide to the land development patterns and associated physical infrastructure that could be built to support a forecasted level of enrollment and employment growth. The 2021 LRDP would be subject to the same rules as other projects under CEQA; if additional significant environmental impacts (additional to those identified in the Draft EIR) are identified in subsequent environmental review of project elements as they are proposed, additional CEQA documentation would be required (see Master Response 9). The LRDP is a land use plan that does not mandate growth and does not govern enrollment decisions.

Comment L7-10

- 1-2 – The DEIR is inadequate for not including the Santa Cruz Local Agency Formation Commission (LAFCO) as a State responsible agency, since it must approve the extension of water and sewer services beyond the City boundaries, which includes the north campus subarea. Its role is considered in the Utilities and Service Systems chapter but should be described here.

Response L7-10

Please refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR.

Comment L7-11

- 1-3 – The LRDP proposes to “accommodate,” not house, 100% of the new students and up to 25% of the new FTE employees by designating land on the Land Use Map where that amount of housing could be built. Simply identifying areas on a map where housing would be allowed is not a meaningful commitment to providing this housing.

Response L7-11

As stated in on page 2-11 of the Draft EIR, the 2021 LRDP would provide for 8,500 student housing beds, approximately 550 employee housing units, and approximately 3.1 million asf of academic and support building space. State CEQA Guidelines Section 15378(a) defines “project” in part as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment....” For the purposes of CEQA the 2021 LRDP is the proposed project. Therefore, the Draft EIR’s analysis of the building program complies with CEQA. Refer also to Master Response 9 regarding plan implementation and phasing of development.

UC Santa Cruz’ recent actions, including proposing the Student Housing West project (under the 2005 LRDP), demonstrate UC Santa Cruz’s commitment to providing student housing on campus. UC Santa Cruz notes that its proposal to provide this housing has been repeatedly challenged in court, resulting in significant delays.

Comment L7-12

- The DEIR recognizes that its LRDP has the same requirements as a city or County general plan – i.e., it is legally binding: “Much like a city or county general plan, the 2021 LRDP does not mandate growth or the provision of new facilities.” While adopting the LRDP is not a “commitment” to any specific project, its adoption allows for any development consistent with it. The EIR should clarify the LRDP’s legal status.

Response L7-12

The information requested in this comment is already provided as part of Chapter 2, “Project Description.” Refer to the first two paragraphs on page 2-1 of the Draft EIR, which provides the statutory definition of an LRDP. The 2021 LRDP is a land use plan; any projects proposed consistent with the LRDP will be subject to additional environmental review. No changes to Chapter 1, “Introduction” are considered necessary. Please refer to Response L7-9 regarding the 2021 LRDP’s consistency with the UC Facilities Manual.

Comment L7-13

- 1-5 – UCSC’s 10-year Capital Financial Plan should explicitly identify the infrastructure needed at different enrollment thresholds to support the additional growth, and enrollment should not increase beyond these thresholds without the necessary infrastructure. The LRDP is inadequate by not considering the need and potentially significant impacts of proposed infrastructure at different enrollment levels.

Response L7-13

As stated in Master Response 11, the 2021 LRDP is a planning level document that designates areas of the campus with certain land uses. An overall assumption of development is provided for each land use type based on the number of students that could be accommodated, but no specific buildings have been proposed under the 2021 LRDP. It is a planning-level document and the EIR evaluates the 2021 LRDP at a planning level of detail. As stated in CEQA Guidelines Section 15146, the “degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR...An EIR on a project such as the adoption or amendment of a...plan...need not be as detailed as an EIR on a specific project.” This same response applies to several of the comments provided below concerning the level of detail in the EIR. Further, the infrastructure identified in Chapter 2, “Project Description” of the Draft EIR considered the building program of the 2021 LRDP in determining the potential sizing and location of on-campus infrastructure, as requested by the commenter. The Draft EIR also

assesses the potential impacts of those infrastructure needs as part of the overall Draft EIR's analysis, consistent with CEQA requirements. Please refer to Master Response 9 regarding phasing of development.

Comment L7-14

- 1-7 – CSA – “The Comprehensive Settlement Agreement (CSA) also required UC Santa Cruz to apply to the Santa Cruz County Local Area Formation Commission (LAFCO) for water and sewer services for the north campus subarea, which UC Santa Cruz did in 2008, ...”. This requirement needs further discussion in the DEIR and, also, indicates the DEIR's inadequacy for not identifying LAFCO as a responsible state agency.

Response L7-14

The CSA referenced in this comment does not bear directly on the environmental impacts of the 2021 LRDP or the analysis required under CEQA. However, because the CSA is relevant as background regarding campus planning, the Section 13.1 of the 2021 LRDP Draft EIR includes a subsection titled “2008 Comprehensive Settlement Agreement,” which provides a detailed discussion of the relevant provisions of the CSA, including the provision that required “UC Santa Cruz to apply to the Santa Cruz County LAFCO for a Sphere of Influence amendment for extraterritorial water and sewer services for the north campus subarea, which UC Santa Cruz did in 2008, but provided that UC Santa Cruz's application to LAFCO was not an admission that UC Santa Cruz is subject to LAFCO jurisdiction and did not change the underlying agreements between the City and UC Santa Cruz.”

As discussed in Response L3-2, the City is contractually obligated to provide service to the entire campus, regardless of whether it is located within current City boundaries, and LAFCO approval is therefore not required for the 2021 LRDP or any future LRDP projects. Accordingly, LAFCO is not a responsible agency in connection with the 2021 LRDP EIR, as addressed under Master Response 2.

Comment L7-15

- 2-1 – The DEIR states that the LRDP “provides for” 8,500 student housing beds and approximately 550 employee housing units. While the plan identifies where those resources could be developed, there is no inclusion of a meaningful commitment to provide this housing.

Response L7-15

Please refer to Response L7-11 regarding the Draft EIR's analysis of the 2021 LRDP building program.

Comment L7-16

- 2-4 – The DEIR indicates that 53% of the campus' 2,000 acres are in the City of Santa Cruz. The DEIR should specify that 940 acres are not within the City and, under state law, development outside the City is subject to regulation by LAFCO.

Response L7-16

Page 2-4 states approximately 53 percent of the main residential campus is located within the city of Santa Cruz with the remaining acreage located within unincorporated Santa Cruz County. Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR.

Comment L7-17

- The north campus subarea is characterized as follows: “extends from the developed central campus subarea to the northern property line;” “The north campus subarea is largely undeveloped at this time except for recreational trails, unpaved service roads, and infrastructure related to water storage. This subarea is characterized by a mix of evergreen forests and some grasslands and includes the sites of long-term outdoor research projects.” The DEIR should specify in the Project Description the amount of development proposed for this subarea – housing for 3,700 students and 200,000 asf of support facilities.

Response L7-17

Please see Master Response 11 and Response L7-13 concerning level of detail needed in the Draft EIR. State CEQA Guidelines Section 15124 requires a project description to contain the level of detail needed “for evaluation and

review of the environmental impact.” The 2021 LRDP building program is provided on page 2-11 and Table 2-2 of the Draft EIR, including a description of development planned in the north campus area. Further, Figure 2-4 on page 2-12 of the Draft EIR identifies potential development areas on the main residential campus, including the north campus subarea. Therefore, the Draft EIR complies with CEQA requirements.

Comment L7-18

- 2-8 – While the Community Advisory Group (CAG) is mentioned, its adopted Guiding Principles are not. Since they directly relate to potentially significant impacts of the LRDP, they should be listed in the DEIR.

Response L7-18

The CAG Guiding Principles were developed in coordination with the Community Advisory group in connection with development of the LRDP and are not applicable to the analysis in the Draft EIR. State CEQA Guidelines Section 15124(b) requires a project description to include a “statement of the objectives sought by the proposed project.” The 2021 LRDP objectives are listed on pages 2-8 and 2-9 of the Draft EIR, and the ability of each project alternative to meet the 2021 LRDP objectives is evaluated in Chapter 6, “Alternatives,” of the Draft EIR. The CAG Guiding Principles were considered during development of the 2021 LRDP and during coordination between the CAG and UC Santa Cruz (refer to Master Response 2). However, the CAG Guiding Principles have no bearing on the physical environmental impacts presented in the Draft EIR.

Comment L7-19

- The DEIR identifies the LRDP objective of “housing 100 percent of the additional FTE students” above 19,500 is stated. The DEIR should explain that nothing in CEQA or other state laws requires the University to meet this objective.

Response L7-19

Please refer to Response L7-18 regarding project objectives pursuant to State CEQA Guidelines Section 15124(b), and Response L7-11 regarding the Draft EIR’s analysis of the 2021 LRDP building program.

Comment L7-20

- 2-9 – The DEIR states: “However, the 2021 LRDP does not commit UC Santa Cruz to any specific enrollment level, campus population, or development.” “UC Santa Cruz plans to provide on-campus housing for 100 percent of the increase in student enrollment beyond 19,500 FTE students and up to 25 percent of the additional anticipated 2,200 FTE faculty/staff members.” These statements are further evidence that, while the DEIR analysis of impacts assumes that the housing objectives will be met, the DEIR is clear that the University is not required to meet them. Without this commitment, the DEIR must analyze the potential impacts of the LRDP assuming that no on-campus housing will be provided.

Response L7-20

Please refer to Response L7-11 and Master Response 9 regarding the Draft EIR’s analysis of the 2021 LRDP building program.

Comment L7-21

- 2-10 – The net new campus population is projected to be 12,830 compared to the existing population of 22,344 (a 57% increase to 35,230 people). The Santa Cruz City population in 2019 was 64,522. The campus population, then represented about 35%. The AMBAG projections show a total City population of about 79,000 in 2040. Based on this estimate, the campus population will be about 45% of the City’s. The DEIR should provide these figures as they provide evidence of the University’s impact on the surrounding community.

Response L7-21

The Draft EIR evaluates the impacts of the proposed project, including to areas off the campus. The comment does not raise any specific issues associated with the evaluation of impacts in the EIR, so no further response is provided.

Comment L7-22

- "An increase of about 9,482 students over the 2018-2019 baseline equates to an average addition of 431 students each year." This projection of annual student enrollment provides the basis for the DEIR to include a feasible mitigation measure that would tie the provision of on-campus housing to these growth increases. No annual increase in needed faculty and staff housing is projected but should be provided.

Response L7-22

Please refer to Master Response 9 regarding potential phasing of development.

Comment L7-23

- 2-11 – Table 2-2 of the DEIR shows the amount of assignable square feet (asf) for existing and new academic, support, and residential space. However, this is significantly less than the gross square feet (gsf) which "reflects the sum of all building space with a building." This distinction is important because, while the total asf of existing and new buildings would be about 9.4 million, the gsf would be 14.1 million (a 50% increase).

To understand the number of acres the new buildings would require, the gsf numbers need to be used. Therefore, the approximately 3.1 million asf of new academic and support space would total about 4. million gsf. The new housing space required would be about 3.8 million. The total new building space needed would be about 8.4 million gsf. The EIR needs to provide these gsf projections in order carry out adequate impact analysis and adequately inform the public of the total extent of construction of the proposed project.

Moreover, the DEIR doesn't consistently use the gsf space requirements in later sections when analyzing potentially significant LRDP development impacts. Not using gsf may significantly understates LRDP impacts.

Response L7-23

The 2021 LRDP reports existing and proposed developable space using asf. For consistency, the page 2-11 of the Draft EIR provides the 2021 LRDP building program in both asf and gsf as follows:

"Total building space on the campus would increase from approximately 3.8 million asf (5.8 million gsf) in 2018-2019 to approximately 9.4 million asf (14.1 million gsf) upon full implementation of the 2021 LRDP, anticipated in 2040."

Further, the footnote at the bottom of page 2-11 defines both asf and gsf as follows:

"Assignable square feet" (asf) refers to the sum of all building space that is programmable for a particular occupant(s) or use(s) (e.g., classrooms, labs, offices, study facilities, health care, residential), whereas "gross square feet" (gsf) reflects the sum of all building space within a building, including hallways, unusable space within basements or attics, and permanent partitions.

As stated throughout the Draft EIR evaluation of potential environmental impacts were based on the description of the project included in Chapter 2 of the Draft EIR which provides the building program in both asf and gsf. For example, the Air Quality analysis methodology on page 3.3-17 of the Draft EIR states that the annual and daily construction emissions were based on approximately 481,100 gsf. Therefore, the Draft EIR adequately analyzes the impacts of the proposed maximum buildout of the 2021 LRDP

Comment L7-24

- The DEIR states: "As currently envisioned, development under the 2021 LRDP would occur primarily within the central and lower campus subareas, as shown in Figure 2-4." This isn't clear in the Figure because it doesn't define the north campus subarea, though it does show significant colleges and academic space there. The DEIR should state here the number of acres in each subarea. The Figure should also include the City of Santa Cruz boundary.

Response L7-24

See Response L7-13 and Master Response 11 concerning level of detail evaluated in this EIR. State CEQA Guidelines Section 15124 requires a project description to contain the level of detail needed "for evaluation and review of the environmental impact." Sections 2.2.1 and 2.2.3 describe the location of the 2021 LRDP area in relation to the City of

Santa Cruz boundary. Further, 2-4 identifies potential development areas on the main residential campus, including the north campus subarea. Therefore, the Draft EIR complies with CEQA requirements.

Comment L7-25

- 2-13 – The LRDP designates the total space for Academic and Support Space as approximately 170 acres and for Residential Space as approximately 359 acres. The number of acres for new construction do not seem to be provided as are not given and it isn’t clear whether these projections are for buildings only. The EIR should clarify this.

Response L7-25

See Response L7-13 and Master Response 11 concerning level of detail evaluated in this EIR. To clarify, as stated on page 2-13 the “2021 LRDP proposes a mix of land use categories to accommodate academic, residential, open space, and facilities and operational uses.” The Draft EIR details each proposed land use category and associated acreage information on pages 2-13 and 2-15. Land use categories within the 2021 LRDP area are also shown on Figure 2-5. The acreages do not reflect new construction, as some construction may involve redevelopment of existing structures or development adjacent to existing structures, which would also be considered new. The existing and projected building space under the 2021 LRDP are provided on page 2-11 of the Draft EIR.

Comment L7-26

- 2-15 – Land use designations in acreage:

Land Use Designations	Acreage Under the 2005 LRDP, as Amended ¹	2021 LRDP Acreage	Net Change
Academic Land Use Designation			
Academic & Support (Academic Core in the 2005 LRDP)	132	163	31 (23.5%)
Residential Land Use Designations			
Colleges and Student Housing	245	277	32 (13.1%)
Employee Housing	75	823	7 (9.3%)

Response L7-26

The comment includes a table that appears to report land use designations and acreage information similar to that provided in Table 2-3 on page 2-15 of the Draft EIR. However, the employee housing acreage under the 2021 LRDP is 82 not 823, as incorrectly presented in the table. There is no comment provided, and therefore, no response can be provided.

Comment L7-27

- The 8,500 new student housing beds, then, would average about 266 beds per acre.

Response L7-27

It is unclear how the commenter arrived at this conclusion. To clarify, the 8,500 new student beds proposed under the 2021 LRDP could be constructed on undeveloped land, as well as potentially renovated buildings, designated for Colleges & Student Housing which totals 277 acres (approximately 32 more acres than identified in the 2005 LRDP). This equates to around 30 beds per acre, if only housing was built on these lands, but they will also accommodate support and some academic space. Regardless, this comment does not raise any environmental issues.

Comment L7-28

- Given that the new student housing (8,500 beds) will approximately double the number of beds on campus now of 9,283 (about a 91% increase) and the new beds will be constructed on about 13% of the area of the current housing, it’s clear that the new housing will need to be much taller than the existing housing. Page 2-18 states that they the housing will be in buildings will be between 4 and 8 stories. This seems to contradict the statement on page 3.1-40 that “new buildings would range from two to four stories in height.” The EIR needs to ensure that the height limits

indicated in the Project Description are analyzed accurately throughout the document and this discrepancy should be clarified in the EIR.

Response L7-28

The comment assumes that new student housing would be constructed on 13 percent of the area, which is designated for Colleges & Student Housing and notes differences in building heights noted in Chapter 2, "Project Description." It is unclear how the commenter arrived at the conclusion that student housing would be constructed on 13 percent of the area. To the extent that the comment is referring to the table provided in Comment L7-26, it appears the comment assumes that new development would only occur within the 32 acres that would be designated for Colleges & Student Housing under the 2021 LRDP. To clarify, the 245 acres of land designated for Colleges & Student Housing under the 2005 LRDP are not completely developed. For example, the land uses from the 2005 LRDP, as shown in Figure 3.11-1 on page 3.11-4 of the Draft EIR reflect land use designations for student housing along a north loop road, which currently does not exist. Therefore, the 8,500 new student beds could be located on undeveloped land, as well as potentially renovated buildings, located within the 277 acres designated for Colleges & Student Housing under the 2021 LRDP. Student housing is also allowed under the mixed-use housing designation at Westside Research Park.

Regarding building heights, the Draft EIR provides height ranges based on location and land use category. To clarify, page 2-16 of the Draft EIR provides height ranges for new buildings within the Academic & Support land use category as follows:

New buildings would generally be similar on average to those in the current academic core, generally ranging in height between four and six stories. In the southern extension of the academic core, buildings would range from two to four stories in height and would be sited to minimize their visibility from the top of the adjoining meadows.

Height ranges for new buildings within the Colleges & Student Housing land use category are provided on page 2-17 of the Draft EIR as follows:

Where housing is located in or near the evergreen and redwood forests toward the north, buildings would likely be denser, at 4 to 8 stories, in order to minimize their footprint and physical extent. Where located in predominantly meadow areas, housing would be lower in density and height to maintain scenic viewsheds and configured to minimize visual impacts.

Page 3.1-40 of the Draft EIR refers to height ranges for new buildings that would be visible in Viewpoint 5 which offers a view from Hagar Drive facing west toward the southern boundary of the Arts area. The land use category for this area is Academic & Support under the 2021 LRDP. Consistent with the height ranges provided on page 2-16, page 2-40 accurately states that "new buildings would range from two to four stories in height..." Therefore, the Draft EIR consistently refers to height ranges based on location and the land use category. No edits to the Draft EIR are necessary in response to this comment.

Comment L7-29

- 2-16 – The EIR needs to indicate the number of new academic developments in each of the subareas to document that new development will occur "primarily" in the central campus.

Response L7-29

See Response L7-13 and Master Response 11 regarding level of detail evaluated in this EIR. State CEQA Guidelines Section 15124 requires a project description to contain the level of detail needed "for evaluation and review of the environmental impact." The 2021 LRDP building program (square footage by land use type) is provided on page 2-11 and Table 2-2 of the Draft EIR. Further, Figure 2-4 identifies potential development areas on the main residential campus, which includes all three subareas. Therefore, the Draft EIR complies with CEQA requirements.

Comment L7-30

- 2-17 – The DEIR states that the new colleges will be on the periphery of the academic core with one in the northeast corner and one in the northwest corner. It is unclear how many acres in the north campus subarea will be developed for these colleges and this should be provided.

Response L7-30

See Response L7-13 and Master Response 11 regarding level of detail evaluated in this EIR.

Comment L7-31

- 2-21 – The DEIR indicates that 11 acres of mixed use are designated in the Westside Research Park that could include housing, academic and support facilities. How can a meaningful impact analysis be conducted without a more precise designation of the uses that would be allowed there?

Response L7-31

See Response L7-13 and Master Response 11 regarding level of detail evaluated in this EIR. The comment provides no details why the analysis of development at Westside Research Park is inadequate, so no further response is required.

Comment L7-32

- 3.1-2 – Cowell Lime Works District - The DEIR states that “[f]uture projects located adjacent to the historic district would be evaluated for consistency with the management plan.” However, this plan is currently under revision. Therefore, the public is unable to know exactly what the criteria is that future projects outlined in this document will be evaluated to be consistent with, and therefore are unable to evaluate their adequacy to mitigate the impact.

Response L7-32

State CEQA Guidelines Section 15126.4(a)(1) requires that the “EIR describe feasible measures which could minimize significant adverse impacts....” Mitigation Measure 3.4-4a on page 3.1-42 of the Draft EIR requires that UC Santa Cruz comply with specific design considerations and ensures that any development within or proximate to the Cowell Lime Work Historic District is developed in a manner compatible with the historic aspect of the historic district until such time as the Cowell Lime Works Historic District Management Plan is completed. The design considerations are described under Impact 3.4-4 on pages 3.4-22 and 3.4-23 of the Draft EIR Accordingly, the EIR discloses the specific criteria that will be used to determine whether a Project is consistent with the Historic District in the immediate future. Furthermore, future projects will be evaluated for consistency with the management plan, which will be evaluated and disclosed in the specific environmental review conducted for those projects.

Comment L7-33

- 3.1-3 – Physical Design Framework – The DEIR states that the purpose of the design guidelines is to ensure designs are “true to the vision” of UCSC, ~~but no requirement to follow~~. However, there is no requirement included that would make guidelines binding.

Response L7-33

As stated on page 3.1-36 of the Draft EIR, the analysis methodology for Chapter 3.1, “Aesthetics,” presumes, correctly, that projects implemented under the 2021 LRDP would comply with Physical Design Framework and 2021 LRDP Planning Principles and Guidelines. In addition, projects are presented to the Design Advisory Board for critical feedback and input at key milestones in the design process. Further, Mitigation Measure 3.1-3c requires future projects under the 2021 LRDP to comply with the standards set forth in the Campus Standards Handbook, which requires project compatibility with the approved LRDP and supporting planning documents.

Comment L7-34

- 3.1-4 - Meadow Areas – The DEIR includes the Physical Design Framework which provides: “Preserve the integrity of meadows by maintaining a clear meadow boundary. Site development so as not to encroach on the meadow open space.” The EIR should clarify the legal status of this Framework. If the University proposed to develop in the meadow area, would an amendment of the LRDP be required? This is necessary in the EIR in order for it to contain an accurate identification of potentially significant impacts.

Response L7-34

As stated on page 3.1-36 of the Draft EIR, the analysis methodology for Chapter 3.1, "Aesthetics," presumes correctly that projects implemented under the 2021 LRDP would comply with existing procedures pertaining to development within UC Santa Cruz (e.g., Design Review) and would be generally consistent with the UC Santa Cruz Physical Design Framework. Further, future projects would also be required to comply with the standards set forth in the Campus Standards Handbook and the UC Santa Cruz Design Review Process, which requires project compatibility with the approved LRDP and supporting planning documents. With respect to future development in the meadow area, as stated on page 2-19 and shown on Figure 2-4 of the Draft EIR, the Great Meadow is designated Natural Space under the 2021 LRDP. The principle use of the Natural Space designation is to maintain the landscape in its natural state, protected from development. Once adopted, future development would be planned and designed in accordance with the assigned land use designations under the 2021 LRDP. If proposed development is not allowed in a specific land use designation per the 2021 LRDP, UC Santa Cruz would conduct a formal approval process, for a major or minor amendment to the 2021 LRDP. The process for amending LRDP's is detailed on the UCOP website here: <https://www.ucop.edu/construction-services/facilities-manual/volume-2/vol-2-chapter-3.html>.

Comment L7-35

- Forests – "Build no taller than the surrounding tree canopy." Does this mean that any proposed development that would violate this policy would be prohibited under the LRDP? Again, this is necessary to adequately analyze potentially significant impacts. In addition, given that some of the campus redwood trees are as tall as 380 feet, the EIR should include mitigations specifying a maximum height limit and/or mitigations should this limit be exceeded.

Response L7-35

If a project was proposed that was not consistent with the 2021 LRDP proposed land use designations, an amendment to the 2021 LRDP would be required as noted in Response L7-34. Further, if a proposed project (e.g., with structures of greater height/massing than anticipated under the 2021 LRDP) would result in new or more severe environmental impacts than addressed in this EIR, additional CEQA documentation would be required. As stated on page 3.1-36 of the Draft EIR, the analysis methodology for Chapter 3.1, "Aesthetics," presumes that projects implemented under the 2021 LRDP would comply with existing procedures pertaining to development within UC Santa Cruz (e.g., Design Review) and would be generally consistent with the UC Santa Cruz Physical Design Framework.

Regarding the comments request to include mitigation that limits building heights in forested areas, Mitigation Measure 3.1-3c on page 3.1-45 of the Draft EIR, would require future projects to comply with the 2021 LRDP Physical Planning Principles and Guidelines which articulate the manner in which future development under the 2021 LRDP would be planned, designed, constructed, and maintained. 2021 LRDP Physical Planning Principle A.5 states that in forested areas, "buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized." Thus, compliance with the Physical Planning Principles and Guidelines in the 2021 LRDP and implementation of mitigation measures, as presented in Section 3.1, "Aesthetics" of the Draft EIR, are considered adequate to reduce impacts associated with building massing/height and further specification of maximum allowable heights are not considered necessary to reduce the impact. Refer also to Response L7-28 regarding building heights under the 2021 LRDP.

Comment L7-36

- 3.1-36ff – Under the heading "Issues Not Evaluated Further" the DEIR includes a series of campus development policies. There is no heading to this list and it is unclear why they are located there and their relation to the aesthetic analysis. This needs to be clarified.

Response L7-36

In response to this comment, the Draft EIR has been revised to clarify that the policies comprise the 2021 LRDP Physical Planning Principles and Guidelines and were inadvertently included in the "Issues Not Evaluated Further" section of the Draft EIR. As stated on page 3.1-36, the 2021 LRDP Physical Planning Principles and Guidelines articulate the manner in which future development under the 2021 LRDP would be planned, designed, constructed,

and maintained. These modifications are also shown in Chapter 4, "Revisions to the Draft EIR". The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

2021 LRDP Physical Planning Principles

In addition, the 2021 LRDP Physical Planning Principles, which are described below, articulate the manner in which future development under the 2021 LRDP would be planned, designed, constructed, and maintained.

A. The Campus Land – Respect and Resiliency

1. Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments -- meadow, ecotone (forest edge), and forest – with architecture that is sensitive to the natural setting.
2. Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.
3. Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.
4. Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.
5. Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.

B. Academic Core Infill and Expansion – Growth from Within

1. Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment
2. Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.
3. Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.
4. Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.
5. Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.

C. Campus Life and Housing – The Expanded Ring

1. Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.
2. Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.
3. Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.

4. Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.
5. Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.

D. Integrated Transportation – Walkable Core

1. Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core
2. Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment.
3. Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner campus loop and interconnected roadway network for improved access.
4. Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.
5. Generate dynamic public gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.

E. Pedestrian Mobility – Web of Pathways

1. Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.
2. Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.
3. Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.
4. Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.
5. Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.

F. Campus and Community – Culture and Connectivity

1. Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.
2. Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.
3. Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.
4. Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.
5. Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.

ISSUES NOT EVALUATED FURTHER

Result in Damage to Scenic Resources within a State Scenic Highway

There are no officially designated State highways in Santa Cruz County. The closest State-designated highway includes segments of California SR-1 located in Monterey County, which is approximately 30 miles south of the main residential campus. Given the distance to the main residential campus, views of the LRDP area are not visible from designated segments of SR-1. Therefore, potential effects of the 2021 LRDP on scenic resources within a State scenic highway are not addressed further.

A. ~~The Campus Land — Respect and Resiliency~~

1. ~~Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments — meadow, ecotone (forest edge), and forest — with architecture that is sensitive to the natural setting.~~
2. ~~Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.~~
3. ~~Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.~~
4. ~~Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.~~
5. ~~Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.~~

B. ~~Academic Core Infill and Expansion — Growth from Within~~

1. ~~Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment~~
2. ~~Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.~~
3. ~~Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.~~
4. ~~Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.~~
5. ~~Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.~~

C. ~~Campus Life and Housing — The Expanded Ring~~

1. ~~Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.~~
2. ~~Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.~~
3. ~~Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.~~

4. Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.
5. Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.

D. Integrated Transportation — Walkable Core

1. Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core
2. Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment
3. Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner campus loop and interconnected roadway network for improved access
4. Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.
5. Generate dynamic public gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.

E. Pedestrian Mobility — Web of Pathways

1. Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.
2. Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.
3. Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.
4. Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.
5. Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.

F. Campus and Community — Culture and Connectivity

1. Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.
2. Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.
3. Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.
4. Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.
5. Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.

Comment L7-37

- 3.1-38ff – Impacts and Mitigation – Impact 3.1-1 - On a Scenic Vista – The DEIR determines that the impact here will be less than significant because development will be adjacent to existing development and will follow design guidelines. This analysis of the impact on scenic vistas is misleading and inadequate for the following reasons:

- The photos don't identify the height of the proposed development and the draft LRDP proposes residential buildings generally 4-6 stories tall (although the Project Description indicates they can go as high as 8 stories – page 2-18) and the height of the buildings in the simulations isn't stated.
- The draft LRDP does not limit building height for most new developments or how much development will occur in the areas proposed for development. Therefore, it's impossible to determine what the impact of the Plan will be on scenic resources.

Unless the EIR simulations assume the maximum development and tallest structures allowed at each site in a scenic vista, the impact should be considered significant and unavoidable.

Response L7-37

Consistent with State CEQA Guidelines Section 15168, the Draft EIR analyzes implementation of the proposed plan at a programmatic level. As noted on page 1-3 of the Draft EIR, the 2021 LRDP does not mandate a level of growth or provision of new facilities. Rather, it provides a guide to the land development patterns and associated physical infrastructure that could be built to support a forecasted level of enrollment and employment growth. The visual simulations for each representative viewpoint evaluated under Impact 3.1-1 depict a reasonably foreseeable height and massing of future projects based on the use type, the area that the development is sited within, and the level of development anticipated within each development area under the 2021 LRDP. For example, potential employee housing depicted in Viewpoint 3 (Figure 3.1-14 on page 3.1-25 of the Draft EIR) was assumed to be two to three stories in height. Refer to Response L7-28, regarding height ranges identified in the 2021 LRDP.

Regarding the comments request to determine Impact 3.1-1 as significant and unavoidable, CEQA requires that conclusions be supported by substantial evidence (PRC section 21168.5). Impact 3.1-1 describes how future development would be required to comply with the UC Santa Cruz Design Review Process, standards set forth in the UC Santa Cruz Campus Standards Handbook, and be generally consistent with the Physical Design Framework and the Physical Planning Principles and Guidelines in the 2021 LRDP, which are established to provide aesthetically compatible facilities. In addition, Section 5 of the 2021 LRDP describes key physical planning considerations, including massing and height, pertaining to many of the areas shown in the renderings. Each project under the 2021 LRDP would be subject to individual review to ensure that these standards are met. The Draft EIR determines that because future development would be sited within and/or adjacent to existing developed areas, would comply with design and building standards that require consistency with surrounding uses, and would not further obstruct any existing long-distance views, the impact would be less than significant. The conclusion is supported by substantial evidence given the explanation provided in the Draft EIR.

Comment L7-38

- 3.1-3 – The DEIR insufficiently evaluates the project's potential to degrade existing visual character or quality in a non-urbanized area by only considering the impact of the 2021 LRDP from roadways and not from all publicly accessible vantage points. There is no analysis or evaluation of the impact of the 2021 LRDP on visual resources or existing visual character or quality of public views of the site from publicly accessible vantage points from paved and unpaved trails and fire roads. These are valuable community assets, publicly accessible, and routinely trafficked by pedestrians, cyclists, and equestrians. These trails can be referenced from figure 3.15.1-1, bike trails can be referenced in figure 4.12 of the LRDP. Aesthetic impacts from these public locations need to be evaluated in the EIR.

Additionally, more detailed information can be found on these upper campus trail map¹. Therefore, without this analysis and proposed mitigation(s), this section of the EIR is inadequate and an updated version should be recirculated that includes a detailed analysis of the visual impacts of the 2021 LRDP on the existing visual character or quality of public views of the site from publicly accessible trails, fire-roads, and all other publicly accessible space and vantage points. Because the trails are specifically used for pedestrians, cyclists, and equestrians to access undisturbed

natural space, the impact on these cherished visual resources on the existing visual character or quality of public views of the site could not be mitigated by adherence to planning documents that guide development in urbanized areas. UCSC must propose feasible mitigations to prevent the degradation of visual resources in North Campus. If none are available, this impact should be changed to **significant and unavoidable**.

¹ <https://ucscampusreserve.ucsc.edu/documents/ucsc-upper-campus-map>,
<https://ucscampusreserve.ucsc.edu/documents/cnr-sector-map-pdf>

Response L7-38

Contrary to the statements in the comment, Impact 3.1-3 of the Draft EIR evaluates temporary and permanent visual changes throughout the UC Santa Cruz main residential campus and Westside Research Park, especially in areas valued for their visual character or quality including the northern portion of campus. Specifically, page 3.1-43 states “The area in the northern portion of campus is valued for its scenic quality because of the visual landscape and attractiveness of redwood trees and forest within the foreground along Empire Grade. Therefore, it is possible that the introduction of new buildings and structures could damage the scenic value of the redwood forested area.” State CEQA Guidelines Section 15151 provides guidance on the degree of specificity required in the EIR. Specifically, an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. Further, evaluation of the environmental effects need not be exhaustive (i.e., presentation of visual simulations from all publicly accessible viewpoints is not required). Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA. Refer also to Master Response 11 regarding level of detail required for a program-level EIR.

Regarding impacts to long-range views, Impact 3.1-1 evaluates impacts to scenic vantage and viewpoint locations including views towards the coast. The paved and unpaved trails and fire roads referenced in the comment are located in forested areas and of intermittent views of the coast in certain areas, if at all. As discussed under Impact 3.1-1, development proposed 2021 LRDP within the main residential campus is expected to be consistent with and complementary to existing development and is not anticipated to result in substantial changes in long-distance and scenic views from within or across the main residential campus. As further shown in Section 2, “Project Description, Figure 2-4, as well as Figures 3.1-12 through 3.1-18, above (simulations of development consistent with the 2021 LRDP), new development 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.

With respect to mitigation, Impact 3.1-3 includes Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c which appropriately mitigate potential impacts to visual character by requiring UC Santa Cruz to implement setback requirements, design measures for protection of scenic views and scenic areas, and screening requirements, that would provide for development that is consistent with and complementary of the landscaped and existing built conditions, thereby minimizing adverse effects on existing visual character of the LRDP area. Therefore, the Draft EIR’s proposed mitigation is = feasible, effective, and in accordance with CEQA requirements.

Comment L7-39

- 3.1-43ff – Impact 3.1-3 – Degrade Existing Visual Character or Quality – The DEIR states: “land use changes would **generally** be visually consistent with existing development under the 2021 LRDP. However, development is also planned for more remote areas of the campus, including areas proximate to Empire Grade to the west of the Santa Cruz city limits.” The DEIR is inadequate in the vagueness of its analysis. To what extent would the proposed land use changes be consistent with existing on-campus development?

Response L7-39

State CEQA Guidelines Section 15151 provides guidance on the degree of specificity required in the EIR. Specifically, an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision on a project that intelligently takes into account the environmental consequences of the project. With respect to development proximate to Empire Grade, the Draft EIR (after an extensive discussion of the potential impact) concludes:

New development that extends beyond the height of existing redwood trees or otherwise alters the scenic nature within the forested area, including publicly accessible vantage points along Empire Grade north of the city limits, could damage or degrade the visual character and quality of the area. As a result, this impact would be **potentially significant**. (Draft EIR, page 3.1-44)

Further, as stated on page 3.1-45 of the Draft EIR, implementation of Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c would require future projects to comply with development requirements as well as distancing and screening requirements, so that future development is consistent with and complementary of the existing landscaped and built conditions, thereby minimizing adverse effects on existing visual character of the LRDP area. The comment does not address the details of this analysis, nor why it is not adequate.

Comment L7-40

- "The area in the northern portion of campus is valued for its scenic quality because the visual landscape and attractiveness of redwood trees and forest within the foreground along Empire Grade. Therefore, it is possible that the introduction of new buildings and structures could damage the scenic value of the redwood forested area." The DEIR should clarify here that there is no height limit in this subarea as stated later that "To the north within forested areas, buildings may be as tall as six or more floors, as dictated by their programs." The EIR must analyze the potential impacts of tall building on the visual character of the area.

Response L7-40

Refer to Response L7-28 regarding building heights and Response L7-35 regarding the 2021 LRDP Physical Planning Principles and Guidelines for future development located within the tree canopy. Also refer to Mitigation Measure 3.1-3a on page 3.1-44 of the Draft EIR, which requires a combination of setbacks and vegetative screening.

Comment L7-41

--3.1-3 - Despite the numerous impacts regarding development in north campus, such as, "The northeast portion of the main residential campus contains redwood forests that are valued for their scenic nature. Additionally, the existing redwood trees in this area provides a visual continuity of forested area and a natural screening feature for future development. New development that extends beyond the height of existing redwood trees or otherwise alters the scenic nature within the forested area, including publicly accessible vantage points along Empire Grade north of the city limits, could damage or degrade the visual character and quality of the area," there are no mitigation measures proposed that address these identified impacts. With 43% of the additional housing proposed in North Campus, there will be significant population changes to a previously unpopulated area. This will inevitably impact the visual resource of North Campus, which was previously an un-urbanized, and (relative to the proposed population growth) unpopulated area. With significant development as well as construction, this will inevitably impact the scenic quality of the space and therefore must be mitigated to a less than significant level. If no feasible mitigations are possible, this impact should be changed to significant and unavoidable.

Response L7-41

As stated on page 3.1-44 of the Draft EIR, land use changes identified in the 2021 LRDP largely focus future development within existing developed areas of the main residential campus.

To the north within forested areas, buildings may be as tall as six or more floors. Refer to Response L7-35 regarding the 2021 LRDP Physical Planning Principles and Guidelines for future development located within the tree canopy. Further, all future buildings, as part of the UC Santa Cruz Design Review Process, Campus Standards Handbook requirements, and Physical Design Framework guidelines, would include landscaping and other features consistent with existing environmental and site conditions, which would soften the visual interface between new development under the 2021 LRDP and existing campus structures and surrounding landscape. Regarding mitigation, State CEQA Guidelines section 15126.4(a)(1) requires that the "EIR describe feasible measures which could minimize significant adverse impacts...." Impact 3.1-3 includes Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c which would require UC Santa Cruz to implement setback requirements, design measures for protection of scenic views and scenic areas, and screening requirements, that would provide for development that is consistent with and complementary of the landscaped and existing built conditions, thereby minimizing adverse effects on existing visual character of the LRDP

area. Therefore, the Draft EIR's proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-42

- 3.1-3 - There is no evidence provided to support the statement made on page 3.1-44 that, "While new development in these areas may change the visual quality, these changes are more likely to be perceived as an improvement, rather than an adverse impact, by providing a more congruous visual condition, consistent with a higher-education institution." In fact, there are numerous examples of significant public opposition to the development of the north campus and for the preservation of that area for its scenic value and biotic importance. It is unclear how this conclusion is determined and either information should be provided to substantiate this claim or it should be removed from the final EIR.

Response L7-42

To clarify, the referenced statement on page 3.1-44 of the Draft EIR is regarding land use changes proposed at the Westside Research Park, not the north campus. However, in response to this comment, page 3.1-44 of the Draft EIR was revised as follows:

Land use changes proposed at the Westside Research Park would also occur within a developed area of the city and would be consistent with surrounding uses, which include commercial, industrial, community, and multi-family residential uses. While new development in these areas may change the visual quality, required compliance with UC Santa Cruz design standards (i.e., Physical Design Framework and Campus Standards Handbook) would ~~these changes are more likely to be perceived as an improvement, rather than an adverse impact, by providing for a continued congruous visual condition, consistent with existing development, a higher-education institution.~~

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5 because it provides clarification regarding a statement made in the Draft EIR and would not result in new or more significant impacts. As such, recirculation of the Draft EIR is not required. Refer also to Response L7-35 regarding the 2021 LRDP Physical Planning Principles and Guidelines for future development located within the tree canopy.

Comment L7-43

- 3.1-44 – The DEIR states: "As described in Chapter 2, "Project Description, "future buildings for academic and support under the 2021 LRDP would generally be similar to those already existing in the academic core, ranging in height between four and six stories." This statement essentially provides no maximum height to development and contradicts the 8-story height limit on page 2-18). The DEIR needs to clarify the maximum heights used in determining the impact level here and provide evidence to support this finding.

Response L7-43

Refer to Response L7-28, regarding height ranges identified in the 2021 LRDP.

Comment L7-44

- The DEIR states: "However, development activities within areas of campus that are highly regarded for their scenic and visual qualities could degrade or damage the character or quality of surrounding uses and landscapes. The northeast portion of the main residential campus contains redwood forests that are valued for their scenic nature. Additionally, the existing redwood trees in this area provides a visual continuity of forested area and a natural screening feature for future development. New development that extends beyond the height of existing redwood trees or otherwise alters the scenic nature within the forested area, including publicly accessible vantage points along Empire Grade north of the city limits, could damage or degrade the visual character and quality of the area. As a result, this impact would be potentially significant." The DEIR is correct in its finding that development under the LRDP could significantly degrade the visual character of the campus.

Response L7-44

The comment restates information provided on page 3.1-44 of the Draft EIR. No response is required.

Comment L7-45

- 3.1.45 – Mitigation Measure 3.1-3 – Protection of View within Scenic Areas – While the impact analysis largely focuses on potential impacts on the north campus, the mitigation measure only refers to viewsheds in central and south campus subareas, not the north campus subarea. This is inadequate and needs to be corrected in the EIR.

Response L7-45

As stated on page 3.1-44 of the Draft EIR, publicly accessible vantage points along Empire Grade within the north campus subarea provide views of the forested areas in the north campus. State CEQA Guidelines Section 15126.4(a)(1) requires that the “EIR describe feasible measures which could minimize significant adverse impacts....” Mitigation Measure 3.1-3b would implement design measures to protect views of the north campus along Empire Grade, and require future development to comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework and Physical Planning Principles and Guidelines in the 2021 LRDP. Mitigation Measure 3.1-3c would require development within primary campus viewsheds, including the north campus, to comply with siting, development patterns, and architecture, consistent with the 2021 LRDP Physical Planning Principles and Guidelines, including those related to building height and massing. Therefore, the Draft EIR’s proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-46

- Significance after Mitigation – The DEIR finds that “Implementation of Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c would reduce impacts to less than significant by requiring building limitations and development requirements as well as distancing and screening requirements, that would provide for development that is consistent with and complementary of the landscaped and existing built conditions, thereby minimizing adverse effects on existing visual character of the LRDP area. Additionally, implementation of these mitigation measures would ensure cohesive development and consistency with the natural landscapes present within these areas of campus. In addition, future projects would be required to undergo review by the Campus Design Advisory Board and incorporate design recommendations as part of the development project.”

Response L7-46

The comment re-states information provided on page 3.1-45 of the Draft EIR. No response is required.

Comment L7-47

- The Campus Design Advisory Board is referenced four times in various mitigation measures in this section. According to documents released in a CPRA request labeled Herken 04/02/2018 CPRA Request, the Board was unanimously, “...opposed to the selection of [the] site for the FSH (Family Student Housing) development. They questioned what alternative sites had been evaluated and expressed concerns that the low-density program, located at such an iconic gateway intersection, undermines the careful approach and purposefulness of campus planning, and were alarmed by the potentially inhospitable interruption to the visual character of the open meadow in that specific location.” Despite the objections, the FSH project was approved and has been included in this EIR as already existing and assumed development. Therefore, it can be concluded that the Campus Design Advisory Board does not have the authority to change specific project details or require changes to projects. Without performance standards strengthening the role of the Campus Advisory Board’s ability to 1) enforce design standards, 2) reject project proposals that don’t meet the various campus planning documents, and 3) enforce compliance with the above mitigations that rely on their “review”, the determination of this impact being brought to a less-than-significant impact just by their review is inadequate.

Response L7-47

To clarify the role of the UC Santa Cruz Design Advisory Board, the responsibilities of the board are listed on page 3.1-2 of the Draft EIR and included below for reference:

- ▶ To assure compatibility with the approved Long Range Development Plan and supporting planning documents that have been adopted by the campus.
- ▶ To review planning studies, proposed building designs and siting alternatives for compatibility with their settings and appropriateness to their functional programs and budgets.
- ▶ To ensure that proposals for new projects are presented in a broad context, with due consideration given at all points of project development to issues of landscape design, circulation, and environmental protection.
- ▶ To review all aspects of exterior urban and landscape design and to provide guidance to the design teams, building committees, and the campus planning committee.
- ▶ To identify and articulate to the campus community planning and design issues critical to ongoing campus development.

These responsibilities include review of projects to assure compatibility with the approved LRDP and the immediate site, provide guidance to the design team, and identify design issues critical to ongoing campus development. In the example provided in the comment, the UC Santa Cruz Design Advisory Board was "opposed to the selection of [the] site for the FSH (Family Student Housing) development." Many factors are considered in the siting and design of capital projects, and the Design Advisory Board offers a critical perspective that benefits all development on the campus, and their input is a critical consideration that the campus must address. However, they do not approve projects. Further, contrary to statements made by the commenter, Mitigation Measures 3.1-3b and 3.1-3c outlined in the Draft EIR and as amended through the Final EIR further enable the review of the Design Advisory Board to enact site-specific considerations as follows:

Mitigation Measure 3.1-3b: Implement Design Measures for Protection of Views Along Empire Grade

Development within 500 feet of Empire Grade and west of the Santa Cruz city limits and the Arboretum and Botanic Garden within the UC Santa Cruz main residential campus shall be subject to review by the Campus Design Advisory Board to ensure that design of new facilities shall be visually unobtrusive and not unduly interfere with existing views. Review of future development by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework and Physical Planning Principles and Guidelines in the 2021 LRDP.

Mitigation Measure 3.1-3c: Implement Design Measures for Protection of View within Scenic Areas

For any development within primary campus viewsheds identified as scenic areas, UC Santa Cruz shall require that siting, development patterns, and architecture is consistent with the 2021 LRDP Physical Planning Principles and Guidelines, including those related to building height and massing, in order to ensure that the visual character and quality of scenic areas are not substantially degraded. Primary campus viewsheds include primary views of the main residential campus including the Great Meadow, East Meadow, and three smaller meadows (Porter, Crown, and Kerr), as well as prominent scenic views from Cowell College Plaza, the Arts area in the Academic Core, University House, the knoll at Porter College, and the field at Oakes College. Review of future developments by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall also comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework.

Therefore, the review responsibilities of the Design Advisory Board and ability to enact site-specific considerations are outlined in the Draft EIR. Further, as stated on page 3.1-44 of the Draft EIR, future projects would be required to comply with the UC Santa Cruz Physical Design Framework and the Campus Standards Handbook, which establish requirements intended to maintain important aesthetic features and compatibility with existing visual conditions.

Comment L7-48

- The mitigation measures are also inadequate because they do not specifically correspond to the impact on the scenic visual quality of development in the north campus subarea. The DEIR provides no mitigations for the potentially significant impacts of converting a currently scenic area into academic, support and residential development with buildings potentially over six stories and with no height limits.

Response L7-48

Refer to Response L7-41, regarding the adequacy of Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c.

Comment L7-49

- The analysis of this impact is reminiscent of bait and switch tactics. The analysis of the draft LRDP's impact on visual character and quality adequately focuses on the north campus subarea and its important scenic character and quality are recognized. However, the mitigations ignore the potentially significant impacts of development in this subarea, except for the area adjacent to Empire Grade, and focus on the visual quality in the lower campus. The EIR must provide mitigation measures for the aesthetic impacts of development in the north campus subarea and determine the subsequent impact level with the imposition of these mitigations. The impact after mitigation should be **significant and unavoidable** without these revisions.

Response L7-49

Refer to Response L7-45 regarding the adequacy of mitigation measures.

Comment L7-50

- 3.2-11 – Impact 3.2-2 – Loss of Forest Land – The DEIR indicates 64 acres of forest land would be lost in the north campus subarea, which contains 750 acres (8%) (page 3.2-7). One of the significance criteria quoted on page 3.2-9 states that a significant impact would: "result in the loss of forest land or conversion of forest land to a non-forest use." The significance criterion, therefore, contains a zero threshold for the amount of forest land that would need to be lost in order for the impact to be considered significant. The loss of 123 acres of forest land (over 10% of the existing forest land), with 64 acres lost to new development in the north campus subarea should be considered a **significant and unavoidable** impact despite the fact that CalFire timber harvesting requirements must be met.

Response L7-50

Impact 3.2-2 of the Draft EIR evaluates the potential for the 2021 LRDP to result in a loss or conversion of forest land to non-forest use consistent with the significance criteria listed in Appendix G of the State CEQA Guidelines. Appendix G of the State CEQA Guidelines serves as "a sample form that may be tailored to satisfy individual agencies' needs and project circumstances.... The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." UC Santa Cruz, as the lead agency, chose to use the sample questions in Appendix G as the significance determination threshold for assessing impacts that could result from implementation of the 2021 LRDP, including the loss or conversion of forest land to non-forest use. Consistent with PRC Section 12220(g), Impact 3.2-2 defined "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. As explained on page 3.2-12 of the Draft EIR, UC Santa Cruz would retain an estimated 10 percent or greater tree cover at a given development site such that the project sites 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. Therefore, the Draft EIR's consideration of PRC Section 12220(g) to determine the ultimate significance conclusion of forest resources meets the CEQA requirement for thresholds of significance and substantial evidence.

Comment L7-51

- The FEIR should analyze the potential loss of forest land that could result from the increased risk of wildfire that will result from the 2021 LRDP and outline mitigation measures that replicate lost forest resources should an event occur.

Response L7-51

Impact 3.18-2 evaluated the potential for 2021 LRDP implementation to exacerbate wildfire risk due to on-campus development and land use patterns. As discussed on page 3.18-17 of the Draft EIR, preparation and implementation of a campus-wide vegetation management plan, as required by Mitigation Measure 3.18-2, would adequately address any potential wildfire risk associated with new development and changes in land use as proposed under the 2021 LRDP. UC Santa Cruz would be required to prepare and implement specific actions to reduce wildfire risk within the LRDP area. Therefore, the 2021 LRDP is not expected to result in loss of forest resources due to increased risk of wildfire. Refer also to Master Response 4 regarding the Draft EIR's analysis of potential impacts related to wildfire in accordance with CEQA requirements.

Comment L7-52

- 3.3-17 – The DEIR states: "Based on the overall building program, as shown in Chapter 2, "Project Description," annual and maximum daily construction emissions are based on the combined results of CalEEMod and RCEM runs for the construction of approximately 312,700 assignable square feet (asf)(approximately 481,100 gross square feet [gsf]) of various land uses per year (not including parking lots), amortized over 18 years to estimate average annual construction activity, associated annual emissions, and maximum daily emissions that may occur within a year of construction."

Response L7-52

This comment restates the Draft EIR's project description. No response is required.

Comment L7-53

- 3.3-22 – Impact 3.3-1 – Construction-Generated Emissions – The DEIR's summary description of the quantitative analysis performed to estimate emissions includes roadway and bridge construction. However, no information is presented regarding how these would increase total emissions. The EIR should include a table with the assumptions used to estimate construction emissions from the various sources. Table 3.3-4 on page 3.3-19 should provide this information.

Response L7-53

Table 3.3-4 does include the roadway and bridge construction assumptions, under "Campus Road, Trails, and Pedestrian Bridges". Additional details can be found in the Appendix D, starting on page 3, where the inputs for the Road Construction Emissions Model are shown.

Comment L7-54

- The DEIR states: "This average sf value was estimated based on 18 years of construction, from 2022 to 2040, assuming that construction activities would be relatively similar from year to year." This statement essentially assumes that housing and academic construction will occur in sync with enrollment since the LRDP assumes student enrollment will increase at the same annual level. However, there is no binding commitment in either the LRDP or the DEIR that ties enrollment growth to the construction activity, either for housing or other infrastructure. Without this commitment, the annual assumptions for construction emissions represent a best-case analysis and understate potentially the higher levels of emissions if construction is not tied to enrollment. The EIR should be corrected to either include a mitigation measure tying enrollment to development or provide a worst-case analysis.

Response L7-54

While the programmatic nature of the EIR limits the specificity in analyzing the level of construction activity that would occur over the build out period of the 2021 LRDP, the Draft EIR provides a reasonable analysis of foreseeable levels of construction during the implementation period based upon historic and projected development levels. As noted on page 3.3-17 of the Draft EIR, the programmatic assessment of construction assumes up to approximately 481,100 gsf of construction, which exceeds an amortization of potential building square footage under the 2021 LRDP through the 2040-2041 academic year by approximately 50,000 gsf per year (i.e., assumes about 10 percent more than average amount of development per year). As a result, the Draft EIR's assessment of potential construction emissions is considered reasonable (not best case or even an average case) and in accordance with CEQA

requirements. The assessment of a worst-case analysis is not required under CEQA and would result in unrealistic overestimates of construction emission estimates. Future projects under the 2021 LRDP will be subject to environmental review, which, among other things, will assess whether assumptions in the EIR about the scale and pace of development were accurate. With respect to the potential need to tie enrollment to development, refer to Master Response 9, regarding plan implementation and subsequent environmental review.

Comment L7-55

- Mitigation Measure 3.3-2 The DEIR states: "UC Santa Cruz has little direct control over fugitive PM emissions from roadway dust nor the use of zero-emissions vehicles from non-university mobile sources. Further PM reductions would require mitigation of these sources of PM10 emissions. Therefore, this impact would be significant and unavoidable". Further, the DEIR states, "Table 3.3-9 shows the modeled emissions after mitigation, quantifying all proposed measures within Mitigation Measure 3.3-2 that are under UC Santa Cruz's direct control." However, the DEIR does not consider on-campus policy changes that would reduce these occurrences substantially, such as traffic reduction efforts that, for instance, could prohibit all future UCSC students, faculty, and staff from having vehicles on-campus or limiting on-campus vehicles to only those that are zero-emissions. The FEIR should include analysis of the PM10 emissions after on-campus policy changes are considered and should include potentially feasible mitigations.

Response L7-55

Limiting on-campus vehicles to zero-emission vehicles is not feasible as UC Santa Cruz cannot control the vehicle choices of private citizens. In addition, such restrictions could restrict campus access to students and staff who are unable, for financial or other reasons, to own a fully electric vehicle. Electric vehicles typically cost well over \$30,000 and imposing this additional cost on students, or other drivers, as a condition for them to drive on campus is not considered reasonable by UC Santa Cruz. Furthermore, restricting campus access to electric vehicles would not reduce roadway dust, which is produced by all vehicles.

UC Santa Cruz is currently engaged in multiple Transportation Demand Management (TDM) initiatives such as improvements to its Bike Lending Library, bike path improvements, bike education, promotion of bus, vanpool, rideshare programs, etc. Mitigation Measure 3.16-2, Parking Management Tools, on page 3.16-37 of the Draft EIR, includes parking management and eligibility policies, as potential TDM measures. Further, the consolidation/reduction in on-campus parking to emphasize the use of mobility hubs and transit (as a component of the 2021 LRDP as stated on page 2-23 of the Draft EIR) would likely achieve some of the reduction envisioned by the suggestion of no faculty, staff, or student vehicles on campus. The TDM Program would include programs and policies to incentivize campus residents not to bring a car to campus, and to make it easier for students, staff, and visitors to travel to, from, and around campus without a car. As part of UC Sustainable Practices Policy implementation, UC Santa Cruz will identify and implement programs and policies to equitably and efficiently incentivize the use of zero emission vehicles, such as charging or parking benefits, or strategic permit pricing. Further, consistent with the UC Santa Cruz's Campus Sustainability Plan, implementation of Mitigation Measure 3.3-2 would require UC Santa Cruz to implement measures to reduce the generation of reactive organic gases and respirable particulate matter (PM₁₀) emissions related to implementation of the 2021 LRDP. These measures include the use of zero emission or low emission vehicles, installation of electric vehicle charging stations, reduction of campus vehicle speed, and the use of zero-VOC products.

Comment L7-56

- Mitigation Measure 3.3-2 The DEIR is misleading when it states: "While such modeling may be warranted when considering extremely large projects that exceed thresholds by multiples, they are of questionable value, and are, in fact, often misleading when considering projects such as the 2021 LRDP, which exceed the significance standard by a very small margin." The 2021 LRDP will exceed MBARD's threshold by 11%. CEQA does not require the evaluation of the 2021 LRDP in relation to other projects, just in relation to the applicable air quality standards. Therefore, the contrast between UCSC and "extremely large projects" is irrelevant and should not be included in the FEIR.

Response L7-56

The referenced discussion in the Draft EIR states that health impact modeling for PM₁₀ emissions is warranted and of potential scientific value for projects that exceed significance thresholds by a significant margin. In contrast, as discussed under Impact 3.3-2, operation of the 2021 LRDP would exceed PM₁₀ thresholds of significance by only 11 percent after implementation of Mitigation Measures 3.3-2. Modeling of health impacts associated with criteria pollutants is inherently unreliable, even for projects that exceed thresholds of significance by extremely large margins. For projects that exceed thresholds by small amounts—like the 2021 LRDP—health impacts cannot be reliably modeled or predicted, and an analysis of potential health impacts would be scientifically unsound and of no informational value.

Given the subjective nature of the language in the referenced paragraph, the discussion under Mitigation Measure 3.3-2 has been revised, as follows and as shown in Chapter 4, "Revisions to the Draft EIR:

While such modeling may be warranted when considering ~~extremely large~~ projects that exceed thresholds by multiples, they are of questionable value, and are, in fact, often misleading when considering projects such as the 2021 LRDP, which only exceeds the significance standard by 11 percent ~~a very small margin~~.

Comment L7-57

- 3.4 – 23 – Mitigation Measure 3.4-4a: Cowell Lime Works – The mitigation measure component to require at least a 200-foot buffer between the Historic District and new buildings "to the greatest extent feasible," is inadequate. The EIR needs to include performance standards for determining feasibility.

Response L7-57

State CEQA Guidelines Section 15126.4(a)(1) requires that the "EIR describe feasible measures which could minimize significant adverse impacts...." Mitigation Measure 3.4-4a directs UC Santa Cruz to require that future projects comply with specific design considerations and conduct any development within or proximate to the Cowell Lime Works Historic District in a manner compatible with the historic aspect of the historic district. Further, implementation of Mitigation Measures 3.4-4a requires the implementation of a 200-foot buffer if feasible, as cited by the commenter, and additional measures if it is not feasible. Feasibility will be determined on a project-by-project basis and will depend on the size, location, and characteristics of each specific project. However, this measure is paired with other measures to ensure that, if buffers are infeasible, actions will be taken to ensure impacts are mitigated.

As to additional measures, any development that must be conducted within that buffer would be required to be evaluated by an architectural historian and to comply with performance standards, namely the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Mitigation Measure 3.4-4a includes appropriate requirements to minimize potential impacts to the Cowell Lime Works Historic District where it is not feasible to maintain the 200-foot buffer. Accordingly, the mitigation measure is effective to reduce impacts to a less-than-significant level, regardless of whether it is deemed feasible to implement a 200-foot buffer and how that feasibility is evaluated.

Comment L7-58

3.5-3 – Coastal Zone – The DEIR states: "Portions of the LRDP area, including the Westside Research Park and the area west of Empire Grade within the Main Residential Campus, fall within the coastal zone. As described in Section 3.11, "Land Use and Planning," although campus lands are not included in any Local Coastal Program (LCP), UC Santa Cruz must comply independently with the requirements of the CCA." The statement that campus lands are not included in any LCP is incorrect. The area west of Empire Grade is within the County's approved LCP.

Response L7-58

As stated on page 3.11-1 of the Draft EIR, because UC Santa Cruz is a state agency, campus lands are not included in (i.e., subject to) either the City of Santa Cruz and County general plans or Local Coastal Programs (LCPs). While campus lands may be reflected in the documents referenced by the commenter, the City and County LCPs do not apply to UC Santa Cruz (i.e., state) lands. Further response is not required. For additional information, refer to Master Response 2, specifically under the adherence to local policies subheading.

Comment L7-59

- 3.5-4 – Ranch View Terrace HCP – The EIR should identify Inclusion Area A as located in the Coastal Zone.

Response L7-59

Inclusion Area A is located west of Empire Grade, as depicted in Figure 3.5-1 on page 3.5-5 of the Draft EIR. The description of the California Coastal Act on page 3.5-3 of the Draft EIR, states that “Portions of the LRDP area, including the Westside Research Park and the area west of Empire Grade within the Main Residential Campus, fall within the coastal zone.

Comment L7-60

- 3.5-4ff – Santa Cruz County General Plan – The DEIR is seriously inadequate in not identifying all the County General Plan policies cited as also being Local Coastal Program policies as well. This error is compounded when the DEIR states that the University “is not bound” by the County’s LCP. Once the Coastal Commission approves a jurisdiction’s LCP, its policies must be followed for any State agency development with the jurisdiction’s Coastal Zone boundary. The EIR must clarify the role of the County’s General Plan/Local Coastal Program policies for the portion of the campus west of Empire Grade.

Response L7-60

As stated on page 3.11-1 of the Draft EIR and because UC Santa Cruz is a state agency, campus lands are not included in either the City of Santa Cruz and County general plans or LCPs. Further, as noted in Section 3.0.1, “University of California Autonomy,” UC Santa Cruz, a constitutionally created state entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of the university’s education purposes. This does not mean that UC Santa Cruz is exempted from the Coastal Act (state law) and Coastal Commission (state entity) authority. To the contrary, UC Santa Cruz must adhere to coastal policies during project-level environmental review and permitting, in which projects would be subject to Coastal Commission approval and oversight.

Comment L7-61

- 3.5-11 – The DEIR finds that Dwarf redwoods “may warrant additional consideration” due to their potential rarity. How many acres of Dwarf Redwoods are located on campus?

Response L7-61

See Response L7-13 and Master Response 11 concerning level of detail evaluated in this EIR. Project-level survey requirements, as outlined in Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR, would include identification of potential sensitive natural communities on a project site (including dwarf redwoods), and subsequent protocol-level surveys for sensitive natural communities if these resources may occur, as outlined in Mitigation Measure 3.5-3a on page 3.5-66 of the Draft EIR.

Comment L7-62

- 3.5-31 – Critical Habitat – The first paragraph on this page of the DEIR is unclear. On the one hand, it indicates that the University is not required to consult with USFWS as part of the implementation in critical habitats. However, it also states that the USFWS must consult with itself before approving an HCP or incidental take permit. Would the University need an HCP or take permit for construction in critical habitats? If so, how would it acquire these without consulting with the USFWS? The role of the USFWS needs to be clarified.

Response L7-62

As stated on page 3.5-31 of the Draft EIR, UC Santa Cruz, as a state agency, is not required to consult with USFWS for nonfederal actions simply by virtue of the fact that a project is within designated critical habitat; critical habitat designations are imprecise, and actual project impacts—including the potential need for consultation with USFWS—are determined based on project-specific surveys and data. UC Santa Cruz would need to consult if its actions resulted in take of a species covered by the federal Endangered Species Act. While much of the area where designated critical habitat for California red-legged frog (federal-listed endangered species) overlaps the LRDP area contains habitat suitable for the species (as shown in Figure 3.5-7 on page 3.5-45 of the Draft EIR) some of these

areas of overlap do not contain habitat suitable for the species (e.g., developed areas and other areas where presence of the species is unlikely). Projects under the 2021 LRDP would only require consultation with USFWS if a project was likely to result in take of California red-legged frog, as determined through implementation of Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR, regardless of whether designated critical habitat for the species is present. However, as noted in Master Response 12, the campus has initiated discussions with the USFWS to permanently set aside acreage currently designated in the Campus Natural Reserve (CNR) on the main residential campus into a campus-wide HCP.

Further, refer to Response F1-2 regarding edits to the impact discussion for California red-legged frog on pages 3.5-43 through 3.5-44, Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47, and Figure 3.5-7 on page 3.5-45 of the Draft EIR.

Comment L7-63

- 3.5-32 – Redwood Forest Sensitive Community – The DEIR indicates that much of the 860.4 acres of redwood forest would not meet the qualifications of the redwood forest sensitive natural community. The portion of the redwood forest that does qualify should be mapped.

Response L7-63

As noted in Master Response 11, the Draft EIR is a program-level document; thus, fine-scale mapping of the entire LRDP area has not been conducted. Project-level evaluations, including project-level survey requirements (e.g., as outlined in Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR) would include identification of potential sensitive natural communities on a project site (including redwood habitat) and subsequent protocol-level surveys for sensitive natural communities if these resources may occur, as outlined in Mitigation Measure 3.5-3a on page 3.5-66 of the Draft EIR. Further refined mapping at this time as part of the programmatic analysis of the 2021 LRDP is not required.

Comment L7-64

- 3.5-37 – Figure 3.5-6 – Development Areas Overlay Vegetation Communities. From the figure, it appears as if a new road is proposed connecting the two areas proposed for development in the north campus subarea. Is this a proposal in the LRDP?

Response L7-64

During initial development of the 2021 LRDP, the potential for a North Loop Road, which was also identified as part of the 2005 LRDP, had been included but was later removed. The proposed campus roadway network under the 2021 LRDP is shown on Figure 2-6. Within Figure 2-4 and Figure 3.5-6, the envisioned development area has been revised to reflect the potential feature which has been removed.

Comment L7-65

- 3.5-40ff – Mitigation for Special Status Plants – The mitigation measure in the DEIR only requires replacement of lost vegetation on a 1 for 1 basis. Given the sensitivity of these species, elimination of their natural habitat should require replacement at least on a 2 for 1 basis in order for the mitigation to be adequate. Requiring a 2 for 1 replacement of vegetation in critical habitat is a common and feasible option.

Response L7-65

A 1:1 replacement ratio, or “no net loss” is common for development projects, and a ratio greater than 1:1 is not typically required or recommended by applicable resources agencies (e.g., USFWS, CDFW). Further, under CEQA, mitigation measures must have an “essential nexus” and be roughly proportional to the impact that they cause; this is also consistent with constitutional law on takings. Thus, for the purposes of CEQA, a greater than “no net loss” mitigation is not considered to be consistent with CEQA requirements and is more than needed to mitigate an impact. However, Mitigation Measure 3.5-1b, which starts on page 3.5-40 of the Draft EIR, provides room for agency coordination and ratios (outside of the context of CEQA) by specifying that the compensation ratio will be “...at a minimum 1:1 ratio, considering acreage as well as function and value.” If determined at the project-level by a qualified

biologist that a 1:1 ratio would not be sufficient to compensate for the impact of future development under the 2021 LRDP, a project-level environmental analysis would not limit the ratio to 1:1.

Comment L7-66

- 3.5-42 – Significance after Mitigation – While the mitigation measure requires meaningful actions to replace sensitive vegetation removed from LRDP development sites, there is no evidence that such actions will be successful. Therefore, it isn't possible to adequately determine that the impacts will be less than significant. In fact, given the failure to transplant sensitive species in other projects, there can be no assurance of successful replacement. Given this uncertainty of success and the lack of substantial evidence, the potential impact should be **significant and unavoidable**.

Response L7-66

The comment's statement that Impact 3.5-1 (on page 3.5-38 of the Draft EIR) should be significant and unavoidable because there is no evidence that mitigation efforts is inaccurate. Mitigation Measure 3.5-1b, which starts on page 3.5-40 of the Draft EIR, includes required success criteria for mitigation for unavoidable impacts on special-status plants. Specifically, a mitigation (i.e., plant transplantation, habitat restoration, habitat creation) effort will be considered successful if the preserved and compensatory plant populations have equal or greater extent of occupied area and plant density as the affected occupied habitat, and if these populations are self-producing (e.g., plants reestablish annually for a minimum of five years). Mitigation Measure 3.5-1b outlines success criteria with specific requirements such that it is possible to determine whether mitigation is successful.

Comment L7-67

- 3.5-46 – Red-legged Frog – The DEIR is unclear regarding the requirements under the federal Endangered Species Act if an LRDP might "take" red-legged frogs or reduce their habitat. The DEIR indicates that the University "may" pursue incidental take coverage by getting a biological opinion or a Habitat Conservation Plan. Is the University required to do one or the other, or may it do neither? The USFWS role needs to be clarified.

Response L7-67

As stated in Mitigation Measure 3.5-2a, which starts on page 3.5-46 of the Draft EIR, UC Santa Cruz would be required to pursue incidental take coverage under Section 7 or Section 10 of the federal Endangered Species Act if take of California red-legged frogs is likely. Both strategies would provide take coverage for California red-legged frog. Mitigation Measure 3.5-2a has been edited to reflect that, "UC Santa Cruz ~~may~~ shall pursue," rather than voluntary, if a project under the 2021 LRDP could result in take of California red-legged frogs. As noted in Response Master Response 12, the campus has initiated discussions with USFWS to prepare a campus-wide HCP.

Comment L7-68

- The DEIR determined that the significance of potential impacts on red-legged frogs after mitigation is less than significant. This is inadequate. While USFWS may give the University permission to take red-legged frogs and/or their habitat when LRDP development results in unavoidable impacts, that doesn't mean, under CEQA, that the impact is less than significant. Moreover, there are no performance standards to ensure that the potentially significant will be reduced to a less than significant level. Therefore, the potential impacts to the species would be **significant and unavoidable**.

Response L7-68

Mitigation Measure 3.5-2a, which starts on page 3.5-46 of the Draft EIR includes a mitigation strategy of identification of habitat suitable for California red-legged frogs on a project site, a habitat suitability verification analysis, an assessment of whether a future project would result in injury or mortality of California red-legged frogs, implementation of impact minimization measures (e.g., exclusion fencing), implementation of compensatory actions, consultation with USFWS if adverse effects cannot be avoided, and incidental take coverage through consultation with USFWS, which would typically include additional take minimization measures and compensation requirements. Moreover, the federal Endangered Species Act requires that projects mitigate their effect on endangered species.

(2)(A) No permit may be issued by the Secretary authorizing any taking referred to in paragraph (1)(B) unless the applicant therefor submits to the Secretary a conservation plan that specifies— (i) the impact which will likely result from such taking; (ii) what steps the applicant will take to minimize and mitigate such impacts, and the funding that will be available to implement such steps. (Section 10 of the Federal Endangered Species Act)

In addition, as noted in Response Master Response 12, the campus has initiated discussions with USFWS to prepare a campus-wide HCP. Accordingly, any impacts with respect to biological impacts, including California red-legged-frog, would be reduced to a less-than-significant level through mitigation as required by the USFWS, based on the benchmarks and performance standards that govern issuance of take permission under the Federal Endangered Species Act.

Comment L7-69

- 3.5-52 – Mitigation Measure 3.5-2e – Burrowing Owls – While the DEIR requires off-site mitigation to include “measures of success,” there are no requirements imposed should the measures not be successful. Simply measuring whether a mitigation achieves its objective does not sufficiently reduce the impact to a less than significant level. Moreover, these measures of success are not specifically identified so it is impossible for the public to evaluate their potential to succeed. Absent measurable performance standards the potential impact should be determined as **significant and unavoidable**.

Response L7-69

Contrary to statements made in this comment, “measures of success” are identified in Mitigation Measure 3.5-2e, which starts on page 3.5-50 of the Draft EIR: “Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.” Mitigation Measure 3.5-2e has been revised to include a requirement in the burrowing owl mitigation and monitoring plan for measures that would be implemented if these measures of success were not met as follows:

Mitigation Measure 3.5-2e: Conduct Protocol-Level Surveys for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for burrowing owl is present within a project site, the following measures shall be implemented prior to and during construction of a particular project under the 2021 LRDP:

- ▶ A qualified biologist will conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of habitat suitable for the species identified during the reconnaissance-level survey (e.g., ruderal grassland, successional grassland, scrub habitat with sparse shrub cover) on and within 1,500 feet of the project site. Surveys will be conducted before the start of project activities and in accordance with Appendix D of the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFW 2012, or most current version) (CDFW Staff Report).
- ▶ If no occupied burrows are found, the qualified biologist will submit a report documenting the survey methods and results to UC Santa Cruz, and no further mitigation will be required.
- ▶ If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), UC Santa Cruz shall establish and maintain a minimum protection buffer of ~~400~~ 165 feet around the occupied burrow throughout construction. The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan will be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls will not be excluded from occupied burrows until the project

burrowing owl exclusion plan is approved by CDFW. The exclusion plan will include a compensatory habitat mitigation plan (see below).

- ▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows will not be disturbed and will be provided with a protective buffer at a minimum of ~~400~~ 650 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report.
- ▶ If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, UC Santa Cruz will mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) will be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. UC Santa Cruz will retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
 - Mitigation lands will be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
 - If feasible, mitigation lands will be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
 - If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and will aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.
 - If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan will include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures (e.g., measures required if performance standards and success criteria are not met). Success will be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

These measures are not “one size fits all” and therefore must be crafted to suit a particular project and site, and therefore will be specified at the project level. These modifications are also shown in Chapter 4, “Revisions to the Draft EIR”. The above-listed change does not constitute significant new information as it simply corrects an error in the EIR and does not result in new or different (i.e., substantially more adverse) impacts.

Comment L7-70

- 3.5-3 – The DEIR states: “This impact evaluation is based on review of existing databases that address biological resources in the vicinity of the LRDP area, aerial photographs, and reports regarding biological resource surveys in the LRDP area, as described above.” Additionally, the DEIR states, “Due to the programmatic nature of this impact evaluation and the fact that focused surveys of future development sites under the 2021 LRDP would be required to verify habitat conditions in subsequent years during implementation of the 2021 LRDP, the envisioned impact acreages for each vegetation community are used as a proxy to assess potential impacts on wildlife and plant species associated with these communities.” The DEIR should identify which projects will be required to have additional analysis and which will be tiered to the 2021 LRDP EIR.

Response L7-70

All future projects under the 2021 LRDP would be first evaluated for their consistency with the 2021 LRDP and then for their ability to tier from the 2021 LRDP EIR. If a new or substantively more significant is identified, UC Santa Cruz would prepare either a tiered IS/MND (if feasible mitigation is available to reduce the new or different impact to less than significant) or a tiered/focused EIR. Project-level review, as described in the comment, would occur for every project tiering off of the Draft EIR.

Comment L7-71

- 3.5-56ff – Ohlone Tiger Beetle - The DEIR considers the potential impact of development on Ohlone Tiger Beetle habitat and seems to require acceptance of USFWS mitigation measures. Mitigation Measure 3.5-2i is inadequate because there is no evidence that the USFWS measures, the biological goals and objectives, adaptive management, or monitoring will reduce the impact to a less than significant level. The impact determination should be **significant and unavoidable**.

Response L7-71

Mitigation Measure 3.5-2i, which starts on page 3.5-58 of the Draft EIR, includes a mitigation strategy of identification of habitat suitable for Ohlone tiger beetle on a future project site, a habitat suitability verification analysis, an assessment of whether the project would result in injury or mortality of Ohlone tiger beetles, implementation of impact minimization measures (e.g., preconstruction surveys, biological monitoring), implementation of compensatory actions, consultation with USFWS if adverse effects cannot be avoided, and incidental take coverage through consultation with USFWS, which would typically include additional take minimization measures and compensation requirements. This mitigation measure identifies the impact minimization measures that would be required but acknowledges that USFWS may require additional measures. This mitigation framework would also include, as stated in Mitigation Measure 3.5-21, adaptive management and monitoring for compliance, effectiveness, and effects, which would require that impact minimization or take avoidance measures are successful or if unsuccessful, that they are modified. As noted in Master Response 12, the campus has initiated discussions with the USFWS to permanently set aside acreage currently designated in the CNR on the main residential campus into a campus-wide HCP.

See also, Response L7-68 regarding the obligation to mitigate impacts to endangered species.

Comment L7-72

- 3.5-67 – Sensitive Communities Mitigation Measure 3.5-3b – While the DEIR includes specific success criteria for the mitigation measure, it doesn't discuss the consequences if these criteria not being met. This should be included.

Response L7-72

Mitigation Measure 3.5-3b includes a performance standard of maintained habitat function of preserved and compensatory habitat. CEQA Guidelines section 15126.4(a)(2) requires mitigation measures to be fully enforceable through permit conditions, agreements, or other legally binding instruments. As the lead agency, UC Santa Cruz would adopt a mitigation and monitoring program (MMRP) if the project is approved by the UC Regents. As described in CEQA Guidelines section 15097(a):

In order to ensure that the mitigation measures and project revisions identified in the EIR...are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The MMRP is a legally binding instrument to require implementation of mitigation measures identified to reduce project impacts in compliance with CEQA Guidelines section 15126.4(a)(2). Therefore, the evaluation of mitigation measures reasonably assumes UC Santa Cruz compliance with mitigation measures that are adopted for the 2021 LRDP.

Comment L7-73

- 3.5-68 – Significance after Mitigation – The finding of a less than significant level is not supported by substantial evidence that the impacts would be reduced to a less than significant level despite the implementation of the mitigation measures. Therefore, the impact after mitigation should be determined as **significant and unavoidable**.

Response L7-73

The comment does not identify why the evidence provided in the impact analysis under Impact 3.5-3 on pages 3.5-65 through 3.5-68 of the Draft EIR is not sufficient. Thus, a detailed response is not possible. Further, as discussed on page 3.5-68, implementation of Mitigation Measures 3.5-1a, 3.5-1c, 3.5-3a, 3.5-3b, and 3.5-3c would reduce significant impacts on sensitive natural communities and riparian habitat to a less-than-significant level by requiring reconnaissance-level surveys of projects under the 2021 LRDP to determine the likelihood of presence of the habitats, prevention measures for the spread of invasive plant species and Sudden Oak Death, protocol-level surveys for sensitive natural communities and riparian habitat if determined to be likely to occur, implementation of avoidance measures, and compensation for permanent loss of these habitats such that there is no net loss, potentially including a streambed alteration agreement with CDFW.

Comment L7-74

- 3.5-70ff – Impact 3.5-5 – Wildlife Movement Corridors – The DEIR focuses on **construction** related impacts on wildlife movement corridors and nursery habitat and the proposed mitigations only respond to these potential impacts.

Response L7-74

Impact 3.5-5 in Section 3.5, "Biological Resources," evaluates construction-related impacts as well as operation-related impacts, such as placement and design of buildings and other infrastructure (e.g., fencing, lighting). Thus, further response is not required.

Comment L7-75

- While the DEIR does mention the danger of fencing on wildlife, it does not consider the reduction of wildlife movement corridors by the permanent development in the north campus subarea where the total subarea was identified as part of a larger wildlife movement area (page 3.5-33). Not only will the new buildings reduce the wildlife corridor but the influx of students, faculty and staff will have impacts on movement of wildlife currently using the area. Particularly, with regards to Mountain Lions, recent UCSC studies have proven that mountain lions will abandon killed prey upon hearing human voices. An adequate EIR analysis must consider the potential impacts of the new structures and their population within the wildlife movement corridor.

Response L7-75

The requested analysis is already provided in the Draft EIR. Impact 3.5-5 on pages 3.5-70 through 3.5-73 of the Draft EIR specifically addressed north campus and identifies this area as a wildlife movement corridor. The impact analysis for mountain lion, which starts on page 3.5-60 of the Draft EIR, discusses potential impacts on the species resulting

from development under the 2021 LRDP. These impacts were analyzed in the Draft EIR, and further response is not required.

Comment L7-76

- Destruction of nesting habitat will have a devastating effect on birds when they return to destroyed nesting sites during the next breeding season. It is essential to permanently protect already existing habitat for special status bird species, as well as common birds. Because the nests of small birds are difficult to find, habitat suitable for these species within the LRDP should be protected. Habitat is crucial not only for nesting but also for foraging (ex. Black Swift may forage within the LRDP area).

Response L7-76

This comment states that habitat suitable for nesting birds (special-status species and common species) should be protected. Impact 3.5-2 in Section 3.5, Biological Resources," evaluates impacts to nesting birds. As stated on page 3.5-54, 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 required.

Comment L7-77

- In general, the impacts and proposed mitigations described in the LRDP do not take into account the overall destruction of habitat for all species in the described area. Construction activities and the resulting permanent changes to the landscape will affect all natural areas and wildlife therein, not just species of special interest. Additional analysis of these issues should be provided in the EIR.

Response L7-77

This comment states that impact analyses and mitigation measures in the Draft EIR do not consider the destruction of habitat in the LRDP area, but does not refer to a specific analysis in the Draft EIR. Table 3.5-4 and Figure 3.5-6 on pages 3.5-36 and 3.5-37 of the Draft EIR, respectively, identify the impact acreage for vegetation communities (i.e., habitat) that would result from implementation of the 2021 LRDP. In addition, Impact 3.5-2 in Section 3.5, Biological Resources," evaluates impacts to 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. This issue has been analyzed in the Draft EIR, and further response is not required.

Comment L7-78

- 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. Additional analysis of these issues should be provided in the EIR.

Response L7-78

The comment is inaccurate in its statement that mitigation for impacts on wildlife in the Draft EIR are focused on the breeding season. Some wildlife species, such as migratory birds, would only be considered sensitive within the LRDP area during the breeding season; thus, impacts would only be expected to occur during the breeding season. Most of the special-status species that could occur in the LRDP area could be present year-round, and the mitigation presented in the Draft EIR is designed to avoid injury and mortality and habitat impacts on these species.

Comment L7-79

- 3.6-12 – This following sentence in the DEIR is unclear and needs to be revised: "The Campus Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES."

Response L7-79

The comment recommends that the sentence on page 3.6-12 be revised and clarified. The comment refers to the following sentence "The Campus Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES."

As shown in Chapter 4, "Revisions to the Draft EIR", this sentence has been revised as follows: "Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES (UC Santa Cruz 2017)."

Comment L7-80

- 3.6-12ff – Impact 3.6-1 – Unnecessary, Inefficient, and Wasteful Energy Use – The DEIR’s determination that the energy impact of the proposed LRDP would be less than significant is inadequate. This finding is based on the fact that development will conform to Title 24 standards and UC energy policy, and that, in most cases, per capita energy use will decline. However, the increased impact on the environment is not only dependent on per capita use but on the total increase in energy demand. The FEIR must include analysis of the total increase in energy demand and analyze its significance under CEQA significance criteria.

Response L7-80

The net increase in building energy and total energy consumption is shown in Table 3.6-3 and Table 3.6-5). There is no evidence, including in this comment, that use the 2021 LRDP’s use of energy, as considered under CEQA, would be wasteful or inefficient. As to the effects of energy use, such as air emissions or greenhouse gas effects, these impacts are considered in Sections 3.3 and 3.8 of the Draft EIR.

Comment L7-81

- As shown in Table 3.6-5, on page 3.6-15, net increase in energy use will be about 67% (the per capita increase will be 16%). The net increase in natural gas use will be about 18%, the net increase in transportation use will be 38%, and the total MMBTU net increase will be about 33%.

Response L7-81

Contrary to statements made in this comment, overall energy use associated with development within the LRDP area would increase under the 2021 LRDP, however, per capita energy use would generally decline. Table 3.6-5 on page 3.6-14 has been updated and relabeled to include the requested information.

Table 3.6-5 Per-Capita Annual Energy Consumption with 2021 LRDP Implementation Compared to Existing Conditions

Annual Energy Metrics	2019 Existing	2040 Net Increase (with 2021 LRDP)	Percent Change
Building Electricity Use (kWh)	48,479,557	32,282,652	NA 67%
Building Natural Gas Use (therms)	4,954,650	873,967	NA 18%
Transportation Gasoline Use (gal) ¹	2,580,660	980,939	NA 38%
Total MMBTU ²	983,050	320,033	NA 33%
Population	22,344	12,830	NA 57%
kWh per capita	2,170	2,516	16%
therms per capita	222	68	-69%
Gasoline gallons per capita	115	76	-34%
MMBTU per capita	44	25	-43%

Notes: gal = gallons; kWh = kilowatt hours; MMBTU = million British thermal units

¹ Includes both fleet and non-fleet mobile fuel use.

² Excludes transportation-related diesel, natural gas, and electricity use.

Source: Data provided by Ascent Environmental, Inc. in 2020

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5 because it provides clarification regarding a statement made in the Draft EIR and would not result in new or more significant impacts. As such, recirculation of the Draft EIR is not required.

Comment L7-82

- The DEIR provides no evidence that these increases are necessary and efficient. For example, Executive Order N-79-20 set a statewide goal of 100% zero emission car and truck vehicles by 2035 yet the UC Sustainable Practices Policy, which is used to justify the DEIR's determination, only requires that 50% of the campus' light duty vehicles be either zero emission or hybrid by 2025.

Response L7-82

As noted throughout Section 3.6, "Energy," additional energy use is needed to support the operation of the new land uses under the 2021 LRDP. Further and as noted on page 3.6-12, achievement of LEED Silver building standards, at a minimum, is required by the UC Santa Cruz Campus Standards Handbook and UC Sustainable Practices Policy for all future construction under the 2021 LRDP. In and of themselves, compliance with these standards is considered a measure of efficiency.

The comment also noted that the UC Sustainable Practices Policy regarding campus vehicle purchase requirements are inconsistent with Executive Order (EO) N-79-20. EO N-79-20 requires that 100% of new sales of passenger cars and trucks in the state be zero-emission by 2035. It does not require that 100% of vehicles in current use are 100% zero-emissions. The 2021 LRDP would not conflict with EO N-79-20.

Comment L7-83

- Moreover, the DEIR doesn't discuss the relationship of the increase in MMBTUs of about 38% to the AB 32 and AB 197 provisions authorizing the California Air Resources Board to achieve a reduction of greenhouse gas emissions by at least 40% below 1990 levels by 2030 (page 3.6-4).

Response L7-83

The 2021 LRDP would result in an increase in overall energy use as required to support the new proposed land uses. Greenhouse gas emissions impacts, including those addressing AB 32 reductions, are evaluated under Impact 3.8-1 (beginning on page 3.8-21 of the Draft EIR) and account for the increased energy use under the 2021 LRDP.

Comment L7-84

- In addition, unlike mitigations included in an EIR, there is no indication that UC policies are legally binding. The EIR should analyze and disclose what would happen if UCSC is unsuccessful in fully implementing these policies. To ensure full implementation and reduce potential energy impacts these policies, unless legally binding, should be added as mitigation measures.

Response L7-84

All campuses in the UC system, including, UC Santa Cruz, are required to implement the policies set forth for the UC system by the UC Regents, unless those policies grant the campuses discretion. The Draft EIR appropriately considered which policies would represent binding commitments to UC Santa Cruz, including those that provide for exceptions (i.e., the use of natural gas as provided on page 3.6-12 of the Draft EIR).

Comment L7-85

- Finally, there is no evidence in the DEIR for determining that simply applying current UC policies is sufficient to help meet State energy goals and to not represent an inefficient use of energy over the term of the LRDP. The impact determination should be **significant and unavoidable**.

Response L7-85

The 2021 LRDP would be required to comply with Title 24 Building Energy Efficiency Standards. As shown in Table 3.6-2 and discussed on Page 3.6-11, the latest Title 24 building energy efficiency standards are more efficient than the

UC Whole Building Performance Target recommended in the UC Sustainable Practices Policy. UC Santa Cruz would thus be subject to the latest Title 24 standards, which are consistent with the State's energy goals.

Comment L7-86

- 3.6-16 – Impact 3.6-2 – Conflict with Policies – The determination that there is no inconsistency with applicable policies is not supported by substantial evidence (see comments on Impact 3.6-1). For example, clearly, implementation of the LRDP as proposed will not meet the goal of 100% zero emission vehicles by 2035. The impact determination here should be **significant and unavoidable**.

Response L7-86

The comment, in stating that the significance conclusion for Impact 3.6-1 is not supported by evidence, refers to the UC Sustainable Practices Policy D 1.a. which states that "By 2025, zero-emission vehicles or hybrid vehicles shall account for at least 50 percent of all new light-duty vehicle acquisitions." The comment also argues that this policy is inconsistent with EO N-79-20. Please refer to the Response L7-82.

Comment L7-87

- 3.7-27 – Impact 3.7-5 – Karst Topography Risk - The DEIR determines that the potential impact will be less than significant because each LRDP project will be subject to a structural analysis and will comply with the CBC and UC policies. However, as a programmatic EIR, the DEIR should consider the potential impacts of the LRDP overall.

Response L7-87

As stated on page 1-1 of the Draft EIR, the EIR was prepared in accordance with the requirements of CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The programmatic analysis of the 2021 LRDP provided in the Draft EIR considers impacts that could result from implementation of the 2021 LRDP within the LRDP area, including those associated with karst topography. Therefore, the Draft EIR is adequate under CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (CCR, Title 14, Section 15000 et seq.). Further response is not required.

Comment L7-88

- In the discussion of Karst Hazard on pages 3.7-17 and 18, the DEIR notes: "One of the principal problems of developing areas underlain by karst is the extreme irregularity of the karst features, and consequently the lack of predictability of subsurface conditions. Because of this unpredictability, some level of risk is inherent in developing in karst regions, as no amount of site investigation can reveal every detail of the subsurface."

In addition, Figure 3.7-8 (page 3.7-20) identifies and rates karst hazard areas on campus. The EIR should include a map that overlays the proposed development areas on the karst hazard areas to determine the risk level for new development areas and, given the environmental damage that could be caused by subsidence, development in high-risk areas should be recognized as a potentially significant impact with mitigation proposed, including avoidance. Without this, the impact should be considered **significant and unavoidable**.

Response L7-88

Figure 3.7-8 on page 3.7-20 of the Draft EIR identifies development areas and karst hazards zones. Regarding the significance determination, as stated under Impact 3.7-5, all structures constructed or redeveloped would be required to comply with the CBC, UC Seismic Safety Policy, and UC Santa Cruz Campus Standards Handbook, which require site-specific geotechnical studies and soil engineering reports to address potential karst hazard risks. Because project-specific design requirements and conditions of approval would be incorporated for all development pursuant to the 2021 LRDP, the potential for structural damage due to karst topography would be less than significant. Further, consistent with the aforementioned CBC [California Building Code] requirements and taking into account location-specific information provided by geology studies conducted by UC Santa Cruz (e.g., UC Santa Cruz Campus Geology Report [UC Santa Cruz 2005]), full consideration of potential hazards from dolines would include collapse of cavern roofs, settlement of doline fill or low-density soil zones on top of the marble, and failure or sliding of materials adjacent to the cavities. Foundations adjacent to the solution chambers, and not just those overlying the voids or

chambers, are therefore potentially at risk and will be evaluated in the site-specific geotechnical studies and soil engineering reports.

This approach of completing site specific studies for specific buildings is typical in regions where geological hazards are ubiquitous. Proposed development in known karst hazard areas since the first campus geology report was issued in 1993 has followed the standard protocol of characterizing the geological hazard and attendant risks to the proposed development and then reducing the risk to an acceptable level where warranted with typical engineering solutions (i.e. spread footings with grade beams to span low-density zones, structural mats and post-tensioned slabs, pier and grade beam foundations with either end-bearing or side-wall friction for support, driven piles, geotextile-reinforced compacted fill, pressure or compaction grouting of underlying sediments combined with the aforementioned footings, and deep dynamic compaction).

Comment L7-89

- 3.8-17 – The DEIR states: “the 2021 LRDP would have a less-than-significant impact if, despite LRDP growth and development, UC Santa Cruz’s 2030 emissions total (including existing and 2021 LRDP sources) are at least 40 percent below 1990 emissions and UC Santa Cruz’s total 2040 emissions are at least 60 percent below 1990 emissions;”

Response L7-89

This comment restates the first greenhouse gas significance criterion on page 3.8-17 of the Draft EIR. No further response is possible.

Comment L7-90

- 3.8-24 – Impact 3.8-1 – Greenhouse Gas Generation - Though this evidence may be in the appendix, the EIR itself should identify the level of reductions due to implementation of the UC policies and from the purchase of carbon credits. It also should discuss why carbon credits aren’t proposed to fully meet the Initiative targets. In addition, the EIR should evaluate the impacts if implementation of the UC policies is not mandatory.

Response L7-90

Carbon offsets, also referred to as carbon credits, are discussed on page 3.8-24 of Section 3.8, "Greenhouse Gas Emissions and Climate Change", as part of an array of solutions, including on-site projects, that UC Santa Cruz can use to meet their Carbon Neutrality Initiative. The comment seems to suggest that carbon credits should be the primary vehicle to meet GHG reduction targets. The UC prioritizes use of plans, programs and policies aimed at reducing GHG emissions on individual campuses, as feasible, before considering offsets (carbon credits). The comment does not explain why this is an environmental issue.

The comment also requests that the EIR evaluate impacts if implementation of the UC policies is not mandatory. Refer to Response L7-84.

Comment L7-91

- 3.8-25 – Mitigation Measure 3.8-1 – Reduce Annual Emissions- Since increased annual emissions are not tied to increases in enrollment growth and the provision of the supporting infrastructure, imposing mitigations that might not be implemented until the end of the LRDP period in order to meet the required targets is not sufficient. The EIR needs to direct compare the implementation of the mitigation measures to increases in enrollment levels in order to ensure that the targets are met on an ongoing basis. In other words, the mitigation measures in the EIR need to include a timeline for when each must be implemented.

Response L7-91

Refer to Response L7-54 and Master Response 9 regarding phasing and steps that would be needed to determine impacts as the campus is built out under the 2021 LRDP. It is important to note that regardless of potential connections between student enrollment growth and other infrastructure, including on-campus housing, the assessment of emissions includes additional factors (i.e., non-housing facilities that would be constructed with or without enrollment growth, such as student support facilities for baseline enrollment and academic facilities improvements that are in line with the university’s academic mission.) As a result, alignment of emissions estimates

and mitigation to only enrollment growth would not necessarily alter the conclusions of GHG emissions estimates. The Draft EIR's assessment of GHG emissions and feasible mitigation as provided in Impact 3.8-1 on page 3.8-25 is based on a reasonable, but conservative estimate of 2021 LRDP implementation, and provides proportionate mitigation to address the impact, in accordance with CEQA requirements.

Comment L7-92

- 3.8-25 – Significance after Mitigation – While the DEIR does provide meaningful and enforceable mitigations, it doesn't provide evidence documenting the reduction in emissions from them. The statement that the mitigations would reduce emission by 6,907 MTCO₂e is conclusory and not adequate under CEQA. Without this evidence, the impact should be considered **significant and unavoidable**.

Response L7-92

Table 3.8-5 on page 3.8-23 of Section 3.8, "Greenhouse Gas Emissions and Climate Change", identifies 6,907 MTCO₂e/year as the additional reductions needed to meet State GHG reduction targets. Consistent with CEQA requirements, Mitigation Measure 3.8-1 would require UC Santa Cruz to achieve the remaining reduction, which is established as the performance standard for the mitigation, through a combination of GHG reduction projects and, if necessary, through the purchase of carbon offsets (referred to as carbon credits by the commenter). Consistent with CEQA requirements, the Draft EIR provides a list of measures that can be selected to achieve the performance standard and desired reduction. The measures listed also identify preliminary estimates of the level of reduction that may be achieved.

Comment L7-93

3.8-26 – Impact 3.8-2 – Conflict with Policies - The DEIR determined that because the 2021 LRDP would achieve the targets in the various plans and policies, the impact would be less than significant. However, this is based on the implementation of the mitigation measures specified under Impact 3.8-1 and this should be specified.

Response L7-93

As noted previously, compliance with the UC Sustainable Practices Policy is a requirement for UC Santa Cruz. Mitigation Measure 3.8-1 specifies how UC Santa Cruz will reduce its emissions associated with the LRDP, expressing preference for on-site measures within the LRDP area. Regardless of the conclusions and analysis under Impact 3.8-1, the 2021 LRDP would not hinder or conflict with the applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, including the UC Sustainable Practices Policy. This is evidenced by statements made under Impact 3.8-2, including the following statement on page 3.8-27: "[a]ny remaining GHG emissions that need to be reduced after the physical implementation of the 2021 LRDP to meet UC Santa Cruz's GHG reduction targets would be abated by purchases of renewable energy credits and verified carbon offset credits by UC Santa Cruz." As such, the conclusion of Impact 3.8-2 is not predicated on implementation of Mitigation Measure 3.8-1, as asserted in this comment.

Comment L7-94

-When considering reductions to wildfire hazards, UCSC proposes the method of prescribed burns to decrease the wildfire risk of the project. The emissions from these burns, as well as the impact on GHG emissions from the reduction in plant life, should be analyzed, disclosed, and mitigated.

Response L7-94

At no point in the Draft EIR does UC Santa Cruz propose the use of prescribed burns. Mitigation Measure 3.18-2 of the Section 3.18, "Wildfire", requires UC Santa Cruz to prepare a Campus-Wide Vegetation Management Plan. However, prescribed/controlled burns are one method of vegetation management. Prescribed burns, if they ultimately are proposed/considered as part of the campus-wide vegetation management plan, would be infrequent and would be required to comply with Monterey Bay Air Resources District (MBARD) regulations, including Regulation IV requirements related to open outdoor fires and smoke management permits and plans. Furthermore, the Draft EIR, on page 3.18-4 and as part of the EIR's presentation of regulatory context for its assessment of wildfire risk, identifies that any prescribed burn requires extensive planning, including with MBARD. As to GHG emissions, this

is a complex and site-specific issue associated with carbon sequestering, burns, and the rate of growth of vegetation following a burn. Because prescribed burning is only an option in the mitigation, it is premature to evaluate the effects of this potential measure at this time, as any analysis would be entirely speculative, and impacts are not reasonably foreseeable. If pursued, the approval of a prescribed burn plan would be evaluated against the 2021 LRDP EIR and as necessary, subsequent CEQA documentation would be prepared to assess the impacts.

Comment L7-95

- Recent legislation has requested the California Air Resources Board to carry out an independent review of the forestry offset programs that are offered through the CA Carbon Offset Program. 36 forestry projects account for 80% of total offset credits issued by the California Air Resources Board. A UC Berkeley study found that, "82% of these credits likely do not represent true emissions reductions due to the protocol's use of lenient leakage accounting methods". California assumes a 20% leakage rate. In a policy brief, UC Berkeley Professor Barbara Haya refers to two studies that found leakage rates can reach as much as 80%. "Using an unsupported low-rate results in over-crediting," Haya writes. Haya states that, "most forest offset projects begin in greenhouse gas debt; project landowners generate offset credits that allow emitters in California to emit more than the state's emissions cap today, in exchange for promises that their lands will continue to increase their storage of carbon over 100 years". But to address climate breakdown, emissions need to be reduced now, not at some hoped for point several decades in the future.² The DEIR should specify which CARB offsets will be purchased to achieve emission targets, and, if they are forest offsets- should incorporate the findings of these studies in order to determine the amount that will need to be purchased to reduce the impact to a less than significant level. If this cannot be done, the impact should be **significant and unavoidable**, despite the offset purchase.

² <https://redd-monitor.org/2019/05/09/californias-lenient-leakage-accounting-means-that-emissions-reductions-from-forest-offsets-may-never-happen/>

Response L7-95

Mitigation Measure 3.8-1 requires that UC Santa Cruz prepare an annual report that verifies the carbon the offset credits as real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations Section 95802(a). Any carbon offset credit, including those potential from a forestry offset program, would be subject to this requirement. In addition, the UC's Carbon Abatement Technical Committee (CATC) is currently advising the development of UC's offset procurement strategy consistent with the UC Sustainable Practices Policy and to further ensure that any credits pursued by UC, including UC Santa Cruz, are appropriate. Further, the UC Office of the President has engaged Professor Haya, who is referred to in this comment, as the offset strategy development lead of the committee.

Comment L7-96

- 3.9-13 – The DEIR indicates that UCSC is "in the process of updating the DTSC's records to reflect existing conditions at Westside Research Park."

Response L7-96

The comment restates information provided on page 3.9-13 of the Draft EIR. No response required.

Comment L7-97

- 3.9.- 21 – Impact 3.9.2 – Release from Known Site - Since the Westside Research Park required cleanup in the past, the EIR should include a mitigation measure requiring the campus to complete the DTSC filing within a specified time period.

Response L7-97

State CEQA Guidelines Section 15126.4(a)(1) requires that the "EIR describe feasible measures which could minimize significant adverse impacts...." As stated on page 3.9-21, Santa Cruz County EHS approved the site closure report for Westside Research Park in 2004, and the site is considered closed. Including mitigation to require UC Santa Cruz to update the DTSC's records to reflect existing conditions at Westside Research Park would not reduce a significant impact to the environment. Further, implementation of Mitigation Measures 3.9-2a, 3.9-2b, 3.9-2c, and 3.9-2d would

minimize impacts related to potential release of hazardous materials from a site of known or potential contamination. Therefore, the Draft EIR's proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-98

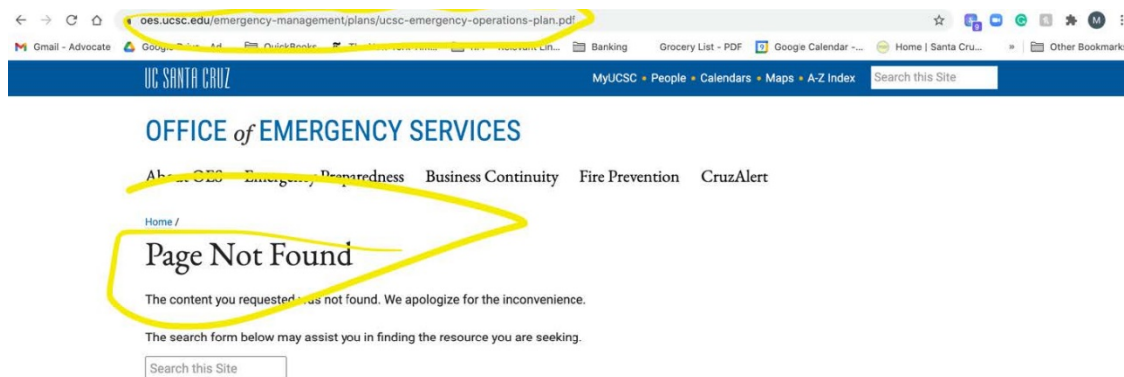
- 3.9-25 – Impact 3.9-4 – Implementation of an Emergency Evacuation Plan - The DEIR only considers short-term, construction related potentially significant impacts of implementation of the draft LRDP on emergency plans. This is inadequate. The draft LRDP proposes at least one new road in the north campus subarea as well as colleges and academic support facilities. Since these developments will occur in a state designated high hazard wildfire area, UCSC's Emergency Response Plan and Emergency Evacuation Plan need to be revised to reflect the proposed development in this subarea. Simply requiring, as mitigation, site specific but unspecified, traffic management plans is inadequate. A comprehensive review and revision of the plans to reflect the new development is necessary. Without this mitigation, the impact determination after mitigation should be **significant and unavoidable**.

Response L7-98

Refer to Master Response 4 regarding the Draft EIR's evaluation of the 2021 LRDP's potential to exacerbate wildfire risk due to on-campus development and emergency response.

Comment L7-99

3.9-25- The DEIR states: "The UC Santa Cruz EOP outlines evacuation procedures for building emergencies (stage 1) and for campus-wide emergencies (stage 2)." However, the DEIR does not allow review of these procedures. Contrary to CEQA requirements that material cited in an EIR be available for public review, the document cited in the appendix is not accessible by the link provided. See screenshot image taken on 1-19-2021 below:



Because of the importance of the provisions in the EOP, it was possible outside of the DEIR to track it down. The EOP (found by google search and linked here) does not include any details for procedures during an emergency. It includes management structures and identifies authority during an emergency only. Further, every "Annex" in the plan is currently under revision and no details are provided. The EIR must identify necessary revisions in the EOP in response to LRDP development and should include the policies for campus-wide evacuation.

Response L7-99

The citation is provided in Chapter 8, "References," as follows:

Section 3.9, "Hazards and Hazardous Materials"

———. 2016d. *Emergency Operations Plan*. Available: <https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf>. Accessed August 2020.

Section 3.18, "Wildfire"

University of California, Santa Cruz. 2016. *Emergency Operations Plan*. Available: <https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf>. Accessed August 2020.

Please note that the reference citation includes a period after the link and before the word "Accessed." To access the UC Santa Cruz Emergency Operations Plan online, the period should be removed before pasting the link in the search bar. Further response is not required. With respect to potential updates to the Emergency Operations Plan, UC Santa Cruz will reevaluate the Emergency Operations Plan, if and when the 2021 LRDP is approved, in order to determine if policy changes/updates are required.

Comment L7-100

- 3.10-11 – Moore Creek Watershed – The DEIR refers to the Arboretum Dam as shown on Figure 3.10-1. An east dam, West Dam, and Arboretum pond are also identified. However, the Figure didn't seem to include the location of these facilities. Please clarify.

Response L7-100

In response to this comment, page 3.10-11 of the Draft EIR was revised as follows:

The head of the Moore Creek East Fork is located just west of University House and drains the central and south portion of campus from Meyer Drive south to the Arboretum Dam, as shown in Figure 3.10-1.

Comment L7-101

- The DEIR indicates that the Arboretum Pond was used as a water source by the City until 1948. If it still exists, could it be used to provide non-potable water for the campus?

Response L7-101

As stated on page 3.10-11, the city abandoned the Arboretum Pond for water supply in 1948 after the City determined that up to 750,000 gallons of water per day were being lost to the subsurface due to the presence of sinkholes in the channel of Moore Creek and the West Entrance Fork.

Comment L7-102

- 3.10-33 – Impact 3.10-5 – Impacts on Karst Aquifer -The DEIR lists reasons why development under the draft LRDP could cause potentially significant impacts to the karst aquifer. However, it determines that these impacts would be less than significant in the north and central campus subareas due to existing Post-Construction Requirements. However, no evidence is provided documenting that these requirements successfully achieve their objectives. In fact, the DEIR indicates that UCSC is "considering" better evaluating the effects of these requirements. Given existing uncertainty regarding the effectiveness of the current requirements, a mitigation measure should be added to require the evaluation of the current requirements with performance standards mandating that, if necessary, additional actions be taken to ensure that the standards are met. Without this mitigation, the impact significance should be considered **significant and unavoidable**.

Response L7-102

As stated on page 1-1 of the Draft EIR, the EIR was prepared in accordance with the requirements of CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (CCR, Title 14, Section 15000 et seq.). The programmatic analysis of the 2021 LRDP provided in the Draft EIR is adequate under CEQA, and additional review will be conducted for future projects as they are proposed and considered, tiering from this analysis. Further, implementation of Mitigation Measure 3.10-5a would ensure that campus pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality nor would it affect offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. In the event that extraction contributes to a net deficit, UC Santa Cruz would terminate or reduce groundwater extraction.

Comment L7-103

- 3.10-36 – Mitigation Measure 3.10-5b – Groundwater Monitoring – The mitigation measure requires the reduction or termination of groundwater extraction if there is a "substantial" decrease in average base flows. This is inadequate. Without a quantitative definition of "substantial," it will be impossible to determine when the implementation of this

mitigation measure would be required. Without providing this definition, the determination of significance after mitigation should be **significant and unavoidable**.

Response L7-103

Contrary to the statements included in the comment, as stated in Mitigation Measure 3.10-5b on page 3.10-36, implementation of this mitigation measure would occur once extraction of groundwater is initiated by UC Santa Cruz. Further, the term “substantial” is defined in Mitigation Measure 3.10-5b as a continual decreasing trend in base groundwater water levels over a 3–5-year period that includes both wetter and drier years coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding rainfall season.

Comment L7-104

- The DEIR states that UCSC will compare flows to historic spring discharge to determine impact. This is inadequate. Flow variation is significant, and therefore UCSC cannot guarantee that the metric used to determine impact significance is sufficient and captures all impacts.

Response L7-104

As stated in Mitigation Measure 3.10-5b on page 3.10-36, in addition to comparing spring flows, UC Santa Cruz would monitor water levels and conduct equivalent monitoring of those springs in the vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. The comment does not address the specifics of this measure, so no further response is provided. Also refer to Master Response 10 regarding groundwater conditions and the need for additional data to support the Draft EIR’s conclusions.

Comment L7-105

- 3.11-1 – Coastal Act – The DEIR states: “As UC Santa Cruz is a state agency, campus lands are not included in either of these general plans or LCPs. Nevertheless, UC Santa Cruz must comply independently with the requirements of the Coastal Act.” The EIR needs to clarify the relationship of the LRDP to the Santa Cruz County LCP. The County’s General Plan/LCP Land Use Map includes the Campus lands west of Empire Grade. Generally, once the Coastal Commission approves the LCP for a local jurisdiction these policies are applied to all future applications, including those of state agencies. Is consistency of the LRDP with the County’s adopted LCP required or do only Coastal Act policies apply?

Response L7-105

As stated on page 3.11-1 of the Draft EIR, because UC Santa Cruz is a state agency, campus lands are not subject to either the City of Santa Cruz and County general plans or LCPs developed for those agencies. Consistent with the provisions of PRC Section 30605, consistency with the County’s LCP is not required as part of the LRDP. Further response is not required.

Comment L7-106

- 3.11-2 – The EIR should make clear that the County of Santa Cruz General Plan is also its Coastal Commission approved LCP.

Response L7-106

The Draft EIR acknowledges the County of Santa Cruz General Plan and LCP on page 3.1-1 “In 1990 and 1994, the City of Santa Cruz and County, respectively, combined the LCP with updates to their General Plans.” However, as stated on page 3.11-1 of the Draft EIR, because UC Santa Cruz is a state agency campus lands are not included in either the City of Santa Cruz and County general plans or LCPs. No further response is required.

Comment L7-107

- 3.11-8 – Impact 3.11-1 – Conflict with Plans, Policies or Zoning - - The DEIR's determination that the draft LRDP would not be in conflict with any local zoning is incorrect and inadequate.

Response L7-107

The comment does not explain why the conclusions in Impact 3.11-1 and incorrect or inadequate. Therefore, no additional response can be provided.

Comment L7-108

- 3.11-11 – The DEIR states that the University, as a state entity, is not subject to municipal regulation. However, it is subject to state agency regulation, which the DEIR ignores. State law requires approval by the Local Agency Formation Commission (LAFCO) before the City of Santa Cruz may provide extraterritorial water and/or sewer outside of its boundaries. The draft LRDP proposal to develop in the north campus subarea without LAFCO approval is in conflict with State law and policy.

Response L7-108

Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP.

Comment L7-109

- This section of the EIR must be revised to recognize this conflict with local and state requirements. Moreover, this conflict represents a potentially significant environmental impact, and a mitigation measure should be included requiring the University to receive LAFCO approval prior to expanding outside the City's boundaries in the north campus subarea. Without these revisions the impact should be determined to be **significant and unavoidable**.

Response L7-109

Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP. Regarding mitigation, the Draft EIR did not identify an impact related to LAFCO jurisdiction over the project. Therefore, no mitigation is required.

Comment L7-110

- 3.12-4 – The DEIR states: "Equivalent Continuous Sound Level (Leq): Leq represents an average of the sound energy occurring over a specified period. In effect, Leq is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period."

Response L7-110

The comment restates information included on page 3.12-4 of the Draft EIR. No response is required.

Comment L7-111

- 3.12-17 – Thresholds of Significance – The on-campus construction noise thresholds proposed in the DEIR are the following:

- "Daytime (8 a.m. to 10 p.m.) construction noise levels at or above 80 dB Leq at the on-campus noise-sensitive uses (e.g., student or employee housing).
- Nighttime (10 p.m. to 8 a.m.) construction noise levels at or above 70 dB Leq at on-campus noise-sensitive uses (e.g., student or employee housing)."

- These thresholds seem unreasonable in noise-sensitive areas where students are in class or residing. The EIR needs to provide evidence supporting these thresholds? Table 3.12-1 on page 3.12-2 provide examples of noise levels at these decibels:

- "Diesel truck at 50 feet at 50 miles per hour — 80dB — Food blender at 3 feet, Garbage disposal at 3 feet
- Noisy urban area, daytime, Gas lawn mower at 100 feet — 70dB — Vacuum cleaner at 10 feet, Normal speech at 3 feet"

- The determination that only average noise above these thresholds would constitute a significant noise impact near student housing and classrooms does not seem reasonable. They should each be lowered by at least 10 decibels.

Response L7-111

The commenter's opinion regarding the thresholds listed in Table 3.12-9 on page 3.12-17 of the Draft EIR is noted; however, the thresholds as presented in the Draft EIR are consistent with criteria implemented by UC Santa Cruz for the purposes of determining significance of impacts to on-campus receptors resulting from ambient noise levels associated with construction activities as set forth in the 2005 LRDP EIR. Furthermore, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals).

Comment L7-112

- 3.12-18ff – Impact 3.12-1 – Construction Noise – The DEIR finds that the impacts of construction noise will be significant and proposes a variety of mitigation measures. Despite the implementation of all the proposed measures, the impact is determined to be significant and unavoidable. However, the mitigation measures are not adequate.

Response L7-112

The comment's statement regarding the perceived adequacy of the Draft EIR's mitigation measures is noted. The comment does not provide a basis for its assertion so further response cannot be provided.

Comment L7-113

- 3.12-21 – Barriers are proposed under specific conditions "if deemed to be feasible and effective." This measure is too vague to be adequate. Feasibility needs to be defined in terms of the potential reduction in decibel levels.

Response L7-113

Within the context of the programmatic evaluation of the 2021 LRDP, there may be instances where barriers (e.g., noise-insulating blankets, temporary plywood structures, etc.) are not considered feasible due to topography, vegetation, or other site-specific considerations. The Draft EIR, in recognition of this potential and in accordance with CEQA requirements, does not universally require or state that such barriers could be applied throughout the LRDP area. Further, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals) during construction activities, which may be achieved through a variety of means. These include, but are not limited to, limiting the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur, requiring the use of properly maintained equipment, alternatively powered equipment, exhaust mufflers, engine shrouds, equipment enclosures, and short-term lodging for residents that would be temporarily exposed to nighttime (after 10 p.m.) interior noise levels that exceed the interior noise standard. The performance criteria are binding and enforceable, as required by CEQA, but can be implemented through various actions, depending on the nature and location of the specific project.

Comment L7-114

- In addition, no rationale is provided for allowing "daytime" construction to continue until 10:00 p.m. Most local jurisdictions limit construction activities to no later than 8:00 p.m. No evidence is included in the DEIR justifying daytime construction to 10:00 p.m. or nighttime construction at all. An additional mitigation should be imposed prohibiting daytime or nighttime construction after 8:00 p.m. at least within 440 feet of a sensitive receptor.

Response L7-114

The thresholds established in the Draft EIR considered UC and local noise regulations. As stated on page 3.12-13 of the Draft EIR, the City of Santa Cruz Municipal Code Section 9.36.010 allows for construction activities to occur between the hours of 8:00 a.m. and 10:00 p.m. As such, the time limits established in the Draft EIR are considered appropriate.

Comment L7-115

- 3.12-22 – Significance after mitigation – The DEIR states: “Additionally, short-term lodging would be offered to residents if they would be temporarily exposed to nighttime interior noise levels that exceed the interior noise standard of 45.” The EIR should provide a full analysis of the impact of this mitigation measure that includes, but is not limited to, the impact on available short term housing options, the impact on student education, VMT, campus emissions, etc. Should students choose not to accept the offer of off-campus accommodation, the EIR should fully analyze the impact of exposure to significant noise on their ability to sleep (and the associated health impacts), study and succeed academically, long-term hearing impacts, etc.

Response L7-115

The short-term lodging to which the commenter refers would be limited to hotels in the Santa Cruz area, but it would be speculative to identify specific locations of that lodging. Refer to Mitigation Measure 3.12-1 on page 3.12-21 of the Draft EIR which states “UC Santa Cruz will offer hotel accommodations to residents who would temporarily be exposed to nighttime interior noise levels that exceed the interior noise standard of 45 Equivalent Continuous Sound Level. Alternative overnight accommodations should be in a location that is not adversely affected by nighttime construction noise.”

Regarding the comments request to evaluate impacts on available short term housing options, page 3.12-22 of the Draft EIR considers the potential impacts and dependency on the acceptance of short-term lodging by affected residents. In general, the Draft EIR includes, where appropriate, an evaluation of the impacts associated with the 2021 LRDP, as well as potential impacts of the proposed mitigation measures.

Should students choose not to accept the offer of off-campus accommodation, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals) during construction activities. These include, but are not limited to, limiting the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur, requiring the use of properly maintained equipment, alternatively powered equipment, exhaust mufflers, engine shrouds, and equipment enclosures. Loss of sleep is not an environmental issue that must be analyzed under CEQA. Further and with respect to issues subject to analysis under CEQA, refer to Master Response 2.

Comment L7-116

- 3.12-22 – Significance after Mitigation – The DEIR states that the proposed mitigation measure “would limit the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur.” This is a misleading statement as nothing in the mitigation measure prevents construction from occurring 24 hours a day. Construction is only limited between 8:00 a.m. and 10:00 p.m. “when feasible.” (page 3.12-21) The mitigation measures in the DEIR need to be revised and strengthened in order to meet CEQA’s requirements.

Response L7-116

The majority of construction under the 2021 LRDP would take place during the day. As noted on page 3.12-20 of the Draft EIR, outdoor construction during nighttime hours would only be pursued if there are no other reasonable options. Because UC Santa Cruz cannot preclude the potential need to conduct construction activities during nighttime hours (e.g., due to site- and project-specific considerations related to concrete pouring, as noted on page 3.12-20 of the Draft EIR, or emergency repairs/corrections during 2021 LRDP development), the Draft EIR properly assessed the potential impacts associated with 2021 LRDP implementation, including the potential for nighttime construction. As acknowledged in the Draft EIR, it is not UC Santa Cruz’s intent to allow for 24-hour construction activities. Furthermore, construction schedules and specific logistics will be determined and considered on a project level as specific projects are proposed. Revisions to the mitigation measures of the Draft EIR are not considered necessary or appropriate for the aforementioned reasons and are to be consistent with CEQA requirements.

Comment L7-117

- 3.12-22 – Impact 3.12-2 – Construction Vibration – Again, the mitigation measure is inadequate. The operation of “construction activities that may require the use of vibration-generating equipment” should be limited to hours of 8:00 a.m. to 8:00 p.m. in addition to the other measures.

Response L7-117

Refer to Response L7-114 regarding the hours applied to thresholds and mitigation measures within the Draft EIR.

Comment L7-118

- The DEIR should fully analyze the impact of excessive noise on animal species, including but not limited to their migration patterns.

Response L7-118

The Draft EIR includes the assessment of potential noise impacts associated with 2021 LRDP implementation and development within Section 3.5, “Biological Resources.” As provided in that section of the Draft EIR, potential impacts associated with “disturbance” would include noise and vibration impacts associated with 2021 LRDP implementation. Revision of Section 3.12, “Noise” of the Draft EIR is not necessary as the requested analysis is already provided elsewhere within the Draft EIR.

Comment L7-119

- 3.13-3 – The DEIR recognizes the City of Santa Cruz code section prohibiting the expansion of water and services beyond its boundaries without the approval of LAFCO. However, this was not identified on page 3.6-16 (Impact 3.6-2 – Conflict with Policies) as a significant inconsistency with a local policy, notwithstanding the contracts signed by the City in the 1960s to provide these services.

Response L7-119

Impact 3.6-2 evaluates consistency with any applicable plan, policy, or regulation adopted for the purpose to mitigate an impact related to energy consumption. The City of Santa Cruz Municipal Code Chapter 16.22 pertains to the expansion of water and sewer services not energy. Therefore, this section of the City code was not referenced.

Comment L7-120

- Measure U – The DEIR’s summary of the policies is so incomplete as to make it inadequate as a public information document. Measure U was not only approved by almost 77% of the City electorate but some of the policies directly relate to Objectives included in the Draft LRDP. The following Measure U policies should be included in the EIR and should be included in every section for which they are relevant, not only the population and housing section:

“a. There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP.

b. If there is additional enrollment growth at UCSC, UCSC should house the net new growth of students, faculty and staff on campus.

c. If there is additional enrollment growth, it will only occur when the on-campus and off-campus infrastructure (including on-campus housing) required to support the growth is provided prior to or concurrent with the growth.

d. The University will legally bind itself to tie the provision of infrastructure to enrollment growth.

e. A Capital Improvement Program identifying on-campus and off-campus infrastructure needs (including on-campus housing), funding and sources needed to carry out the proposed LRDP, shall be prepared concurrently with the LRDP.”

Response L7-120

Section 3.13-3 of the Draft EIR provides a summary of Measure U, and this comment provides additional detail on the City of Santa Cruz measure and its relationship to the 2021 LRDP. The Draft EIR provides an appropriate level of detail in compliance with CEQA. As a City measure, it is not legally applicable to or binding on the UC. However, it is

acknowledged that the 2021 LRDP does not align with the restrictions expressed in the measure. This information is provided for consideration by the UC Regents as they consider certification of the 2021 LRDP EIR and approval of the 2021 LRDP.

Comment L7-121

- 3-13-4 – Regional population growth – The DEIR includes population figures for the Santa Cruz County and its jurisdictions between 1990 and 2020 but doesn't provide similar figures for UCSC growth. This should be included in the EIR as they would a useful comparison when analyzing growth proposed under the draft LRDP.

Response L7-121

State CEQA Guidelines Section 15125 states that the "environmental setting will normally constitute the baseline physical conditions by which the lead agency determine whether an impact is significant." Section 3.13, "Population and Housing," provides baseline population and housing estimates to facilitate the evaluation of potential impacts related to population and housing. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA. Refer also to Master Response 2 regarding 2021 LRDP growth projections.

Comment L7-122

- 3.13-5 – The DEIR recognizes that the extremely tight housing market in Santa Cruz County with available housing vacancy rate of about 1.9%. It also identifies UCSC one of the three major economic drivers "behind the tight housing market." It summarizes that due to the summer wildfires and despite remote teaching at UCSC "a general housing shortage still exists."

Response L7-122

The comment restates information included in Section 3.13, "Population and Housing." No response required.

Comment L7-123

- 3.13-8 – Growth projections – The DEIR includes AMBAG population growth projections for the City of Santa Cruz and estimates a change from 2015 to 2040 of 29%. For a meaningful analysis of the impacts of proposed UCSC growth on the City, the DEIR should compare UCSC's growth with the City's over a similar time period. Based on the AMBAG estimates, the City's growth between 2020 and 2040 will be about 20%. The EIR needs provide a direct comparison of this growth with that proposed under the LRDP to adequately analyze the Plan's significant impacts on Santa Cruz.

Response L7-123

Section 3.13, "Population and Housing," provides baseline population and housing estimates to facilitate the evaluation of potential impacts related to population and housing. The AMBAG growth projections included on page 3.13-8 of the Draft EIR assumed the growth forecasted in the LRDP. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA.

Comment L7-124

- 3.13-9 – Issues Not Evaluated Further – The DEIR argues that implementation of the LRDP would not "displace substantial numbers of existing people." However, the DEIR only considers the potential displacement from on-campus students. This is inadequate because the DEIR does not consider the possible displacement of people living in the City of Santa Cruz resulting from enrollment growth should the University not meet the LRDP's housing objectives.

Response L7-124

As stated on page 3.13-9, no housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people. The 2021 LRDP includes a substantial addition of new housing; if existing student housing is demolished, it would be replaced by an equal or greater amount of new housing. Further, the 2021 LRDP does not propose development on lands owned by the City of Santa Cruz. As described in Master Response 9, the Draft EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on reasonable assumptions. The 2021 LRDP is a land use plan that does not

actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. Therefore, implementation of the 2021 LRDP would not result in the displacement of substantial numbers of people or housing in the City of Santa Cruz, necessitating the construction of replacement housing elsewhere. Refer also to Response L9-31 regarding housing availability data considered in the Draft EIR. No further response is required.

Comment L7-125

- While an "Objective" of the draft LRDP is to house 100% of the new students and up to 25% of new faculty and staff on campus there is no binding requirement to make this happen. Moreover, there is no requirement that enrollment growth be tied to housing increases. Without mitigation measures requiring the proposed housing additions to occur in sync with enrollment growth, the determination that the draft LRDP will not displace people is unsupported by evidence and inadequate.

Response L7-125

Refer to Master Response 9 regarding the phasing of development. Regarding mitigation, State CEQA Guidelines requires mitigation only for impacts that are significant per Section 15126.4(a)(3). As stated on page 3.13-9, no housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people. The Draft EIR did not identify an impact related to displacement of people or housing. Therefore, no mitigation is required. As described in Master Response 9, the Draft EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on reasonable assumptions. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-126

- 3.13-10ff – Impact 3.13-1 – Directly or Indirectly Induce Substantial Unplanned Population Growth and Housing Demand – On page 3.13-12 – Regarding the impact of the draft LRDP on off-campus housing demand, the DEIR states: "Combined with the projected student demand identified above, the 2021 LRDP may result in an off-campus housing demand for 2,190 residential units within Santa Cruz County." The DEIR doesn't make clear that this impact assumes that 100% of the new students and up to 25% of the new faculty and staff will live on campus on the land "set aside" for housing. Again, given that there is no assurance such housing will be provided, the EIR needs to analyze the off-campus impacts should this objective not be met.

Response L7-126

Page 3.13-12 states that the 2021 LRDP would "add up to 8,500 beds" to accommodate the projected increase in student enrollment, which equates to 100 percent of new student enrollment, and provide "housing on campus for 558" employees, which equates to a 25 percent of the increase in employees. As described in Master Response 9, the EIR evaluates the whole of the action. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz's (or any city's) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. In addition, as described in Master Response 9, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required. Regarding the evaluation of housing demand off-campus, the Draft EIR evaluates additional demand for housing in the community, including the city of Santa Cruz, on pages 3.13-12 to 3.13-14.

Comment L7-127

- The DEIR assumes that 100% of new students and up to 25% of new faculty and staff will be housed on campus by simply stating: "The 2021 LRDP sets aside an adequate amount of land for housing to accommodate 100 percent of the increase in student enrollment above 19,500 and for 25 percent of the increase in the number of employees, based on demand." Again, setting aside land for the development of housing is not adequate justification under CEQA for not considering the impacts of the LRDP should the housing not be provided.

Response L7-127

As described in Master Response 9, the EIR evaluates the whole of the action based on reasonable assumptions about the development process. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz's (or any city's) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. State CEQA Guidelines Section 15378(a) defines "project" in part as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." For the purposes of CEQA the 2021 LRDP is the proposed project. However, as described in Master Response 9, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required.

Comment L7-128

- 3.13-14 – Mitigation Measures – The DEIR states as a mitigation measure: "UC Santa Cruz is planning to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP," and "UC Santa Cruz anticipates that it will be able to provide housing to all students projected under the LRDP and the impact associated with student housing demand is expected to be less-than-significant." These are not adequate mitigation measures under CEQA because they do not change the project to reduce the potential impacts to a less than significant level (see Section 15370 of the State CEQA Guidelines where mitigation is defined). And, in past LRDPs (the 1988 LRDP, for example) that contained significant on-campus housing goals without adequate mitigation measures, these goals were not realized.

In order to meet CEQA requirements for an adequate mitigation measure, the mitigation measure should read: "UC Santa Cruz shall provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP and shall provide housing to all students projected under the LRDP."

Response L7-128

State CEQA Guidelines Section 15126.4(a)(1) requires that the "EIR describe feasible measures which could minimize significant adverse impacts..." The language identified is not a mitigation measure, rather it is a summary of the 2021 LRDP. The LRDP is a land use plan to guide future development, if and when it occurs. As noted in Response L7-127, the components of the project, including 8,500 student beds and 558 residential units for employees, are evaluated as a whole and would be subject to project-level and subsequent evaluation under CEQA. The mitigation measure proposed would not change the project but rather reinforces the project as proposed. Also refer to Master Response 2 regarding the manner in which planned development would occur and be subsequently evaluated under the 2021 LRDP.

Comment L7-129

- The DEIR also recognizes (page 3-10) that enrollment growth will occur over time but doesn't analyze the potential impacts of not directly relating the production of the on-campus housing to enrollment growth. It merely states: "On-campus student enrollment is projected to increase by an additional 9,482 FTE students by 2040–2041, which would equate to an average annual increase of 431 additional students (assuming student enrollment growth occurred linearly; in actuality annual enrollment growth could fluctuate from year to year)."

Without a requirement that ties enrollment growth to the provision of on-campus housing, the proposed mitigation measure would not be adequate to reduce the potential impact to a less than significant level. Even with the mitigation measure proposed above, significant off-campus housing demand beyond what the DEIR anticipates would occur if there were long delays between enrollment growth and the provision of housing to serve it.

Therefore, the following mitigation measure should be added in order to reduce the potential impact of the proposed on-campus enrollment growth to a less than significant level: On-campus student housing beds and employee housing units shall be available within four years of enrollment growth in excess of 19,500 students.

There is substantial evidence that these proposed mitigation measures are feasible as based on the fact that the University has successfully complied with essentially the same conditions under the 2005 LRDP's Comprehensive Settlement Agreement (Section 2).

Response L7-129

The comment's general statement regarding the need for a requirement that ties enrollment growth to the provision of on-campus is noted. Refer to Master Response 9 regarding the phasing of development. Regarding mitigation, consistent with State CEQA Guidelines Section 15126.4 the Draft EIR includes feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA.

Comment L7-130

- If the EIR does not include these (bolded) mitigation measures, the FEIR must include a detailed analysis of the impact that insufficient housing will have on students, including, but not limited to economic and financial impacts, health (physical and mental) and sanitary impacts, traffic and VMT impacts, etc on additional populations, students, and the environment.

Response L7-130

Refer to Response L7-127 and Master Response 9 regarding the Draft EIR's evaluation of the 2021 LRDP and timing of development.

Comment L7-131

- The chapter on Population and Housing is inadequate because it does not analyze the induced off-campus impacts of the draft LRDP. The increase in campus population of over 12,000 people will, as documented in the Growth Inducing section of the DEIR, have a multiplier effect on jobs, population growth and housing off-campus. The University functions as a basic industry and, as stated earlier in the DEIR, is an important economic driver in the community. The financial impact of spending in the community by new students, faculty and staff will be significant. It will generate new jobs, population growth and housing demand in the community. These will create potentially significant environmental impacts that must be analyzed in the EIR. Additionally, according to the Systemwide Economic and Social Impact Analysis (2021) commissioned by the University of California, "every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs". The EIR needs to take into account the job generating impact of adding new staff at UCSC and the effect on the housing market.

Without this analysis, the DEIR is inadequate.

Response L7-131

The Draft EIR evaluates growth inducing impacts of the 2021 LRDP, including population and employment growth, are evaluated in Chapter 5, "Other CEQA Sections."

Comment L7-132

- 3.14 – The DEIR analysis of the potential impact of the LRDP on public services assumes that the on-campus housing commitments will be met. This further supports the importance of the proposed revised mitigation measures in the Population and Housing chapter for the EIR to be adequate.

Response L7-132

Refer to Responses L7-128, L7-129, and L7-130 regarding evaluation of the project under CEQA and suggested mitigation.

Comment L7-133

- 3.14-2- Impacts on Police Facilities – The DEIR states, "...implementation of the 2021 LRDP could result in the need for additional sworn officers, dispatchers, and support staff..." To address this, the DEIR states, "Funding and planning for additional staff members is carried out through UC Santa Cruz capital planning process...Capital planning is a continuous and iterative process that evaluates capital needs identified and assess alternatives to meet such needs in

the context of anticipated capital resources.” However, according to UCSC PD Chief Nadar Oweis’ comments in a 2016 City on a Hill Press article, “Six hundred fifty [extra] people on this campus is a lot of people. With the additional bodies on campus, UCSC PD has taken measures to maintain its presence, including having two extra officers earning overtime on Friday, Saturday and Sunday nights. I wish we had an opportunity to hire more officers,” said Oweis. “But I haven’t been given any more money in my budget to hire [them].” This article shows that with additional students present, UCSC has not always increased police presence on campus. But “the campus has also seen an increase in parking citations, thefts, roommate disputes and traffic incidents including hit and runs, said Oweis”. Given the history of inadequate funding, the EIR should include a detailed analysis of the impacts on students and their property should UCSC not allocate funding for additional police officers, as they have not in the past. Since there is substantial evidence that the proposed enrollment increases will generate the need to provide additional police services, the EIR should include a mitigation tying enrollment growth to increases in additional police personnel and all relevant public services.

Response L7-133

Impact 3.14-2 evaluates the potential for the 2021 LRDP to result in physical impacts associated with the provision of new or physically altered police facilities consistent with CEQA requirements to focus on the adverse physical impacts to the environment. As stated on page 3.14-11, while implementation of the 2021 LRDP could result in the need for additional sworn officers, dispatchers, and support staff, this would not necessitate that need for new or additional police facilities. Further, the Draft EIR coordinated directly with UC Santa Cruz Police Department and relied on information provided by Chief Nadar Oweis in 2020. Therefore, the Draft EIR relied on best available data and evaluated potential impacts to police services consistent with CEQA requirements. Regarding mitigation, the Draft EIR did not identify an impact related to the provision of police services. Therefore, no mitigation is required.

Comment L7-134

- 3.14-10 – Mitigation Measure 3.14-1 – Require new fire equipment and construction to meet fire access requirements - This is an example of an adequate mitigation measure. The “shall” initiate operation of a new campus fire station if demand warrants it.

Response L7-134

The comment states that Mitigation Measure 3.14-1 is adequate and is noted.

Comment L7-135

- 3.14-11ff – Impact 3.14.3 – Impacts on School Facilities – The DEIR is inadequate in the analysis of the draft LRDP’s potential impact on school facilities because it only considers the potential impact from faculty and staff school age children. Since many UCSC students also have school age children the potential impact from school age children of the 8,500 additional students living on campus needs to be analyzed.

Response L7-135

In response to this comment, Impact 3.14-3 was revised as follows:

Under the 2021 LRDP, the number of students and faculty/staff living on campus is anticipated to increase, which could contribute additional primary and secondary students to local school districts. The largest area of potential impact would be the SCCS, because housing would be provided on campus (within the SCCS boundaries) for 558 employees (faculty/staff). While housing would also be provided for students, the number of school-age children associated with enrolled college students is expected to be minimal given their typical age range. However, to be conservative, this Draft EIR assumes that the 140 units dedicated to on-campus student family housing would be occupied by newly enrolled students with children. Based on student generation rates established by SCCS, a new dwelling unit (for faculty/staff and existing student family housing units) would generate 0.273 students for grades K-6, and 0.207 students for grades 7-12 (City of Santa Cruz 2011). As noted above, student enrollment for SCCS schools is anticipated to decrease through the 2024-2025 academic school year.

A total of 558 new dwelling units for faculty and staff housing is expected to generate 153 students in grades K-6 and 116 students in grades 7-12. The existing 140 student family housing units would generate 38 students in grades K-6 and 30 students in grades 7-12. As shown in Table 3.14-1, SCCS schools have a combined available capacity to accommodate 922 students. Even if all children living in on-campus student family housing and of the roughly 1,650 faculty/staff not living on campus lived in the SCCS (resulting in 450 K-6 students and 341 grade 7-12 students), or a total of ~~4,055~~ 1,123 students, they would barely exceed the forecasted capacity of SCCS schools. Realistically, a sufficient percentage of faculty and staff would live outside the SCCS in more dispersed communities, that the capacity of SCCS schools is not expected to be exceeded. Further, SCCS has established procedures for interdistrict transfers to students who would otherwise attend a different district. SCCS existing schools have adequate capacity to serve existing enrollment levels in addition to enrollment generated by the 2021 LRDP. Some percentage of faculty/staff may reside in areas outside the SCCS. Based on the available information noted above, the nearby school districts have available capacity to accept new students and declining enrollment. Given that, only a fraction of the total 1,055 estimated students generated by employees associated with the 2021 LRDP would attend schools in these districts, it is expected that adequate capacity will be available to accommodate these students. Therefore, implementation of the 2021 LRDP would have a **less-than-significant** impacts on schools.

Consistent with State CEQA Guidelines Section 15088.5(a), text edits to Impact 3.14-3, outlined above, do not constitute significant new information because it would not result in a substantial adverse environmental impact that has not already been evaluated in the Draft EIR.

Comment L7-136

- The DEIR is inadequate in its analysis of public service impacts of the LRDP by ignoring a potentially significant impact of the LRDP to public services. As a public agency, the academic and support services it provides its students are public services. Moreover, UCSC students are also members of the public. To the extent, then, that the University in implementing the LRDP provides the physical infrastructure to support increased enrollment, it is providing public services.

The DEIR analyzes the potentially significant impacts on the environment of providing this infrastructure necessary to implement the LRDP but does not consider the environmental impacts if the proposed facilities are not provided. The lack of this infrastructure would reduce the direct environmental impacts of the LRDP but it would cause indirect environmental impacts directly related to social and economic impacts for the newly enrolled students. There is a direct nexus between the lack of infrastructure and these social and economic impacts, and they need to be considered in the EIR and, if potentially significant, mitigated.

The 2005-2020 LRDP has constructed less than 7% of the physical infrastructure included in the Plan. As a consequence, there are overcrowded classrooms, inadequate faculty to student ratios, and insufficient staff support. This has caused significant mental health problems for students as well as negatively impacted their economic opportunities. Unless the 2021 LRDP provides the infrastructure included in the Plan, these social and economic impacts will be even more significant.

The EIR needs to analyze these potential impacts and, if it determines that they are potentially significant, propose feasible mitigation measures to reduce them. One such measure would tie enrollment growth to the provision of the infrastructure needed to support it. The language could be similar to the mitigation measures proposed in the Population and Housing chapter.

Response L7-136

The comment requests that the EIR evaluate impacts if facilities are not constructed to accommodate the increase in enrolled students, but does not suggest what these physical environmental impacts may be, and without this type of information, further response is not possible.

Comment L7-137

- 3.15-12 – Impact 3.15-2 – Impacts on Off-Campus Recreation Facilities - The DEIR analysis of the potential impact of the LRDP on recreation assumes that the on-campus housing commitments will be met. This further supports the

importance of the revised mitigation measures in the Population and Housing chapter for the EIR to be adequate. The DEIR estimates that 982 students will seek housing off-campus. If the “planned” on-campus housing is not provided, the off-campus demand on recreational facilities would increase by thousands of students.

Response L7-137

Refer to Responses L7-128, L7-129, and L7-130 regarding evaluation of the project under CEQA and suggested mitigation and Master Response 9 regarding phasing of development.

Comment L7-138

- According to the DEIR – “... in recognition of the need for distributed recreational facilities to support increased housing throughout the campus, recreation and athletics facilities have also been included as a supporting use in the Colleges and Student Housing land use designation.” Without the inclusion of specific quantity of additional facilities that will serve additional students, it is impossible to evaluate the adequacy of the additional recreational facilities to serve proposed enrollment growth. All proposed recreation facilities should be specified in the EIR. Without the inclusion of these changes, members of the public are unable to evaluate the adequacy of the recreation infrastructure to support additional students.

Response L7-138

As stated on page 3.5-11 of the Draft EIR, the total acreage of existing recreation and athletic facilities would not decrease under the 2021 LRDP and land would still be available for expansion of recreation facilities in the LRDP area, as needed. In addition, the 2021 LRDP provides for the construction of new recreational facilities including new multi-use pathway corridors to connect key locations on campus, new unpaved multi-use trail networks, and minor/supporting recreation and athletic facilities. New recreation and athletic facilities may include small field houses offering courts and exercise rooms and may also include small playing fields and open areas suitable for informal use. As noted previously, the analysis in the Draft EIR is programmatic, and as a result, specific detail regarding the number and types of recreational facilities are not known at this time. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA.

Comment L7-139

- According to the DEIR – “Although on-campus recreation facilities are heavily utilized, substantial deterioration of those facilities is not apparent.” The FEIR should include evidence of this claim, or, if no evidence is available, it should be removed. Contrary evidence to this statement is provided in a 2016 City on a Hill Press Article³ that says, “Finding money for all necessary maintenance is an issue.”

³ <https://www.cityonahillpress.com/2016/10/21/the-overcrowding-problem/>

Response L7-139

Regarding the statement from a 2016 article included in the comment, the Draft EIR relied on best available data related to the physical environmental conditions and evaluated potential impacts to recreational facilities consistent with CEQA requirements. As stated on page 3.15-10, recreation facilities at UC Santa Cruz are maintained as needed to prevent deterioration based on the use levels. Continued preventative maintenance in accordance with UCOP Facilities Manual prevents the substantial deterioration of on-campus facilities. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. The issue of funding and how funding is allocated is part of an annual budgeting process, and the quote provided in this comment does not assert anything beyond the budgeting process. As such, it is not considered material to the Draft EIR’s analysis.

Comment L7-140

-3.15-12 - The DEIR states, “The construction of new facilities would occur when warranted by increased demand and when financially feasible.” According to a City on a Hill Press Article, “A lot of our buildings need some really serious repairs,” said Colin Allison (OPERS facilities and operations supervisor). Additionally, the article states, “Even with the Measure 64 and 65, student fees that passed last spring in the campus elections, the sheer amount of people seeking

to use Office of Physical Education, Recreation and Sports (OPERS) facilities and services still poses a challenge — and expansion is not in the immediate future.”⁴ The DEIR should reevaluate the impact of additional enrollment on existing recreation resources in consideration of this evidence.

⁴ <https://www.cityonahillpress.com/2016/10/21/the-overcrowding-problem/>

Response L7-140

Impact 3.15-1 evaluated impacts to on-campus recreation facilities that could result from the increase in campus population under the 2021 LRDP consistent with CEQA Guidelines requirements to focus on physical effects to the environment. Further, the 2021 LRDP includes substantial additional administrative and support facilities for students, which is intended to provide additional services (including recreation resources) for potential new students in addition to the existing student body. Reevaluation of potential impacts of the 2021 LRDP is not considered required or warranted.

Comment L7-141

- Moreover, the DEIR inadequately determines, with no substantial evidence, that the imposition of the payment of in-lieu fees on off-campus new development sufficiently “addresses” the potential impacts.

There are two inadequacies with the DEIR analysis. First, students living off-campus in the locally tight housing market could simply crowd into existing units and thus, not generate increased park fees. More important, though, the DEIR does not consider whether existing fees are sufficient to provide the increased facilities needed to adequately meet the increased demand. No evidence is provided justifying the conclusion that in-lieu park fees will be sufficient to develop the additional facilities needed. There is not even an analysis of what additional facilities would be required. The EIR needs to provide a specific analysis of the recreational facilities required to meet additional off-campus demand resulting from LRDP growth and whether the fees generated from housing developments to serve this demand will be sufficient. Without these revisions the impact would be **significant and unavoidable**.

Response L7-141

The comment does not present evidence of overcrowding that is directly attributable to UC Santa Cruz students. As such, the comment’s statement regarding the potential for students living off-campus to “crowd” into existing units is considered speculative and counter to existing federal and state occupancy limits, as established by Section 503(b) of federal Uniform Housing Code and the California Department of Fair Employment and Housing practices/restrictions. In particular, the Uniform Housing Code uses the dwelling size to determine the maximum occupancy rate. Further, the City also has an established Residential Rental Dwelling Unit Inspection and Maintenance Program, as established in Chapter 21.06 of the City’s Municipal Code, that requires the regular (annual) inspection of rental housing to prevent overcrowding.

Regarding in-lieu park fees, the fees referenced on page 3.15-12 of the Draft EIR are established by the local communities (e.g., the City of Santa Cruz.). It is the responsibility of local agencies to ensure they are providing sufficient funding for local services such as parks and local agencies periodically consider updates, as evidenced by a February 21, 2021 presentation to the Santa Cruz County Parks Department regarding an adjustment to its park impact fees (Santa Cruz County 2021). UC Santa Cruz has no regulatory authority to determine whether or not the fees are adequate, but it is reasonable to assume that local entities like the City would amend their fee structure if current fees are inadequate for providing sufficient recreational facilities. The comment provides no evidence to support its assertion that impacts would be significant and unavoidable and is referred to Impact 4.3 on page 4.6-37 of the City’s General Plan 2030 Draft EIR (City of Santa Cruz 2011) related to the expansion of recreational facilities and parks within the facilities within the City. Based on implementation of City policies, including the collection of in-lieu fees, impacts were determined to be less than significant, similar to the 2021 LRDP Draft EIR.

Comment L7-142

- 3.16-30 – Impact 3.16-1 – Conflict with Plan - The DEIR determined that the impact would be less than significant based on the inclusion in draft LRDP of a number of road construction projects – the extension of Meyer Drive, the north entrance at Empire Grade, and the Western Drive Extension. This is inadequate because there is no requirement

that these projects will be implemented. In fact, both the Meyer Drive extension and the northern entrance are included in the 2005 LRDP and have not reduced the impacts anticipated in that Plan.

The construction of these projects must be tied to enrollment growth and timelines provided for their completion. Absent these assurances, the EIR must analyze the potential transportation impacts under the assumption that they will not be provided. In addition, the DEIR analysis assumes that on-campus housing will be provided. Without the proposed additional mitigation measures to ensure the provision of this housing, the EIR must analyze the potential transportation impacts assuming that this housing will not be provided.

Without these assurances, the draft LRDP would not be consistent with the local general plans and the impact would be **significant and unavoidable**.

To justify a determination that the impact will be less than significant, the following feasible mitigation measure should be added: **The road construction projects proposed in the LRDP shall be provided in advance of or concurrent with the increased growth they are designed to support.**

Response L7-142

Impact 3.16-1 discusses the 2021 LRDP's potential impacts relative to the plan's consistency, including proposed roadway, bicycle, pedestrian, and transit improvements, with relevant non-university plans related to circulation. As discussed in Impact 3.16-1, the proposed improvements are not in conflict with the relevant on-university plans and the impact is less-than-significant. Further, as stated on page 3.16-31 of the Draft EIR, the proposed roadways would reduce congestion on campus and reduce trip lengths associated with VMT. Regarding phasing of development, refer to Master Response 9. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. Refer also to Response L7-11 regarding the Draft EIR's analysis of the 2021 LRDP building program.

Comment L7-143

- 3.16-33 – Impact 3.16-2 – Conflict related to Vehicle Miles Traveled - The VMT analysis in the DEIR is based on the assumption that the on-campus housing proposed in the draft LRDP will be provided. The DEIR, thereby, finds that the residential VMT will be below the significance threshold. However, without the recommended mitigation measures to require the provision of the proposed on-campus housing, the DEIR is inadequate because there is no evidence that the proposed housing will be realized.

Response L7-143

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR's analysis of the 2021 LRDP building program. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-144

- As stated in the DEIR "The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus." The DEIR doesn't calculate the VMT assuming the proposed housing is not built on-campus, but it is clear, that the VMT would greatly exceed the threshold of significance.

Without the recommended on-campus mitigation measures, there is no evidence that the performance standard of reducing the VMT below the threshold of significance can be met, even with the array of proposed mitigation measures, and the impact will be **significant and unavoidable**.

Response L7-144

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR's analysis of the 2021 LRDP building program. The LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The LRDP EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-145

- 3.16-38 – Significance after Mitigation – The DEIR is also inadequate because it does not analyze the potential VMT increase due to off-campus induced growth based on the economic multiplier effect.

Response L7-145

The impacts of growth are determined by the locations where growth occurs, which is directly tied to the approval of new development. CEQA analyses for new development provide the vehicle for these project-specific analyses. The VMT modeling conducted for the 2021 LRDP used the Santa Cruz County Regional Travel Demand Model (SCC Travel Model) (refer to page 3.16-28 of the Draft EIR), which provides for an assessment of countywide VMT using countywide VMT metrics, including assumed growth factors that include indirect growth. As such and through discussions with City and County staff regarding the appropriate model to use for the Draft EIR's analysis, the SCC Travel Model is considered to present the best representation of countywide VMT, including indirect growth factors, as requested by the commenter. As a result, the Draft EIR's analysis is considered adequate, appropriate, and in accordance with CEQA requirements.

Comment L7-146

- 3.16-38ff – Impact 3.16-4 – Inadequate Emergency Access - The DEIR is inadequate in its treatment of this impact because it does not analyze the potential need for emergency access to serve the significant new development in the north campus subarea. The LRDP proposes new colleges and academic support facilities in this high hazard wildfire area but the DEIR does not mention the potential impacts on the provision of emergency access as a result of this development and provides no substantial evidence that emergency access will be adequate. The potential impact may be significant and, absent the required analysis and consideration of mitigation measures, the impact should be considered **significant and unavoidable**.

Response L7-146

The impact assessment is intended to determine whether the 2021 LRDP has the potential to impact emergency vehicle access by creating conditions that would substantially affect the ability of drivers to yield the right-of-way to emergency vehicles, or preclude the ability of emergency vehicles to access streets within the study area. As noted in the Draft EIR, while adequate emergency access within the LRDP area is already provided, the proposed roadway extensions and new streets would provide improved network connections that could supplement existing emergency vehicle access throughout the LRDP area. Any roadway extensions and new streets would be designed and constructed to include bicycle, pedestrian and transit facilities, where physically feasible, and in a manner consistent with the UC Facilities Manual, which notes that the UC system, as a whole and inclusive of UC Santa Cruz, complies with the Title 24 California Building Standards Code, Parts 1-12 and all amendments. UC Santa Cruz would also comply with applicable federal and state regulations related to roadway and transportation facility design, and with local regulations where campus roadways connect to city and county facilities. Thus, the 2021 LRDP was appropriately determined to have a less-than-significant impact with respect to emergency vehicle access.

Comment L7-147

- 3.17-5 – Santa Cruz Water Service Agreements - The DEIR discussion of the water services agreements with the City of Santa Cruz is misleading, incomplete, and inadequate. This analysis fails to serve as an adequate public information document.

Response L7-147

UC Santa Cruz has reviewed the referenced text (specifically, the 2021 LRDP Draft EIR at 3.17-5) and confirmed that the statements are factually correct. Additionally, this comment does not raise a specific concern about the adequacy of analysis of environmental impacts in the Draft EIR, and CEQA requires no further response to this comment. However, 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 L7-148

- For example, the DEIR is misleading when it states: "The City has not confirmed its obligations and has taken the position that it is only required to provide water to areas of the campus within the service boundary unless otherwise approved under state and local law." This is misleading because the City is prohibited under State law from providing water and service outside its boundaries without the approval of the Local Agency Formation Commission (LAFCO).

Response L7-148

Please refer to Response L3-2 regarding application of Government Code Section 56133(e)(4) to LRDP development projects outside the current City service boundary.

Comment L7-149

- The DEIR provides no information on the State law requirements that are under dispute. The University may not believe it is subject to the state law requirements but CEQA requires that the public be informed regarding the relevant provisions of state law.

Response L7-149

Please refer to Responses L3-2, L7-14 and L7-148, which provide information regarding the 2021 LRDP Draft EIR's discussion of the CSA and LAFCO with regard to the 2021 LRDP. Additionally, this comment does not raise a specific concern about the adequacy of analysis of environmental impacts in the Draft EIR so no further response is provided.

Comment L7-150

- In addition, the DEIR neglects to mention or consider the Comprehensive Settlement Agreement provisions, adopted as part of approval of the 2005-2020 LRDP, that required the University to apply to LAFCO for the extraterritorial water and sewer services. Nor does the DEIR indicate that the University may be in violation of this Agreement by not fulfilling its obligations under its provisions. While the University did initially apply for the extraterritorial service, it never completed the process in good faith and allowed the application to languish at LAFCO for over ten years before LAFCO terminated it for lack of action. Without inclusion of this information in the EIR, the document is inadequate in its description of this issue.

Response L7-150

Please refer to Responses L3-2, L7-14 and L7-148, which provide information regarding the 2021 LRDP Draft EIR's discussion of the CSA and LAFCO with regard to the 2021 LRDP. Section 1.3.1 on page 1-6 of the 2021 LRDP Draft EIR state the obligations in the CSA and that UC Santa Cruz did submit the Sphere of Influence amendment application to LAFCO in 2008. As stated above, information regarding the CSA is provided for background purposes; the parties' obligations under the CSA do not bear directly on the environmental impacts of the 2021 LRDP or the analysis required under CEQA.

Comment L7-151

- 3.17- 12 – According to the DEIR the City's water demand in 2035 will exceed the water supply in 2035 by 40 million gallons a year (mgy) assuming a UCSC demand of 308 mgy. On page 3.17-15, the DEIR indicates that in 2018, the per capita water usage was 8,904.88 gallons per year for a total of 167.1 mgy, a slight per capita increase over 2017. On page 3.17-16, the DEIR indicates that the campus policy is to reduce water consumption 20% by 2020 and 36% by 2025 over the earlier average of 13,924 gallons per capita. This translates into a per capita of 11,139.8 gallons per capita in 2020 and 8,911.36 by 2025. If the campus consumption stays at the 2018 rate or decreases further, it will meet the 2025 goal.

Response L7-151

The statements in this comment regarding the City's water supply and demand in 2035, and the UC Santa Cruz per capita water usage, are acknowledged and are consistent with the information in the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR). No further response is necessary.

Comment L7-152

- 3.17-19ff – Projected Water Demand - There appears to be an inconsistency in the demand figures in the DEIR that needs to be clarified. The total campus demand in 2018 (calendar year) is stated as 167.1 mgy. However, the table on page 3.17-21 showing 2017/18 demand lists the total as 154.5 mgy.

Response L7-152

Water demand values can be different when expressed in calendar year vs. fiscal year because the actual months of data included are different. The 2018 calendar year demand reflects water use from January 1, 2018 through December 31, 2018. The 2017/18 fiscal year demand reflects water use from July 1, 2017 through June 30, 2018. The 2018 calendar year demand is higher than the 2017/18 fiscal year demand, indicating that water demand for the second half of the 2018 calendar year (July 1, 2018 to December 31, 2018) was higher than the water demand for the first half of the 2017/18 fiscal year (July 1, 2017 to December 31, 2017).

Comment L7-153

- In addition, the basis for the Projected 2040 Annual Demand on campus of 289.1 mgy is unclear. From page 2-10 the total campus population in 2040 under the LRDP is projected to be 35,174. Assuming the campus continues the per capita demand achieved in 2018 of 8904.88 gallons per year this demand would be about 313 mgy, which is about 24 mgy more than projected. This totals a net increase in annual demand of 158.6 mgy. The DEIR provides no evidence supporting the 289.1 mgy estimate. The figures in the DEIR either need to be justified or revised as the difference of about 8% is not inconsequential.

Response L7-153

The technical information regarding the projected 2040 water demands within the LRDP area are provided as part of the Draft EIR and its appendices. The basis for the projected 2040 demand for the 2021 LRDP is described in Appendix J of the Draft EIR (Water Supply Evaluation) and is further detailed in Appendix A of the Water Supply Evaluation (Appendix J of the Draft EIR). As described, the projected water demand of 289.1 MGY for the 2021 LRDP was developed based on specific water use categories based on the specific characteristics of the 2021 LRDP facilities, and was not determined by using the current per capita demand applied to the future campus population.

Comment L7-154

- 3.17-22 – Impact 3.17-1 – Impacts on Water Supply - 3.17-23 Sufficiency of Supply – The DEIR uses its unsupported projection of increased water demand under the LRDP of 137.5 mgy in its analysis of the sufficiency of the City's water supply.

Response L7-154

Table 3.17-9 on page 3.17-21 of the Draft EIR shows the increased demand under the 2021 LRDP. That table shows a slightly different number (134.6 million gallons per year [MGY]) for the increased demand under the 2021 LRDP than the cited 137.5 MGY. The increased demand (134.6 MGY) compares the projected demand for the 2021 LRDP (289.1 MGY) (which is described in the Water Supply Evaluation, Appendix J of the DEIR) to the existing FY 2014/15 demand (154.5 MGY) and results in a net increase of 134.6 MGY.

Comment L7-155

- 3.17-23 – Table 3.17-10 – City projected supply and demand – The DEIR indicates that even in normal years in the City systems' 2035 demand will exceed supply by 40 mgy. If this deficit carries over until 2040 and the UCSC demand is 24 mgy greater than stated in the DEIR, the water supply deficit in normal years will be about 64 mgy or 60% greater than projected. Again, the DEIR needs to provide evidence to support its analysis.

Response L7-155

The projected UC Santa Cruz demand is not greater than the demand stated in the Draft EIR as indicated in the response to comment L7-153. The City's 2015 Urban Water Management Plan (UWMP) does show that projected 2035 demand exceeds the projected 2035 supply by 40 MGY; however, this represents only a 2 percent difference between the projected demand and the projected supply. The City's 2015 UWMP (page 7-8) further states that "operationally the City has sufficient water supply available in normal years to meet demand even though a slight deficit seems to exist in the modelled projections."

Comment L7-156

- 3.17-24 – The DEIR asserts that the 2021 LRDP water demand would be less than the UCSC projected demand in the UWMP. Without documentation, this finding isn't supported by the evidence. The UWMP projects a UCSC water demand of 308 mgd by 2035. The analysis above, using 2018 per capita demand figures, indicates that the total demand in 2040 would be 313 mgd not counting the Coastal Marine Campus. UCSC demand, therefore, may exceed the City's UWMP projection. The impact of LRDP growth on the City's water supply may be more significant than indicated in the DEIR and, if true, the EIR should reflect this.

Response L7-156

Refer to Response L7-153, which describes why the projected water use under the 2021 LRDP is substantially less than shown in the comment.

Comment L7-157

- The DEIR discusses the "dispute" with the City of Santa Cruz regarding provision of water and sewer service in the north campus subarea without discussing the State law requirements on the City to receive LAFCO approval in order to provide this service. Since the DEIR recognizes a "remote" possibility that the City will have to follow state law, it indicates that a number of alternatives will be analyzed, including the option of "curtailing" proposed LRDP development. Given the importance of the state law requirements, this DEIR decision is prudent.

Response L7-157

The comment's opinion regarding the Draft EIR's evaluation of curtailing development under the 2021 LRDP as prudent is noted. Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP.

Comment L7-158

- The EIR should include a full analysis of the impact of exposure to drought conditions, water scarcity, and rationing, including but not limited to health impacts, recreational risks, infectious disease, diseases transmitted to animals, food and nutrition, economic impacts, air quality, and hygiene⁵, etc., on the additional students, faculty, staff, and the entire population that exist within the City's municipal services district.

⁵ Information taken from: <https://www.cdc.gov/nceh/drought/implications.htm>

Response L7-158

The comment's statement regarding the potential effects of a drought and speculates that the 2021 LRDP will increase the exposure of individuals to drought conditions. First and foremost, the 2021 LRDP, as evaluated in the Draft EIR, would not increase water demand beyond the anticipated demand from current planning efforts and agreements. As described in the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR), water use on the UC Santa Cruz Main Campus has dropped dramatically in recent years. In 2008, annual water use on the Main Campus was about 200 MGY, equal to about 13,147 gallons per person per year based on a campus population of 15,278. In more recent years, annual water use on the Main Campus dropped to as low as 151 MGY (in 2009, 2011 and 2014) equal to about 9,104 gallons per person per year based on a campus population of 16,543 in 2014, representing an approximate 25 percent reduction in total water use and a 30 percent decrease in per capita water use, in response to drought conditions and associated water conservation. In 2018, water use was 167 MGY, equal to about 8,902 gallons per person per year based on a campus population of 18,765. This represents a 32 percent decrease in per capita water use from 2008. The downward trend in water consumption has resulted from

proactive water conservation, improved water use efficiency, and drought response measures on the campus. Furthermore, the Draft EIR acknowledges uncertainties regarding future water supplies, discusses alternative water sources (to the extent information is known), and discloses the potential environmental impacts of each alternative water source, such that water supplies could be reasonably maintained to prevent adverse conditions. Furthermore, UC Santa Cruz has complied with the provisions of the City's Water Shortage Contingency Plan and, as required by Mitigation Measure 3.17-1a, would implement further measures that are consistent with the City's drought emergency measures, to ensure the safety and health of the local population, as it pertains to drought conditions.

Comment L7-159

- 3.17-25ff – Alternative Water Supplies – The analysis of alternative water supplies is inadequate because it doesn't quantitative projections of the amount of water each of the options would supply and how these would impact future demand. For example, the discussion of the water recycling doesn't make clear that the project with the greatest potential to increase supply, which is under development by the Soquel Creek County Water District, would not directly increase the water supply to City customers.

Response L7-159

The Draft EIR's evaluation of alternative water supplies and the potential impacts associated with them was based on available information and quantified, where possible, the level of potential water supplies that could be made available to the City (and, by extension, UC Santa Cruz). Further, the Draft EIR does not speculate as to the level of water supplies where uncertainty regarding water rights, agreements between agencies, and planning and design of facilities has yet to be determined. The Draft EIR appropriately acknowledges throughout Impact 3.17-1 (beginning on page 3.17-22 of the Draft EIR), as well as prior descriptions of current water supply planning efforts beginning on page 3.17-22, the regional context and degree to which water supply planning involves multiple agencies within Santa Cruz County. Consistent with CEQA requirements (CEQA Guidelines Section 15155), the Draft EIR acknowledges uncertainties regarding future water supplies, discusses alternative water sources (to the extent information is known), and discloses the potential environmental impacts of each alternative water source. The Draft EIR also includes a discussion of curtailment of development if uncertain water supplies do not become available. Therefore, contrary to the assertions made in this comment, the Draft EIR is not considered deficient because it does not attempt to quantify uncertain water supplies that may be available but have yet to be determined by other agencies. Regarding the comment's opinion regarding the water recycling project with the "greatest potential," it is assumed that the commenter is referring to Pure Water Soquel, which is acknowledged on page 3.17-15 of the Draft EIR. The Draft EIR appropriately acknowledges that the City would coordinate with Soquel Creek Water District (SqCWD) to benefit regional groundwater supplies.

Comment L7-160

- Also, while conservation has played the major role in reducing the threat of droughts to City water customers, it is questionable how much additional reduction in demand is possible through conservation.

Response L7-160

The comment contradicts current City and UC Santa Cruz efforts that are underway, as well as short-term conservation measures provided and historically implemented through the City's Water Shortage Contingency Plan. Further, the comment does not directly address the adequacy of the EIR's analysis, and no further response is possible.

Comment L7-161

- 3.17-30 – The DEIR states that "Because many (alternatives) of them are common supplemental supply sources (such as recycled water and more conservation), there is a reasonably high probability that the City will be able to successfully supplement its water sources." The DEIR provides no quantitative evidence to justify this conclusion. And, given that, as stated above, neither recycling at this time or conservation in the future are likely to prove adequate. The EIR needs to provide data to support its determination.

Response L7-161

The statement on page 3.17-30 of the Draft EIR, as referenced in this comment, was made in reference and deference to efforts by the City, both individually and in cooperation with SqCWD and Scotts Valley Water District. Further, as noted on the City's website (City of Santa Cruz 2021), the City has incorporated SCWD's Water Supply Augmentation Strategy into its 10-year Capital Improvement Program (CIP). As water supply augmentation (including improvements to Graham Hills WTP [i.e., "more conservation" as described in this comment"] and the River Bank Filtration Study) has been included as part of the near-term CIP improvements, this is considered evidence in support of the Draft EIR's statement.

Comment L7-162

- 3.17-30 – The draft LRDP and the Project Description chapter of the DEIR state repeatedly that development under the 2021 LRDP will occur "primarily" in the central campus subarea. Here, finally, the DEIR provides the data related to this: "Approximately **43 percent of housing and 8 percent of academic and support space** under the 2021 LRDP is estimated to be located outside the service boundary." (i.e., the north campus subarea). This means that 3,655 student beds are proposed in the north campus subarea. With 43% of the housing beds planned in the north campus subarea, it is incorrect and inadequate for the DEIR to assert that the central campus subarea will be the primary location of increased UCSC growth. This misstatement needs to be corrected.

Response L7-162

Given that 57 percent of housing and 92 percent of academic and support space would occur outside of the north campus subarea of the main residential campus and that development under the 2021 LRDP would involve redevelopment and remodeling of existing space within the central campus, it is accurate to state that development would be primarily located outside of the north campus and focused within the central campus.

Comment L7-163

- The DEIR considers groundwater as one alternative to supply water for development in the north campus subarea. The DEIR reviews a number of potential impacts of such a project but does not make clear that this analysis is presented on a programmatic level. No detailed project is described or potentially significant impacts on the hydrology of downstream springs identified. The EIR should clarify that any proposal to develop this alternative would not only be subject to "additional study" but to full environmental review.

Response L7-163

The development of additional facilities to support groundwater withdrawal within the lower campus subarea of the main residential campus and use by UC Santa Cruz would constitute a later action under the 2021 LRDP. As such and upon further design and planning, it would be subject to independent, project-level review. Additional mitigation measures identified in the Draft EIR that would pertain to this potential alternative water supply would be determined by subsequent project level environmental review, including Mitigation Measure 3.10-5b (as provided on page 3.10-36 of the Draft EIR). Also refer to Master Response 10 regarding groundwater supplies and the need for additional study/data.

Comment L7-164

- 3.17-32 – Air Quality with no north campus development – The DEIR states: "Thus, construction-related air quality impacts would be reduced compared to those under the 2021 LRDP." Despite this finding the DEIR concludes that the impact will be "similar" to the draft LRDP. Why isn't it "Less impact"?

Response L7-164

The comment reiterates a statement on page 3.17-32 regarding the air quality finding under the potential environmental impacts associated with no 2021 LRDP development above water service boundary. As stated on page 3.17-32, although construction related impacts would be reduced, it is possible that operational emissions could exceed MBARD operational thresholds. For this reason, the Draft EIR determined that operation-related air quality emissions would result in a similar impact when compared to development under the 2021 LRDP.

Comment L7-165

- 3.17-33ff – Population and Housing with no north campus development – The DEIR assumes that, although enrollment will be reduced, 100% of the additional students will be housed on campus and, thus, the impact will be less than significant. However, this will only be the case with the mitigation measures stating that the on-campus housing **shall** be provided and that it **shall** be tied to increases in enrollment.

Response L7-165

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR's analysis of the 2021 LRDP building program. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable.

Comment L7-166

- 3.17-34 – Transportation with no north campus development – The campus enrollment level would decline from 28,000 students by 3,700 to 24,300 students (over 13%) with a concomitant reduction in faculty and staff, as well as in induced growth. These reductions would all lead to decreases in VMT and it, therefore, incorrect for the DEIR to find that the impact would be "similar." The evidence indicates that the impact will be less.

Response L7-166

As stated on page 3.17-34, decreased development of student housing and academic/administrative and support space would reduce on-site population, such that overall VMT would be reduced. However, similar transportation demand reduction measures to reduce VMT associated with faculty/staff commutes would be necessary in order to ensure a less-than-significant impact. For this reason, the Draft EIR determined that transportation impacts would be similar when compared to the 2021 LRDP.

Comment L7-167

- 3.17-35 – Mitigation Measure 3.17-1b – Water Conservation - While the mitigation measure requires an audit that will include "top priority" measures for implementation within five years, there is no requirement to implement these recommendations, only that "measures determined in cooperation with the City" be implemented. The EIR needs to explain why the mitigation measure shouldn't require that the top priority conservation measures identified by the audit be implemented. As written, the mitigation measure is unclear regarding whether the cooperation with the City will lead to the implementation of the top priority conservation measures or simply that they be "addressed." The performance standards for this deferred mitigation are inadequate and need to be revised.

Response L7-167

Mitigation Measure 3.17-1b requires UC Santa Cruz to prepare an audit that identifies both top priority measures and lower priority measures. It further requires that UC Santa Cruz "implement measures determined in cooperation with the City of Santa Cruz to address issues identified in the audit" following the completion of the audit. The measure to be implemented would be clearly outlined in the audit, which as stated previously, includes both top priority and lower priority measures. Therefore, the Draft EIR's proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-168

- The potential impacts of not developing in the north campus subarea compared to the development under the draft LRDP is quite useful. This analysis should also be included in the Alternatives chapter as an additional feasible alternative to the draft LRDP. Though the analysis in the DEIR understates the number of impact areas where not developing in the north campus subarea would reduce the impacts, it determined that impacts overall would be less than if the area was developed as proposed.

Response L7-168

Chapter 6, "Alternatives," includes an evaluation of projects alternatives that would either exclude or reduce development within the north campus, as requested by the commenter. More specifically, Alternative 3 (Reduced

Development Footprint) would exclude development within the north campus, and Alternative 4 (Reduced Campus Growth and Use of UC MBEST Off-Site) would reduce development of Academic and Support uses within the north campus.

Comment L7-169

- The determination that Wildfire impacts with no development in the north campus subarea will be similar to those with development in that subarea is incorrect and inadequate. 3,700 student beds are proposed in the north campus subarea which is part of a high hazard fire danger area. Eliminating development in the area that is most subject wildfire would clearly reduce the potential wildfire impacts of the LRDP. While the implementation of wildfire risk reduction and evacuation procedures would reduce the potential impact of wildfires somewhat, there is no evidence provided that this reduction would be similar to that of not building in this high hazard danger area.

Response L7-169

Refer to Master Response 4 regarding the Draft EIR's evaluation of the 2021 LRDP's potential to exacerbate wildfire risk due to on-campus development.

Comment L7-170

- The 2021 LRDP EIR estimates that approximately 43% of the additional housing and 8% of the additional academic and support infrastructure will be located in a CALFire designated HFHSZ. This increases the risk of fire ignition, and, as a result, raises the risk of exposing residents, employees, and visitors to catastrophic wildfires.⁶ The FEIR must include a detailed analysis that quantifies the most serious health, air quality, greenhouse gas emission consequences of exposure of additional students, faculty, staff, and the entire population of the region to increased risk of wildfire.

⁶ AG's Office Motion and comments (above)

Response L7-170

Refer to Master Response 4 regarding the Draft EIR's evaluation of the 2021 LRDP's potential to exacerbate wildfire risk due to on-campus development.

Comment L7-171

- 3.18-6 – Regional Setting – Since the LRDP proposes significant development in the north campus subarea, which is located in the unincorporated area of Santa Cruz County, the EIR must include consideration of the provisions of the County's Local Hazard Mitigation Plan.

Response L7-171

As stated on page 3.18-6 of the Draft EIR, UC Santa Cruz, a constitutionally created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of its educational purposes. Further, the UC Santa Cruz Emergency Operations Plan (EOP) comprises the entirety of emergency planning activities that govern emergency response and evacuation on the main residential campus and the Westside Research Park.

Comment L7-172

- 3.18-7 – Human Influence on Wildfire – The DEIR provides a strong rationale for avoiding development in areas prone to wildfire. It recognizes "increased development in the WUI" (Wildland Urban Interface) can influence wildfire." In addition, the DEIR notes that humans are responsible for starting an estimated 95% of wildfires and, "Consequently, areas near human development generate fires at a more frequent rate than very remote or urban areas." Also, the DEIR provides evidence that climate change has significantly increased the risk of wildfires.

3-18-8 – The DEIR identifies the following approaches for reducing wildfire risk: "some combination of hazardous fuel reduction projects, fire prevention planning, and fire prevention education." However, the DEIR analysis is inadequate because it doesn't consider an avoidance approach of not building in areas with a high risk of wildfires. Particularly, since the north campus subarea is located in such an area, the DEIR must consider the potential impacts of avoidance along with the others. The 2020 Lightning Complex fires were an example of the limitations of these other strategies.

In addition, the proposed approaches are inadequately vague and non-specific so it is impossible to evaluate the extent to which they would reduce the wildfire risk.

3-18-9 – The DEIR in its description of wildfire risks on campus states: “the northern portion of the campus is largely rated high wildfire severity” and Figure 3.18-1 shows the entire north campus subarea which is proposed to house 3,700 students as well as academic facilities is located in the High Fire Hazard Severity Zone.

Response L7-172

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development, including within the upper campus subarea of the main residential campus.

Comment L7-173

- 3.18-13 – Impact 3.18-1 – Compatibility with Emergency Response and Evacuation Plans
- The DEIR’s analysis of the potential compatibility the LRDP on UCSC’s emergency plans focuses solely on short term construction and states: “there are no elements in the 2021 LRDP that would interfere with the emergency response and evacuation procedures set forth in the EOP (Emergency Operations Plan).” This finding is inadequate.

Response L7-173

Contrary to statements made in this comment but as stated on page 3.18-13 of the Draft EIR, there are no elements in the 2021 LRDP that would directly interfere with or prohibit UC Santa Cruz from implementing emergency response and evacuation procedures set forth in the EOP. Under the 2021 LRDP, UC Santa Cruz would continue to implement the policies, procedures and an organizational structure for the preparedness, response, recovery and mitigation of disasters outlined in the EOP. The Draft EIR presents a qualitative analysis of development under the 2021 LRDP based on evidence, consistent with CEQA requirements. The EIR’s analysis is adequate and a less than significant impact with mitigation conclusion is considered appropriate and supported by evidence.

Comment L7-174

- Implementation of the LRDP will result in between 4,000 and 5,000 people, with 3,700 residents, occupying the High Fire Hazard Severity Zone in the north campus subarea. Unlike the 2005-2020 LRDP that proposed a loop road to serve proposed development in this area, the 2021 LRDP includes no additional new road access to the area. Moreover, the new roads proposed in the LRDP do not directly serve this area. If the adopted EOP and Emergency Evacuation Plan don’t specifically consider the need to respond to the increased fire danger to the occupants of this area, they must be revised and the LRDP is incompatible with them.

Response L7-174

Page 2-23 of the Draft EIR describes the proposed Northern Entrance under the 2021 LRDP. This roadway would provide a third access and egress point to the main residential campus, which may help facilitate north campus subarea development and emergency access. Regarding the applicability of the EOP to future development in the north campus, as stated on page 3.18-13, new development on the main residential campus and Westside Research Park would be subject to the EOP. In addition, specific projects proposed under the 2021 LRDP will be evaluated at a project level at the time of consideration.

Comment L7-175

- 3.18-14 – Mitigation Measures - The DEIR only proposes a traffic management plan to reduce the short-term impacts. Unless the two plans include adequate consideration of the LRDP’s proposed development in the north campus subarea, the potential impact would be **significant and unavoidable**. Moreover, they would need to be revised even if, as mitigations, the revised plans would not reduce the risk to a less than significant level.

Response L7-175

As stated on page 3.18-13, new development on the main residential campus and Westside Research Park would be subject to the EOP. Further as stated on page 3.9-25, UC Santa Cruz shall prepare and implement site-specific construction traffic management plans for any construction effort that would require work within existing roadways. As

such, development within the north campus that would require work within existing roadways would be subject to Mitigation Measure 3.9-4.

Comment L7-176

- 3-18-14 – Impact 3.18-2 – Wildfire Risk of New Development

- The DEIR finds that: “However, in the absence of an adopted Vegetation Management Plan, the wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant.” This determination is partially incorrect, incomplete, and inadequate.

- Proposed development in the north campus subarea would not be “in close proximity to an HFHSZ,” it would be located primarily within an HFHSZ.
- No evidence is presented to document that adoption of the Vegetation Management Plan by itself would adequately reduce the wildfire risk in the subarea.
- The DEIR fails to recognize that locating the development proposed in the LRDP in an HFHSZ by itself significantly increases wildfire risk.
- As documented in the DEIR: “the prevailing trend in California indicates an increase in the severity and frequency of wildfires over time as a result of climate change, modified vegetation regimes, and increasing human influence. Such trends are expected to continue and will pose an increasing threat to wildland areas... regardless of the actions that UC Santa Cruz takes in terms of the adoption and implementation of the 2021 LRDP.” These trends need to be recognized and included as important contributors causes of significant impacts of new development in the north campus subarea.

- While the DEIR recognizes that all the increased development proposed by the LRDP would increase the risk of wildfire, it doesn’t differentiate the degree of risk in the different risk zones or the implications for public safety or wildfire danger of differences in these risks. This analysis should be included in the DEIR for it to be adequate.

Response L7-176

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-177

- 3.18-16 – The DEIR argues that with the implementation of vegetation management measures in the north campus area “would likely result in reduced wildfire risk on the newly developed land.” However, no evidence is presented to support this “likely” conclusion.

Response L7-177

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development and the discussion of a vegetation management measure.

Comment L7-178

- Moreover, the DEIR recognizes that “However, urban encroachment, especially in the northern portion of the campus, could lead to exposure of new development to increased wildfire risks.” This conclusion is disingenuous at best. How could housing 3,700 students and constructing academic facilities in a High Fire Hazard Severity Zone not result in an increased wildfire risk?

Response L7-178

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-179

- According to the 2021 LRDP Draft EIR: “The increase in the campus population associated with the implementation of the 2021 LRDP, and the development of buildings to accommodate population growth, by the sheer probability of

adding more people to the area, would increase the risk of wildfire on or near the main residential campus and Westside Research Park. Human-caused wildfires tend to be generated by activities such as debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson.” Accordingly, from a wildfire analysis perspective, it is critical to analyze whether the Project itself—in its location and with its land uses, density, topography, etc.—increases the risk of wildfire ignition and spread. The EIR recognizes that “[T]he wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant”.

However, the proposed mitigation measure does not include the necessary mechanisms that would reduce the risk of wildfire caused by the Project. The DEIR’s reliance on a Vegetation Management Plan does not fill this deficit. It provides a range of wildfire prevention and response strategies (or, mitigation measures) focused on reducing wildfire impacts on the Project. But this again skips the central requirement of CEQA—to analyze, disclose, and propose feasible mitigations of the **2021 LRDP’s impact** on wildfire risk.

- 3.18-17 – Mitigation Measure 3.18-2 – Vegetation Plan

- - The DEIR requires that a campus-wide vegetation plan be adopted that meets the requirements of State law within two years. The DEIR asserts that adoption of the plan the wildfire risk will be less than significant. However, no evidence is provided to document that such a plan would reduce the risk, especially in the north campus subarea, to a less than significant level and the performance standards for the Plan are inadequately vague. To what extent have such plans worked elsewhere? What is the factual basis for the conclusion reached? Without this documentation the potential impact should be considered to be **significant and unavoidable**.

Response L7-179

Refer to Master Response 4 and Section 3.18, “Wildfire,” regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development. As stated on page 3.18-17 of the Draft EIR, Mitigation Measure 3.18-2 requires UC Santa Cruz to prepare and, within 2 years, begin implementation of a campus-wide vegetation management plan. Regarding the effectiveness of vegetation management plans, treatments that alter vegetation to reduce fire intensity can aid in wildland fire containment and control, while creating safety zones for fire fighter and citizen safety (CAL FIRE 2021).

Comment L7-180

Moreover, the DEIR is inadequate because it does not consider a potentially feasible mitigation measure of not developing in the High Fire Hazard Severity Zone in the north campus subarea. The Utilities and Service Systems chapter analyzed this option and found that in most environmental impact areas not building in the north campus subarea would reduce the impacts. It is likely that a more detailed analysis will show that, even with a vegetation management plan the wildfire risk to development in the north campus subarea will be significant. Not developing in that area clearly would reduce this risk to a less than significant level.

Response L7-180

Regarding the adequacy of the Draft EIR’s evaluation of wildfire risk, refer to Master Response 4. With respect to development within the north campus, if this area were excluded from development, the project would be fundamentally different and would not achieve the Project Objectives, as it would render the University unable to house 100 percent of students in accordance with the projected enrollment growth under the 2021 LRDP. Furthermore, Chapter 6, “Alternatives,” includes evaluation of projects alternatives that would either exclude or reduce development within the north campus. Specifically, Alternative 3 (Reduced Development Footprint) would exclude development within the north campus, and Alternative 4 (Reduced Campus Growth and Use of UC MBEST Off-Site) would reduce development of Academic and Support uses within the north campus.

Comment L7-181

- 4-40 – Transportation – Vehicle Miles Traveled – The analysis here is a clear example of the importance of the proposed mitigation measures in the Population and Housing chapter that would effectuate the LRDP commitment

to house 100% of the additional enrollment on campus and tying this increased growth to the provision of housing. As documented in Table 4-4, Cumulative VMT in 2040 is projected to be 12.3 VMT per capita. Cumulative conditions with the 2021 LRDP will be 12.1 VMT per capita. This reduction in VMT from the LRDP results from the campus successfully meeting its housing commitment. Without the proposed mitigation measures the cumulative impact here and in other environmental areas would be **significant and unavoidable**.

Response L7-181

With respect to the need for phasing or a housing guarantee as mitigation to reduce cumulative impacts, refer to Master Response 9 and Response L7-143 with respect to the Draft EIR's evaluation of impacts associated with implementation of the 2021 LRDP. The Draft EIR's evaluation of potential cumulative impacts is considered appropriate, adequate, and in accordance with CEQA requirements in light of the programmatic nature of the evaluation.

Comment L7-182

- 5-1 – Significant and Unavoidable Impacts – the list of impacts in this section is incomplete. The comments contained in this letter provide substantial evidence documenting the need to include an increased number of significant and unavoidable impacts that will result from the implementation of the LRDP.

Response L7-182

This comment is conclusory in nature and no response is required. Where the commenter has suggested that certain impacts be determined significant and unavoidable in previous comments, a specific response is provided.

Comment L7-183

- 5-4ff – Growth Inducing Impacts – The DEIR recognizes that the campus growth proposed under the LRDP will induce economic and population growth off-campus and employs job multiplier, based on a 2019 UCSC study, of 1.23 to project that the 2021 LRDP could result in the indirect increase of an additional 3,568 job in the region (mostly in the City of Santa Cruz but also in the rest of Santa Cruz County).

- The DEIR finds that "the environmental impacts of that growth are not reasonably foreseeable and will be addressed in future environmental review under CEQA." This is not correct or adequate. It is reasonably foreseeable for the DEIR to provide estimates of increased population growth and housing demand based on the projected induced growth in employment. In fact, the EIR analyzing the impacts of the 2005-2020 LRDP carried out such an analysis.

Response L7-183

The comment incorrectly asserts that the 2005 LRDP EIR's conclusions with respect to the conclusions of the 2021 LRDP EIR are inconsistent. The commenter is referred to the top of page 6-9 of the 2005 EIR, which states "the magnitude of growth, especially due to the incubator effect, cannot be predicted with much precision." Furthermore, the 2021 LRDP's Draft EIR does provide estimates of increase population growth and housing demand on page 5-5, contrary to statements made in this comment. The 2021 LRDP's Draft EIR correctly determines though that the impacts associated with that development would depend on the location of proposed development (beyond that evaluated within the cumulative context, which is evaluated in Chapter 4, "Cumulative Impacts" of the Draft EIR) and are not reasonably foreseeable or anticipated at this time. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. In accordance with CEQA, the analysis of growth does not speculate on the exact locations of where growth may occur, because this decision, as well as the analysis of specific environmental impacts, is the responsibility of those local agencies who would evaluate and ultimately decide on whether to approve growth-induced projects.

Comment L7-184

While the Growth Inducing Impacts section of the DEIR may not be the most appropriate place to analyze these potential impacts of this employment growth, CEQA requires that these indirect impacts be considered. The

appropriate chapter to analyze these indirect impacts is in the Population and Housing chapter and it is not speculative to estimate the likely increase in population and housing demand resulting from this increase.

- There is substantial evidence in this DEIR that the 2021 LRDP is indirectly likely to result in an increase of 3,568 new jobs in the County. These jobs will create additional housing demand, which should be analyzed in the Population and Housing Chapter. The EIR will be inadequate without such an analysis.

Response L7-184

CEQA Section 15126.2(e) requires EIRs to consider the effects of growth inducement, and this Draft EIR does so in Chapter 5.3. Within the context of Section 3.13, "Population and Housing" and per the CEQA checklist questions in Appendix G, upon which thresholds were developed (listed on page 3.13-9 of the Draft EIR), the Draft EIR appropriately evaluates the potential for substantial unplanned population growth either directly (i.e., increased enrollment, housing, and staffing) and indirectly (i.e., through the provision of new infrastructure). The potential for indirect growth as evaluated in Chapter 5, "Other CEQA Section" would be regulated by local land use plans and zoning, and would be subject to land use approvals within the surrounding communities. It is reasonable to assume that such development would be evaluated in a manner consistent with applicable land use planning efforts by those jurisdictions. Further, CEQA (refer to Sections 15144, 15145, and 15384 of the State CEQA Guidelines regarding speculation and forecasting) requires that an EIR not speculate regarding conditions that cannot be determined with reasonable certainty at this time, in light of evidence. As a result and contrary to the statements made in this comment, the Draft EIR presents a discussion of potential growth-inducing effects of the 2021 LRDP but does not speculate as to the locations or impacts of that growth, in accordance with CEQA requirements.

Comment L7-185

- 6-1 – The DEIR quotes the CEQA Guidelines requirements for the analysis of alternatives, which includes: "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain **most of the basic objectives** of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The alternatives do not need to meet all the basic objectives.

- A related CEQA Guidelines provision includes: "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly." This provision is particularly important in considering the comments below.

Response L7-185

Refer to Master Response 3 regarding consideration of a reasonable range of alternatives.

Comment L7-186

- 6-2 – 6.5.2 - Alternative 2: Reduced UCSC Enrollment

- 5-13 - This alternative would reduce enrollment under the 2021 LRDP to 26,400 students with the same land use plan as proposed. The DEIR asserts that "this alternative would not provide the full additional capacity for 28,000 students, which is based on the state's 2040 college enrollment projections; therefore, Alternative 2 would only partially meet Project Objective 1 which involves the accommodation of projected increases in student enrollment through 2040 based on statewide public educational needs."

The DEIR provides no evidence to support the statement that enrollment growth to 28,000 students is based on the state's 2040 college enrollment projections. None of the references listed in the DEIR seem to relate to this statement. Moreover, if the objective of meeting the referenced state projected need, the DEIR should have included the 28,000 number in the objective language.

Response L7-186

Contrary to statements made in this comment, the 2021 LRDP Goals and Objectives, identified on page 2-8, state that projected increases in student enrollment through 2040 are based on statewide public educational needs, as stated in Master Response 2 and including the Master Plan for Education in California (OPR 2018b). Further, as stated on page

2-9, the 2021 LRDP growth assumptions are based on overall UC and campus population projections, demonstrating need for additional public university capacity in California.

Comment L7-187

Finally, there is no evidence in the DEIR documenting that the LRDP could not meet state's projected enrollment levels in 2040 with a lower enrollment at the UCSC campus. It is not accurate or adequate, therefore, for the DEIR to assert that a lower student enrollment would only partially meet Objective 1.

Response L7-187

The comment states that it is inaccurate for the Draft EIR to assume that lower projected enrollment rates would not meet the states enrollment levels in 2040. As stated on page 2-9, the 2021 LRDP growth assumptions are based on overall UC and campus population projections, demonstrating need for additional public university capacity in California. Therefore, a proposed decrease in the projected enrollment would not align with statewide public educational needs and additional public university capacity. See also Response L7-186.

Comment L7-188

- 6-17ff – 6.5.3 Alternative 3: Reduced Development Footprint - While this alternative would eliminate development in the north campus, it would not fully reduce the enrollment proposed to be served by development in that subarea and as in Alternative 2 enrollment would total 26,400 students.

- 6-19 – Ability to Meet Project Objectives – As with Alternative 2, the DEIR finds that the alternative would meet most of the project objectives but would not serve the project state projected enrollment needs and, thereby, would not meet objective 1. The objections to this determination are the same as listed above for Alternative 2.

Response L7-188

The comment summarizes statements included in Chapter 6, "Alternatives," of the Draft EIR. No response is required.

Comment L7-189

- In addition, the DEIR finds that Alternative 3 would not meet Objective 3 which is to provide 2 additional college pairs.

Response L7-189

The comment summarizes a statement included in Chapter 6, "Alternatives," of the Draft EIR. No response is required.

Comment L7-190

- The DEIR determined that many of the impacts of this alternative would be similar to those resulting from the proposed project, some would be less, and one would be greater as a result of locating more development on the central campus.

Response L7-190

The comment summarizes statements included in Chapter 6, "Alternatives," of the Draft EIR. No response is required.

Comment L7-191

- 6-33 – Comparison of Alternatives – The DEIR is inadequate in its comparison of alternatives. The CEQA Guidelines require that the alternatives to the proposed project meet most of the basic objectives and **substantially** reduce the significant environmental impacts of the project. The DEIR in comparing the alternatives merely states whether the impacts are lesser, similar or greater than the project. The EIR needs to indicate which impacts the alternatives would reduce substantially.

Response L7-191

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to attain most project objectives and avoid or substantially lessen any of the significant effects of the 2021 LRDP. Chapter 6, "Alternatives," of the Draft EIR considered and evaluated four alternatives. Several alternatives were developed to aim at reducing impacts associated with the location of project elements, as well as the magnitude of

impacts associated with the numbers of students. As stated on page 6-34 of the Draft EIR, each of the evaluated alternatives would result in lesser environmental impacts than the 2021 LRDP to some environmental resources and greater impacts to others with the exception of the No Project Alternative and the Reduced LRDP Enrollment Alternative. Refer also to Master Response 3 regarding consideration of a reasonable range of alternatives.

Comment L7-192

While the DEIR mentions, on page 6-34, that the impacts of Alternative 2 would be less than those in the 2021 LRDP, "it would not altogether avoid the significant and unavoidable with respect to" a number of impact areas. This is unclear and inadequate. To what extent would significant and unavoidable impacts be reduced to a less than significant level, even if they were not totally avoided.

Response L7-192

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to avoid or substantially lessen any of the significant effects of the 2021 LRDP. CEQA does not require the Draft EIR to identify whether an alternative would reduce impacts to a less-than-significant level. Table 6-2 on page 6-33 of the Draft EIR provides a summary of the environmental analyses provided above for the 2021 LRDP alternatives. As shown in Table 6-2, impacts associated with air quality, greenhouse gas emissions, hazards and hazardous materials, and utilities and service systems would be less under Alternative 2 when compared to the 2021 LRDP.

Comment L7-193

The EIR should contain a chart comparing the alternatives that includes impacts after mitigation for each environmental factor.

Response L7-193

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to avoid or substantially lessen any of the significant effects of the 2021 LRDP, compared to the project. CEQA does not require the Draft EIR to identify whether an alternative would reduce impacts to a less-than-significant level. Table 6-2 on page 6-33 of the Draft EIR provides a summary of the environmental analyses provided above for the 2021 LRDP alternatives. Each of the evaluated alternatives would result in lesser environmental impacts when compared to the 2021 LRDP.

Comment L7-194

- Additional Feasible Alternative - The DEIR is also deficient in its consideration of alternatives because it does not include the alternative discussed in Utilities and Service Systems chapter that is similar to Alternative 3 by not developing in the north campus subarea but eliminates the enrollment growth that would be served in that subarea. This is a potentially feasible alternative and should be evaluated.

Under this alternative, total enrollment growth would be reduced by 3,700 students for a total enrollment of 24,300 students rather than 26,400. By not forcing additional growth in the central campus subarea, as would occur under Alternative 3, the impact to the Historic District would be the same as with the 2021 LRDP. Further, the impacts in all the environmental areas would be similar or less than the 2021 LRDP and all the other alternatives except the No Project Alternative. While it might not meet Objective 1, CEQA only requires that an alternative meet "most" of the objectives and, also, as mentioned above, the DEIR provides no evidence that reduced enrollment at the UCSC campus wouldn't meet state projections for enrollment growth. This alternative would also not meet Objective 3 to provide two sets of new colleges, but this objective is based on the assumption that enrollment would reach 28,000 students. With reduced enrollment, there may not be the same need for the additional college.

It clearly would be the environmentally superior alternative and as a reasonable alternative with substantially fewer impacts, it should be included in the EIR.

Response L7-194

The comment states that the Draft EIR fails to consider an alternative in Chapter 6, "Alternatives" of the Draft EIR that eliminates development in the north campus and reduces enrollment to 24,300 students. This evaluation is provided

in Section 3.17, "Utilities and Service Systems." Refer to Master Response 3 regarding consideration of a reasonable range of alternatives. Moreover, the Draft EIR already includes the requested information, in the water supply discussion (Impact 3.17-1). The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions.

Comment L7-195

In conclusion, while the DEIR includes a great deal of important and relevant regarding the LRDP, as documented in this letter it is currently inadequate in meeting CEQA's requirements.

Response L7-195

The comment states that the Draft EIR is inadequate in meeting CEQA requirements. This comment does not state specifically what the commenter finds inadequate; therefore, no additional response can be provided.

Letter L8 Monterey Bay Air Resources District

Christine Duymich, Air Quality Planner II

March 8, 2021

Comment L8-1

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the UC Santa Cruz 2021 LRDP DEIR. The Air District has reviewed the document and has the following comments:

Response L8-1

The comment is introductory and is noted. This comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-2

- **Mitigation Measure 3.3-1:** The Air District appreciates UC Santa Cruz's plan Vehicle Miles Traveled (VMT) reduction measures to maximize emission reductions and for congestion management. The Air District highly supports UC Santa Cruz 2021 LRDP making the project plan area a more bike- and ped-friendly community and encourages UC Santa Cruz's exploration of and eBike fleet for faculty and staff use as well as a possible campus/regional bikeshare program.

In an effort to further reduce emissions, the Air District would like to suggest inclusion of roundabouts at intersections or if signaling intersections is selected, then the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design should be employed. *Local annual funding opportunities from the Air District are available for ATCS and roundabout design and construction projects. Please contact Alan Romero, aromero@mbard.org, for more information.*

Response L8-2

Consistent with the comment's request, Mitigation Measure 3.3-2 in Section 3.3, "Air Quality", includes a similar recommendation to "Reduce campus vehicle speed limits to the extent feasible and install traffic calming or signal coordination to reduce the intensity of vehicle braking and acceleration." Roundabouts and ATCS are forms of traffic calming and signal coordination and would be considered in the implementation of this measure.

Comment L8-3

- **PM 10 and NOx Construction – Related Emissions: (Sections 3.3 and 3.8)**
As both construction and operational PM 10 and NOx emissions exceed MBARD's CEQA thresholds and since mitigation measures cannot reduce emissions below significance thresholds, we request that UC Santa Cruz coordinate with the Air District to develop off-site mitigation measures. Please contact David Frisbey at the Air District office at (831) 647-9411 or dfrisbey@mbard.org.

Response L8-3

Mitigation Measure 3.3-1, "Reduce Construction-Generated Emissions of NO_x" would reduce any exceedance of oxides of nitrogen emissions from construction to less-than-significant levels without the need for off-site measures. With respect to operational emissions, only PM₁₀ would still be exceeded even after the implementation of Mitigation Measure 3.3-2. The comment does not suggest specific programs or measures that could be implemented, nor are there measures identified in available MBARD CEQA guidance materials. Furthermore, the feasibility of and quantifiable reductions that could be possible are considered speculative at present. However, UC Santa Cruz, as a regional partner and outside the context of CEQA, will coordinate with MBARD to determine how best UC Santa Cruz may assist in reducing regional emissions, including participation in regional education and/or other programs related to reducing emissions. Nonetheless, the conclusions of the Draft EIR are considered appropriate, adequate, and in accordance with CEQA requirements.

Comment L8-4

- **Mitigation Measure 3.8-1 and 2:** The Air District supports incorporating increasing electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, the Air District suggests including publicly available dual port Level 2 & DC fast-charge charging stations throughout the project area. *Local annual funding opportunities from the Air District are available for EV charging infrastructure. Please contact Alan Romero, aromo@mbard.org, for more information.*

Response L8-4

UC Santa Cruz is committed to expanding support for electrical vehicles. Consistent with the comment's request, electric charging stations are already part of UC Santa Cruz's Transportation and Parking Services programs and part of UC Santa Cruz's Campus Sustainability Plan and Energy Efficiency Programs. Level 2 charging stations are currently provided within the Core West Parking Structure and East Remote Parking Lot within the LRDP area. Further, Mitigation Measure 3.3-2 also requires installation of additional electric vehicle charging stations, which (if installed within the next few years) would likely be the type identified in this comment. However, as the 2021 LRDP would be implemented over a period of approximately 20 years, it is considered likely that Tier 2 charging stations and current fast-charge stations may become obsolete during the course of 2021 LRDP implementation. The commenter's support for additional charging stations is noted and is not considered inconsistent with the findings or mitigation measures provided in the Draft EIR. As appropriate, UC Santa Cruz Transportation and Parking Services will coordinate with MBARD regarding potential funding opportunities for additional EV charging infrastructure.

Comment L8-5

- **Construction Equipment:** The Air District is pleased with UC Santa Cruz's employment of Tier 3 construction equipment and renewable diesel. To further reduce GHG emissions the Air District would like to encourage the use of Tier 4 construction equipment in addition or in place of the Tier 3 construction equipment.

Response L8-5

The comment expresses support for the Draft EIR's requirement to use Tier 3 construction equipment and renewable diesel and recommends that the Draft EIR further reduce GHG emissions through the encouragement of Tier 4 construction equipment. While all new diesel-powered construction equipment has been required to install Tier 4 engines since 2015, its availability is still limited as construction equipment manufactured prior to this time is still largely in use. This comment has been noted and Mitigation Measure 3.3-1 has been revised as follows:

Mitigation Measure 3.3-1: Reduce Construction-Generated Emissions of NO_x

Per contract specification requirements, UC Santa Cruz shall require that the contractor(s) develop and implement a plan demonstrating that the off-road equipment used on-site to construct 2021 LRDP projects would achieve a fleet-wide average 45 percent reduction in NO_x exhaust emissions, compared to uncontrolled aggregate statewide emission rates for similar equipment. One feasible plan to achieve this reduction would include the following:

- ▶ At least 80 percent of diesel-powered off-road equipment operating on the project site for more than two days continuously shall be equipped with engines meeting US EPA emissions standards for Tier 3 engines or equivalent, and use of Tier 4 engines shall be encouraged;
- ▶ Use of renewable diesel or other zero emissions alternative (e.g., electric) construction equipment to the degree available and feasible;
- ▶ Plan construction projects such that multiple project components (i.e., bridge construction, or roadway construction) will not occur on the same days ~~as other construction activities;~~ and
- ▶ Alternatively, if UC Santa Cruz can demonstrate through preparation of an air quality assessment report prepared by an air quality specialist that large or contemporaneous 2021 LRDP construction projects would not exceed MBARD thresholds, then the above mitigation requirements may be waived.

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 L8-6

- **2021 LRDP Goals and Objectives:** The Air District supports UC Santa Cruz's objective of promoting Transportation Demand Management (TDM) and providing infrastructure to optimize trip and vehicle miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.

Response L8-6

This comment expresses support for the 2021 LRDP's TDM objective that would provide infrastructure to optimize trip-and vehicle-miles-travelled-reduction benefits. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-7

- **Demolition, Grading and Trenching Activities:**

If any asbestos piping or asbestos material is uncovered as part of the earth moving, trenching or during any part of the project, Air District rules may apply. Notification to the Air District is required at least ten days prior to renovation or demolition activities. In addition to the 10-day waiting period if any construction work involves renovation or demolition of a structure as well as removal/replacement of a subsurface pipe, the Air District recommends that the building materials/pipe be thoroughly inspected for asbestos prior to any construction/demolition activity.

Air District Rule 424 National Emissions Standards for Hazardous Air Pollutants can be found online at: <https://www.arb.ca.gov/drdb/mbu/cur.htm>.

Please contact Shawn Boyle or Cindy Searson at (831) 647-9411 for more information regarding these rules.

Response L8-7

The comment provides the MBARD notification process in the event that asbestos material is uncovered during constructions activities that would result from 2021 LRDP implementation. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-8

- **Portable Equipment:**

The Air District permits to operate, or statewide portable equipment registration, may be required for portable and/or auxiliary equipment such as engine generator sets and compressors. Please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for any portable equipment planned to be utilized for this project.

Response L8-8

The comment provides the MBARD permit process for operation of portable equipment such as engine generator sets and compressors. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-9

- **Tree Removal:**

Please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Equipment Registration is necessary for the woodchipper being utilized for this project.

The Air District appreciates the level of detail and analysis provided in the Draft EIR. Should you have any questions, please contact me at (831) 647-9411 or cdymich@mbard.org.

Response L8-9

The comment provides the MBARD contact information for woodchipper registration. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Letter L9 City of Santa Cruz, Planning and Community Development Department

Matthew VanHua, Principal Planner - Advance Planning

March 8, 2021

Comment L9-1

The City of Santa Cruz (City) continues to value the partnership it has with the University of California, Santa Cruz (UCSC) and the many amenities, opportunities, and benefits that UCSC itself and the larger UCSC community bring to the City. As UCSC considers expansion, the City appreciates the opportunity to offer feedback on how said expansion may impact the City, its residents, and its visitors. The City has reviewed the information provided in the UCSC Long Range Development Plan (LRDP) Draft Environmental Impact Report (EIR) and provides comments as follows.

Response L9-1

The comment is introductory in nature and is noted.

Comment L9-2

The timing of proposed mitigations is imperative to minimize negative impacts of future development. Prior to increasing student enrollment and additional faculty/staff, the EIR should clearly note that the necessary transportation and housing mitigations, along with other infrastructure needs, will be in place prior to said increases, not afterwards, so that negative impacts to the environment, the City, and City residents are minimized. For instance, increasing the number of students, faculty, and staff without a coinciding increase in on-campus housing capacity would have different impacts than those studied under this Draft EIR.

Response L9-2

The comment states that the Draft EIR should require that transportation and housing mitigations, along with other infrastructure needs, should be implemented prior to enrollment increases. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. In addition, regarding phasing of development, refer to Master Response 9.

Comment L9-3

While the project anticipates providing housing for 100% of its FTE students over 19,500 and up to 25% of its additional 2,200 staff and faculty, UCSC does not control where anyone chooses to reside. The DEIR has not studied the impacts under a scenario where less than 100% of new enrollment lives on campus or a significantly smaller portion than 25% of faculty and staff choosing to live off-campus. Additionally, while increases in FTE students, faculty, and staff are analyzed, the number of part time students, faculty, and staff and their impact is unknown. Additional scenarios addressing these issues should be studied. Given this need for further analysis, this Draft EIR

should further analyze the impacts of the LRDP on such environmental areas as Air Quality, Hydrology and Water Quality, Population and Housing, Public Services, Recreation, Transportation, and Utilities and Service Systems.

Response L9-3

Refer to Response I76-2 regarding the UC Santa Cruz Housing Policy. Regarding the Draft EIR's evaluation of campus enrollment and population projections, as stated on page 2-9, the 2021 LRDP planning effort addresses anticipated growth in on-campus student population of 28,000 FTE students and approximately 5,000 FTE faculty and staff. State CEQA Guidelines Section 15378(a) defines "project" in part as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. Refer also to Master Response 9 regarding planning implementation and phasing of development.

With respect to the use of FTE as an appropriate metric and as stated in Master Response 2, it is important to note that FTE takes into consideration non-full-time students, so as to better project potential impacts and facility needs. Pages 2-10, 3.13-4, 3.13-11, and 3.15-10 of the 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. Calculations and impact analysis associated with part-time students is considered to be included within the assessment of FTE students, as carried through the Draft EIR's analysis. Refer also to Master Response 2 regarding level of detail required in the Draft EIR.

Comment L9-4

Impact-Specific Comments. The following comments relate to the proposed impact analysis sections.

Response L9-4

The comment is introductory in nature and is noted. This comment does not address the adequacy of the EIR analysis. Further comment is not required.

Comment L9-5

The City's General Plan states that "views toward Monterrey Bay and the Pacific Ocean provide orientation and strong sense of identity" and that coastal terraces such as the ones home to UCSC "afford panoramic views of the city and Monterrey Bay". A view looking south from approximately Viewpoint Location #6 is noted in the City's LCP document (see Attachment 1) as a Scenic View location and should be analyzed further in the EIR to ensure any impacts to this view are considered.

Response L9-5

State CEQA Guidelines Section 15151 provides guidance on the degree of specificity required in the EIR. Specifically, an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. Further, evaluation of the environmental effects need not be exhaustive. Impact 3.1-1 evaluates potential impacts to scenic vistas and includes a discussion of seven viewpoint locations. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA.

This viewpoint was considered; however, due to intervening topography it does not provide a substantially different view than what is already presented in the Draft EIR (refer to Viewpoint 7 as shown on page 3.1-20.) Long distance views from this location are largely precluded with the exception of the southeastern view of development within the City and the Pacific Ocean, which are shown in the distance within Viewpoint 7.

Comment L9-6

As noted above in the general comments, the impacts related to different percentages of students, faculty, and staff living off-campus have not been fully analyzed. If student enrollment increases precede increases in on-campus housing capacity, there would be further impacts also not analyzed in this Draft EIR.

Response L9-6

As described in Master Response 9, the EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on evidence-based assumptions. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz's (or any city's) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. Further, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required.

Comment L9-7

Additionally, the amount of new housing, if any, built at the Westside Research Park is unknown and that may also affect the air quality analysis as this is in a separate location from the rest of the main campus studied in the Draft EIR. It would be ideal to maximize employment on this site and house only individuals employed on this site and the Marine Lab campus.

Response L9-7

The 2021 LRDP building program includes 8,500 new student beds and 558 housing units that could be developed within the 2021 LRDP area, including the Westside Research Park. Section 3.3, "Air Quality," considered full build-out under the 2021 LRDP within the LRDP area, including the Westside Research Park. The programmatic analysis of the 2021 LRDP building program provided in the Draft EIR is adequate and appropriate under CEQA. The Draft EIR's proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L9-8

One specific comment relates to Mitigation Measure 3.3-2 and electric vehicle (EV) charging. The Plan's impact on air quality is significant so the Plan should commit to a specific amount of EV charging stations constructed at parking lots and should build all new parking spaces as EV charger-ready. These actions would better support electric vehicles and cleaner air.

Response L9-8

Please refer to the Response L8-4 regarding Mitigation Measure 3.3-2 and EV charging infrastructure.

Comment L9-9

The Plan includes 119.1 acres of Redwoods within the possible development zone which is a high number. There is substantial acreage for other sensitive areas as well. With potentially significant impacts with respect to biological resources, including many sensitive habitats, what analysis was done to minimize development in biologically sensitive areas and maximize development in areas that do not carry the same potential for significant impacts on sensitive habitat?

Response L9-9

This comment inquires about the analysis done to minimize development in biologically sensitive areas, but does not address the adequacy of the EIR analysis. The EIR thoroughly evaluated impacts, on a programmatic level, to biological resources and included mitigation measures to reduce all impact to a less-than-significant level. See Section 3.5 of the Draft EIR. 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 L9-10

While the report states that the probability of impacting Burrowing Owls is low, the mitigations are not sufficient to adequately address potential impacts. Namely, one mitigation measure calls for providing a 100-foot buffer between

active Burrowing Owl sites and development, and that distance is typically larger to ensure that impacts are mitigated. Biologists typically require significantly larger buffers, around 500 feet, so the EIR should increase this buffer to a larger distance in the unlikely event that active Burrowing Owl sites are identified near construction.

Response L9-10

Comment acknowledged. Please refer to Response L7-69 regarding edits to Mitigation Measure 3.5-2e to reflect the requirements of the CDFW Staff Report on Burrowing Owl Mitigation, which requires buffers of at least 165 feet and 650 feet during the non-breeding and breeding season, respectively.

Comment L9-11

Mitigation Measure 3.5-3b in the Draft EIR states that the mitigation would result in no net loss of habitat function and the City agrees that compensatory practices resulting in no net loss of habitat function is a vital mitigation measure. However, one possible mitigation option under 3.5-3b is to preserve existing sensitive natural communities of equal or better value through a conservation easement at a sufficient ratio to offset the loss of habitat function. Further analysis should be included on this mitigation option. Does it relate to both plant and animal life? If so, an environmental easement may work better for some species more than others. An additional mitigation could also include providing funds to non-profit organizations whose work can also directly compensate for habitat loss and impacts.

Response L9-11

As stated in the Section 3.5.2, "Environmental Setting," on page 3.5-31 of the Draft EIR, sensitive natural communities are native plant communities defined by CDFW as having limited distribution statewide or within a county or region. While sensitive natural communities may support wildlife, preservation of the communities would be focused on the native plants associated with that community. UC Santa Cruz has identified feasible mitigation measures that reduce all impacts related to biological resources to a less-than-significant level, and the measures to compensate for unavoidable loss of sensitive natural communities and mechanisms are generally those accepted by CDFW, the trustee agency.

Comment L9-12

While the DEIR provides a fairly detailed discussion of historic karst geologic and hydrogeologic issues, it is relatively silent on recent developments in natural resource protection planning related to karst. Since the previous environmental review process related to the UCSC LRDP, the San Lorenzo River has been listed for temperature impairment under the Clean Water Act, the City has become obligated to provide additional instream flow for the protection of special-status species, and development of County of Santa Cruz Karst Protection Zone policies has begun.

Specifically, the following issues should be further evaluated in the Final EIR:

Response L9-12

The comment states that the Draft EIR does not reference the City's obligation to provide additional instream flow for the protection of special-status species and development of County of Santa Cruz Karst Protection Zone policies. Refer to Master Response 10 regarding consideration of the County of Santa Cruz Karst Protection Zone policies. Refer to Responses S1-3 and I69-4 regarding the water rights petition that the City submitted to the State Water Resources Control Board to provide protective flow conditions for coho and steelhead.

Comment L9-13

Relationship of the area proposed for potential groundwater development to the regional karst aquifer dynamics warrants more discussion in Chapter 3.10 of the DEIR. The DEIR states: "the assignment of surface water runoff to a particular watershed is based on topographic features of the main residential campus; however, flows captured by the natural subsurface karst aquifer drainage system or by the UC Santa Cruz storm water drainage system may be transferred from one watershed to another in some cases." This is a very important and valid point that understandably exacerbates the evaluation of impacts of the proposed project. On a related note, there have been several significant rainfall years (1998, 2017) and surface runoff from the University has likely changed dramatically

since the hydrogeologic investigation in 1989. There is the potential that subsurface flow dynamics have also changed since that time. Furthermore, it also appears that the historic hydrogeologic studies did not identify all karst features in the vicinity; therefore, the evaluation of karst-related impacts is incomplete. For example, seeps at the headwaters of Redwood Creek – a significant lower San Lorenzo River tributary – do not appear to be identified. Finally, there were field and mapping studies performed in order to support recent County of Santa Cruz karst protection efforts that may provide additional background on hydrogeologic dynamics in the region (Nolan 2016). Reference to them in Chapter 3.10 should be included, if only for completeness' sake.

Response L9-13

Refer to Master Response 10 for further information regarding clarifications and supplemental information regarding karst topography and groundwater conditions as they related to the 2021 LRDP. As noted previously, the Draft EIR's analysis was based on available information. Additional reference to non-LRDP-related studies has been reflected in the Final EIR (as stated in Master Response 10) where appropriate.

Comment L9-14

- Water pollution impacts related to stormwater discharge into the karst aquifer and receiving waters' water quality and increased stormwater discharge effects on karst aquifer morphology and flow paths warrant further evaluation in Chapter 3.10. The DEIR clearly states that "New development under the 2021 LRDP could potentially cause new runoff to be diverted to sinkholes." Discharge of any additional runoff could be considered significant in the context of karst protection – especially since some new development is proposed for the area immediately upgradient of the Pogonip Springs. While the DEIR focuses on erosion, additional flow into sinkholes can cause significant changes to flow patterns underground. Communication with surface flow to the karst aquifer is very similar to a surface water system – whereby polluted runoff is effectively directly discharged to receiving waters. Given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts – specifically with regard to the lower San Lorenzo River and its associated beneficial uses – needs further evaluation.

Response L9-14

The Draft EIR presents a programmatic evaluation of the potential environmental impacts that may occur with further development within the LRDP area under the 2021 LRDP. Subsequent analysis will be conducted as projects are considered under the 2021 LRDP that will evaluate site-specific conditions, including that of karst features. Refer to Master Response 10 for further clarification. Further, the commenter's citation of the EIR is within the context of Impact 3.10-4 (Flood-Related Impacts) on page 3.10-32, which does evaluate surface runoff. However, consistent with the commenter's request, the Draft EIR's analysis of hydrology and water quality impacts does include consideration of potential impacts to the San Lorenzo River, as shown on pages 3.10-7, 3.10-10, 3.10-13, 3.10-25, and 3.10-34 (which specifically addresses impacts to groundwater resources within the San Lorenzo River watershed). The Draft EIR's analysis is considered appropriate, adequate, and in accordance with CEQA requirements.

Comment L9-15

- County of Santa Cruz Karst Protection Zone policies warrant exploration in Chapter 3.11. These policies – while in their infancy – have recently begun to be implemented in the County code and should be evaluated for relevance to the project. For more information please see the following link:
http://santacruzcountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst

Response L9-15

The comment states that the Draft EIR should consider the County of Santa Cruz Karst Protection Zone policies in Section 3.11, "Land Use and Planning." Refer to Master Response 10 regarding consideration of the County of Santa Cruz Karst Protection Zone policies.

Comment L9-16

- Potential use of karst-derived groundwater warrants exploration in Chapter 3.11. As the DEIR correctly states repeatedly, karst groundwater often flows through solution channels. Given the stark differences in production potential of the various wells (as reported in the DEIR and also as anecdotally accounted by Dr. Gerald Weber), it is quite likely that monitoring wells identified for groundwater extraction potential on the campus are located within these solution channels. Given that California Water Law requires valid water rights in order to put water that flows through confined channels into beneficial use, the status of the San Lorenzo River and tributaries as a fully-appropriated system (with regard to water rights), and the potential impacts on other, senior water rights holders in areas affected by reduction in flow from the karst aquifer underlying the University (such as the City of Santa Cruz), evaluation of the University's water rights obligations seems appropriate.

Response L9-16

Within the context of CEQA and based on historic activities within the LRDP area, the Draft EIR assesses the potential physical environmental impacts associated with the possible use of an existing groundwater well in the lower campus subarea of the main residential campus. The commenter is referred to the analysis beginning on page 3.10-35 of the Draft EIR, which focuses on the potential physical environmental impacts of use of the groundwater well. It is acknowledged that, if UC Santa Cruz pursues use of WSW#1 for groundwater extraction, further evaluation of use of the well as a subsequent project under CEQA would be conducted. Also refer to Master Response 10. Regarding water rights, as explained on page 3.10-20 of the Draft EIR:

WSW#1 was drilled and completed under City of Santa Cruz permit in December 1988. Drilling to a total depth of 226 feet encountered limestone/marble, with evidence of karst solution channels and zones of hard intact marble interspersed with abundant open to rubble-filled fractures and void spaces.

As described above, well WSW#1 may either be drawing water from a groundwater basin or from a subterranean stream. Because the source of groundwater extracted by this well could either be a groundwater basin or a subterranean stream, additional examination of its provenance would be needed if the well is dedicated to long-term regular extraction, and this determination would be made during the project-level evaluation described above. The Draft EIR properly evaluates the physical impacts of potential groundwater/subterranean water, as required by CEQA.

Comment L9-17

- Groundwater extraction impacts on lower San Lorenzo River biotic resources warrants further evaluation in Chapter 3.5. Dry season and dry year hydrology, as well as dry season water temperatures in the lower river can be limiting to special-status species such as coho salmon and steelhead trout. Again, given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts –specifically with regard to the lower San Lorenzo River instream flows and temperature dynamics – needs further evaluation.

Response L9-17

Refer to Response L9-16.

Comment L9-18

- Impacts on the City of Santa Cruz water system related to potential reduction in karst springs discharge to the lower San Lorenzo River also seems warranted in Chapter 3.17. Again, the San Lorenzo River is a fully-appropriated stream (with regard to water rights) during the dry season. Reduction in flow from Pogonip and Redwood Creeks (as well as smaller karst-derived tributary flows to the lower San Lorenzo River) could have negative effects on the City's ability to divert at our primary diversion at Tait Street (also known as the Tait Diversion or Crossing Street Diversion). While it may be that the proposed use of groundwater on campus is ultimately determined to have negligible effects on San Lorenzo River flows and water quality, it is not clear from the existing analysis that is so.

Response L9-18

Refer to Response L9-16.

Comment L9-19**Statistical Approach to Water Years**

Much of the DEIR's statistical analysis related to groundwater and surface water monitoring is based on averaging water monitoring data across all years and calculating standard deviations around these comprehensive averages. While averaging available data is useful for comparing annual data to a standard (e.g. rainfall, groundwater levels, stream flow), it is not a good measure of how highly variable systems operate.

Historically, rainfall in California is highly variable from year to year. In the 124 years that the State has collected rainfall data, only two of those years have exhibited "average" rainfall. California precipitation tends to fluctuate between wet water years that recharge groundwater and dry water years where little or no groundwater recharge occurs. Further, climate science research from UC Berkley Lab (and elsewhere) indicates that California's already variable rainfall patterns are likely to become even more variable in the future.

We recommend the DEIR's analysis of existing groundwater and surface water monitoring data include additional analysis that is grouped and analyzed by water year (wet, normal, dry and very dry). This additional analysis will provide a more nuanced range of groundwater levels and insight into their interrelationship with surface water by water year types. This more nuanced analysis will provide greater insight into the extremes for rainfall and runoff, greater insight into the management of groundwater levels, and how the management of groundwater pumping changes surface water flows and the habitats that depend on interconnected springs and streams.

Response L9-19

As stated in Master Response 10, the analysis presented in the Draft EIR has been supplemented, based on the commenter's request, with an assessment of hydrologic conditions by water year type. The inclusion of the supplemental information does not constitute significant new information (per Section 15088.5 of the CEQA Guidelines) and did not identify new or substantially more significant hydrology and water quality impacts. As a result, recirculation of the Draft EIR is not necessary.

Comment L9-20

We also recommend the DEIR's proposed mitigation measures for groundwater pumping monitoring be revised to rely on these recommended water year calculations. Specifically, we request that any potential groundwater pumping strategy and mitigation monitoring be based on analysis of available historic data by water year type as it corresponds to the current water year (e.g. wet water year pumping is compared to wet water year statistical averages). This will ensure that the analysis of potential groundwater pumping in wet years fits within the standard deviations for wet water years, rather than the artificially low average that incorporates wet and dry years. This will also allow additional pumping in dry water years based on the mean average and standard deviations for dry water years. This revised pumping and mitigation monitoring strategy would be less likely to impact surface water flows beyond what is experienced during natural climate processes. The goal being to ensure that the proposed project incorporates groundwater and surface water monitoring protocols as mitigations that are protective of the natural systems that rely on groundwater, including areas with interconnected surface waters located within the City.

Response L9-20

Refer to Response L9-19.

Comment L9-21**Impact 3.10-3 Alteration of Drainage Patterns and Increased Runoff**

The DEIR provides average rainfall data on p. 3.10-9 but does not include an appendix to support this rainfall analysis. As discussed above, rainfall in California is highly variable and planning for runoff in an average year is different than planning for runoff in a wet year. While flooding is not expected in this area of the City, the DEIR should include its rainfall analysis including the statistical approach used to analyze this rainfall data. More detailed information is needed for wet years to determine more if there is adequate stormwater retention and storm drain capacity to

handle wet year flows, especially since climate change is projected to lead to more rainfall variability and more severe storms.

Response L9-21

Refer to Response L9-19.

Comment L9-22

Impact 3.10-4 Flood-Related Impacts

The DEIR identifies karst geology on the central and lower campus and states that the natural karst sinkholes and swallow holes convey surface flows to off-campus springs. The analysis of potential flooding on campus relies on these natural features to address potential flood impacts and on state required rainfall retention related to new construction to limit runoff. The DEIR also relies on drainage improvements made since above normal rainfall events in 2003 & 2004 to divert storm flows away from certain sinkholes and swallow holes where flooding had occurred on campus during those 2003/2004 storm events.

The DEIR states that additional LRDP related construction on campus will lead to additional storm related runoff. The DEIR goes on to state that, "...regulatory compliance and programmatic elements in place for new development in the LRDP area are designed to reduce runoff, peak flows and impacts to water quality and, therefore, implementation of the 2021 LRDP would result in a less-than-significant impact."

UCSC is located on a hill within the City of Santa Cruz and is tied into City provided wastewater and stormwater infrastructure. The 40 to 50 sinkholes and swallow holes are also connected to springs and seep fed streams located off campus within the City and unincorporated County. While the DEIR discusses potential impacts on campus, it does not provide information on increased runoff that would flow into the City as surface runoff, into its wastewater or stormwater infrastructure, or to the interconnected springs and streams.

The DEIR should be revised to include runoff projections for storms from wet water years that would allow the City to evaluate the potential impacts in the City from additional runoff related to the proposed project's potential impact on City infrastructure.

Response L9-22

As noted in Chapter 1, "Introduction" of the Draft EIR and Master Response 11, the analysis of the 2021 LRDP is programmatic in nature and does not provide project-specific analysis, including specific changes in drainage patterns that could result in additional runoff to specific water courses/features. The Draft EIR does include a campus-wide evaluation of potential changes in permeability and increased runoff and provides mitigation that can address the range of environmental impacts. As noted in Impact 3.10-5, compliance with UC Santa Cruz Post-Construction Requirements would involve the retention of runoff to pre-development conditions which would prevent changes in flows to springs and seeps. Any on-site stormwater facilities developed consistent with these requirements would have the capacity to retain/detain flows during wet water years, consistent with the commenter's request.

Comment L9-23

Karst Aquifer Management

The DEIR should recommend mitigations that increase the knowledge needed to properly manage any potential groundwater pumping in this karst aquifer: (1) the DEIR should recommend mitigations that will expand understanding of the interrelationship between groundwater and surface springs that would inform and improve resource management, (2) the DEIR should evaluate biological resources that depend on the interconnected springs/streams supported by groundwater and potentially impacted by groundwater pumping both on and off campus, and (3) the DEIR should recommend a process to develop groundwater sustainability standards that are protective of surface water resources. This process should include the City of Santa Cruz and the County of Santa Cruz, where interconnected springs/streams are located. The process should also identify any relevant resource agencies and other partner agencies involved in protecting the identified biological resources.

Response L9-23

This comment offers generalized conceptual ideas regarding evaluation of biologic and hydrologic conditions that could be used to refine regional approaches to groundwater management. The Draft EIR evaluates impacts associated with 2021 LRDP implementation, including those related to groundwater extraction under Impact 3.10-5. Implementation of Mitigation Measure 3.10-5a would ensure that campus pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality nor would it affect offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and defines average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. In the event that extraction contributes to a net deficit, UC Santa Cruz would terminate or reduce groundwater extraction. Outside the context of CEQA and as a partner agency in the region, UC Santa Cruz will coordinate with both the County and City of Santa Cruz to ensure the sustainable management of groundwater in the region.

Comment L9-24**Groundwater Mitigation Measures**

Based on the complex geology involved in karst aquifers, the DEIR recommends groundwater and spring monitoring that is inadequate to protect groundwater and surface water resources from potential groundwater extraction related to the proposed project. The DEIR recommends annual groundwater monitoring of the production well only when groundwater is actually being produced.

In karst systems, continuous monitoring is often used to understand water levels, static reserves, and groundwater recharge. If water is extracted from the karst aquifer, the DEIR monitoring program should include continuous monitoring to confirm that any water extracted from the karst aquifer during the dry season (static reserves) is regularly replenished during periods of aquifer recharge. This continuous monitoring is necessary to adequately understand the karst aquifer, groundwater pumping's effects on static water levels, the sustainability of the karst system to recharge naturally during sustained and/or periodic groundwater withdrawals in order to protect this groundwater resource from depletion. It would also provide information that could be useful to develop the karst aquifer as a storage reserve when excess water is available.

The DEIR should be revised to include continuous groundwater monitoring that is reviewed at least quarterly to increase understanding of the complex karst aquifer system as it responds to potential groundwater pumping and recharge in both wet and dry years.

Response L9-24

The monitoring protocols set forth in the Draft EIR are adequate to protect against over pumping and maintain sustainability based on the 2021 LRDP; additional monitoring could be required on a project level as future development is considered. Refer to Master Response 10.

Comment L9-25**Spring Monitoring and Interconnected Streams**

The DEIR should be clarified to discuss the type and location of ongoing surface water monitoring proposed, should include data collection that address both water quality and water quantity at these interconnected springs. This mitigation monitoring should include biological assessment of the habitat values supported by groundwater at interconnected springs and streams located both on campus and off campus. These mitigations should be based upon statistical information developed based on the separate analysis of data from wet water years and dry water years, as discussed above. This is especially important because the biggest shortfalls are likely to occur during single and multi-year droughts.

Response L9-25

The monitoring proposed as part of Mitigation Measure 3.10-5b, as amended through responses to comments, does not involve surface water monitoring but focuses on the monitoring of existing and potential new wells within the LRDP area to better determine connectivity of groundwater supplies in the vicinity of the LRDP area. The analysis and mitigation presented in the Draft EIR (Mitigation Measures 3.10-5a on page 3.10-35 and 3.10-5b on page 3.10-36 of

the Draft EIR) are based upon available statistical information and are adequate and appropriate to reduce the potential significant impacts of the 2021 LRDP. As noted above and in Master Response 10, the analysis presented in Impact 3.10-5, beginning on page 3.10-33 of the Draft EIR, has been amended to reflect data by water year type, as requested by the commenter.

Comment L9-26

Significance Criteria for Groundwater and Surface Water Depletions

The DEIR's identified significance thresholds for the depletion of groundwater and interconnected surface water states: "If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, *as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs*, the campus will terminate or reduce its use of groundwater from the aquifer. *A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period that includes both wetter and drier years coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding rainfall season*. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, with consideration of associated seasonal rainfall." (emphasis added).

The Sustainable Groundwater Management Act (SGMA) provides a comparable legal framework to analyze significance criteria related to groundwater pumping and surface water impacts, which addresses both groundwater and surface water sustainability planning. The SGMA allows for the local identification of significance criteria when defining what is sustainable to protect an identified resource. However, these locally defined significance criteria must actually be protective of the resource(s) in question.

The significance criteria for groundwater and surface water depletions should be linked to the protected resources. For groundwater, water levels are linked to the resources supported, this could be local well users to ensure that their well continue to produce after the university begins pumping the aquifer. For surface water it is related to the human and biological systems that use the water.

Response L9-26

The significance criteria applied for Impact 3.10-5, beginning on page 3.10-33 of the Draft EIR, and Mitigation Measure 3.10-5b (as partially quoted by the commenter) uses a no-net-deficit threshold to ensure the sustainable use of groundwater supplies such that various natural resources, including protected resources, are not significantly affected, consistent with the commenter's request. Further, the mitigation measure as provided in the Draft EIR and amended through responses to comments would require halting groundwater extraction if a net deficit in groundwater levels over the period defined is noted, regardless of whether the extraction of groundwater by UC Santa Cruz was the determining factor in the deficit. As a result, the thresholds employed for this evaluation are no net change, which is consistent with the intent and requirements of the SGMA.

Comment L9-27

The DEIR should be revised to propose mitigations that will both identify existing water uses and develop significance criteria that protects those uses.

The Biological Resources section of the DEIR provides no information on the plants and animals supported by interconnected springs off campus, in the City and County areas, that could be impacted by on campus groundwater production. Biological mitigations recommend "Project-Level Biological Reconnaissance for Sensitive Species and Habitats Surveys" to understand and protect the sensitive species potentially impacted by the proposed project.

These types of biological surveys should also be included at section 3.10-5b as mitigation to evaluate surface water resources and protect the habitats and species that rely on these interconnected springs. This additional detail is needed to determine if the significance criteria outlined in the DEIR is likely to be protective of the resources in question. This is especially important considering that groundwater extraction is most likely during single and multi-year droughts when surface water resources are least available to natural systems.

Response L9-27

As noted in Master Response 10, Mitigation Measure 3.10-5b has been amended to better reflect the potential interconnected nature of groundwater within and adjacent to the LRDP area. Further, as noted above in Response L9-16, UC Santa Cruz would conduct a project-level analysis, including a subsequent assessment of physical environmental impacts under CEQA, prior to approval of groundwater extraction within the lower campus subarea and at WSW#1.

Comment L9-28

Additional information regarding the University's commitment to providing housing for faculty and staff is needed. The Draft states that 100% of new students enrolled beyond 19,500 and up to 25% of the 2,220 full time equivalent faculty/staff members will be housed on-campus. Despite the Draft EIR studying these percentages of groups being housed on-campus, it fails to adequately evaluate the impacts of all new students, faculty, and staff being housed off-campus. UCSC does not currently have mandatory on-campus residence requirements, so students, faculty, and staff can live wherever they like despite the analyzed percentages. When students, faculty, and staff are not housed on-campus, they create more impacts in the City on such things as transportation, housing demand/cost, water use, etc. In order to adequately assess the impacts of the project, the percentage of students, faculty, and staff living on-campus will need to be clearly established, such as through on-campus living mandates, or alternative percentages of on-campus residents should be analyzed, which would likely result in new or different impacts.

Response L9-28

As noted in Master Response 2, the 2021 LRDP is a guide for campus development, and the Draft EIR reflects a regional projection of how impacts would occur in light of implementation of the 2021 LRDP, as the project being evaluated under CEQA. The analysis carried forward throughout the Draft EIR is considered a reasonable projection of the potential environmental impacts associated with the project under CEQA. 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, particularly related to faculty and staff, would be significant and unavoidable. The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

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 is able to conclude that, with cumulative development, all of the growth in student enrollment would be accommodated on campus. Refer also to Response I76-2 regarding the UC Santa Cruz Housing Policy and the need for a mechanism to require residence within the LRDP area. Further, based on historic housing data for the campus and typically low vacancy rates within the LRDP area, it is reasonable to conclude that if housing is made available on campus that students, faculty, and staff would attempt to live on campus.

Comment L9-29

The Draft EIR also does not propose tying the development and provision of on-campus housing to increases in students, faculty, and staff. There could be a large gap (possibly many years) between student, faculty, and staff growth and on-campus housing development, and neither the EIR nor the LRDP mandates that housing be built and occupied prior to enrollment growth. This scenario would create impacts to the City of Santa Cruz that have not been analyzed or mitigated. UCSC should commit to providing a specific amount of on-campus housing prior to expansions of students, faculty, and staff members, as this will allow for a more accurate assessment of the project's impacts.

Response L9-29

Refer to Master Response 9 regarding the phasing of development.

Comment L9-30

The Draft EIR states that proposed and entitled housing development in the City's pipeline adequately mitigates for the housing demand created by students, faculty, and staff that choose to live off-campus. Some housing developments have been approved for years, but have not been constructed (e.g., the 32-unit, mixed use project at

the southeast corner of Soquel and Hageman Avenues was approved four years ago but has not yet pursued building permits). The construction of most projects is out of the City's control and cannot be guaranteed. While significant percentages of new units produced in the City are affordable (due in large part to City inclusionary requirements coupled with the City's support for 100% affordable projects), students are not as likely to live in new, market-rate housing due to cost. While some filtering can occur as newly constructed housing becomes available, this process can take years and relies on continuous production of housing both within the City and regionally, something that cannot be guaranteed, so more affordable housing may not be readily available to meet the needs of student growth just because new housing development is in the pipeline. This scenario could place further demand on housing in the City, particularly on the limited supply of affordable housing. An ongoing contribution to the City's Affordable Housing Trust Fund should be provided to offset the increased housing demand from students, faculty, and staff in the City, particularly to offset the demands for affordable housing stock in the City.

Response L9-30

UC Santa Cruz acknowledges the status of the City's housing development. This comment does not address the adequacy of the EIR analysis. No further response is necessary. However, please refer to Master Response 2 regarding 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 L9-31

The Draft EIR presents conflicting viewpoints on vacancy. Given that the City of Santa Cruz is the closest city to UCSC, using the County-wide 2020 Department of Finance (DOF) vacancy rate of 7.8% does not accurately reflect the housing pressure on the City itself (a lower rate of 5.6% in the same study). That study also does not take into account the loss of approximately 1,000 units in the County due to the CZU Fire Complex. Additionally, HUD data from 2019 is also referenced and shows a vacancy rate of 1.9% in the County. The report states that based on a number of factors including vacation home counting, the DOF vacancy rate is possibly not accurate and that the vacancy rate is likely lower. The current American Community Survey (ACS) data estimates a County of Santa Cruz rental vacancy rate of 2.0% and a homeowner vacancy rate of 0.4%, similarly low as the HUD data provided. The HUD and ACS data shows an extremely low housing vacancy situation that could be given more weight than the DOF vacancy rate in the Draft EIR analysis. The Draft EIR uses the higher DOF vacancy rate to support its position that there is a less than significant impact on off-campus housing when there is lower vacancy data from two other sources. Increases in student, faculty, and staff populations coupled with a low vacancy rate places further pressure on housing, especially when housing that might be available for students may not be affordable. These potential housing shortages could force students to live further from campus, increasing impacts to transportation and air quality. Housing shortages could be further compounded if UCSC does not tie on-campus housing to its enrollment growth, because if it the two are not linked, there could be years where there is no on-campus housing available for new students, despite additional enrollment and associated demand for housing. This would create additional growth pressure in the City.

Response L9-31

Impact 3.13-1 on page 3.13-10 of the Draft EIR explains the various housing availability data considered to evaluate housing demand. This analysis also reflected data from US Housing and Urban Development Department (2019), California Department of Finance (2020), the 911 housing units that were lost due to the CZU Lightning Complex Fire, and units approved by the City of Santa Cruz, and other information in Section 3.13.2. The Draft EIR does not contradict the City's comment; see the discussion below from page 3.13-12 of the Draft EIR:

According to the City of Santa Cruz 2015-2023 Housing Element, housing affordability, including rental units, is a significant challenge. Students at UC Santa Cruz and Cabrillo College struggle to find affordable housing, and frequently live with several other students in single-family homes. (City of Santa Cruz 2016) The Santa Cruz City Council is actively engaged in strategies to address housing needs in the community, with the Mayor conducting a listening tour, the City Council holding housing study sessions, development of engagement reports, and creation of a Housing Blueprint Committee. This committee developed

recommendations, many of which have been adopted by the City to provide for accessory dwelling units, creation of a rental housing task force, other measures (City of Santa Cruz n.d.).

The demand for additional housing would likely contribute to the housing issues facing the City, especially in light of the current extremely low rental vacancy rate.

The Draft EIR attempts to explain the discrepancy between data and on-the-ground experience related to vacancy rates but acknowledges the difficult housing situation being faced in the City of Santa Cruz.

Based on the information presented above, including the number of units that have been approved by the City of Santa Cruz, balanced against information in the City of Santa Cruz Housing Element and other information in Section 3.13.2, and the need to pursue additional housing under existing conditions (e.g., efforts by the Santa Cruz Blueprint Housing Committee), it is likely the 2021 LRDP will result in demand for new housing that would not already be provided. UC Santa Cruz has determined that while the future housing market is not entirely predictable, it is possible that there will not be adequate off-campus housing units to meet the housing demand of additional students and employees in the years leading up to 2040-2041. Therefore, implementation of the 2021 LRDP could further reduce the available housing market in the County and induce unplanned levels of substantial housing demand because of the projected increase in UC and non-UC employees. This impact is **potentially significant**. (Draft EIR, pages 3.13-3.14)

Refer also to Master Response 9 regarding the phasing of development.

Comment L9-32

The increase in students, faculty, and staff will create increased demand for housing off-campus. Most of that demand will fall on nearby cities, especially Santa Cruz. While this demand for housing may generate a housing market response and the construction of new housing, as mentioned above, there will likely be times when housing development and demand are not in sync. These will be times of far greater demand and pressure on the Santa Cruz housing market. This could have impacts on existing residents due to rent increases to meet the increased demand. Rent increases or even the construction of new housing could also cause displacement. These impacts should be addressed in the Draft EIR.

The exact location of the new housing is unknown, so it is difficult to assess specific impacts. For instance, housing located at the Westside Research Park could have different impacts to transportation and parks than housing located on the main campus. Studies also show that employment and housing in closer proximity generates less travel demand. Further, jobs in proximity to transit support transit ridership more so than housing in proximity to transit, due in part to the "last mile quandary," which speaks to people being able to drive to a transit starting point but having more challenges in navigating the transit-station-to-destination end point. Given the Regional Transportation Commission's recent vote to support rail transit along the rail corridor and the adjacency of the Westside Research Park to said rail line, the City encourages UCSC to maximize employment opportunities on the Westside Research Park as a means to promote future transit use. If housing is considered at that location in addition to the employment uses, then the occupants should be limited to employees and students who work at or study at the Westside Research Park and the nearby marine lab as a means to maximize active transportation options (biking, walking, etc.) for those residents. Similarly, the provision of faculty and staff housing on-campus that houses greater than 25% of the new faculty and staff growth could result in fewer negative environmental effects experienced by the City and its residents, and the EIR should consider a project or alternative that provides on-campus housing for a higher percentage of its workforce.

Response L9-32

Consistent with this comment, the Westside Research Park proposed land use designation of Mixed Use would allow for the provision of both housing and employment uses. As noted in Master Response 2, the Draft EIR presents a reasonable projection of impacts associated with student enrollment growth and the development of facilities to accommodate the projected growth. Additionally, the high demand for housing and low vacancy rate in the City of Santa Cruz and surrounding communities are described in Section 3.13, "Population and Housing" of the Draft EIR, as well as the potential environmental effects of additional demand for housing. Further, with respect to the level of

detail and specificity of housing locations and types under the 2021 LRDP, refer to Master Response 11. As noted in Chapter 2, "Project Description," the 2021 LRDP includes numerous mobility hubs that are intended to provide greater access to transit and regional connections, including the rail-trail transit corridor that was recently considered by the Regional Transportation Commission, as well as "complete streets" and other improvements to facilitate biking and walking. Refer to "Integrated Land Uses" as described under "Transportation Demand Management Programs" on page 2-30 of Chapter 2, "Project Description" of the Draft EIR for further clarification, including the use of transit-oriented design concepts to capture last mile connectivity between the main residential campus and Westside Research Park, transit stops to final destinations, and proximity to a mix of land uses (e.g., student support and public services.) Regarding the Draft EIR's presentation of a reasonable range of alternatives, refer to Master Response 3 and Response L12-9.

Comment L9-33

The types of housing to be developed for students, faculty, and staff are not outlined in the Draft EIR either. Mixed-use housing with additional amenities on the ground will likely reduce trips and overall impacts. Even horizontal mixed-use development would allow for an increased relationship between where students, faculty, and staff may live and work. This could be especially true for the Westside Research Park area which is more isolated from many campus amenities. The EIR should clearly specify the details of the potential residential uses, how/by whom they will be used, and the resulting environmental impacts.

Response L9-33

Please refer to Master Response 11.

Comment L9-34

The Draft EIR speaks to analysis of full time equivalent (FTE) students and FTE faculty/staff and a definition of FTE is provided in Footnote 1. However, it is not clear how this definition considers students, faculty, staff who are not full time. Students, faculty, and staff working part time are more likely to live off-campus which may create greater impacts. For instance, two students that are half-time and commuting into the main campus may have generate greater impacts to traffic, air quality, etc. than one student living on campus even though they are both considered 1 FTE. The EIR should clearly identify how impacts from all new students, faculty, and staff are assessed. If the FTE analysis does not address this discrepancy in potential impacts, an alternative measure should seek to quantify the increase in impacts under such a scenario and include an evaluation of the impacts in the EIR.

Response L9-34

Regarding the Draft EIR's evaluation of campus enrollment and population projections, refer to Response L9-3.

Comment L9-35

As discussed in the Housing and Population section, the Draft EIR should further analyze potential impacts caused by off-campus population increases by students, faculty, and staff of UCSC. While housing may be provided for 100% of new student enrollment over 19,500, it does not address alternatives where fewer than 100% of new students live on campus, as is likely, especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students.

For instance, the Draft EIR only addresses potential impacts to emergency services due to the increase in the number of vehicles on-campus while there could be further impacts off-campus as well. With an increase in campus population and concurrent increase in traffic congestion, emergency vehicle access could be affected and an increase in response times could result. To mitigate this impact, the Public Services section of the EIR should address the following access and response needs:

- All traffic signals installed on campus shall be outfitted with a Santa Cruz City Fire Department compatible Opticom Emergency Vehicle Traffic Pre-Emption (Opticom) system. This applies to future signals as well as the existing traffic signals already in use on campus.

- Bicycle/pedestrian paths should be wide enough and strong enough to support emergency vehicles. Currently there are a number of paths that do not support Emergency Vehicle Access (EVA), which significantly delays emergency response.
- Provide for EVA to all new and renovated buildings. Allow adequate approach and egress routes as determined by the Fire Marshal.
- Ensure elevators installed in new and renovated buildings are large enough to accommodate a medical gurney in the flat/level position along with the emergency response personnel.
- Turnouts, turn pockets, cut outs, lane widths, number of lanes, islands, and lane separators should all be evaluated in terms of emergency vehicle requirements.
- Address the impact of radio coverage and discuss the need for in-building radio and cellular communications for emergency response.

The existing on-campus fire station has reached end-of-life for functionality and will not accommodate additional staffing or equipment. The City does not own the station, nor has a new fire station site been identified on campus. The construction of a new fire station should be tied to specific development and the EIR should address the criteria that will be used for the discussion of mitigating the impacts of development.

Response L9-35

State CEQA Guidelines Section 15378(a) defines "project" in part as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." For the purposes of CEQA the 2021 LRDP is the proposed project. It would be speculative to assume the UC Santa Cruz would choose not to implement the project as proposed. The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

The comment also states that the Draft EIR should include additional measures to address emergency vehicle access and response times in the Public Services section and will be considered as part of UC Santa Cruz's continuing coordination with the City. However, the measures presented in this comment are not considered necessary to be included as mitigation to reduce a significant impact. Impacts related to emergency vehicle access are addressed under Impact 3.16-4. As stated on page 3.16-39, implementation of the 2021 LRDP would not result in inadequate emergency vehicle access. Consistent with the first three bullets provided in the comment, future roadway modifications would be designed in a manner consistent with applicable regulations, including those related to roadway widths, turning radii, and emergency vehicle access. In addition, UC Santa Cruz will coordinate with the County to install compatible Opticom Emergency Vehicle Traffic Pre-Emption (Opticom) systems on-campus. With respect to building design measures pertinent to emergency services (e.g., elevator sizing and communications equipment), all new development and renovations under the 2021 LRDP would be subject to applicable building code requirements, including those related to emergency access. Further, potential impacts associated with temporary road closures due to construction activities within the LRDP area are addressed in Section 3.9, "Hazards and Hazardous Materials," Section 3.16, "Transportation," and Section 3.18, "Wildfire." As stated under Impact 3.9-4, implementation of Mitigation Measure 3.9-4 would adequately address any potential conflicts with emergency access or evacuation routes during construction, by requiring the preparation and implementation of site-specific construction traffic management plans.

Further, the Draft EIR assess the potential impacts associated with development of new fire facilities as part of the overall building program of the LRDP, as part of the Facilities and Operation land use designation. Regarding impacts related to emergency response times and when the new fire station should be operational, implementation of Mitigation Measure 3.14-1 would ensure that adequate fire access and facilities are available to serve UC Santa Cruz prior to operation of new facilities/development that would require their use, consistent with the request made in this comment.

Comment L9-36

In addition to world-class education, students, faculty, and staff are drawn to UCSC because of its access to world-class recreation activities. Hiking, beaches, and countless open spaces are located near the university and many of these facilities are maintained by the City. Whether students, faculty, and staff live on campus or not, an increase in these populations will result in an increase in City park usage. This increase in park usage will have deleterious effects on the park system if this impact is not properly mitigated.

The Draft EIR states that there is a less than significant impact to recreation and that UCSC has no obligation to mitigate any impacts as they would be paid through off-campus development fees. This is not a satisfactory analysis of the impacts. For one, any students living on-campus are still highly likely to use City-maintained parks, especially trails located near campus and beaches, so simply providing additional recreation space on-campus does not mitigate this off-campus impact to City recreation facilities. Additionally, students living off-campus are more likely to establish themselves in crowded living situations beyond the original intent of the housing unit (for instance, two or three individuals to a bedroom). The effect is two-fold: 1) a crowded living situation increases the need for one to seek open space, and 2) any park impact fee derived from off-campus development fails to mitigate for a higher density of people living in a unit than originally intended. The increase in campus population will impact the City park system beyond what the Draft EIR has analyzed and therefore, a more complete analysis in the EIR is required.

Response L9-36

Refer to Response L7-141 regarding funding for local parks. To the extent that the LRDP area and UC Santa Cruz are part of a greater regional network of recreational facilities with the City and other entities, UC Santa Cruz is committed to providing interconnections and appropriate recreational opportunities and looks forward to further coordination with the City regarding ways to improve recreational access and facilities, including shared facilities on campus. Further, over 1,400 acres on-campus are protected from development and open to the public as a recreational resource.

Comment L9-37

Given the importance of properly maintaining parks for UCSC students, faculty, and staff, as well as residents of the City of Santa Cruz, the City has determined that a City park impact fee on new residential development should be required. Funds from this impact fee would be used for a City parks system that serves all residents of the area, including students who live both on- and off-campus.

UCSC should evaluate how an impact fee could be incorporated into student fees or some other manner to support the maintenance of existing parks and services. Students currently pay a recreation fee as part of their tuition. This support on-campus recreational amenities, facilities, and programming (via OPERS or now called Athletics and Recreation). The City would like the opportunity to work with UCSC on a Joint Powers Authority (JPA) or similar mechanism that would clearly define the UCSC scope of recreation facilities and services and define the City's scope. Students currently pay fees to UCSC but use City amenities, perhaps even more than those on campus. Impact fees could help development of new park assets potentially needed for increased park demand. Currently, the real need is funding to maintain the existing park system, which will be used more with an increase in UCSC students, faculty, and staff, so a parks impact fee to the City represents a reasonable mitigation request. Below are some ways this fee could be instituted:

- University of California allows individual campuses to establish unique compulsory fees per the following policy: PACAOS-80: Compulsory Campus-Based Student Fees (ucop.edu). There is a set process similar to a public ballot measure, but within the UCSC system only.
- It is common for universities in California and other states to incorporate a fee for a specific purpose (e.g., building a new rec center or for athletics, etc.). Perhaps it could be deemed an "environmental preservation fee" as part of tuition fees.
- The National Recreation and Parks Association (NRPA) sets standards for Parks and Recreation services: nrpa-agency-performance-review.pdf. If UCSC or the University of California system has parks and recreation standards, a nexus between the population increases and park and recreation service could be more easily

determined. The City has parks and recreation service standards that will be affected as the result of increased population and use of City parks.

Response L9-37

Refer to Response L7-141 regarding funding for local services such as parks. UC Santa Cruz, whose on-campus recreational and open space facilities also serve as a resource to the City and who is a partner agency to the City of Santa Cruz, looks forward to greater coordination regarding interconnections between and improvements at recreational facilities for residents both on and off campus.

Comment L9-38

A key transportation goal (M2) in the City's General Plan is to provide... "A safe, sustainable, efficient, adaptive, and accessible transportation system". The increase in student, faculty, and staff populations will have impacts on transportation, in a broader environmental sense and on the City's ability to achieve and maintain that goal.

While SB 743 eliminates Level of Service (LOS) as a CEQA impact, the City still maintains some LOS policies in order to maintain a safe and efficient transportation system. UCSC should coordinate with the City to determine critical intersections impacted by the LRDP and analyze LOS impacts at those critical intersections in addition to the Vehicle Miles Traveled (VMT) analysis. The previous LRDP included mitigation measures in this same way to provide traffic impact fees to the City and institute a monitoring program and should continue to do so.

Response L9-38

LOS is no longer an acceptable measure in CEQA for transportation impacts; thus, only VMT was evaluated. However, UC Santa Cruz agrees that coordination with the City to better understand safe, sustainable, efficient, adaptive and accessible transportation solutions at City intersections would be mutually beneficial.

Comment L9-39

As mentioned in other sections, the impacts of different proportions of increased student population living off-campus has not been adequately analyzed especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students. The Draft EIR states that providing housing for all new students on campus would reduce traffic concerns. However, the transportation analysis provided indicates that the trip generation rate for resident students is higher than that of commuter students. This is in conflict with the comments made that providing housing for all new students would reduce traffic concerns. The analysis also identified a significant impact in the VMT analysis per worker with TSM mitigation as proposed in response. While the University has done a good job to date implementing strategies to reduce trips, the City believes these measures may have reached their maximum potential. Please provide additional analysis to support the TSM measures as a satisfactory mitigation response.

Response L9-39

Refer to Master Response 9 regarding phasing of development.

While some of the TDM measures identified are those already employed by the campus, Mitigation Measure 3.16-2 in the Draft EIR, identifies additional measures that would help support UC Santa Cruz in mitigating the identified impacts. As shown in Table 3.16-6 the total campus VMT/capita with the 2021 LRDP is estimated to be 7.9 miles with a 7.7-mile threshold. The 7.9 miles represent a 13 percent reduction in 2019 baseline VMT; thus, the campus needs to achieve an additional 2 percent VMT reduction, which is a reasonable target for Mitigation Measure 3.16-2: Implement TDM Program and Monitoring. Further, the 7.9-mile estimate developed with the SCC Travel Model does not fully account for all the TDM measures listed in Mitigation Measure 3.16-2. Further, the mitigation measure includes a monitoring requirement, that will monitor whether the VMT thresholds are achieved regardless of measures identified and implemented.

With respect to trip generation and similar to the way in which employee trips are treated, the potential vehicle trips associated with off-campus students are attributed to their function as residents within the City of Santa Cruz or other nearby community. It reflects an industry standard methodology for quantifying and reflecting off-campus student residents as their trips to and from the LRDP area would more closely resemble an employee travelling to

and from work. Other non-campus-related trips are appropriately considered as part of the quantification of trips and VMT for the residence within which the off-campus student resides. Contrary to statements made in this comment, this is not considered to be a conflict but an appropriate way to ensure that VMT and trips associated with County residents, including UC Santa Cruz students, are not double counted.

Comment L9-40

The expansion of students, faculty and staff, as well as facilities, special events (open lectures, sporting events, etc.), and new classes may attract more individuals who enroll/participate in continuing education, who visit those living on campus, who attend the special events, or who otherwise are drawn to the campus as a result of its expansion. The methodology utilized in the EIR should analyze not only the impacts of additional students, faculty, and staff but should also analyze any impacts (e.g., vehicle trips) associated with the above-described potential additional usage.

Response L9-40

The VMT analysis presented in the Draft EIR utilizes the SCC Travel Model, as calibrated using trip count information collected by UC Santa Cruz on an annual basis, which includes visitors. This includes the trips referred to in this comment, as the type of "potential additional usage" represent the types of trips that already occur to and from the LRDP area. Visitors to the campus are captured in the trip rate for on-campus students, since the model was validated to generate the same number of vehicle trips as observed in the counts, so the "incidental" activity is captured as part of the overall VMT and trip generation for UC Santa Cruz. As a result, the Draft EIR and VMT analysis already include the requested analysis.

Comment L9-41

The transportation analysis does not fully consider areas outside of the main campus such as Westside Research Park. In focusing only on the main campus, system-wide travel associated with UCSC growth is not described. It is also not clear whether the employment numbers used in the analysis apply only to the campus or if they reflect the total UCSC employment which is disaggregated to various areas in the County such as at the Research Park, Coastal Science center, and Scotts Valley offices. This shift in employment location has been a major reason why the traffic volumes at the main entrances to the University have been reduced over the years. If the actual employee volume on the main campus is in fact less, then the trip generation rate used for employees would be higher and affect the subsequent analysis.

Response L9-41

Impact 3.16-2 evaluates VMT that could be generated from implementation of the 2021 LRDP within the 2021 LRDP area which includes both the main residential campus and Westside Research Park (as stated on page 3.16-33 of the Draft EIR). As noted on page 1-3 of the Draft EIR, the 2021 LRDP does not include employment numbers for the Coastal Science Campus, which is governed by a separate LRDP, or the Scotts Valley Center offices/campus, which is governed by a lease through 2040. However, to the comment's concern regarding the consideration of trips from these campuses to and from the LRDP area, the Draft EIR's calculation of VMT includes consideration of annual traffic count information (see page 3.16-23 of the Draft EIR), which would include trips from other locations, as part of its overall trip and VMT calculation. As such, the Draft EIR's assessment of vehicle trips and VMT is adequate and conservative.

Comment L9-42

The City has had previous concerns with the trip generation rates established by the University. The transportation analysis in the Draft EIR refers to a 2017 Tool developed by UCSC which established trip generation rates. This tool is not included in the appendices, so the City is unable to review these trip generation rates and determined if they are improved over ones previously used. This information should be included in the EIR. Additionally, a signal is proposed for the intersection of Western Drive and High Street and there is no analysis provided to warrant such a proposal. Please provide this in the EIR.

Response L9-42

The trip management tool, as referenced in this comment, was used in conjunction with the tube counts collected by UC Santa Cruz to assist in the calibration of the SCC Travel Model. Trip generation rates are discussed in the Draft EIR on page 3.16-29 and presented in Appendix I, Table 1. While the trip rates from the trip management tool, as referenced in this comment, were used to refine the SCC Travel Model, it was ultimately the driveway tube counts collected by UC Santa Cruz that was used to in the model calibration. As outlined in the first paragraph on page 3.16-29 of the Draft EIR, based on the initial volume check, the model overestimated observed campus volumes (i.e., tube counts) by 35 to 40 percent. The model trip generation rates for the project were adjusted based on the data from the 2017 tool, and while the model still overestimated the volumes in and out of the campus, it was within ten percent and no further refinements were required. Given that the model generated an appropriate number of vehicle trips with the adjusted trip rates, this demonstrates that the project trip generation rates are within reason and applicable for the VMT analysis. To provide clarifying information, Appendix I of the Draft EIR has been amended, consistent with the commenter's request. With respect to the potential extension of Western Drive (as shown in Figure 2-6 of Chapter 2, "Project Description"), this roadway segment and associated signal were included as part of the overall analysis of the 2021 LRDP. However, as noted in Master Response 6, LOS and signal warrants related to traffic congestion control are no longer legally valid metrics for assessing transportation impacts within CEQA analyses. The roadway extension, as shown in Figure 2-6 is preliminary and would be subject to subsequent project-level environmental review and further planning and design (which would include additional detail regarding signal warrants) when appropriate, including design and permitting coordination with the City as the signal is proposed within City right-of-way.

Comment L9-43

Finally, the City would like more analysis on whether the LRDP growth in transit demands conflicts with Metro Plans. A near 50% increase in transit demand to the main campus will significantly affect Metro service and coordination is needed to ensure service levels meet the increased demand. The LRDP proposes identification of new trail connections south of the main residential campus to provide access to Westside Research Park and Coastal Science Campus as a proposed improvement and those are not identified in the Draft EIR.

Response L9-43

Potential increases in ridership are acknowledged and would occur as part of implementation of transportation demand management (including through Mitigation Measure 3.16-2). As part of this mitigation measure, coordination with Metro would be required as part of 2021 LRDP implementation. This support of transit services could include but not be limited to additional funding from UC Santa Cruz to ensure that established transit standards are met under existing and future conditions. In combination with potential funding increases, the items listed in Mitigation Measure 3.16-2 include improving "transit service between Coastal Science Campus, Westside Research Park, and the main residential campus" and establishment of multimodal hubs to maximize the efficiency of transit service. These items would assist with adjusting service levels to support increased demand and meet desired service standards.

Regarding the "proposed trail connections" referenced in this comment, as stated on page 2-25, north-south trail networks could connect through the Moore Creek Preserve and the Great Meadow, connecting routes north to the east-west trail network in the north campus. The proposed trail improvements are evaluated throughout the Draft EIR as part of the project.

Comment L9-44

We understand the conclusion of a significant and unavoidable impact to water supply because, although there is adequate water supply from the City's existing water sources in normal water years, during single and multiple dry water year conditions, there is a potential gap between demand and available supply, which would require the City to secure new water sources. As you are aware, the City is planning for new sources of water and is currently implementing the Water Supply Augmentation Plan that was developed by the Water Supply Advisory Committee. It is important to understand that the City's need to secure new sources of water is not dependent on growth of the UCSC campus or future projected demand increases. Even if demand were not forecast to increase, new sources of

water are needed to address existing potential shortages during dry years. Furthermore, demand associated with this project, or additional growth in local demand, is not a significant factor in sizing of such future projects because sizing of these projects is being primarily driven by climate change and associated uncertainty surrounding future hydrological conditions.

Response L9-44

The comment provides the commenter's understanding of current water supplies and the need for the City to secure new sources of water to address existing potential shortages during dry years, as well as the reason for the Draft EIR's conclusions related to water supply impacts. This comment does not address the adequacy of the EIR analysis.

Comment L9-45

Additionally, the City is in the process of preparing the 2020 Urban Water Management Plan which will incorporate demand projections from the 2021 LRDP into overall projected City demands. It is noted that the UCSC demand forecast in the 2021 LRDP is significantly lower than that projected in the 2005 LRDP which was used as the basis of the 2015 Urban Water Management Plan. We appreciate the commitment that University leadership has made to ongoing water conservation, including working with the City water department to develop an engineering analysis to further reduce water demand. We recommend an ongoing and collaborative effort between the City and UCSC to identify the most efficient ways to use, reuse, recycle, and store water so that the proposed project is as water efficient as possible.

Response L9-45

The comment provides an update as to the City's current water management efforts and studies. The statements in this comment are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance. UC Santa Cruz looks forward to an ongoing and collaborative effort with the City for future water supply planning.

Comment L9-46

The section referring to the "The Water Rights Conformance Project for Water Rights and Entitlements", should reference the Santa Cruz Water Rights Project. An Initial Study and Notice of Preparation for the Santa Cruz Water Rights Project were released in 2018, and a Draft EIR is expected to be circulated for public review in spring 2021. The scope of this project extends beyond direct diversion for the City's Felton and Newell Creek water rights. Because the City's water rights were granted more than 50 years ago, they are out-of-date with current needs and lack flexibility that would ensure the Water Department can provide supply reliability, protect fish populations, and partner with neighboring water agencies to improve regional water supply reliability.

Response L9-46

The comment provides an update on the current status of the Santa Cruz Water Rights Project. The statements in this comment regarding the Santa Cruz Water Rights Project are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance. UC Santa Cruz supports the City's efforts to improve regional water supply reliability. The Draft EIR also acknowledges competing factors associated with the City's water supplies, on page 3.17-13 of the Draft EIR, consistent with this comment.

Comment L9-47

Water Supply Augmentation Plan

The City continues to pursue and make progress on the implementation of the Water Supply Augmentation Plan developed by the Water Supply Advisory Committee. A report detailing progress on implementation of the Water Supply Augmentation Plan is presented quarterly to the City Water Commission, with the most recent quarterly report presented at the Water Commission meeting January 4, 2021. The report can be found beginning on page 15 of the PDF here:

https://ecm.cityofsantacruz.com/OnBaseAgendaOnline/Documents/Downloadfile/Water_Commission_1607_Agenda_Packet_1_4_2021_7_00_00_PM.pdf?documentType=5&meetingId=1607&isAttachment= True.

Response L9-47

The comment provides an update on the current status of the City's Water Supply Augmentation Plan. The statements in this comment regarding the City's Water Supply Augmentation Plan are acknowledged.

Comment L9-48**Water Shortage Contingency Plan**

Please note that the City adopted an Updated Interim Water Shortage Contingency Plan in February 2021, replacing the 2009 Water shortage Contingency Plan referenced in the Draft EIR. The Plan is available here on the City's website here: <https://www.cityofsantacruz.com/home/showpublisheddocument?id=83118>.

Response L9-48

The comment provides an update on the Updated Interim Water Shortage Contingency Plan, which was adopted in February 2021, following initiation of public review of the Draft EIR. The statements in this comment regarding the City's updated Water Shortage Contingency Plan are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance.

Comment L9-49**Mitigation Measure 3.17-1a: Require Implementation of Measures Consistent with City Drought Measures**

The DEIR recommends water conservation and reuse measures to reduce project impacts relate to its demand for potable water from the City of Santa Cruz. However, the DEIR links these proposed mitigation measures to a time, "If and when the City of Santa Cruz implements drought emergency management measures..."

Mitigation Measure 3.17-1a should be revised to tie water conservation, reuse, and recycling measures to project design and implementation, not the City's implementation of water emergency management measures. Water conservation and water recycling measures are best implemented when incorporated into the facility design stage, when it is easiest to provide water efficient fixtures, sustainable/native landscape materials, and separate pipes to carry potable and recycled water.

Mitigation Measure 3.17-1a should also be revised to provide more detail regarding monitoring and reporting related to development and use of on campus groundwater. Use of the existing groundwater supply well in Jordan Gulch, if undertaken, should comply with the recommendations for biological monitoring at interconnected springs both on and off campus, and groundwater/surface water monitoring protocols discussed at Mitigation Measure 3.10-5b above.

Response L9-49

As noted on page 3.17-29, the university's Water Action Plan, which was updated in 2017, requires the implementation of on-site water conservation measures during project design and implementation, consistent with the commenter's request. Mitigation Measure 3.17-1a includes requirements in the event the City declares the need for drought emergency management measures. In addition, Mitigation Measure 3.17-1b requires coordination between the City and UC Santa Cruz to provide an additional campus-wide evaluation of where additional on-campus conservation measures may be feasible and should be implemented, consistent with the commenter's request.

With respect to the potential use of groundwater supplies in the lower campus subarea, this was included within Section 3.17, "Utilities and Service Systems," as part of the overall evaluation of alternative water supplies. The potential physical environmental impacts to groundwater supplies are evaluated and mitigated (in a manner consistent with the commenter's request) in Section 3.10, "Hydrology and Water Quality." Please also refer to Master Response 10 regarding groundwater resources.

Comment L9-50**Please see the following comments on the Water Supply Assessment**

The DEIR includes a Water Supply Assessment (WSA) to stand in for the WSA that the City would ordinarily be required to prepare as the public water system that will supply [at least a portion of] the proposed project. (Wat.

Code § 10910(a)-(c.) WSA's are required under state law for a variety of development projects that are likely to increase water demand on the public water system serving the project (Wat. Code § 10912(a)). WSA's are required to assess the projects water demand, available water supplies, and if water is not available for the project, the cost to obtain and develop the additional supplies required to serve the proposed project.

Because a portion of the UCSC campus where development is proposed is outside the City's existing water service boundary, it is not clear that the WSA was prepared following the law. Under state law, when a proposed project is outside the boundaries of a water service agency the WSA must be prepared after consultation with the Local Agency Formation Commission, and any public water system adjacent to the proposed project site. (Wat. Code § 10910(b).)

The DEIR should be revised to indicate whether and how UCSC consulted with the City, other neighboring water agencies, and the Local Agency Formation Commission in relation to the preparation of its WSA as required when an entity other than the water service provider prepares the WSA for an area outside the boundaries of an existing water system.

This concludes the comments from the City of Santa Cruz. We look forward to working with you to resolve the points contained herein. Feel free to reach out to us should you have any questions.

Response L9-50

The comment requests revisions to the Draft EIR to indicate UC Santa Cruz's level of compliance with California Water Code Section 10910, also known as Senate Bill (SB) 610. However, the requirements of SB 610 and Water Code Section 10910 are limited to cities and counties; they do not apply to UC Santa Cruz. However, the University elected to prepare the equivalent of a water supply assessment (the Water Supply Evaluation included in Appendix J of the Draft EIR) that meets the overall requirements of a WSA to determine and demonstrate the sufficiency of the City's water supplies to satisfy the water demand of the planned development under the proposed 2021 LRDP.

Letter L10 Santa Cruz Metropolitan Transit District

Pete Rasmussen, Transportation Planner
March 8, 2021

Comment L10-1

Thank you for the opportunity to provide comments on the draft UCSC 2021 Long Range Development Plan and draft EIR.

The Santa Cruz Metropolitan Transit District (METRO) has had a long-standing partnership with the University, providing transit service to students, staff, and faculty to and from campus funded primarily by the student transportation fee. METRO transit service is one of the primary tools employed to reduce vehicle trips to and around campus, which is vitally important for preservation of the environment and for limiting traffic congestion in and around a campus that has severely limited access routes.

Response L10-1

UC Santa Cruz acknowledges and appreciates the partnership with METRO. The comment includes introductory information and does not address the adequacy of the EIR analysis.

Comment L10-2

Historically, METRO has increased service to UCSC as enrollment has grown so that the University can continue to limit on-campus parking and limit automobile trips.

However, if the University were to increase enrollment by an approximately 50% from 18,518 to 28,000 FTE students (and associated growth in staff, faculty and student families) by 2040, this would present formidable budgetary and operational hurdles to METRO to scale up service in proportion to UCSC growth.

Response L10-2

The commenter's opinion regarding potential increases in demand for transit service are acknowledged. It is important to note that due to the location of the net increase in students and employees on campus, much of the

potential increased demand for transit is anticipated to be served by UC Santa Cruz Campus Transit. However, as noted in Response L9-43, UC Santa Cruz would be required to coordinate with METRO regarding potential increased demand for service along METRO routes and provide assistance, including potential financial assistance related to increased service, as part of service agreements and in support of the overall TDM program required by Mitigation Measure 3.16-2.

Comment L10-3

Funding for Operations and Capital Expenditures

The University pays METRO monthly fees based either on the number of passenger trips provided to students/staff/faculty or on the number of vehicle trips to campus (the calculation method has varied over time), but METRO still bears a significant share of the operations and maintenance cost for these trips (subsidy). As an agency that receives a portion of its funding from Federal sources, METRO must comply with the Federal Transit Administration's regulations regarding Title VI of the Civil Rights Act. Title VI requires that transit agencies provide equitable service across the service area, not just to one area or community, so as UCSC grows, the University will need to contribute a greater share of the cost of providing service to the campus so that METRO can continue to provide service equitably to the County as a whole.

Furthermore, METRO alone has borne the cost of acquisition of buses, other than a short-term articulated bus lease funded by UCSC as a test. As Federal government assistance for bus purchases has dwindled, and as the State of California Air Resources Board (CARB) has instituted requirements for a transition to zero-emissions buses, the cost of acquiring buses has become a major financial hurdle to transit agencies. Zero-emissions buses cost over \$1 million each – 55% more expensive than the compressed natural gas buses that are the majority of the METRO fleet, and nearly four times as expensive as the diesel buses that were standard 15-20 years ago.

As student enrollment increases, there will be a need to increase the use of 60-foot articulated buses. This, however, presents a substantial space challenge at the Judy K. Souza Operations Facility (i.e. bus yard), as the yard is currently at capacity with only four articulated buses in the fleet. An expansion of the bus yard, or acquisition of off-site parking may be needed to increase the articulated bus fleet, and there is no funding currently available for that need. Similarly, the maintenance facility will require an expansion if there is a significant expansion of the articulated bus fleet.

How will the University increase its contribution to METRO to cover operating costs and capital expenditures necessary to increase the UCSC service to meet projected growth in demand from the projected campus growth?

UCSC funds METRO service primarily through the Transportation Fee self-assessed by students, but the 2019 increase in the fee sunsets in 2030. How would the University handle the growth in trips if future referenda fail, and UCSC was not able to continue to fund METRO service at a level commensurate with student population growth?

Response L10-3

Regarding potential increases in demand for METRO service, refer to Response L10-2. Additionally, as a partner agency in the region, UC Santa Cruz is committed to assisting and providing a fair share contribution towards future needs, including through continuation and adjustment of the referenced Transportation Fee when warranted. The degree to which specific types of expansions may be necessary is considered uncertain at this time and appropriately acknowledged within the Draft EIR. The use of articulated buses may increase as student enrollment increases, however, the degree to which on-campus residents, with increased campus shuttle service and alternative transportation services within campus, may increase ridership on articulated buses is considered speculative at this point but would be continually evaluated and adaptively managed as part of the UC Santa Cruz TDM Program required by Mitigation Measure 3.16-2. In addition, the 2021 LRDP's proposed provision of on-site mobility centers may include specific consideration for articulated buses, as suggested by the commenter. As a regional mass transit entity, the commenter is referred to Mitigation Measure 3.16-2, specifically the third paragraph on page 3.16-37 of the Draft EIR, which could involve fair share contributions towards regional mass transit. Furthermore, UC Santa Cruz is required to meet carbon neutrality goals, including transition to a zero-emission transit fleet by 2040 and will continue to partner and coordinate with METRO in support of zero emission buses.

Comment L10-4**Mitigations**

The following mitigations are proposed:

All growth beyond the academic year 2018-2019 baseline of 18,518 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to cover 100% of the annual operating cost of the additional METRO revenue service hours needed to respond to said growth.

- All growth beyond the academic year 2019-2020 baseline of 19,500 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to purchase METRO buses for METRO use, as needed to respond to the additional revenue service hours needed beyond the 2018-2019 academic year baseline (last full year prior to COVID-19 service reductions).
- Pursuant to California Air Resources Board regulations requiring METRO to have a 100% zero-emissions bus fleet by no later than 2040, in the event that in-route zero-emissions bus infrastructure (e.g. electric charging) is needed in order to serve UCSC, UCSC will provide a suitable site and charging infrastructure on its property.
- Construction of an on-campus transit center/layover facility (consider the East Remote Lot for a potential location), including restrooms for bus operators, to provide operational flexibility for METRO to better serve the campus.
- Extension of Meyer Drive with a transit-only lane to create an "outer loop" that METRO could utilize instead of the current longer, heavily congested Hagar Drive/McLaughlin Drive/Heller Drive loop. From there, students could either walk or bike to destinations, or ride a TAPS shuttle. This outer loop would shorten each campus trip, thereby reducing operating cost.
- Expansion of on-campus bus stops to accommodate increased use of articulated buses
- Dedicated HOV or transit-only lanes and/or queue jumps at select locations on and around campus
- Transit-signal priority on campus and along campus gateways such as Bay Ave
- Pedestrian channelization, traffic signals, and pedestrian overcrossings, to reduce delays to transit caused by unmanaged pedestrian crossings
- Reduce vehicle trips and vehicle delay on campus by permitting work-from-home for those staff roles for which it is feasible.

Response L10-4

UC Santa Cruz acknowledges and will continue to work with METRO to prioritize transit for campus affiliates as an alternative to single occupant vehicle trips over the next 20 years. UC Santa Cruz appreciates the level of detail and intent of METRO's proposed improvements, and these suggested improvements would require further project-level feasibility during plan implementation, as UC Santa Cruz considers campus wide circulation and implementation of other projects located off-site of UC Santa Cruz main residential campus and Westside Research Park, where UC Santa Cruz does not have the jurisdiction to implement projects. UC Santa Cruz currently provides a subsidy to METRO to off-set operating costs associated with campus ridership, however UC Santa Cruz is not required to subsidize 100 percent of METRO's operating costs, nor would such a subsidy be required in the future, as METRO is funded from various other sources, including tax revenues and fares from non-UC Santa Cruz riders. Refer to Responses L10-2 and L10-3 above. As the feasibility of these measures has yet to be evaluated, will require coordination with other jurisdictions and would depend on the overall function of UC Santa Cruz as a campus, taking into consideration the level of pedestrian, bike, and transit activity, inclusion of these specific measures in project-level implementation activities, will be considered. That said, many of the measures suggested are considered to be already required through implementation of the 2021 LRDP and/or Mitigation Measure 3.16-1. For example, the on-campus transit facility identified by the commenter is not considered inconsistent with the proposed mobility hubs (as shown in Figure 2-6 of the Draft EIR and Figure 4.11 on page 134 of the 2021 LRDP and evaluated as part of the

overall project within the Draft EIR). Further, the last bullet of the comment is considered to be included as part of the telecommuting requirement of Mitigation Measure 3.16-2 on page 3.16-37.

Comment L10-5

Previous LRDPs have proposed mitigations such as increasing on-campus student housing, but the University has fallen short of delivering the promised housing, causing more and more students to find off-campus housing and commute to campus, creating stress of the transportation system of the campus and the Westside of Santa Cruz. For this LRDP, increases in student population need to be contingent on completing of proposed mitigations, rather than proceeding with growth and having to live with the consequences.

Thank you in advance for review and consideration of these comments.

Response L10-5

Refer to Master Response 9 regarding the need for phasing of development under the 2021 LRDP.

Letter L11 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

Morgan Bostic, Advocate
March 8, 2021

Comment L11-1

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on air quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

Response L11-1

The Draft EIR presents an evaluation of the potential impacts related to wildfire risk and appropriate mitigation in Section 3.18, "Wildfire." As noted in the reference section of the Draft EIR, UC Santa Cruz would implement a campus-wide vegetation management plan (Mitigation Measure 3.18-2) that would reduce fuel loads and maintain defensible space such that development under the 2021 LRDP would not substantially exacerbate wildfire risks. With respect to the potential need to evaluate air quality impacts from increased wildfire risk and as noted in Master Response 4 and because the 2021 LRDP is not anticipated to substantially exacerbate wildfire risks, further evaluation of potential impacts related to catastrophic events is not required. As demonstrated by conditions associated with the 2020 CZU Lightning Complex fire, it is acknowledged that wildfires can temporarily but substantively alter regional air quality conditions and require implementation of emergency provisions to protect the health and safety of local residents, including on-campus residents. In the event of a wildfire, UC Santa Cruz would implement a variety of measures (as summarized in Master Response 4) based on the University of California Air-Quality-Index-based Decision-Making Matrix for Wildfire Smoke Events to reduce the effects of a catastrophic wildfire on the health and welfare of the on-campus population.

Comment L11-2

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus' air quality.

Response L11-2

The comment suggests that the EIR should address the increased risk of wildlife from the additional population in the North Campus. General wildfire impacts and mitigation are discussed in Section 3.18, "Wildfire". Refer to the Response L11-1.

Comment L11-3

According to the California Air Resources Board, "Extreme fires are a growing threat to public health and safety, to homes, to air quality and climate goals, and to our forests. California is seeing fires that burn larger and hotter on average than ever before... Smoke from extreme fires can occur with little warning, and travel long distances and into urban areas many miles from the flames, negatively impacting public health and degrading quality of life."

Additionally, "Air pollution from fine particles, known as PM2.5s, was already known to take four months off the lifespan of the average American." However, "After California's residents endured a month of orange-brown air filled with dangerous tiny particles, another set of Stanford researchers tracked dramatic increases in hospitalizations for conditions including strokes, heart attacks, and asthma. Bibek Paudel, a postdoctoral researcher at Stanford's asthma clinic, found that hospitalizations for strokes and related conditions increased by 60% in the five weeks after fires caused by lightning strikes began sending smoke around northern California last August. The number of pregnancies lost also doubled in the weeks after the fires – a startling finding that the researchers are still interpreting. Paudel also found significant increases in heart attacks and youth hospitalization for respiratory illness. "I don't think that people are aware of the long-term health effects of wildfire smoke," said Mary Prunicki, the director of research for Stanford's Sean N Parker Center for Allergy & Asthma Research."

Specifically, "[W]hen air pollution of tiny particles called PM 2.5 — for particulate matter 2.5 microns or smaller, so small that 30 of them can line up along the width of a human hair —increased modestly, the number of people admitted to hospitals for respiratory ailments like asthma increased by 1% on average. But when PM 2.5 levels from wildfire smoke went up by the same amount, or 10 micrograms per cubic meter, there was a 10% increase in those hospital admissions.

The tiny particles can penetrate deep into people's lungs, enter the bloodstream and increase the risk of heart attacks, strokes and other serious health issues."

Response L11-3

This comment expresses concern related to the public health and safety and air quality impacts related to wildfires and provides supporting references for Comment L11-2. This comment is acknowledged.

Comment L11-4

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that wildfires have substantial public health and air quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

All information for this section is taken from the 2021 LRDP EIR and

<https://ww2.arb.ca.gov/our-work/programs/wildfires>,

<https://www.theguardian.com/world/2021/jan/19/wildfires-air-pollution-western-us#:~:text=Scientists%20from%20Stanford%20University%20and,gains%20in%20cutting%20air%20pollution.&text=Air%20pollution%20from%20fine%20particles%2C%20known%20as%20PM2,>

<https://www.santacruzsentinel.com/2021/03/06/wildfire-smoke-up-to-10-times-more-harmful-tha>

Response L11-4

This comment recommends that new structures not be located in the north campus subarea, citing hazards related to wildfires and associated public health and air quality impacts. Refer to Response L11-1.

Letter L12 Santa Cruz County, Planning Department

Kathleen Molloy, Planning Director
March 8, 2021

Comment L12-1

The County of Santa Cruz appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the UC Santa Cruz of California, Santa Cruz's (UC Santa Cruz's) Long Range Development Plan (LRDP). Please consider and address the following comments in the Final EIR:

Response L12-1

The comment provides introductory information and does not address the adequacy of the EIR analysis.

Comment L12-2

1. Mitigation Measures to identify and Protect Unknown Archaeological Resources—These measures should include the requirement that a qualified archaeologist be present on site to monitor ground-disturbing activities in areas where an archaeological site has been identified.

Response L12-2

While Mitigation Measure 3.4-1 does address known archaeological sites, the third bullet has been modified for clarity:

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project's area of effects:

- 1) For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project's area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC Santa Cruz and/or archaeologist shall notify consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program ~~the appropriate Native American tribe and extend an invitation for monitoring.~~

- 2) Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.
- 3) If it is determined that ~~the resource~~ a known archaeological site extends into the project's area of potential effects, UC Santa Cruz shall ensure that the ~~resource~~ site is evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project's area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.
- 4) If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.
- 5) If archaeological material within the project's area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or ~~other means~~ more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).
- 6) If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe's nonprofit

organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.

Comment L12-3

2. Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District—This measure should be amended to include the requirement that an architectural historian review any proposed alterations to existing buildings within the historic district for compliance with the Secretary of the Interior Standards. A qualified professional review any significance alterations to the landscape for potential impacts to the historic district.

Response L12-3

Review of modifications to Cowell Lime Works Historic District by an architectural historian are included in Mitigation Measure 3.4-4a. For clarity, the mitigation measure is revised as follows:

Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for historic buildings and structures as early as possible. If the project is located within or adjacent to the Cowell Lime Works Historic District, UC Santa Cruz shall take the following measures into account in project design to preserve the historic visual quality of the historic district:

- ▶ ~~New buildings or structures within 500 feet of the district boundaries shall be subject to design review by the Design Advisory Board, to ensure that design is compatible with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.~~
- ▶ To the greatest extent feasible, a buffer of at least 200 feet shall be maintained between the boundaries of the Cowell Lime Works Historic District and new building development that would be visible against the backdrop of historic buildings from significant campus viewpoints.
- ▶ Any development, including new buildings, structures, access improvements, within ~~at~~ the 500-foot buffer or within the district boundaries shall be evaluated by an architectural historian prior to implementation and conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).
- ▶ New buildings or structures within 500 feet of the district boundaries shall additionally be subject to design review by the Design Advisory Board, to ensure that the design does not interfere with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.

Comment L12-4

3. Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District
- a. Since the existing survey was prepared in 2005, it is recommended any building that is more than 50 years of age, is located within the boundaries of the potential district, and is proposed to be altered or demolished, be evaluated by a qualified architectural historian to determine if it meets criteria for a contributing building.

If found to be a contributing building, then the mitigation measures provided would also apply to this building.

Response L12-4

As outlined on page 3.4-3 of the Draft EIR, Mitigation Measure 3.4-4b discusses the need and timing for an architectural historian to evaluate buildings that have been identified as potential contributors to the potential Campus Core discontinuous historic district. Specifically, the third bullet of the mitigation measure states, "For larger exterior repairs, building additions, or demolition of buildings that could be contributors to the potential Campus Core discontinuous historic district, UC Santa Cruz shall retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors to the potential historic district."

Comment L12-5

- b. In addition, it is recommended that significant alterations to the landscape and landscape features be evaluated to determine if these alterations would affect the significance of the potential historic district. If found to affect the significance of the district, then appropriate mitigation features should be considered such as modifications to the proposed design to reduce the impacts to a less than significant level.

Response L12-5

The 2005 survey concluded that the potential Campus Core discontinuous historic district could be significant as a potential historic district under NRHP/CRHR Criterion C/3 (architecture), as an exceptional example of the Bay Region Modernism movement. Landscape features were not identified as potential contributors within the context of the 2005 study but may be considered in future evaluations in and near potential contributing structures through implementation of 2021 LRDP mitigation. Mitigation Measure 3.4-4b requires that a qualified architectural historian evaluate buildings that could be contributors to the potential Campus Core discontinuous historic district prior to and before large exterior repairs, building additions, or demolition. This evaluation by a qualified architectural historian would include an assessment of integrity, which consists of location, design, setting, materials, workmanship, feeling, and association. Integrity of setting refers to the physical environment surrounding a property that informs the characterization of the place.

Comment L12-6

4. Impact 3.10-5: Impacts to Karst Aquifer Supply, Recharge and Groundwater Quality—Surface water runoff that is infiltrated into the ground typically goes through both physical and biological treatments in the vadose zone which diminishes risks of contaminating groundwater with pollutants. The karst features that dominate the campus topography lack much of this natural filtration, and therefore typical stormwater management activities may be insufficient to ensure the minimization of pollution into the water systems. Due to the nature of the karst topography of the campus, it is vital that any changes in surface runoff quantity of quality be fully evaluated and mitigated.

The County Board of Supervisors has emphasized the importance of karst protection and has required that karst protection zone standards be considered. More details can be found at:

http://santacruzcountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst

The EIR does not provide sufficient analysis of which new measures to address impacts of new development particularly on water quality will be implemented and where. It states "UC Santa Cruz is also engaging in planning that would be implemented to provide a comprehensive, integrated, and consistent approach to maintain the health and functionality of the existing karst system. This planning would also take into consideration development envisioned under the 2021 LRDP, current water infrastructure planning, campus projects currently under development, and UC Santa Cruz's goals and aspirations for watershed health, water sustainability and resilience to further ensure that net deficits or increases to the karst aquifer would not occur. As a result, impacts would be less than significant." This explanation is not sufficient to assess impacts. Further analysis in Section 3.10 is recommended.

While UC Santa Cruz is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by the University we hope that UC Santa Cruz will embrace the County's concerns for protection of karst systems on campus for the benefit of downstream users of that water.

Response L12-6

Refer to Master Response 10 regarding impacts to groundwater and karst aquifer supply.

Comment L12-7

5. The County of Santa Cruz is currently preparing its Sustainability Policy and Regulatory Update, a substantial revision to its 1994 General Plan and County Code to encourage more sustainable and compact urban development within its Urban Services Line and to plan for growth in the unincorporated County. The Sustainability Policy and Regulatory Update is based primarily on the Sustainable Santa Cruz County Plan, a conceptual planning study approved by the Board of Supervisors in 2014. Changes are proposed to all the General Plan policies listed in section 3.11.1 of the LDRP EIR. Public drafts of the revised General Plan, County Code, and associated EIR are in progress but are not yet available. The County understands that UC Santa Cruz is not subject to municipal regulations of surrounding local governments. Nevertheless, it is suggested that the EIR should recognize Santa Cruz County's upcoming regulatory changes as part of the regulatory setting discussed in section 3.11.1 of the LRDP EIR. Additional information on this project can be found at: <https://www.sccoplanning.com/sustainabilityupdate>.

Response L12-7

The County's efforts regarding its Sustainability Policy and Regulatory Update are acknowledged. However, within the context of the Draft EIR, including Section 3.11, "Land Use and Planning," amendments to the Draft EIR's analysis or regulatory setting are not considered necessary at this time as the information presented within the Draft EIR generally reflects existing conditions at the time the NOP for the 2021 LRDP EIR was issued, and the proposed changes to the General Plan have not been adopted

Comment L12-8

6. The EIR anticipates growth from 18,500 students and 2,800 faculty and staff (2018-2019 academic year) to 28,000 students and 5,000 faculty and staff by the 2040- 2041 academic year. Student growth would be accommodated on-campus with the Student Housing West, Kresge Housing, and Crown College Major Maintenance Projects, as well as future housing development indicated in the LRDP. Employee growth would be partially accommodated with housing at the University's Westside Research Park and in the lower campus portion of the main campus in a location that is currently part of the Ranch View Terrace Habitat Conservation Plan (HCP) area.

The EIR states that although the overall housing vacancy rate of 7.8% indicates some availability in the housing market, other indicators point to a market that is, in reality, quite constrained. Vacancies may represent housing that is not available for sale or rent due to housing that is in disrepair or in use as vacation homes, and the vacancy rate in the rental market is much lower than the for-sale rate, at just 1.9%. The EIR notes that this already tight housing market has tightened further due to the pandemic as well as the CZU Lightning Complex fire. As a result, the EIR identifies a potentially significant impact on population and housing.

Santa Cruz County is in agreement regarding the tight market and the potentially significant impact on housing availability and affordability from increased demand from UC Santa Cruz students or employees. Both the supply and affordability of housing continues to be a problem, the extent and severity of which are far greater than they were in 2005. In fact, EIR section 3.13.2 should take note of additional factors related to the tight market, such as homelessness and overcrowding of housing units. Section 3.13.2 should also take note that the Association of Monterey Bay Area Governments is preparing for an updated Regional Housing Needs Allocation (RHNA), and it is anticipated that housing production requirements could be increased as much as 1.5 to 3 times the current allocation, with new restrictions on the types of sites that may be counted toward fulfilling RHNA requirements. EIR section 3.13.2 should acknowledge these anticipated near-future housing requirements faced by local jurisdictions. Housing projects that are currently planned and recently completed in the City of Santa Cruz, Santa Cruz County, and other local jurisdictions will not serve to meet the updated RHNA allocation requirement.

Response L12-8

The comment states that the Draft EIR should acknowledge additional factors related to a constrained housing market including homelessness, overcrowding, and the RHNA currently being preparing by the Association of Monterey Bay Area Governments. However, this information is already addressed, as responded to in Response L9-31 above, which acknowledges that a variety of factors affect housing availability in the local area.

Comment L12-9

The County is not in agreement with the statement in EIR section 3.13.3 that the potential LRDP impact on population and housing is unavoidable and there is no feasible mitigation for this impact. The LRDP proposes to provide housing for only 558 of the 2,550 additional employees anticipated over the next 20 years, creating a demand for up to 1,992 off-campus residences. Mitigation measures for this impact should be included and could include options such as:

- Identify additional locations for employee housing could be considered on UC Santa Cruz property, including locations outside of the HCP area or other environmentally protected areas that face fewer hurdles to development.
- Plan for higher density housing to accommodate more employees where housing is already planned on the UC Santa Cruz main campus or at the Westside Research Park property.
- Assess housing development potential on other UC Santa Cruz-owned parcels. If no other University parcels are viable for housing development, purchase additional land for production of multifamily employee housing project(s).
- Pay a negotiated mitigation fee to Santa Cruz County and/or other local jurisdictions based on the anticipated local demand for 1,992 housing units.
- Given market uncertainty over the next 20 years, consider a phased approach whereby every five years, a housing market study and coordination with local jurisdictions is conducted to determine the maximum number of employees without on-campus housing for the next five-year period that would be less than significant or could be mitigated with payment of mitigation fees.

Response L12-9

The suggested measures have been considered, however, they would either not directly reduce population and housing impacts or would substantially alter the project such that it would be considered an alternative to the 2021 LRDP. The first three bullets would either necessitate the densification of planned uses or the purchase of additional property, which would not be dissimilar to the alternatives considered in Chapter 6, "Alternatives" (refer to Section 6.4, specifically). The alternatives presented therein, beginning on page 6-5 of the Draft EIR, include the further development of off-campus property and the development of higher density housing. As such, the first three measures provided in this comment are not considerably different from those already analyzed in the Draft EIR. Further, the suggested measures would require the development of additional areas and could result in greater environmental impacts for the majority of CEQA issue areas (e.g., aesthetics, air quality, biological resources, cultural resources, tribal cultural resources, greenhouse gas emissions, hydrology and water quality, geology and soils, hazards and hazardous materials, noise, public services, and utilities), which would not fulfill the requirements of mitigation or alternatives under CEQA.

With respect to the fourth and fifth suggested measures, neither measure would provide additional housing but would be limited to funding provisions to an outside agency or a market study. As such, these two measures would not feasibly reduce physical environmental impacts to less than significant. In summary, the suggestions provided in this comment have been considered but would not further reduce the impacts of the 2021 LRDP, as proposed, and as such are not included as part of the Draft EIR as feasible mitigation measures.

Comment L12-10

7. Minor text edit suggestions:

- Table 3.13-11 (Baseline and Projected On-Campus Housing Capacity and Demand): The total “Demand Not Provided on Campus” appears to be a typo. This number should be the sum of 982 student beds and 1,992 employee residences.

Response L12-10

The comment identifies a text edit in Table 3.13-11. Table 3.13-11 was revised as follows:

Table 3.13-11 Baseline and Projected On-Campus Housing Capacity and Demand

	New Housing Under 2021 LRDP (Compared to 2018-2019)	Projected Housing Demand	Demand Not Provided on Campus	Would All of the Increased Housing Demand Be Accommodated On-Campus?
Student Housing (beds)	8,500 ¹	9,482 students	982 beds	No
Employee Housing(homes)	558	2,550 employees	1,992 residences	No
Totals	9,058	12,032	2,974 12,032	

Source: UC Santa Cruz 2020a

Comment L12-11

- Page 3.13-12, “Additional Housing Demand” third paragraph states “an additional 2,550 employees would be provided with housing on campus.” This statement is incorrect.

Response L12-11

The comment requests that a statement on page 3.13-12 be revised to correct an error. Page 3.13-12 of the Draft EIR was revised as follows:

Moreover, an additional 558 housing units ~~2,550~~ for employees would be provided ~~with housing~~ on campus ~~for 558 in~~ under the 2021 LRDP. Assuming all employees would be new residents, which is an overstatement, this would create a demand for an additional 1,992 residences, assuming each employee lives in their own residence. This is an oversimplification of potential demand, as it would be expected that some employees already live in the region, some may share residences with others, etc., but it would be speculative to specify more refined estimates of demand for residences over the next 20-year period.

Comment L12-12

- Page 3.13-12, “Additional Housing Demand” fourth paragraph states: “This could create additional demand for housing in the community, including the City of Santa Cruz.” Suggest changing the end of this sentence to state “City of Santa Cruz, Santa Cruz County, and other neighboring jurisdictions.”

Response L12-12

The comment requests an editorial change to the Draft EIR, however, the requested edit is not necessary for the purposes of providing an accurate assessment of the potential physical environmental impacts of the 2021 LRDP as “Santa Cruz County and other neighboring jurisdictions” are considered to be included within the term “community” provided on page 3.13-12 of the Draft EIR. As a result, no change to the Draft EIR is made in response to this comment.

Comment L12-13

8. Figure 3.16-6 and the text above it classify Uber/Lyft or transportation network companies (TNCs) in the same mode share category as carpools. Additionally, the LRDP section “Transportation Demand Management” references them as a trip and a strategy to reduce vehicle miles traveled (VMT). Yet TNC vehicles create additional trips as they pick up passengers between rides. Classifying a TNC as a carpool does not fit the purpose of a carpool, particularly if there is one rider in the TNC as one person is arriving to campus in a vehicle with an Uber/Lyft driver who then leaves the campus. The purpose of a carpool is to eliminate trips: when a single person uses a TNC without other users they would have generated less VMT by driving alone from their starting point. Are all TNCs arriving to campus carrying more than one passenger? How are TNC trips between

passengers account for? Please clarify what assumptions were made for TNC trips for the VMT analysis. If they were counted as carpools this would result in an understatement of VMT attributable to TNCs.

Response L12-13

The comment requests that the Draft EIR clarify what assumptions were made for TNC (e.g., Uber/Lyft) trips for the VMT analysis. For clarification, the 2021 LRDP states that TNCs can be used to reduced VMT if they are properly managed. This includes designation of drop-off and pick-up areas, co-located with mobility hubs. The campus can explore options, such as surcharges and geo-fencing, to manage this emerging technology. This would increase the ability for campus to more frequently and reliably accommodate transit service, reduce trip numbers and VMT, and reduce vehicle/pedestrian conflicts to promote a more pedestrian-friendly campus.

The legend referring to "Carpool" in Figure 3.16-6 has been revised to be consistent with the text and now reads "Carpool/Multi-Occupant Vehicle." The mode shares in the figure refer to person trips and are based on observed vehicles and the number of persons in each vehicle. The text states carpools and multi-occupant vehicles (such as Uber/Lyft) account for 21 percent, however these observed counts were unable to distinguish between a carpool and a TNC vehicle with two or more occupants. Therefore, TNCs have not been classified as a carpool in the context of the data supporting Figure 3.16-6. Furthermore, the data presented in Figure 3.16-6 is representative of data collected on one day in May 2019 and was not a direct input into the VMT calculations.

The SCC model is the best tool available to develop VMT estimates and was initially developed in 2016 consistent with the regional travel model developed by the Association of Monterey Bay Area Governments (AMBAG). Santa Cruz County updated the model to 2019 existing conditions. The SCC Model determines vehicle (driving alone and carpool), transit, bicycle and pedestrian trips only, to establish vehicle trip distance or VMT, but does not include TNCs as a separate mode. The SCC model estimates the probability of driving based on auto ownership, household income, and other variables; however, available travel data used to develop the original model, including 2012 California Household Travel Survey (CHTS), 2012 Santa Cruz Metro on-board survey, and EPA's Smart Location Database, do not directly account for TNCs.

While the model does not separately account for TNCs, the SCC model was validated for use of the campus VMT estimates based on tube counts at the campus access points, so to the extent there are TNC trips in the counts, the model is replicating them in the trip generation. To that end, there is no reason to suggest that TNC use would diverge in the future from the trends reflected in the hose count data.

The model estimates the number of vehicle trips for the existing condition and in 2040 and assigns a trip distance to those vehicle trips to establish VMT. This information is then used with the project service population to estimate VMT for each of the three VMT metrics. In addition, the campus is required to implement Mitigation Measure 3.16-2: Implement TDM Program and Monitoring, which will monitor VMT annually and allow the campus to adjust their TDM strategies to address changing travel behavior over time.

Comment L12-14

9. The CAPCOA guidance cited for percent reductions throughout the transportation section of the EIR also contains a global maximum VMT reduction of 15% (or 20% with neighborhood electric vehicles) due to transportation measures for suburban areas, which is inclusive of land use/location factors. Transportation Demand Management (TDM) program expansion is cited as a mitigation measure, along with proximity of housing, telecommuting, parking management and transit funding. The EIR notes a 15% reduction of VMT due to these measures, but UC Santa Cruz has a robust TDM program, high parking prices, and a high frequency of transit service.

Response L12-14

The comment is correct about CAPCOA guidance and maximum VMT reductions; however, as shown in Table 3.16-6 the total campus VMT/capita with the 2021 LRDP is estimated to be 7.9 miles with a 7.7-mile threshold. The 7.9 miles represent a 13 percent reduction in 2019 baseline VMT; thus, the campus needs to achieve an additional 2 percent VMT reduction, which is a reasonable assumption based on the data presented for Mitigation Measure 3.16-2: Implement TDM Program and Monitoring. The employee VMT needs to be reduced by approximately 30 percent

from 12.5 VMT to the threshold of 8.9 VMT. While this is greater than the 20 percent global maximum from CAPCOA, it is not unreasonable to expect the campus to reach the employee VMT thresholds. The VMT estimates developed using the Santa Cruz County travel model does not fully account for all the TDM measures listed in Mitigation Measure 3.16-2. In addition, the CAPCOA global maximum is theoretical maximum that indicates you should not expect to achieve reductions higher than 20 percent; however, robust TDM Programs, such as those for major tech employers in Silicon Valley, have shown reductions much greater than 20 percent. In addition, TDM measures are most effective for employees because an employer has greater influence on employee travel behavior than for students or visitor. Further, the mitigation measure includes a monitoring requirement, that will monitor whether the VMT thresholds are achieved, regardless of measures identified and implemented.

Comment L12-15

Additionally, the proximity of housing is a component of the project and therefore should already be accounted for in the calculation of project VMT: it cannot be counted again as a mitigation. This claim of a 15% reduction does not consider the fact that the UC Santa Cruz is already employing many of these measures, in effect taking credit for measures already in place or exceeding the maximum reduction that CAPCOA documentation observes in these suburban land use contexts. Additionally, a 15% reduction to the per capita employee VMT of 12.5 would not meet the stated threshold 8.9 miles per employee. If the reduction of 15% when applied to total VMT results in less than or equal to 8.9 miles per employee, then the calculation demonstrating such a reduction to total employee VMT divided by the number of employees should be shown, and this reduction should be attributable to mitigation measures not already in use by UC Santa Cruz, or the EIR should provide evidence that UC Santa Cruz can exceed the typical global maximum cited by CAPCOA.

Response L12-15

Refer to Response L12-14.

Comment L12-16

10. As mitigation monitoring occurs, the monitoring program should include a mechanism to guarantee that UC Santa Cruz does not shift vehicle trips to other University-owned properties that are not included in this LRDP, such as the Scotts Valley campus or the Coastal Science Campus, effectively increasing VMT on County and City roadways.

Response L12-16

Both properties identified in this comment have specific functions, and in the case of the Coastal Sciences Campus, a separate LRDP, including mitigation monitoring of transportation, and for Scotts Valley Center a lease agreement through 2040 with limited office spaces. Furthermore, and as noted in Chapter 6, "Alternatives," the Scotts Valley campus is limited in form and function as the allowable space is limited by existing lease requirements. As such, inclusion of the suggested mechanism is not considered necessary, as it would not be feasible to "shift" vehicle trips as suggested by this comment.

Comment L12-17

11. Currently, people often drive to the city or close to UC Santa Cruz and take shuttles or transit to get onto campus to avoid parking pricing, which does not achieve the purpose of truly decreasing trips or VMT, but does reduce trips as counted by tubes. Will the cellphone or "big data" collected by UC Santa Cruz be able to do a complete accounting of trip length to account for people who park off campus to avoid a "no net new commuter parking" policy? Instead of completely eliminating parking, the University should consider remote lots with shuttles that could also serve as park and rides off campus at locations that are conveniently accessed off of highways.

Response L12-17

The suggested measure is already provided as part of the TDM program under Mitigation Measure 3.16-2 (see the 13th bullet on page 3.16-36). "Big data" would not be able to capture drivers that park at sporadic/random places within the City to avoid parking on campus, as the data collected would be for trips that only begin or end on campus and Westside Research Park, however UC Santa Cruz is willing to work with the County to determine what

anonymous cell phone data options there are available to better understand this type of trip characteristic and determine what TDM program measure could potentially address it.

Comment L12-18

12. On page 3.17-3, the EIR states: "In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin." This information is out of date. The Soquel-Aptos Groundwater Management Committee was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016. The MGA is the Groundwater Sustainability Agency designated to oversee management of the renamed Santa Cruz Mid-County Groundwater Basin. The MGA was created under a Joint Powers Agreement.

Response L12-18

In response to this comment, the fourth paragraph on page 3.17-3 has been amended to reflect the Santa Cruz Mid-County Groundwater Agency, as follows:

On December 15, 2014, DWR announced its official "initial prioritization" of the state's groundwater basins for purposes of complying with the SGMA, and this priority list became effective on January 1, 2015. The Soquel-Valley Groundwater Basin (Basin Number 3-01) was identified by DWR as one of 21 groundwater basins to be reclassified as critically overdrafted. In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016, through a joint powers agreement to oversee management of the basin. ~~is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin.~~

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L12-19

13. On page 3.17-3, the EIR states: "The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin (which includes the Soquel-Valley Groundwater Basin), and the westerly area is within the Santa Margarita Groundwater Basin." This information is incorrect and out of date. The Santa Margarita Groundwater Sustainability Plan does not cover any part of the City of Santa Cruz or the UC Santa Cruz campus. The City does own assets within the Basin, including part of Loch Lomond and the Felton Lift Station. The author likely is confusing the Santa Margarita Basin with the West Santa Cruz Terrace Basin, which includes part of the city and the campus. West Santa Cruz Terrace is not required to write a Groundwater Sustainability Plan. The Soquel-Valley Groundwater Basin no longer exists; it was superseded by the Santa Cruz Mid-County Groundwater Basin.

Response L12-19

In response to this comment, the fifth paragraph on page 3.17-3 has been amended as follows:

The City of Santa Cruz receives a minor amount (5 percent) of drinking water from groundwater basins. The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin ~~(which includes the Soquel-Valley Groundwater Basin)~~, and the westerly area is within the West Santa Cruz Terrace Basin ~~Santa Margarita Groundwater Basin~~.

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Comment L12-20

14. On page 3.17-9, the EIR states: "The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency." The groundwater agencies do not serve the city. This should say: "The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency."

Response L12-20

In response to this comment, the third paragraph on page 3.17-9 has been amended as follows:

The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. ~~Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.~~ The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required

Comment L12-21

15. On Page 3.17-9, the EIR states: "The Santa Margarita GSP, covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz, is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020)." As previously mentioned, the Santa Margarita Basin does not include any part of the City of Santa Cruz or UC Santa Cruz.

Response L12-21

In response to this comment, the fifth paragraph on page 3.17-9 has been amended as follows:

~~The Santa Margarita GSP, covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz,~~ is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020).

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

Letter L13 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

Morgan Bostic, Advocate

March 8, 2021

Comment L13-1

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on water quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus' water resources, particularly the San Lorenzo Valley Watershed.

Response L13-1

As noted in Master Response 4 and Response L11-1, the Draft EIR presents an evaluation of the potential impacts of the 2021 LRDP related to wildfire risk and appropriate mitigation consistent with CEQA requirements within Section 3.18, "Wildfire." As noted in the reference section of the Draft EIR, UC Santa Cruz would implement a campus-wide vegetation management plan (Mitigation Measure 3.18-2) that would reduce fuel loads and maintain defensible space such that development under the 2021 LRDP would not exacerbate wildfire risks. The policy framework for managing fuel loads would also include management practices for reducing human activities that may contribute to wildfire risk. With respect to the potential need to evaluate hydrology impacts from increased wildfire risk and as noted in Master Response 4 and because the 2021 LRDP is not anticipated to exacerbate wildfire risks, further evaluation of potential impacts related to catastrophic events is not considered appropriate within the context of the EIR.

Comment L13-2

As Figure 3.10-1 Watersheds and Sub-Basins on UC Santa Cruz Campus shows, the "...northeastern and eastern boundary of the main residential campus is drained mainly by a series of hillslope drainages within the San Lorenzo River watershed. In general, the San Lorenzo – Pogonip watershed drains much of the eastern portion of the main residential campus east of Hagar Drive from north of the Crown-Merrill Apartments south to the southern boundary of the campus and borders the City of Santa Cruz' Pogonip Park to the east of campus."

Additionally, "Eight sub-watersheds comprise the larger area that are associated with a number of west-east trending gullies (Gullies A through H) that drain to the east (see Figure 3.10-1)."

" Gully H is located in the northeastern corner of the campus with an on-campus drainage area of approximately 40 acres. Existing UC Santa Cruz development that contributes runoff to this gully includes Crown Merrill Apartments, Crown College and three large parking lots. The erosion conditions previously documented in this Hydrology and Water Quality UC Santa Cruz 3.10-14 2021 Long Range Development Plan EIR gully include actively migrating knickpoints, incised channel, and eroding slope gullies. Concentrated runoff is the primary cause of these conditions (Kennedy/Jenks Consultants 2004)." Channel conditions in the San Lorenzo–Pogonip watershed vary from location to location but are in general fair to poor."

After rains drenched the areas where the CZU Fire occurred, Boulder Creek residents experienced "their water running black for a few days and "[f]or weeks, residents in Boulder Creek, Ben Lomond, and Felton were without drinking water. In some areas — particularly those close to Big Basin Redwoods State Park, and served by the smaller Big Basin Water District —residents didn't get water back until early January."

Fires leave behind, "an array of incinerated plastics, lead, pesticides and other toxic particles that have the potential to contaminate water supplies." Additionally, "[b]urnt piping and equipment, as well as potentially contaminated supplies, were largely to blame for the water shortage." Scorched landscapes, "add to the risk of mudslides, blocking access for water district workers."

Response L13-2

This comment provides background information on runoff and pollution caused by runoff from the CZU Lighting Complex fires but does not address the contents of the EIR; no further response is provided.

Comment L13-3

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that the north campus subarea is within the San Lorenzo River watershed and drains into the river and that wildfires in water supply watersheds potentially have significant water quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

All information for this section is taken from the 2021 LRDP EIR and <https://www.latimes.com/california/story/2021-02-13/wildfire-santa-cruz-boulder-creek-residents-fear-water-quality>

Response L13-3

Refer to Response L11-1. The location of development within the north campus subarea is largely located within a high wildfire severity zone and the risk of wildfire associated with locating new structures is acknowledged in Impact 3.18-2 starting on page 3.18-14 of the Draft EIR, however the 2021 LRDP has reduced north campus development areas compared to the 2005 LRDP. The north campus subarea is 776 acres, 93 percent of which is protected as open space. The remaining 7 percent of land that would not be protected as open space, would allow for 53 fewer acres allowed for development compared to the 2005 LRDP. The 2021 LRDP would include some student housing and a small amount of academic and support space within this area. However, the vast majority of the north campus subarea would remain undeveloped as part of the campus reserve for habitat protection, research, and recreation. Through the restriction of available fuel material and enforcement of defensible space as required by Mitigation Measure 3.18-2, which would reduce fuel loads and maintain defensible space. UC Santa Cruz would limit the potential increase in wildfire risk such that impacts, including impacts associated with hydrology and water quality, would be less than significant.

Letter L14 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

March 8, 2021

Comment L14-1

The release of the Draft UC Santa Cruz Long Range Development Plan (LRDP) for 2021-2040 presents a critical opportunity to come together as a community and envision what development and infrastructure will be essential to the success of future UCSC students, faculty, and staff over the next 20 years. In that spirit, and on behalf of the Santa Cruz City-County Task Force on UCSC Growth Plans and the constituents of the City and County of Santa Cruz, we are appealing to you directly in an effort to ensure that policies centering the needs of future students, our community-at-large, and our cherished environment are implemented under the 2021 LRDP.

Response L14-1

The comment provides introductory information and does not address the adequacy of the EIR analysis.

Comment L14-2

The Santa Cruz City-County Task Force on UCSC Growth is requesting consideration of the following policies for the 2021 Long Range Development Plan:

1. Consistent with Measure U, the 2021 Long Range Development Plan will include a legally enforceable commitment to house all additional students, faculty, and staff beyond 19,500 on campus.
2. The 2021 Long Range Development Plan will tie the increase of the campus population to additional infrastructure, with infrastructure provided prior to or concurrent with enrollment.
3. UCSC will designate the UCSC Campus Natural Reserve as a permanent reserve, ineligible for development in perpetuity, except to support the uses of recreation, research, environmental conservation, and scientific education.
4. The 2021 LRDP will prioritize areas with low endemic biodiversity for development in order to protect the most biodiverse habitats on the campus and areas that have undergone substantial regeneration.
5. UC Santa Cruz will adhere to or exceed the strictest greenhouse gas emission targets and air quality standards, whether they be statewide, regional, and/or UC-specific.
6. Given the increasing severity of wildfire due to climate change and the urban-wildland interface, it is imperative that the University adequately analyze and mitigate the increase in wildfire risk that the 2021 LRDP will impose on the campus and, by extension, the community.

In closing, we are grateful for this opportunity to collaboratively envision the future of our community and campus.

Response L14-2

The comment requests that the 2021 LRDP be revised to include suggested policies and does not address the adequacy of the EIR analysis. The University looks forward to continued collaboration with the community over the next 20 years under the 2021 LRDP. No further response is necessary. However, refer to Master Response 9 regarding plan implementation and phasing of development. Refer to Master Response 12 regarding long-term habitat protection and preparation of a campus-wide HCP. Regarding the request to cite development in areas of low biodiversity, all future buildings, as part of the UC Santa Cruz Design Review Process, Campus Standards Handbook requirements, and Physical Design Framework guidelines, would include landscaping and other features consistent with existing environmental and site conditions, which would soften the visual interface between new development under the 2021 LRDP and existing campus structures and surrounding landscape. In addition, as discussed further in Master Response 12, approximately 789 acres of the main residential campus would be designated as Campus Natural Reserve under the 2021 LRDP, an increase from the 379 acres designated as part of the 2005 LRDP. The 2021 LRDP, as proposed, comports with the comment by emphasizing the placement of development within the areas suggested in this comment.

Regarding GHG emissions, consistent with the UC Santa Cruz's Campus Sustainability Plan, implementation of Mitigation Measure 3.3-2 would require UC Santa Cruz to implement measures to reduce emissions related to implementation of the 2021 LRDP. These measures include the use of zero emission or low emission vehicles, installation of electric vehicle charging stations, reduction of campus vehicle speed, and the use of zero-VOC products. Further as explained in Master Response 4 and Section 3.18, "Wildfire," on page 3.18-17, Mitigation Measure 3.18-2 would require UC Santa Cruz to prepare and implement a campus-wide vegetation management plan to address any potential wildfire risk associated with new development and changes in land use as proposed under 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.

2.3.4 Organizations

Letter O1 League of Women Voters of Santa Cruz County

Barbara Lewis, President
February 23, 2021

Comment O1-1

Thank you for the opportunity to comment on the UCSC 2021 Long Range Development Plan Draft Environmental Impact Report (LRDP DEIR). On a statewide level, the League of Women Voters supports a comprehensive system of public higher education that serves the personal, professional, and occupational goals of all adult Californians and advances the social, economic, and civic needs of the state. To achieve these objectives, public higher education must prioritize access, affordability, equity, and excellence. These priorities require state funding, including student financial aid that is stable, predictable, sustainable, and timely.

While we appreciate the university's contribution to our local community in terms of educational, intellectual, cultural and economic assets, we are concerned to read in the DEIR that multiple significant and unavoidable negative and cumulative impacts would result from the proposed LRDP for the Santa Cruz campus. Even after implementation of feasible mitigation measures, significant negative impacts would occur with respect to: air quality, historical resources, noise, population and housing, and water supply.

Although there are many important areas of negative impact, we will focus our comments primarily on air quality and transportation, population and housing, and wildfire hazards.

Response O1-1

The comment is introductory in nature and is noted. This comment does not address the adequacy of the EIR analysis. Additional detailed comments follow this comment and responses are provided below.

Comment O1-2

As you have pointed out on page 3.16-1 of the DEIR, Senate Bill (SB) 743, passed in 2013, eliminates consideration of traffic congestion in the CEQA process. However, we believe that the DEIR has underestimated the level of greenhouse gas emissions that result from traffic backups as students, faculty and staff arrive in the morning and head home at the end of the day. Because of its unique geographic location, the UCSC campus does not have easy access to major transportation corridors or freeways. The campus is accessed primarily through two-lane residential streets. This limited vehicular access creates congestion along the few streets leading to the campus. Cars and trucks are routinely stopped with engines running for blocks along these residential streets while waiting for gridlock to clear. Residents who live on or in proximity to these streets are not only subjected to the effects of carbon emissions, but also find it difficult, if not impossible, to enter or leave their own homes during these times.

Response O1-2

As noted in Table 3.3-4 on page 3.3-19 of the Draft EIR, the emission factors used to model GHG emissions for the 2021 LRDP were derived from the EMFAC 2017 emissions database, which has been approved by the U.S. Environmental Protection Agency for use in State Implementation Plan and transportation conformity analyses. As these emissions factors are based on vehicle miles traveled, they are considered the most appropriate and valid method of assessing potential GHG emissions resulting from 2021 LRDP implementation. EMFAC 2017 is also considered an aggregate emissions database, in that it considers emissions associated with a variety of different processes of a given vehicle, including running exhaust emissions and idle exhaust emissions that would occur during typical stop-and-go traffic. While stop-and-go traffic may be routine around UC Santa Cruz during peak times, this type of traffic pattern is also routine in many California cities. Consequently, the emissions projections identified in the Draft EIR are considered reasonable estimates and in accordance with CARB-approved modeling techniques.

Comment O1-3

The neighborhood middle school and elementary schools that exist on these same residential streets begin and end the school day at times that overlap the hours during which commuters are arriving and leaving the UCSC campus, creating potentially hazardous conditions for the students. These significant adverse impacts have existed for years with no indication that conditions will improve. On the contrary, we believe that campus growth as described in the LRPD DEIR will exacerbate these problems.

Response O1-3

Consistent with CEQA requirements, the Draft EIR evaluates the potential for the 2021 LRDP to increase risks related to roadway volumes, including those to nearby schools, in two separate locations within the document. Refer to Impact 3.9-4 on page 3.9-25 and Impacts 3.16-3 and 3.16-4, beginning on page 3.16-38, of the Draft EIR, where impacts were determined to be less than significant (with mitigation, in the case of Impact 3.9-4 which requires the preparation of site-specific construction traffic management plans.) The comment does not specify how campus growth would exacerbate impacts, nor does it comment on the analysis of safety provided in the Draft EIR or otherwise. No further response is necessary.

Comment O1-4

As you may know, early campus planners were very much aware of the potential negative impacts on neighborhoods adjacent to the new campus and suggested what they called an "eastern access" road that would bypass the neighborhoods and somehow connect Coolidge Drive to the Highway 1 and/or Highway 17 Freeways. The concept was met with strong opposition from the local community. The FEIR should explain why an "eastern access" was never constructed and why it is very unlikely to ever become a reality.

Response O1-4

UC Santa Cruz acknowledges that the history of development and continued cooperation between UC Santa Cruz and the local community has evolved and is continuing to evolve over time. While early planners may have considered an eastern access, the City of Santa Cruz acquired land, currently designated as Pogonip open space, creating a physical constraint for implementation of an eastern access roadway connection to campus. An eastern access is not proposed as part of the 2021 LRDP, so analysis of it is not required. For comments on the 2021 LRDP project, please see Master Response 2. As this comment does not address the adequacy of the EIR analysis, and no further response is necessary.

Comment O1-5

We do not believe that housing more faculty and staff on campus would reduce vehicle miles travelled (VMT) or greenhouse gases. Indeed, it could even increase VMT. To the extent that faculty and staff have families, we expect that household members will need to make regular trips off campus to commute to work or to access services provided in the community, such as: elementary and secondary schools, day care facilities, grocery stores, pharmacies, and a multitude of other destinations in the course of normal daily life. The DEIR does not seem to address the fact that most household members living on campus would need to travel off campus on a regular basis.

Response O1-5

The VMT estimates used in the Draft EIR were based on the Santa Cruz County (SCC) Regional Travel Demand Model (SCC Travel Model) and take into consideration the need for students, faculty, and staff who may live on campus to travel to other destinations for shopping, etc. As noted in the modeling results provided in Section 3.16, "Transportation," employment VMT per capita, which includes non-UC Santa Cruz residents, would exceed the 2019 Countywide Average, which indicates that the modeling accounts for more than faculty/staff traveling on a daily basis within the LRDP area. The comment provides anecdotal considerations but provides no evidence to dispute the analysis in the EIR. The Draft EIR analyzes and discloses these impacts appropriately. No further response is necessary.

Comment O1-6

The DEIR acknowledges that the proposed LRDP will create significant and unavoidable negative impacts by directly or indirectly inducing substantial unplanned population growth and housing demand.

Santa Cruz is one of the most expensive housing markets in California. Local governments struggle to find ways to provide affordable housing for lower income workers and their families. Service employees are priced out of the market as higher income buyers and renters compete for housing. The DEIR cites the volume of housing units expected to come on line in the City of Santa Cruz. But, these new housing units are mostly market rate units that do not help to fulfill the need for low-income housing. Moreover, the growth of population further increases the need for low-income housing as the demand for services increases to meet the needs of additional residents. As a result, service and workforce employees must look for affordable housing further and further from local places of employment, defeating efforts to reduce VMT and address global warming. Indeed, affordable housing for service workers is now so rare that those workers are leaving the county for areas with less expensive housing markets, leading to a dearth of those workers for the university and other local employers.

Response O1-6

It is reasonable to assume that low-income/affordable housing in the City of Santa Cruz and in unincorporated Santa Cruz County would be provided in accordance with local ordinances and requirements, as well as in a manner consistent with local housing elements. The demand for low-income housing in the comment is acknowledged. UC Santa Cruz is committed to increasing housing opportunities on-campus in an effort to meet demands. 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. Please also refer to subsection "Housing Affordability and Other Socioeconomic Considerations" in Master Response 2 for a discussion of housing affordability and other socioeconomic considerations.

Comment O1-7

Compounding the problem is the high cost of on-campus student housing. On-campus rental rates create an incentive for students to look for cheaper housing off-campus, competing with low-income City residents for affordable housing. Although the UC Administration promises to house 100% of the projected increase in student population, this will not alleviate the shortage of affordable housing if on-campus student housing continues to be too expensive and drives students to look for cheaper housing off-campus. Moreover, the DEIR fails to explain where the funds will come from to subsidize new student housing in order to offer on-campus rental rates that will be affordable and attractive to students. Historically, UCSC's track record for providing enough on-campus student housing at affordable rates has been grossly inadequate.

Response O1-7

Please refer to subsection "Housing Affordability and Other Socioeconomic Considerations" in Master Response 2 for a discussion of housing affordability and other socioeconomic considerations.

Comment O1-8

The City and County of Santa Cruz require major developments to include a certain percentage of low-income units in their development plans or pay in lieu fees to help local governments provide low-income housing. Is the University prepared to honor this low-income housing inclusionary requirement in its development plans?

Response O1-8

The requirements referred to by the commenter are specific to local jurisdictions (i.e., county and city governments) and is not a requirement of the UC, as a state entity. With respect to the affordability of on-campus housing, please refer to subsection "Housing Affordability and Other Socioeconomic Considerations" in Master Response 2.

Comment O1-9

Wildfire

In the wake of global warming and the probability of increase in wildfires, we are alarmed to see the University propose additional development in the Wildland-Urban Interface areas of the campus. While the described mitigation measures seem good on paper, wildfires are unpredictable in the presence of increased human activities, dry

vegetation, and high winds. It's not clear how required and costly hardening measures and vegetation maintenance will ensure the feasibility of safely developing in areas susceptible to the hazards of wildfire. It seems irresponsible to unnecessarily put students, faculty, and staff and adjacent communities at risk when viable and more cost effective alternatives may be available, such as growing the UC system at other UC campuses not threatened by potential wildfires.

Response O1-9

The comment does not address the specific contents of the Draft EIR, so further response is not possible. Please refer to Section 3.18, "Wildfire," and Master Response 4, regarding the potential for the 2021 LRDP to exacerbate wildfire risk.

Comment O1-10

Alternatives

Together with the No Project Alternative, the FEIR should consider the possibility of utilizing distance learning as a mitigation measure for increasing the student population. For example, if lower division classes in selected majors were offered online at reduced tuition rates, this could not only mitigate environmental impacts of additional student enrollment, but also would make higher education at UCSC more affordable for Freshmen and Sophomores. Encouraging students to transfer in as Juniors and streamlining the transfer process would be another way to leverage availability and affordability.

Response O1-10

The Draft EIR did include information regarding a remote/distance learning alternative, as requested by the commenter. Please refer to page 6-6 of the Draft EIR. Please refer to Master Response 3 regarding a reasonable range of alternatives considered in the 2021 LRDP Draft EIR.

Comment O1-11

Conclusion

In view of the significant and unavoidable negative impacts of the proposed 2021 LRDP, we urge the University of California to maintain the UC Santa Cruz campus at its present student population of 19,500 so that this campus of higher learning will continue to be an asset to the local community in which it resides and not become an impactful liability through unmitigated growth. We believe it would be more environmentally acceptable for the University of California to achieve its mission and goals by increasing student enrollment at some of the other excellent UC campuses that are better suited to safely accommodate growth.

Response O1-11

UC Santa Cruz acknowledges the opinions expressed by the commenter on the project, the 2021 LRDP. However, the comment 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. Further response is not required.

Letter O2 Springtree Home Owners Association

Ron Goodman, Board Member
March 2, 2021

Comment O2-1

The Long-Range Development Plan (LRDP) will have significant impacts on the region surrounding and including the Springtree HOA. The attached comments on the DEIR enumerate concerns and questions we have. We request that you address these comments.

Response O2-1

The comment is introductory in nature and is noted. This comment does not address the adequacy of the EIR analysis. Additional detailed comments follow this comment and responses are provided below.

Comment O2-2

Mitigation measures 3.10.2, 3.10.3, 3.10.4 and 3.10.5: UCSC currently drains runoff from the east side of campus into Kalkar Quarry Pond. This water is rapidly funneled into the pond causing extensive silt deposition, leading to significant environmental damage to the pond and placing the burden of maintenance on a poorly resourced HOA. The mitigations described in the DEIR failed to protect the pond ecosystem either in UCSC's current or future state as described in the LRDP.

Response O2-2

As noted in Chapter 1, "Introduction" of the Draft EIR, the analysis of the 2021 LRDP is programmatic in nature and does not provide project-specific analysis, including site-specific changes in drainage patterns. The Draft EIR does include a campus-wide evaluation of potential changes in permeability and increased runoff and provides mitigation that can address the range of environmental impacts. As shown in Table 3.10-7, potential impacts to Kalkar Quarry were considered as part of this programmatic analysis. The mitigation measures presented in the Draft EIR address the identified impacts in accordance with CEQA requirements. The comment, while raising important issues, does not specifically address the analysis in the EIR. In addition, and with respect to the perceived impacts to Kalkar Quarry, similar comments were previously offered by the commenter and UC Santa Cruz provided evidence that indicated otherwise, as explained below. As evidence in support of the 2021 LRDP EIR's analysis, the following excerpt from the Student Housing West Final EIR, as certified in March 2019, with respect to similar comments by the commenter is provided:

With respect to the commenters' concerns of potential increased sediment loads to spring-fed stream channels, Kalkar Quarry Pond, and/or Neary Lagoon, it should be noted that current and historic stormwater that is captured from Faculty Housing and Coolidge Drive flows to Kalkar Quarry Pond has shown relatively low sediment loads via a measure of turbidity and Total Suspended Solids (TSS). Specifically, turbidity monitored during first flush (i.e., worst case) stormwater sampling events between 1990 and 2009 ranged from 1.1 to 92 NTU (nephelometric turbidity unit) and during the past nine (9) years of monitoring "first flush" stormwater entering Kalkar Quarry Pond, TSS remained below 100 mg/L with one exception when TSS was detected at 250 mg/L in October 2009. To put these values in perspective, a statewide turbidity *Numerical Action Level* (NAL) has been set at 250 NTU for runoff generated from construction sites under the Construction General Permit, and a numeric action level (NAL) of 100 mg/L has been set for sites with industrial activities under the Industrial General Permit. These threshold values have been adopted to be protective of receiving waters and both current and historic results of first flush stormwater sampling indicate that campus pollution prevention structures and best management practices effectively control offsite sediment transport during stormwater run-off events to levels below thresholds that would indicate a significant impact.

It is also important to note that, under current conditions, stormwater from employee housing does not discharge directly into Kalkar Quarry but is conveyed to a detention vault where it is detained (allowing sediment to filter out) and then released to Kalkar Quarry. Refer also to Master Response 10 regarding hydrology and water quality.

Comment O2-3

1) The V-channel along Coolidge is inadequately maintained and collects vast quantities of dirt during dry months. Rain events send this dirt and debris into the pond.

- How can we have confidence that new construction and new projects will address this better?

Response O2-3

The comment generally questions the conclusions of the EIR but does not specifically address the content or provide evidence in support of another determination. The V-ditch along Coolidge is owned and maintained by the County of Santa Cruz. As stated in Section 3.10, "Hydrology and Water Quality," any development under the 2021 LRDP would be required to comply with applicable National Pollutant Discharge Elimination System (NPDES) requirements and UC Santa Cruz Post-Construction Requirements, including through continued implementation of the campus Storm

Water Management Program (SWMP). With respect to the connection of drainage facilities along Coolidge Drive and water quality at Kalkar Quarry, refer to Response O2-2.

Comment O2-4

- Would UCSC commit to clearing this channel of debris before rain season?

Response O2-4

The comment also does not provide substantial evidence that the analysis is inadequate or why the clearing of channel debris is necessitated as a result of 2021 LRDP buildout. As noted above in Response O2-3, UC Santa Cruz implements its SWMP in conformance with NPDES requirements. Any additional commitment to specific maintenance activities or additional mitigation measures are not considered necessary to prevent significant impacts associated with implementation of the 2021 LRDP.

Comment O2-5

- What consequences would UCSC commit to if it continues to fail to manage this channel and associated runoff?

Response O2-5

As noted in Response O2-3, the UC Santa Cruz SWMP includes specific requirements and recommendations for campus to implement to manage storm water quality within the LRDP area, including recommended actions in the event of a discharge. However, the comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment O2-6

2) The drain at the intersection of Hagar and Coolidge is poorly maintained and the runoff from the field above feeds significant quantities of silt into the pond. New construction would likely lead to less runoff absorption and more runoff entering the various drains that deliver untreated water to the pond.

- How will UCSC mitigate this impact which is not described in the DEIR?

Response O2-6

It is unclear what potential development is referred to in the comment as the nearest area of potential development identified in Figure 2-4 would largely involve redevelopment of existing developed areas. Development under the 2021 LRDP along Hagar and Coolidge Drives is not anticipated proximate to the intersection of these two roadways. Please refer to Response O2-2 for the programmatic nature of the analysis. No further response is possible.

Comment O2-7

- If mitigations are proposed that redirect the water, how will the impacts of reduced recharge to the karst (and resulting reduced spring flows) be mitigated?

Response O2-7

Please refer to Response O2-2. The Draft EIR, beginning on page 3.10-33 and as part of Impact 3.10-5, evaluates the potential need for mitigation related to changes in drainage conditions and the potential for the 2021 LRDP to affect groundwater recharge within the Karst aquifer. As noted on pages 3.10-33 and 3.10-34, compliance with UC Santa Cruz Post-Construction Requirements and the State Water Resources Control District Phase II NPDES requirements would ensure that changes in drainage patterns would not substantially reduce groundwater recharge potential within the LRDP area.

Comment O2-8

- What responsibility will UCSC take in assisting the HOA in managing the pond if despite its best efforts, LRDP projects cause further damage to the pond?

Response O2-8

Regarding potential impacts to Kalkar Quarry, please refer to Response O2-2. As noted above, both current and historic results of first flush stormwater sampling indicate that campus pollution prevention structures and best management practices effectively control offsite sediment transport during stormwater run-off events to levels below thresholds that would indicate a significant impact or substantial damage to the pond. In addition, as stated under Impacts 3.10-2 and 3.10-3 of the Draft EIR, construction-related projects in the LRDP area would be required to comply with the State Water Resources Control Board 2009-0009-DWQ CGP, and each new facility would be required to adhere to UC Santa Cruz Post-Construction Stormwater Management Requirements to reduce potential water quality impacts. If, due to unforeseen circumstances, it is determined that potential impacts (i.e., exceedance of applicable water quality requirements) may occur/have occurred as a result of 2021 LRDP implementation, UC Santa Cruz would coordinate with the appropriate agency(ies) regarding and implement appropriate corrective actions, consistent with water quality requirements.

Comment O2-9

- Would UCSC consider raising the drain so the sinkhole acts as a settling pond, allows more water to seep into the karst, and reduce inundations to the pond?

Response O2-9

Please refer to Response O2-2 for clarification regarding existing detention/settling facilities provided on campus.

Comment O2-10

3) The drainage from Hagar Dr. and Hagar Ct. flows into multiple gutters along Hagar Ct. delivering whatever road debris/pollutants have collected on those roads from preceding dry months.

- How will the University ensure that increased runoff and increasingly toxic runoff does not cause additional harm to the ecosystem of the pond?

Response O2-10

As noted in Response O2-2, the commenter has misunderstood the manner in which drainage facilities are provided. Further, a description of the applicable regulations and UC Santa Cruz's requirement to comply with them (e.g., Phase II General Permit for Small Municipal Separate Storm Sewer System) are provided in the Draft EIR (refer to Impacts 3.10-2 and 3.10-3, beginning on page 3.10-30 of the Draft EIR. Also please refer to Master Response 10 regarding ongoing stormwater quality monitoring that occurs on campus.

Comment O2-11

- What responsibility will the University take if despite their best efforts, the pond ecosystem is further degraded as a result of LRDP projects?

Response O2-11

Please refer to Response O2-8 and Master Response 10 for further discussion of issues related to hydrology and water quality.

Comment O2-12

4) According to the California Air Resource Board, pollution from tire and brake wear is a serious environmental pollutant (<http://relynk.me/carimpacts>). Furthermore, auto speed is correlated with levels of wear (<http://relynk.me/tirewear>).

- Can UCSC commit to lowering speed limits on Hagar and Coolidge to reduce the impact of this type of pollution in runoff (as well as improve safety for bicyclists, wildlife and drivers, and reduce noise pollution)?

Response O2-12

The Draft EIR considered potential impacts related to polluted runoff (Impact 3.10-3), roadway noise (Impact 3.12-4), and transportation safety (Impact 3.16-3) and determined that impacts would be less than significant without mitigation. However, the LRDP Physical Planning Principle of Integrated Transportation includes enhanced walking

and biking pathways and limiting vehicular traffic. All new roadways are envisioned as multimodal “complete streets” which would embrace design concepts such as traffic calming to encourage more bicycle use. Automobile access restrictions are proposed to prioritize transit, bicycle and pedestrian access and reduce vehicle/pedestrian conflicts. Reducing speed limits on campus roads will be considered, in addition to other potential traffic calming measures, where feasible and enforceable, however it is not required as mitigation to reduce significant impacts associated with 2021 LRDP implementation. Also please refer to Master Response 10 for further discussion of hydrology and water quality analysis provided in the Draft EIR, including information regarding ongoing stormwater quality monitoring that occurs on campus.

Comment O2-13

- What other solutions can UCSC implement to ensure this type of pollution does not increase if, as is anticipated, overall VMT increases?

Response O2-13

Please refer to Response O2-12. In general, the Draft EIR provides appropriate mitigation to reduce the significant environmental impacts of the 2021 LRDP where necessary. Further mitigation, beyond that identified in the Draft EIR, as amended through responses to comments, is not considered to be required. Also refer to Master Response 10 for further discussion of hydrology and water quality analysis provided in the Draft EIR.

Comment O2-14

As a result of an informal agreement to allow UCSC to pipe collected runoff into the pond, and an abdication of UCSC’s responsibility to abide by its agreed management of this runoff, the current situation is that UCSC’s runoff delivers substantial silt and pollutants directly into the pond without any settling or treatment. This has resulted in several problems that are difficult for the HOA to manage.

- 1) Multiple feet of silt deposition have provided habitat and shallow water that have led to complete inundation by California bullrush (*Schoenoplectus californicus*). This has eliminated the open water and created a maintenance problem that exceeds the technical and financial capabilities of the Springtree HOA.
 - How will UCSC address this ecosystem damage?

Response O2-14

Under CEQA, mitigation (and/or corrective actions) are required when a proposed project (i.e., the 2021 LRDP) would result in significant physical environmental impacts as a result of its implementation. The commenter’s description of the perceived current conditions at Kalkar Quarry are an existing condition (but see Response O2-2) and are not impacts associated with the 2021 LRDP.

Comment O2-15

- Will UCSC agree to pay a portion of maintenance to restore the ecosystem?

Response O2-15

Please refer to Response O2-14.

Comment O2-16

- 2) The loss of open water has eliminated habitat for waterfowl, western pond turtles, red-legged frogs, fish larger than a few centimeters, etc. This loss of species has radically impacted the diversity of the open space and created disease vector impacts like increased mosquito population.
 - How will UCSC monitor the biota of the pond to ensure LRDP projects are not causing damage?

Response O2-16

Regarding the need for monitoring of Kalkar Quarry by UC Santa Cruz, refer to Response O2-3. However, if it is identified, either through project-specific evaluations or otherwise, that runoff from UC Santa Cruz as a result of 2021 LRDP implementation would result in impacts to biological resources within Kalkar Quarry, UC Santa Cruz would

arrange for appropriate measures to be implemented on a project-by-project basis and in conformance with existing regulations/requirements (as identified in Section 3.10, "Hydrology and Water Quality.") Additionally, the comment does not provide evidence that UC Santa Cruz has contributed to this existing condition, nor evidence to suggest a potential impact of the 2021 LRDP.

Comment O2-17

- What responsibility will UCSC take for any damage LRDP projects do cause to the pond?

Response O2-17

Please refer to Response O2-16 regarding impacts to Kalkar Quarry.

Comment O2-18

3) UCSC runoff may be causing fish die-offs - Kalkar pond fish population disappeared in 2020 coinciding with first 2020 rain event in late November – <http://relynk.me/rain> . Although these events may be associative rather than causally related, this should be investigated further.

- If UCSC runoff is killing mosquito eating fish, what responsibility will UCSC take to address the health risks associated with a large mosquito population?

Response O2-18

Please refer to Response O2-16 regarding impacts to Kalkar Quarry.

Comment O2-19

4) LRDP projects may, according to Impact 3.10-5 cause further reductions to spring flows on top of reductions that have been noted. As noted by historian Dean Silvers, "[The Dodero Spring in Kalkar Quarry] bears a complicated relationship to the Santa Margarita Sandstone aquifer located on the UCSC campus. Stanley (Warrick, Sheridan F., ed. The Natural History of the UC Santa Cruz Campus. Santa Cruz, Environmental Field Program, UCSC, 1982, pp. vi-vii and 81-85) notes that when the old city reservoir (near today's UCSC Arboretum) was built around 1900, people were at first unaware that it leaked through the fractured marble at a rate as high as 750,000 gallons a day! When the Cowell Reservoir was emptied in 1948, the flow of water at the Dodero Spring at the Kalkar Quarry (0.7 miles east) decreased by an equal amount of water."

- Mitigation 3.10-5b states UCSC will compare flows to historic spring discharge. Flow variation is significant, so how can UCSC guarantee that the metric used to determine impact significance is sufficient and captures all impacts?

Response O2-19

As required by Mitigation Measure 3.10-5b as amended through the Final EIR (refer to the edit below and Chapter 4, "Revisions to the Draft EIR" of this document), UC Santa Cruz would require annual monitoring of groundwater levels (in the event that additional groundwater supplies are extracted) at multiple locations to ensure that groundwater levels do not decrease as a result of 2021 LRDP implementation. In the event that a decrease is realized, groundwater extraction by UC Santa Cruz would be halted/reduced until such time as the groundwater levels have recovered to ensure that UC Santa Cruz does not result in a net decrease in available groundwater supplies and associated impacts. It is understood that spring flows and precipitation may vary year over year, which is why the mitigation requires a multi-year period of observation to determine whether impacts would occur. However, based on available information, the potential level of groundwater extraction would not exceed the sustainable yield of the groundwater aquifer.

Mitigation Measure 3.10-5b on page 3.10-36 of the Draft EIR was revised as follows:

Mitigation Measure 3.10-5b: On-Going Groundwater Level and Spring Flow Monitoring

If the existing well WSW#1 or a new groundwater well is used for extraction, UC Santa Cruz shall perform monitoring of water levels within that well and any other campus wells completed in the karst aquifer on an ~~annual~~ annual/continuous basis when groundwater pumping occurs. UC Santa Cruz shall also conduct, at a minimum,

monthly equivalent flow monitoring of those springs in the vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. Monitoring of the springs shall also include an assessment of surface water resources (i.e., habitats, plant species, and wildlife species) for a distance of 500 feet downgradient from the daylighting of connected springs at least 30 days prior to and after groundwater pumping to determine if there are any adverse changes (i.e., reduction in ordinary high water mark, changes in plant or wildlife species assemblages such that a species is no longer present, or reduction in plant cover) in the condition of these resources that may be directly attributed to changes in spring discharge as a result of groundwater pumping.

If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period ~~that includes both wetter and drier years~~ coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding ~~rainfall season~~ water year type. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, ~~with consideration of associated seasonal rainfall grouped by water year types~~. As new monitoring data becomes available, UC Santa Cruz will continually update the statistical analysis.

Comment O2-20

- Mitigation 3.10b states that if spring flows decline per a defined formula, groundwater extraction would be reduced or terminated. But changes in spring flow would likely also result from drainage pattern modifications that reduce karst absorption. The DEIR doesn't state what UCSC would do if the reduction in flow is a product of modified drainage patterns. How will UCSC mitigate reduced spring flow if the cause is due to factors other than groundwater extraction, such as modified drainage?

Response O2-20

The Draft EIR evaluates the potential for new impervious surfaces to affect groundwater recharge within Impact 3.10-5, which begins on page 3.10-33. As noted in Impact 3.10-5, compliance with UC Santa Cruz Post-Construction Requirements would involve the retention of runoff to pre-development conditions which would prevent a reduction in flows to springs and seeps. As a result of regulatory compliance, no mitigation measures are considered necessary to address the impact of 2021 LRDP implementation.

Comment O2-21

The DEIR fails to address these existing issues, how UCSC would mitigate these issues as they worsen, and what level of responsibility UCSC would take if they are unable to mitigate issues. New development proposed on the eastern portion of campus would exacerbate these existing problems by adding more concrete and increasing surface flow and runoff and reducing absorption of water into the karst. That would lead to more polluted water inundations, with less consistent clean spring flow throughout the year.

These issues should be mitigated in section 3-10 by:

- 1) Eliminating the V-channel along Coolidge and instead creating drainage systems that slow and trap precipitation, allowing it to be absorbed into the karst.
- 2) Installing a system at the Hagar/Coolidge intersection to collect rainwater and allow it to seep into the karst as it would naturally do if there were less pavement and no drainage pipe.
- 3) Requiring that any newly created storm runoff should be dispersed as sheet flow along the landscape or captured to seep into the karst, and not funneled into streams.
- 4) Stopping use of any potentially dangerous chemicals that could end up entering the watershed (e.g., for landscaping, maintenance, pest control).

- 5) Monitoring Kalkar spring flows (these have not been historically measured, so this should start) and ensuring that projects do not reduce these flows.
- 6) Creating settling tanks for any runoff collected rather than allowing free flow into the pond.
- 7) Committing to reducing automobile pollution on campus (see below).

Response O2-21

As demonstrated above in Responses O2-2 through O2-20, the Draft EIR provides appropriate programmatic analysis of environmental conditions associated with 2021 LRDP implementation. The suggested mitigation measures are noted but based on available evidence, inclusion of additional mitigation measures is not considered necessary. Further, CEQA does not require the evaluation of potential improvements to existing conditions and instead requires that a project is responsible for proportionally mitigating its contribution to a physical environmental condition.

Comment O2-22

Two final questions:

- If the University cannot commit to these or similar mitigations, how can it guarantee that the projects described in the LRDP will not have significant adverse impacts on the hydrology, flood patterns, karst, and groundwater quality?

Response O2-22

Please refer to Response O2-21. Further, as part of its consideration of the 2021 LRDP, the UC Regents will also consider and (if the 2021 LRDP is approved) adopt the mitigation measures identified in the EIR and a mitigation monitoring and reporting program (MMRP), as provided in Chapter 3, "Mitigation Monitoring and Reporting Program" of this document. Consistent with CEQA requirements (State CEQA Guidelines Section 15097), the MMRP outlines the process by which and parties who are responsible for the implementation, monitoring, and reporting of the commitments necessary to ensure that the potentially significant impacts of 2021 LRDP implementation are mitigated to less-than-significant levels.

Comment O2-23

- What consequences can the University commit to if it is unable to protect the Kalkar Quarry Pond as well as the downstream waterways, additional ponds, lagoon and ocean?

Response O2-23

As noted previously in Response O2-21, UC Santa Cruz would comply with existing hydrology and water quality regulations related to changes in runoff and water quality conditions such that significant environmental impacts are not anticipated. In the event a violation of the requirements occurs, UC Santa Cruz would be subject to corrective actions as determined by the appropriate regulatory agency (e.g., Regional Water Quality Control Board).

Comment O2-24

Mitigation measure 3.3-2 and 3.16-2: The measures described do not adequately address impacts of cars, and critically, lack substantive consequences for failing to meet targets.

Response O2-24

UC Santa Cruz acknowledges the concerns expressed by the commenter, however the measures, as presented in the Draft EIR and amended through the Final EIR (refer to Chapter 4, "Revisions to the Draft EIR" of this document), include reasonable and feasible solutions for UC Santa Cruz to meet the desired performance standard. Due to the number of available reduction measures, UC Santa Cruz could implement one or more suggestions within each measure and would be expected to adaptively manage their implementation based on timing and availability until the required reduction is achieved. With respect to Mitigation Measure 3.16-2, in particular, this measure presents a feasible approach to mitigating the VMT impact identified, in the form of a travel demand management program, setting of the performance standard, annual monitoring, and development of a corrective action plan in the event

that the target is not met. The comment provides anecdotal considerations but provides no evidence to dispute the analysis in the EIR. The Draft EIR analyzes and discloses these impacts appropriately.

Comment O2-25

Additionally, reducing residential VMT per capita, even if successful, would lead to substantially greater total VMT. Increased automobile use has significant negative impacts on the campus, the surrounding neighborhoods, and the community at large.

Response O2-25

UC Santa Cruz acknowledges that while reducing residential VMT per capita, an increase in total VMT would still occur. Nevertheless, the goal related to traffic in California has shifted, under SB 743, to a focus on efficient transportation in new development. The increase in total campus residential VMT is a direct result of adding residents and employees and is unavoidable because the transportation system does not support a completely auto-free lifestyle for all residents. As stated in Section 3.16, "Transportation," of the Draft EIR under Impact 3.16-2, campus development under the 2021 LRDP would generate lower VMT per resident when compared to the countywide average, which demonstrates that locating UC Santa Cruz students and staff on campus will do more to reduce statewide VMT than locating them off-campus.

Comment O2-26

UCSC should make a stronger commitment to a future prioritizing telecommuting, bikes, electric bikes, and electric vehicles. California's governor has committed to banning the sale of gas-power vehicles by 2035 (<http://relynk.me/phaseout>). UCSC's commitment to do this would address:

- 1) Mitigation 3.10-2 and 3.10-5 by eliminating or reducing several types of auto pollution from collecting on roads (oil, exhaust, lubricants, brake pad dust). This would reduce pollution in runoff that enters streams, Kalkar Quarry Pond, and other regional water fed by UCSC runoff.
- 2) Mitigation 3.3-2 by reducing air pollution from autos.
- 3) Mitigation 3.12-14 by reducing noise pollution on campus and to nearby neighborhoods.
- 4) Mitigation 3.8-1 by helping reduce the campus' contribution to climate change.
- 5) Reduce the pressure to build new access roads and new campus circulation roads.

The TDM described in mitigation 3.16-2 and mitigations in 3.3-2 should address this.

Response O2-26

It is important to note that the implementation of the September 2020 executive order by Governor Newsom related to the sale of zero-emission single-occupant vehicles (SOVs) by 2035 would affect emissions associated with UC Santa Cruz, as faculty, staff, and students would, at some point in the future, have vehicles that comply with this order. Further, requiring such vehicles in advance of state requirements could place additional economic burdens on students to buy generally more expensive vehicles. With the exception of operational roadway noise, UC Santa Cruz acknowledges that the use of electric SOVs would reduce impacts. However, it is not clear that the reductions (if UC Santa Cruz established a similar requirement in terms of timing and implementation) would occur in time to affect impacts associated with 2021 LRDP implementation. The mitigation measures within the EIR, upon adoption, would serve as requirements of UC Santa Cruz and are considered to be consistent with the commenter's request. In particular, telecommuting and bicycle programs are included in the suite of travel demand management strategies described in Mitigation Measure 3.16-2. As electric bicycle availability and adoption increase, UC Santa Cruz will consider potential measures such as subsidies for e-bike purchase, e-bike share services, or other strategies to encourage use of this travel mode. The role of fewer gasoline/diesel-powered vehicles in GHG reduction is described as part of Mitigation Measure 3.8-1, and compliance with the UC Sustainable Practice Policy would also serve to reduce vehicle emissions ahead of the Governor's executive order. Additionally, the comment does not address the adequacy of the Draft EIR's analysis, and no further response is necessary.

Comment O2-27

- Can the LRDP specifically state that where auto infrastructure is built or maintained, there is a requirement to phase out infrastructure for gas cars in favor of EV support?

Response O2-27

The UC Carbon Neutrality Initiative and UC Sustainable Practices Policy set UC-wide goals for carbon neutrality, including a campus fleet mix to include zero emission or hybrid vehicles in new vehicle procurements. The UC Santa Cruz Campus Sustainability Plan furthers these initiatives with campus goals to reduce commuter greenhouse gas emissions, reduce vehicle miles traveled and reduce per capita parking demand. Campus has converted existing parking spaces to electric vehicle charging stations in the Core West Parking Structure and East Remote Parking lot and will continue to convert existing parking spaces to electric vehicle charging stations and develop new electric vehicle charging infrastructure during implementation of the LRDP to meet carbon neutrality and sustainability goals. Additionally, the comment does not pertain to the adequacy of the Draft EIR's analysis, and no further response is possible.

Comment O2-28

- Can the LRDP encourage EV use over internal combustion engines (ICE) cars by:
 - a. requiring that a progressively increasing amount of charging infrastructure for EVs and electric bikes shall be installed throughout the campus;
 - b. specifying that existing auto parking spaces should be converted to EV-charging, at a minimum, to keep pace with statewide EV sales;
 - c. apportion new parking passes to a progressively higher ratio of EV to ICE cars, phasing out passes for ICE cars entirely by 2035;
 - d. offering other incentives to EV drivers as possible;

Response O2-28

Please refer to Response O2-27 above. The 2021 LRDP has goals that support a more efficient roadway network to support transit with peripheral parking and mobility hubs, provide infrastructure to optimize trip- and vehicle-miles-travelled and to reduce single-occupant vehicles. As part of the 2021 LRDP, parking supply on campus will continue to be limited for on-campus housing and SOV commuters to encourage carpooling, transit and other non-SOV alternatives. The 2021 LRDP envisions the availability of an electric bike (eBike) fleet for faculty and staff use, and working with partner agencies on a campus/regional bikeshare program. Parking permit eligibility will be considered as a parking management strategy to reduce parking demand. Any new proposed parking structure will require a business-case analysis to document how a capital investment in parking aligns with the campus' sustainability policies.

As noted in Section 3.8, "Greenhouse Gas Emissions and Climate Change," the UC Santa Cruz Campus Sustainability Plan has a goal of reducing commute travel mode impacts relative to the 2017 baseline by reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022; reducing commute VMT five percent by 2022; and reducing per capita parking demand by 10 percent by 2022. UC Santa Cruz will comply with the strategy of increasing electric vehicle (EV) charging infrastructure/programs to achieve a 4.5 percent mix of zero emission vehicles (ZEVs) for personal commute by 2025. Additionally, the comment does not pertain to the adequacy of the Draft EIR's analysis, and no further response is possible.

Comment O2-29

- Can UCSC encourage more bicycle and electric bike usage by:
 - a. subsidizing staff purchases of bikes and electric bikes;
 - b. equipping existing bike racks with electric bike charging stations?
 - c. offering other incentives to bicyclists as possible?

Response O2-29

UC Santa Cruz's Transportation and Parking Services provides a bicycle lending library for students. The program offers bike loans along with a safety orientation, maintenance assistance, and general support. Recipients also receive a helmet, lock, and set of lights to borrow. Bikes are loaned on a quarter-by-quarter basis, with eligibility determined through an essay application process.

UC Santa Cruz is currently implementing eBike testing, eBike 101 trainings, a 2-week eBike loan for campus affiliates, and collaborating with other agency partners on a regional bikeshare proposal. UC Santa Cruz will evaluate existing and future bike rack locations for feasibility of electric bicycle charging based on demand for such facilities.

UC Santa Cruz will evaluate expansion of existing TAPS bicycle programs and incentives, such as bicycle shuttles, bike locker rentals operated by BikeLink, indoor bicycle parking rooms, bicycle classes, clinics, fix-it stations, lending library, bicycle commuter shower program at East Field House and a 0 percent interest bicycle loan program up to \$1,500. Additionally, the comment does not pertain to the adequacy of the Draft EIR's analysis, and no further response is possible.

Comment O2-30

- Can UCSC reduce all speeds on campus to a maximum of 25MPH to improve bicyclist and wildlife safety and encourage more bicycle commuting?

Response O2-30

The LRDP Physical Planning Principle of Integrated Transportation includes enhanced walking and biking pathways and limiting vehicular traffic. All new roadways are envisioned as multimodal "complete streets" which would embrace design concepts such as traffic calming to encourage more bicycle use. Automobile access restrictions are proposed to prioritize transit, bicycle and pedestrian access and reduce vehicle/pedestrian conflicts. Reducing speed limits on campus roads will be considered, in addition to other potential traffic calming measures, where feasible and enforceable. This comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment O2-31

- Can UCSC redesign existing roads using accepted traffic engineering techniques to induce slower driving speeds to help ensure compliance with lower speed limits?

Response O2-31

Please refer to Response O2-30.

Comment O2-32

- Can UCSC join other local agencies and commit to Vision Zero (<http://relynk.me/visionzero>), in part by committing to include bicycle/pedestrian improvements in all new LRDP projects?

Response O2-32

A commitment to Vision Zero will be evaluated and considered by UC Santa Cruz in collaboration with other regional agencies, and separate from the 2021 LRDP. Further, similar to bicycle and pedestrian considerations noted in Response O2-30, the 2021 LRDP, as shown in Draft EIR Figures 2-8 and 2-9 on pages 2-26 and 2-27, respectively, identify numerous pedestrian and bicycle improvements that would be implemented throughout the LRDP area. 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 O2-33

- Can UCSC continue offering options for students to attend classes remotely when appropriate? Can UCSC commit to a transportation equity policy that emphasizes bicycles, transit, and emission-free vehicles rather than by facilitating ICE vehicles?

Response O2-33

In light of the COVID pandemic and in response to state and county health orders, remote learning and working were implemented to varying levels in 2020 and 2021. UC Santa Cruz will continue to evaluate remote learning opportunities for students as appropriate, but this is not an ideal solution to learning, in general, and in keeping with UC Santa Cruz's objectives of having the campus function as a place where students can learn from their environment and as a center for public cultural life. With respect to transportation equity, refer to Response O2-28. Further, the comment does not pertain to the adequacy of the EIR analysis. No further response is necessary.

Comment O2-34

- New road capacity and auto parking increases VMT, contrary to the intent of California SB 743 (<http://relynk.me/sb743>). Can UCSC commit to address transportation issues on campus via methods other than increasing road capacity and parking capacity?

Response O2-34

The 2021 LRDP does not propose to increase existing roadway capacity, however the 2021 LRDP does propose to restrict vehicular access on roadways in the vicinity of the academic core to prioritize transit, bicycle and pedestrian access. All new roadways are envisioned as multimodal "complete streets" which would embrace design concepts such as traffic calming to encourage and promote the use of sustainable transportation modes, such as transit, bicycling and walking. New roadways are intended to improve internal campus circulation for transit and restrict vehicles within the campus core through improvements at the periphery of campus. The Draft EIR appropriately evaluated the potential increases in VMT associated with 2021 LRDP implementation and determined that impacts would be less than significant with mitigation, due in large part to the required Transportation Demand Management (TDM) Program (Mitigation Measure 3.16-2). The LRDP 2021 TDM Program would include parking management, in part by limiting parking supply on campus for on-campus housing and SOV commuters to encourage carpooling, transit and other non-SOV alternatives.

Letter O3 Valley Women's Club, Environmental Committee for the San Lorenzo Valley

Nancy Macy, Chair
March 3, 2021

Comment O3-1

The Valley Women's Club appreciates this opportunity to comment on UCSC's Long Range Development Plan Draft EIR. Started in 1978, our organization is dedicated to community action, awareness and leadership in environmental, educational, social, and political concerns that affect the health and welfare of the San Lorenzo Valley and our community.

Please find our comments as follows, organized by section.

Response O3-1

The comment is introductory in nature and is noted.

Comment O3-2***Vegetation Communities***

The vegetation communities section 3.5.2 states that the recent "2019 mapping effort was conducted at a coarse scale" and not used because known sensitive natural communities from the 2005 LRDP were not represented, including coastal prairie and northern maritime chaparral. The purpose of the 2019 vegetation mapping project was to produce fine scale vegetation data that would be comparable to that of surrounding counties. The minimum mapping unit is reported to be "a quarter to a half acre" according to a 2020 webcast: <https://youtu.be/QQi88BvwyNk>

The Conservation Network vegetation layer would be comparable if not finer scale than the 2005 layer shown in figure 3.5-2, and it is more recent. This information should be presented and reviewed to determine the actual vegetation, and address any additional concerns raised therein.

Response O3-2

This comment does not accurately represent the introduction to the Vegetation Communities discussion on page 3.5-8 of the Draft EIR. The 2019 mapping from the Conservation Lands Network project was used to generate vegetation community mapping in the LRDP area. This recent mapping was amended with known mapping of sensitive natural communities (i.e., coastal prairie, northern maritime chaparral) from the 2005 LRDP; mapping which was confirmed as still accurate by x biologists at UC Santa Cruz as well as the project consultant team. Adequate vegetation mapping and data was used to determine impacts at a programmatic level per CEQA.

Comment O3-3

In tables 3.5-2 & 3 it is stated repeatedly that many sensitive sandhills species are not expected to occur because the LRDP area “does not contain” Zayante soil habitat or sandhills habitat. However, according to the Santa Cruz County GISWeb, potential sandhills habitat is located within the LRDP area in much of the same area that is identified as Northern Maritime Chaparral. Additionally, there are no soils reports shown for that area: See attached map from the County GIS application.

The project area is also in close proximity to Zayante band-winged grasshopper critical habitat (Figure 3.5-4). Further, under Sensitive Natural Communities on page 3.5-31 the document states “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, including the Northern Maritime Chaparral.”

More detailed vegetation community and soil surveys are necessary to support the conclusion that “the LRDP area does not contain Zayante soil habitat” and “the LRDP area does not contain *sandhills* habitat,” and how to respond if there are *sandhills* issues of concern.

Response O3-3

The output from the Santa Cruz County GISWeb application, which does show sandhills habitat in the LRDP area, is not consistent with multiple sources, including those used in preparation of the Draft EIR (e.g., the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey [<https://websoilsurvey.sc.egov.usda.gov>] and the County of Santa Cruz Information Services Department [<http://purl.stanford.edu/bf413wv4722>]). In addition, and specific to soils within the LRDP area, Section 3.7, “Geology and Soils,” of the Draft EIR does not identify sandhills or Zayante soils in the LRDP area. As a result, UC Santa Cruz considered the information cited by the commenter, but due to the degree of evidence/information that did not identify such habitat, it was not included as part of the EIR’s analysis.

Comment O3-4

Special Status Species

The LRDP zone includes habitat and terrain for 66 special-status wildlife species and 64 special-status plant species, many holding statuses CRPR 1B (Endangered in CA) and known to occur in the development zone.

The LRDP DEIR mitigation measures proposed, regarding mountain lion dens and other carnivores, are inadequate to address potential impacts of construction. They include only a time-limited survey for occupied or potential dens in the specified area within 30 days of commencement of project activities. “If the den is determined to be unoccupied by any carnivore species...no further mitigation will be required.” (ES-36)

However, in 2020 Santa Cruz County suffered the most severe wildfires in its history, directly affecting the forested lands adjoining and surrounding the UCSC campus, including Bonny Doon and the San Lorenzo Valley, and displacing many animal species, resulting in more frequent incursions into the wildland/urban interface areas by animals whose normal patterns of migration, denning, hunting and young-bearing and raising have been substantially disrupted by habitat loss. None of this is accounted for by the DEIR. In 2017, UCSC Professor Chris Wilmers, who runs the Santa Cruz Puma Project, estimated the total mountain lion population of the Santa Cruz

Mountains to be 50-60, each requiring a territory of approximately 50-100 square miles. When mountain lions are displaced from their territories they come into competition with each other and humans for resources, increasing population stress and malnourishment, as well as affecting the animals' ability to successfully reproduce. The DEIR sections dealing with wildlife were drawn up prior to the wildfire season of 2020 and should not be used as reliable guides. They fail to address harm to wildlife and offer mitigations BEFORE such harm occurs. By the time damage to species is observed, it is often too late to ameliorate or correct it. This must be addressed.

Response O3-4

In general, and consistent with State CEQA Guidelines Section 15125, baseline conditions are normally interpreted to be and are expressed in the Draft EIR as the physical environmental conditions as they exist at the time the NOP is published. To provide additional context regarding the 2020 California Department of Forestry and Fire Protection, San Mateo–Santa Cruz Unit (CZU) Lightning Complex fire, Section 4.3.5, "Biological Resources" on pages 4-24 and 4-25 of the Draft EIR has been edited as shown in Chapter 4, "Revisions to the Draft EIR" of this volume. Also see Master Response 4 related to the assessment of wildfire risk provided in the Draft EIR. 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.

As a program-level analysis, the Draft EIR requires all projects under the 2021 LRDP to undergo project-level review, which would include updated data review and project-level biological reconnaissance surveys for sensitive species and habitats, as described in Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR. During this review, the full context, including potential impacts resulting from wildfire, would be considered for future projects under the 2021 LRDP. The comment also states that Mitigation Measure 3.5-2k on page 3.5-61 of the Draft EIR is inadequate but does not specifically identify why it is inadequate. In addition, Mitigation Measure 3.5-2k is required to be implemented prior to disturbance of habitat and mountain lions (individuals and dens) through reconnaissance and other preconstruction surveys and implementation of avoidance measures, as necessary. Further response is not required.

Comment O3-5

Other animals affected by the campus expansion include coyotes, gray foxes, bobcats, bats (including Townsend's bat, western red bats and pallid bats), ringtails, San Francisco dusky-footed woodrats, invertebrates such as the Ohlone tiger beetle (critically imperiled) and amphibians like the California red-legged frog (a federally listed threatened species), deer, and other vital prey animals. UCSC campus also contains the San Francisco Champion, Point Reyes Horkelia, Santa Cruz Manzanita, San Francisco Popcorn Flower and Marsh Microseris, among many others, all listed as State Endangered and all known to occur in the LRDP area. What has made UCSC one of the most important of the UC campuses, for the study of natural sciences, is exactly this abundance of wildlife in a vibrant ecosystem accessible for observation and study. By so extensively altering the natural landscape of its campus the University runs the risk of damaging the very programs which have made it so attractive to students, and so important to preserve.

Response O3-5

This comment does not address the adequacy of the Draft EIR, and further response is not required. 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." 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 O3-6

Karst formations under the campus can, and have created sinkholes when too much or too little water is flowing through them. Will each of the proposed buildings need to have 300 feet of foundational pillars? These karst formations under the campus are also highly susceptible to earthquakes. It is troubling to imagine that so many students and faculty are currently, or in the future, may be sleeping in structures that could be swallowed in the night by a giant sinkhole. This cannot be ignored and should limit construction.

Response O3-6

The issues raised in this comment have been adequately addressed in Section 3.7, "Geology and Soils" of the Draft EIR (e.g., Impact 3.7-5: Increase the Risk of Exposure of People or Buildings to Unstable Conditions Due to Karst Topography, Including Subsidence or Collapse, which begins on page 3.7-27 of the Draft EIR). As noted in Impact 3.7-5, all structures constructed or redeveloped would be required to comply with the California Building Code (CBC), UC Seismic Safety Policy, and UC Santa Cruz Campus Standards Handbook, which require site-specific geotechnical studies and soil engineering reports to address potential karst hazard risks. Because project-specific design requirements and conditions of approval would be incorporated for all development pursuant to the 2021 LRDP, the potential for structural damage due to karst topography would be less than significant. Further, as provided on page 3.7-28, consistency with CBC requirements and taking into account location-specific information provided by geology studies conducted (and to be conducted for individual projects under the 2021 LRDP) by UC Santa Cruz (e.g., UC Santa Cruz Campus Geology Report [UC Santa Cruz 2005]) would require full consideration of potential hazards from dolines, including the potential for collapse of cavern roofs, settlement of doline fill or low density soil zones on top of the marble, and failure or sliding of materials adjacent to the cavities. Foundations adjacent to the solution chambers, and not just those overlying the voids or chambers, are therefore potentially at risk and will be evaluated in the site-specific geotechnical studies and soil engineering reports.

It is unlikely that "each of the proposed buildings need to have 300 feet of foundational pillars" primarily based upon past development over dolines within the LRDP area. It is also impossible to specifically respond to the comment regarding depths of piers for any given building since the site-specific studies that come later have not been completed. The approach of completing site specific studies for specific buildings is typical in regions where geological hazards are ubiquitous. Proposed development in known karst hazard areas has followed the standard protocol of characterizing the geological hazard and attendant risks to the proposed development and then reducing the risk to an acceptable level where warranted with typical engineering solutions (i.e. spread footings with grade beams to span low-density zones, structural mats and post-tensioned slabs, pier and grade beam foundations with either end-bearing or side-wall friction for support, driven piles, geotextile-reinforced compacted fill, pressure or compaction grouting of underlying sediments combined with the aforementioned footings, and deep dynamic compaction).

Site-specific geological, geotechnical engineering and sometimes geophysical investigations are performed in areas where the habitable structures might be underlain by dolines that could present a hazard to the structure. The engineering properties of the underlying soil that are contained in a doline are evaluated by the geotechnical engineer and the team comprised of the geologist, geotechnical engineer and structural engineer look at the strength of the soil and loading created by the building to calculate the settlement and potential ground displacements that could occur under the building. Foundation and/or ground improvements are considered where warranted to mitigate the risk and bring it to an acceptable level.

Comment O3-7

Right now city rental costs are almost unbearable, how can campus employment live nearby? The LRDP commits to housing 100% of new students, and only new students, and to housing 25% of the increase in faculty and staff. It currently costs \$1330 per month for students to use available on-campus housing--nearly \$4000 per month for a 3-bedroom shared apartment--which is driving many to seek cheaper housing off-campus, including in the San Lorenzo Valley, further impacting an already inadequate local housing market. Additionally, the loss of 925 Bonny Doon and San Lorenzo Valley (SLV) residences in the 2020 CZU fire has exacerbated the situation, forcing previously housed SLV residents into the rental market or into houselessness. How will the University ensure not just housing, but affordable on-campus housing for its students, faculty and staff, to reduce the impacts on housing in surrounding communities?

Response O3-7

Section 3.13, "Population and Housing," of the Draft EIR includes an evaluation of potential housing opportunities (with and without the 2021 LRDP) and reflects conditions as a result of the 2020 wildfires. Refer to Master Response 2, specifically the discussion under "Housing Affordability and Other Socioeconomic Conditions" subsection regarding

the consideration of housing affordability for students. The comment does not pertain to the adequacy of the EIR analysis, and further response is not necessary.

Comment O3-8

Right now, traffic rates an "F" around the campus. The LRDP proposes creating a "mobility hub" around its Westside Research Park facility, including bus and shuttle routes, but it does not specify any mitigation for the increased traffic along feeder roads to the hub such as Mission Drive, Swift St., Delaware Ave., and Natural Bridges Drive.

Response O3-8

As noted in Master Response 6 on transportation, level of service (LOS) is no longer considered the appropriate metric for evaluating transportation impacts under CEQA but has been replaced by VMT as the appropriate metric for transportation analyses. Refer to Section 3.16, "Transportation" for an evaluation of transportation, specifically Impact 3.16-2 on pages 3.16-33 through 3.16-38 of the Draft EIR for evaluation of VMT. As a result, the EIR's lack of traffic/LOS analysis is considered adequate, appropriate, and in accordance with CEQA requirements.

Comment O3-9

The LRDP also fails to include any increase in the grossly inadequate number of carpool parking spaces set aside for students and employees. It is currently listed at 50 spaces out of a total of 5,800 spaces on the main campus. The DEIR recognizes the importance of parking policies to reduce SOV auto use and VMT, but it does not specify the number of additional parking spaces required to serve a larger campus.

Response O3-9

As noted in Response O2-2, the EIR's analysis is programmatic in nature. The level of parking to be provided under the 2021 LRDP will be dependent on the type, function, and level of development considered for individual projects, which will be subsequently evaluated (at a project-specific level) within the context of CEQA (as noted in Master Response 10). Additionally, parking or the lack thereof, in and of itself, is not considered an environmental impact subject to CEQA.

Comment O3-10

The failure of the University to supply sufficient on-campus housing also worsens the transportation issue, as it forces students to become commuters, adding more traffic to the area surrounding campus. This is untenable.

Response O3-10

UC Santa Cruz acknowledges the commenter's opinion. Please refer to Section 3.16, "Transportation," where the Draft EIR appropriately evaluated the potential increases in VMT associated with 2021 LRDP implementation and determined that impacts would be less than significant with mitigation, due in large part to the required TDM Program (Mitigation Measure 3.16-2). Mitigation Measure 3.16-2 includes mechanisms for periodic monitoring of the campus generated VMT and incorporation of additional TDM measures if the campus VMT average exceeds those thresholds. The comment does not provide any additional information regarding the inadequacy of the Draft EIR impact analysis or the mitigation measure. As the comment does not address the content of the analysis and 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 O3-11

Wastewater

It is difficult to see how implementation of the LRDP would not exceed the available capacity of existing wastewater infrastructure or require the construction or expansion of treatment facilities or conveyance systems. Like the energy and fresh water networks, climate change is already exposing the potential shortcomings of our existing infrastructure. Long term droughts and intense storms such as the atmospheric rivers already threaten the capacity of the existing sewer system, without increased demand. This must be addressed.

Response O3-11

Section 3.17, "Utilities and Service Systems," specifically Impact 3.17-3 on pages 3.17-36 and 3.17-37, evaluates the potential need for additional facilities/infrastructure beyond that included as part of the 2021 LRDP (e.g., pipeline extensions, connections, etc.) and determines that impacts would be less than significant based on available information related to the current capacity and flows of existing infrastructure. Impacts were determined to be less than significant without mitigation. The comment does not address the content of the analysis and no further response is possible.

Comment O3-12***Water Supply***

The DEIR correctly states that implementation of the LRDP will result in significant, unavoidable impacts. The county is going to run out of water. Currently the county is at less than 50% of normal precipitation for the year, with surrounding population gains, the aquifers continue to be depleted. The damage to surface water sources due to the CZU Wildfire will impact water supply for years, exacerbating limited water supply, becoming impossible to meet demand. This must be addressed.

Response O3-12

UC Santa Cruz acknowledges the commenter's opinion regarding county water supplies, which are not inconsistent with the conclusions of the Draft EIR. No further response is possible.

Comment O3-13***Impacts to Karst Aquifer***

This impact is identified as POTENTIALLY SIGNIFICANT, which should be of concern to all county residents, already dealing with severe water supply issues: "...lowering of aquifer water levels as a result of reduction in recharge due to increased impervious surfaces." (Impact 3.10-5, ES-59) The expansion requires millions of square feet of new paving on campus, as well as expanding from 2 million square ft. of buildings to 5 million; this will affect water runoff, percolation and aquifer recharge enough to be listed as a potentially significant impact. The city of Santa Cruz supplies UCSC with water as a condition of the 1965 charter agreement, but the city itself relies on the surrounding river and watershed systems. The Santa Margarita Groundwater Basin underlies 30 square miles of the Santa Cruz Mountains and on top of it is the San Lorenzo River watershed, which supplies 59% of the city's water. The SMGB has lost an estimated 28,000 acre feet in groundwater storage, resulting in diminished local water supply and reduced sustaining base flows to streams supporting fishery habitats. Although pumping from the SMGB has been reduced by 45% since 1997 and supply and demand have been in balance for the last 10 years, the addition of new residents in the county poses a significant draw on resources, and we are facing current and long-term water deficits due to drought, wildfire, and climate change. The Santa Margarita Groundwater Agency (SMGWA), a joint powers authority comprised of the SVWD, the SLVWD, the County of Santa Cruz, and well-owners, was formed in 2017 to protect and sustain the over-drafted groundwater basin by the development of a Groundwater Sustainability Plan, as required by State law. The GSP must be completed by 2022, and the basin must reach sustainability by 2042. How can the University mitigate the long-term strain on water resources placed on the county of Santa Cruz by its growth from 18,518 current students to 28,000 by 2040, as well as an additional 2200 faculty and staff from its current 2800, for a potential total of 33,000?

Response O3-13

As stated on page 3.17-24, the demand for water supplies would be less than the projected demand from UC Santa Cruz that is already accounted for in the City's 2015 Urban Water Management Plan (UWMP). In regard to groundwater and as noted on page 3.10-18 of the Draft EIR, the LRDP area is not located within the boundaries of the Santa Margarita Groundwater Basin (SMGB), and as such, the procedures for strategic groundwater management and conditions associated with the basin are not considered directly applicable to the Draft EIR's evaluation provided in Impact 3.10-5. As noted in Impact 3.10-5 of the Draft EIR (beginning on page 3.10-33), mitigation measures are identified to reduce the potential for groundwater quality impacts associated with pressure grouting and to ensure that, if groundwater pumping within the lower campus subarea is considered, UC Santa Cruz does not extract groundwater supplies beyond sustainable levels. Further, as noted in Response L9-16, the evaluation of potential

water rights issues would be conducted if future development would necessitate development of a groundwater pumping system. The mitigation, as provided in the Draft EIR, would provide for the long-term protection and availability (to the extent it is within UC Santa Cruz's control) of water supplies within the groundwater aquifer within the lower campus.

Comment O3-14

Findings of previous UCSC LRDPs

Finally, we would like to underline the City of Santa Cruz's findings regarding campus growth resulting from 1988 and 2005 LRDPs as memorialized in the Santa Cruz Municipal Code:

16.22.030 FINDINGS.

It is hereby found and determined as follows:

1. Importance of UCSC. UCSC is a vital part of the Santa Cruz community and provides substantial economic, social, cultural, and intellectual benefits to the community at large.
2. Growth Under 1988 Long Range Development Plan (LRDP) Has Been Excessive. The 1988 LRDP provided for an enrollment increase of four thousand five hundred students, and this increase has caused massive problems for the community, particularly in the areas of traffic congestion, housing costs, and neighborhood livability.
3. 1988 LRDP Housing Mitigation Not Carried Out. The 1988 LRDP contained goals to the effect that the university would house seventy percent of the undergraduate student body, fifty percent of the graduate students, twenty-five percent of the faculty, and twenty-five percent of the staff newly attracted to Santa Cruz. However, the university in 2003-2004 provided housing for less than fifty percent of the undergraduates, about fifteen percent of the graduate students, and approximately twenty-four percent of the faculty and eighteen percent of staff recruited from outside the county of Santa Cruz.
4. Housing Crisis Has Intensified. Housing prices in Santa Cruz are among the highest in the nation. While only one of many factors, university growth and the failure of the university to implement the housing goals in the 1988 LRDP contribute to this crisis.
5. 2005 LRDP Proposes Significant UCSC Growth. According to the Environmental Impact Report (EIR) for the university's 2020 LRDP, the LRDP provides for a four thousand five hundred student increase, for a total student population of nineteen thousand five hundred. Faculty and staff would increase by one thousand three hundred forty over the number of employees in 2003-2004. In total, the increase by 2020 of the campus population would be five thousand six hundred ninety people, bringing the total campus population to twenty-five thousand three hundred twenty-five, almost half of the city's current population.
6. Numerous Significant Unavoidable Impacts from UCSC Growth. According to the 2005 LRDP EIR, UCSC growth would result in ten significant, unavoidable environmental impacts despite the measures included to reduce those impacts, including impacts in the areas of air quality, cultural resources, hydrology and water quality, and noise.
7. Traffic Impacts of Proposed UCSC Growth. The 2005 LRDP EIR traffic analysis findings included the fact that "campus growth under the 2005 LRDP would cause unacceptable levels of service at ten off-campus intersections" and these cumulative impacts were significant and unavoidable.
8. Housing Impacts of Proposed UCSC Growth. The 2005 LRDP EIR found that "development under the 2005 LRDP would directly induce substantial population growth in the study area by accommodating increased enrollment and additional employment" and that this impact was significant and unavoidable.
9. Public Service and Safety Limitations. The proposed university growth, by increasing demand for public services without providing compensating revenues, will severely tax the city's ability to provide adequate police and fire services as well as other necessary public services such as road maintenance, parks, and child care.
10. UCSC Growth Threatens Community Quality of Life. The proposed UCSC growth, by seriously increasing traffic and parking congestion, deepening the housing crisis, placing pressure on city services, and making it

increasingly difficult for families and workers to live in the city, will cause the quality of life throughout the city to significantly decline.

11. UCSC Housing Commitment Inadequate. According to the proposed LRDP's EIR, the university intends to provide housing for about fifty percent of its undergraduates, twenty-five percent of its graduate students, twenty-five percent of its faculty, and three percent of its staff. This represents a significant reduction in the student housing goals contained in the 1988 LRDP and will worsen the housing crisis in the city of Santa Cruz. Moreover, since student housing is unsubsidized and the university has added a number of administrative costs to the housing fees, the on-campus housing costs are unaffordable to many students, resulting in greater student demand for housing in the community, thereby causing an inflationary effect on community rent levels.
12. Limited Water Supply. In normal rain years, the city has a limited supply of water available to serve future growth. The 2005 LRDP EIR found that, as a result of the proposed enrollment growth, in conjunction with other anticipated city growth, the city's remaining supply would be inadequate and it would need to expand its water supply capacity even during normal rain years. In drought years the current water supply serving the city is inadequate to meet existing demand.
13. Emergency Access. The streets leading to the university are so congested that lack of access during emergencies constitutes a public danger. Proposed university growth will significantly worsen this danger.
14. Federal and State Environmental Protection Laws. Past university growth has resulted in potential violations of the Endangered Species Act and the Clean Water Act. Proposed growth will result in additional threats, both on and off campus, to habitats of rare and endangered species and Clean Water Act discharge requirements. (Ord. 2008-19 § 1 (part), 2008).

Response O3-14

The comment cites historic positions adopted by the City with respect to UC Santa Cruz, as codified within the City's Municipal Code. 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 O3-15

In closing, we would ask you to consider, "What will the City's future findings be? And how do you respond to these crucial findings.

Again, thank you for your time and the opportunity to offer comment on the UCSC LRDP DEIR.

Response O3-15

The comment provides a closing statement related to the City's potential position in light of its historic position on UC Santa Cruz growth. 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.

Letter O4 Campaign for Sustainable Transportation

Rick Longinotti, Co-chair
March 4, 2021

Comment O4-1

I notice that our document submitted during the scoping period did not get included in Appendix B of the Draft EIR. I have included it here in addition to our comments on the Draft EIR for the 2021 LRDP.

Could you please reply that you have received this email?

Response O4-1

UC Santa Cruz apologizes for the oversight in omitting the email attachment/memo, dated December 3, 2019, which was provided by the commenter on February 28, 2020. While the attachment was not included as part of Appendix B of the Draft EIR, the suggestions related to trip reduction were considered and are reflected, where appropriate, in Mitigation Measure 3.16-2, beginning on page 3.16-35 of the Draft EIR. This response serves as confirmation that the commenter's Draft EIR comment was received.

Comment O4-2

The Campaign for Sustainable Transportation, organized in 2002, advocates for policies that reduce auto dependency in order to improve the sustainability and social equity of our community. The 2021 Long Range Development Plan would allow growth in student enrollment and number of employees that would result in significant increases in auto travel. Accordingly, our organization is concerned that the Draft EIR does not accurately analyze a reasonable range of alternatives to the LRDP that would result in lower environmental impact. We advocate that the EIR formulate legally binding mitigations of significant impacts such that enrollment growth envisioned by the LRDP is contingent on fulfillment of those mitigations. We propose that UCSC fulfill prior commitments to provide adequate classroom space and infrastructure for the current level of students as a condition for increasing enrollment.

Response O4-2

Contrary to statements in this comment and as provided in more specific comments and responses below, the Draft EIR provides a reasonable range of alternatives, consistent with CEQA requirements. The comment also does not provide any substantial evidence or specific comments to substantiate the opinion that the EIR does not analyze a reasonable range of alternatives, nor does the commenter propose any additional alternatives.

Furthermore, the mitigation measures, as presented in the Draft EIR, would become legally binding requirements upon adoption of a mitigation monitoring and reporting program for the 2021 LRDP, consistent with the commenter's request. The commenter's statement regarding the level of classroom space and infrastructure at UC Santa Cruz is noted but is not considered to address the adequacy of the Draft EIR's analysis. No further response is necessary.

Comment O4-3**P&H 1. The Draft EIR's analysis of housing demand impact should account for the economic multiplier effect**

According to the *Systemwide Economic and Social Impact Analysis (2021)* commissioned by the University of California, "every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs". The EIR needs to analyze the effect on the housing market of the job-generating impact of adding new staff and students at UCSC.

Response O4-3

The evaluation of the potential induced growth that may occur as a result of 2021 LRDP implementation is already provided in the Draft EIR within Chapter 5, "Other CEQA Sections." More specifically, the comment is referred to Section 5.3, "Growth-Inducing Impacts," beginning on page 5-3, which takes into consideration the potential for implementation of the 2021 LRDP to foster growth within the surrounding areas. No further analysis or response is warranted.

Comment O4-4**P&H 2. The Draft EIR's analysis of displacement is inadequate**

The Draft EIR acknowledges "the project would result in a potentially significant impact on population and housing if it would...displace substantial numbers of people." However, the Draft EIR denies that displacement will occur as a result of implementing the LRDP and does not further evaluate displacement:

"No housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people."

The Draft EIR's narrow definition of displacement (removing housing) misses the substantial displacement of economically stressed households that will occur with the increased housing demand due to increased population of students, staff and job-holders in induced jobs. The US Dept. of Housing and Urban Development explains, "Displacement can happen in many ways:

direct displacement, in which residents are forced to move out because of rent increases, building rehabilitation, or a combination of both..."¹

CEQA case law maintains that the statutory goals of the EIR process are thwarted when the failure to include relevant information precludes informed decision-making and informed public participation. The EIR needs to present adequate information on the housing crisis in the Santa Cruz area. The following claim in the Draft EIR suggests that adequate analysis of the housing crisis in Santa Cruz has not been conducted:

"Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff, and non-UC employees for whom on campus housing would not be accommodated."

The Draft EIR does not describe the vacancy rates or provide references. Nor does it analyze factors that might influence vacancy rates other than housing supply.

The EIR needs to more thoroughly analyze *the impact of additional demand from UCSC population growth on existing residents as well as new residents*. The following are some resources to begin to analyze that question.

- According to the *Out of Reach Report* (2019)², Santa Cruz is the least affordable small city in the US.
- According to reports from Apartment List over the last seven years, an average 60% of renter households in Santa Cruz County are cost-burdened (spending over 30% of household income on housing).
- No Place Like Home, a research project of UCSC Professors Miriam Greenberg and Steve McKay, indicates that the rent burden is even worse for households in proximity to UCSC: 73% for the Westside; 68% for Downtown; and 76% for Beach Flats/Lower Ocean.
- State legislation capping rent increases of 5% plus inflation will not prevent displacement. In the four years ending in December 2020, the consumer price index for the San Francisco Bay Area has risen on average between 2%-3%. At a 7% annual increase, the rent of a unit will double in ten years. Few households will experience a doubling of income. Some households will decide to relocate out of the area. Other households will double up in overcrowded units. HUD reports, "Overcrowding is associated with a range of negative outcomes, including for physical and mental health; personal safety and well-being; and childhood growth, development and education."
- For years many UCSC students have coped with unaffordable housing by living in their cars or camping in the woods. Students from low-income households are especially stressed in trying to meet the cost of housing on campus and off campus. The EIR needs to analyze the affordability of on campus housing for low-income students.
- Chapple, et al, *Developing a New Methodology for Analyzing Potential Displacement*

In summary, the EIR needs to analyze the extent to which area housing is unaffordable to large sectors of the community, including UCSC students, and how increased demand resulting from the 2021 LRDP may affect the housing market.

¹ HUD, *Displacement of Lower-Income Families in Urban Areas Report* (2018)

² National Low Income Housing Coalition, *Out of Reach Report* (2019)

Response O4-4

The 2021 LRDP does not prescribe rent increases or building re-habilitation within the City of Santa Cruz or surrounding communities. The 2021 LRDP does provide for on-campus housing for the net increase in anticipated student enrollment above 19,500 and 25 percent of the projected increase in employment. As a result, the Draft EIR

properly evaluates the potential for the remaining increase in employment under the 2021 LRDP and some student enrollment to seek housing outside of the LRDP area. The attempt at connecting this increase to potential increases in rent, however, does not consider the already low vacancy rate in the local area and provides no evidence to support the assertion that increases in rent would occur as a result of the LRDP. Santa Cruz is an attractive community, and its rental and housing prices are affected by a variety of factors, including proximity to a highly paid workforce. As stated by the US Department of Housing and Urban Development:

A growing number of high-income households have moved into the HMA since 2010; 15 percent of all households had incomes of \$200,000 or greater in 2017, up from an inflation-adjusted 10 percent in 2010 (2010 and 2017 ACS, 1-year estimates and estimates by the analyst). A significant proportion of those new high-income households is from the neighboring San Jose-Sunnyvale-Santa Clara metropolitan area, where the median income in 2017 was 49 percent higher, and home prices are significantly higher, than in the Santa Cruz HMA. Net immigration from San Jose increased 27 percent between the 2010-to-2014 and 2012-to-2016 periods. (U.S. Department of Housing and Urban Development 2019.)

Additionally, the assertion that the Draft EIR does not present current vacancy rates is not correct. As shown in Table 3.13-3 of the Draft EIR, publicly available data from the California Department of Finance was used to characterize vacancy rates in the area. Furthermore, the Draft EIR acknowledges on page 3.13-5 that vacancy rates could reflect second-home ownership and other factors, such as some housing in disrepair, contrary to the assertions made in this comment.

For further general discussion of the issue of housing affordability within the context of CEQA, refer to Master Response 2, specifically the discussion under "Housing Affordability and Other Socioeconomic Considerations" subsection regarding the consideration of housing affordability for students.

Comment O4-5

P&H 3. The EIR Needs to Formulate an Enforceable Mitigation for the LRDP's Impact on Housing Demand

The Draft EIR concludes that:

"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."

However, the Draft EIR fails to propose a mitigation of this significant impact:

"No feasible mitigation measures are available to reduce the anticipated impact.... Lesser development and/or lesser enrollment could reduce the potential impacts associated with population growth but would not achieve the anticipated necessary level of development consistent with UC and UC Santa Cruz policy direction."

In formulating a mitigation for the impact of housing demand, the EIR should take into account the principles developed by the Community Advisory Group that the University convened to meet with the Chancellor and take input into development of the LRDP. The first principle (published in the Draft 2021 LRDP) called for "a binding commitment to housing 100 percent of net new on-campus student enrollment." While the LRDP articulates a goal of housing 100 percent of new students, the LRDP makes no legally binding commitment to meet the goal. Nor is there a mitigation in the Draft EIR that would bind the University to the goal. Without mitigations requiring the University to provide the housing that is proposed or tying enrollment growth to the provision of housing, the analysis of the impacts and mitigation measures proposed are inadequate under CEQA.

Similarly, the LRDP intends to "increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus." That is not a binding commitment to provide the housing, only a vague goal to "allow up to" 25 percent of new staff to be housed. The goal is further weakened by the contingency, "based on demand".

The Draft EIR is deficient because it solely analyzes environmental impacts as if the goals for housing students and staff will be met. The assumption of meeting housing goals cannot be substantiated by the terms of the LRDP or any

mitigation in the Draft EIR. Nor does the history of performance on past LRDP goals suggest that the housing goals of the 2021 LRDP will be met. The 1988 LRDP set a goal of housing 70% of undergraduate students, 50% of graduate students, and 25% of faculty and staff. Actual performance never approached that goal. For decades, the actual percentage of students housed on campus has hovered around 50%. According to the Draft EIR, there are currently enough beds on campus to house 50% of the student population (9283 student beds; 18,518 student population (2018-19 baseline). There are 270 on-campus housing units for a faculty and staff population of 2800.

There are formidable structural obstacles to meeting the goal of housing 100% of new students and 25% of new staff. The principle obstacle is the cost of housing on campus. With a dorm room shared by three students costing above \$4000/month (over \$1333/mo. per student), students are motivated to find cheaper (but still expensive) housing off campus.

The DEIR does not describe how providing housing that would be more affordable to students can be accomplished. To the contrary, it fails to include or analyze extensive existing data and information from both the Campus Community Rentals Office and the April 2018 Student Housing Demand Report associated with the proposed Student Housing West Project (SHW) that demonstrate just the opposite: that the University's student housing is not affordable to a large sector of students or competitive with off campus housing.

According to the Campus Community Rentals Office data, average student rental rates are between \$500-\$1,000 per month (as of 2017), less than half of campus rates. On February 7, 2020, during the last pre-pandemic academic quarter, City On A Hill Press reported that according to the University's Associate Director of Colleges, Housing and Educational Services, there were 711 vacant beds on campus, while at the same time there were over 9,000 students living off campus. Proposed rents for SHW units show an increasing disparity between campus and off campus rates. For examples: 2 Bedroom/1 Bath unit with four students, no kitchen,

\$5,580/month; 2 Bedroom/2 Baths, four students, small kitchenette, \$5,880/month; 5 Bedroom/2 Bath, 6 students, \$10,020/month. Without including or analyzing this essential data, the DEIR fails to accurately describe or analyze housing demand and impacts.

Without a credible plan to provide affordable housing, it can be assumed that meeting the housing goal is infeasible. In the absence of an enforceable means of achieving housing targets, the EIR would need to analyze the impacts of the more likely scenario in which the housing goals of the LRDP are not met. However, since it is feasible to mitigate the housing impacts of expansion by limiting enrollment growth, we propose the following mitigation:

Each incremental step in campus enrollment growth shall be contingent on UCSC actually housing 100% of new students and 25% of new faculty and staff.

Response O4-5

UC Santa Cruz acknowledges and shares the commenters concerns about the availability of housing, including affordable housing, for residents of Santa Cruz, including students, faculty, and staff. This is why the 2021 LRDP proposes housing for 100% of all new students above 19,500 and up to 25% of new faculty, staff, and employees. The 2021 LRDP, as proposed for consideration by the UC Regents, is a land use plan that is intended to guide campus development over the next 20 years to meet the needs and goals of UC Santa Cruz and the University of California as a whole. One of those goals is to provide housing to 100 percent of new students; accordingly, the project has been designed to provide that housing. The EIR analyzes the impacts of the project, considering the "whole of the action," which includes development of the proposed housing totals. The EIR analyzes and discloses the reasonably foreseeable environmental impacts of the LRDP based on reasonable, data-based assumptions at a program level, much like a City or County would as part of its consideration of a General Plan. Moreover, the assumption that housing would be provided as proposed is reasonable based on evidence. As noted in Master Response 2, UC Santa Cruz has met or exceeded its housing commitments under the 2005 LRDP CSA year over year.

However, specific development and its sequencing under the 2021 LRDP would be determined over the next 20 years based on the needs of the campus and the UC Santa Cruz community and the availability of funding to support particular endeavors. This inhibits linking housing and enrollment in lockstep with each other. For one, housing cannot be provided on a scale of individual beds or even dozens of beds. In fact, each housing project on campus

provides hundreds of beds, whereas enrollment changes gradually and fluctuates over time. Therefore, it is infeasible to “tie” enrollment to housing production, simply from the perspective of timing. Nevertheless, this does not alter the project or its intended outcome: provide housing for 100 percent of students above 19,500 and for 25 percent of new employees. Accordingly and consistent with the requirement of CEQA applicable to a Program EIR, this EIR evaluates the environmental impacts of the project in its entirety as it will be presented to the UC Regents.

Each individual project proposed under the 2021 LRDP would be subject to CEQA and would undergo additional environmental review. At that time, the specific project would be analyzed in the context of the physical environmental conditions existing at that time as well as other campus projects under consideration. If the assumptions and conclusions in the 2021 LRDP EIR do not adequately address the environmental impacts of the specific project, additional analysis and mitigation may be required, consistent with CEQA requirements (refer to CEQA Guidelines Section 15168(c)). Accordingly, project-specific environmental review and documentation is the best tool to ensure that the conclusions in this EIR are sound and would provide opportunities to further mitigate impacts with regard to housing, if necessary.

With respect to affordable housing, refer to Master Response 2, specifically the discussion under “Housing Affordability and Other Socioeconomic Considerations” subsection regarding the consideration of housing affordability for students. With respect to phasing of the 2021 LRDP, refer to Master Response 9. Regarding mitigation that limits enrollment growth, as explained in the discussion above and under Impact 3.13-1, on pages 3.13-3 and 3.13-4, of the Draft EIR, lesser development and/or lesser enrollment is not feasible mitigation for potential impacts associated with population growth because “it would not achieve the anticipated necessary level of development consistent with UC and UC Santa Cruz policy direction. As a result, and because they would result in substantively different projects, these actions are not considered feasible as mitigation.” Further, a reduced enrollment alternative is discussed in Chapter 6, “Alternatives” of the Draft EIR. In addition, UC Santa Cruz is planning to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP along with additional beds and residences for students that are expected to be provided under the 2005 LRDP as part of the Kresge Housing and Student Housing West projects. The significant and unavoidable determination is conservative based on an abundance of caution due to the unpredictability of the future housing market in Santa Cruz County. Therefore, additional mitigation limiting enrollment to avoid potential housing impacts is not required. Refer also to Master Response 9 under “Plan Implementation” regarding the mitigation measures presented in the Draft EIR and the degree to which these would serve as binding commitments by UC Santa Cruz during implementation of the 2021 LRDP.

Comment O4-6

P&H 4. The EIR Needs to Further Mitigate the Impact on Housing Demand

The Draft EIR concludes that there may be a significant impact on housing demand even though it makes the speculative assumption that 100% of new students and up to 25% of new staff will be housed on campus. If a commitment to house 100% of new students and 25% of new staff were made legally binding, this would not alter the Draft EIR’s conclusion that a significant impact on housing demand remains. Hence there is a need for additional mitigation.

Given the housing crisis in Santa Cruz, we propose an additional mitigation that would require 100% of new students and new faculty and staff to be housed in UCSC facilities. This mitigation would be enforced by a freeze on enrollment growth whenever new student and staff actually housed on campus falls beneath 100%.

Based on the multiplier effect of additional job creation, we conclude that a significant impact on housing demand is likely to exist after implementing this proposed mitigation. To prevent this and other significant and unavoidable impacts, we advocate that the EIR name the No Project Alternative as the preferred alternative. See below.

Response O4-6

The suggestion by the commenter would result in a substantially different project, compared to the 2021 LRDP. It would add approximately 1,700 more residential units, which would increase construction impacts and impacts to aesthetic, biological and other resources, as substantially more development would be needed. The commenter’s

preference for the No Project Alternative is noted. Further and as noted in Master Response 2, CEQA does not require the analysis of economic/social issues.

Comment O4-7

Alts 1. The Draft EIR Fails to Substantiate that the Alternatives Examined Will Not Meet Project Objectives

The Draft EIR examines a No Project Alternative in which enrollment would not grow beyond the 19,500 student cap set by the Comprehensive Settlement Agreement (2008). The concept of no new growth was approved by 77% of Santa Cruz City voters approving Measure U in 2018, which read: "There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP."

The Draft EIR concludes that the No Project Alternative "would potentially meet" project objectives 2, 4, 5, and 7, and does not meet project objectives 1, 3, 6, 8, 9, and 10. Below we list in italics the project objectives that the Draft EIR considers unmet by the No Project Alternative, followed by our critique in regular type.

1. *Expand campus facilities and infrastructure to allow for projected increases in student enrollment through 2040 based on statewide public educational needs and to support the academic mission, including housing for 100 percent of the additional FTE students (above the 2005 LRDP total of 19,500 FTE students) in both colleges and student housing developments, and commensurate academic and support space.*

CEQA law prohibits the formulation of project objectives that are so specific as to disqualify alternatives that could meet the goals of the project. Expanded enrollment at UCSC is not the only strategy available to accommodate projected increases in statewide student enrollment. Other strategies that would meet statewide enrollment goals include:

- Expansion of the UC Merced campus beyond the 15,000 enrollment in 2030 anticipated by its 2020 LRDP. There is a large amount of land under UC ownership for this purpose.
- Establishment of a new campus. The University of California has established only one new campus since 1965, UC Merced, which was approved by the Regents in 1995.
- Increasing enrollment at satellite campuses
- Increasing the ability of students to spend a quarter or more taking online courses.

2. *Potentially met*

3. *Provide for establishment of two new college pairs at the main residential campus to provide academic services and a close-knit intellectual and social environment.*

CEQA law prohibits the formulation of project objectives that are so specific as to bias the alternatives analysis in favor of the project. Objective 3 is so specific as to unnecessarily disqualify otherwise worthy alternatives.

4. *Potentially met*

5. *Potentially met*

6. *Increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus.*

A No Project Alternative should be formulated so as to allow more housing for faculty and staff on campus.

7. *Potentially met*

8. *Develop an improved, more efficient roadway network to support transit with peripheral parking and mobility hubs.*

This project objective is solely formulated for the purpose of supporting the proposed growth envisioned by the LRDP. The LRDP's proposed additions to the roadway network and additional parking facilities are unnecessary if the campus enrollment does not grow. Therefore an alternative should not be disqualified on the basis that it does not allow more growth in parking and streets.

9. *Promote Transportation Demand Management (TDM) and provide infrastructure to optimize trip- and vehicle-miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.*

A No Project Alternative should be formulated so as to allow more TDM programs.

10. *Foster long-term physical and social resilience, including a response to climate change through climate resiliency and adaptation strategies and integrating sustainability leadership into campus teaching, learning, research, design, and operations.*

A No Project Alternative should be formulated so as to foster long-term physical and social resilience, etc.

In summarizing this list, the Draft EIR fails to substantiate that statewide enrollment goals cannot be met through a variety of strategies. The LRDP fails to formulate a No Project Alternative that would allow housing a higher percentage of staff on campus; measures to reduce vehicle miles traveled; and measures to improve physical and social resilience. The LRDP formulates objectives that are so specific as to unnecessarily bias the analysis towards rejection of viable alternatives.

Response O4-7

Regarding the range of alternatives, refer to Master Response 3. With regard to the comments on project objectives, the underlying purpose of the 2021 LRDP is to provide additional classroom and housing capacity for additional students at UC Santa Cruz. This is not an objective that is so specific as to not allow consideration of other alternatives, as several alternatives are evaluated in the EIR. Moreover, the comment suggests that other communities, such as UC Merced, shoulder the burden of additional students, but not Santa Cruz. All universities in the UC system have LRDP's that accommodate additional students. Specifically related to this comment, the consideration of alternatives that involve an expansion of student enrollment related to UC Santa Cruz, in light of projected statewide education needs (UCOP 2020c), is considered appropriate and in accordance with CEQA requirements. The projected student enrollment takes into consideration the initial vision for the UC Santa Cruz campus, historic enrollment trends, and the system-wide increase in enrollment. Further, the potential expansion of satellite campuses is discussed and evaluated beginning on page 6-4 of the Draft EIR. Consistent with the commenter's request, the Draft EIR includes consideration of expansion of four satellite campus and one online learning alternative within this section. In addition, Alternative 4 on pages 6-23 through 6-31 of the Draft EIR, includes an expanded online learning component. As a result, the range of alternatives presented in the Draft EIR is considered reasonable and in accordance with CEQA requirements. Furthermore, the project objectives are not considered impermissibly narrow or biased, as asserted by the comment, because they allow for a reasonable range of alternative to be developed, analyzed, and considered. (See *North Coast Rivers Alliance v Kawamura* (2015) 243 Cal.App.4th 647, 668 (finding that project objectives are narrow when they preclude consideration of reasonable alternatives for achieving the project's underlying purpose).)

Comment O4-8

The Draft EIR further elaborates why the No Project Alternative does not meet project objectives:

The transportation improvements described in Chapter 2, "Project Description," would not be implemented within the LRDP area, which would impede UC Santa Cruz from providing a close-knit intellectual and social environment and improving means of active and alternative transportation within the campus.

The Draft does not explain how *not adding* new roads, parking, and transit stops to the campus would impede UCSC from providing a "close-knit intellectual and social environment". Nor does it explain how the proposed additional transportation infrastructure will improve means of active and alternative transportation. Without credible explanations, these grounds for dismissal of the No Project Alternative are unpersuasive.

Response O4-8

The commenter is referred to Chapter 2, "Project Description," specifically pages 2-21 through 2-30, which describes the integrated transportation strategy of the 2021 LRDP. This would include new transportation hubs, as well as new connections for transit, bicycles, and pedestrians. As stated on page 2-21 of the Draft EIR, the 2021 LRDP's

transportation strategy will “integrat[e] alternative modes of transportation (transit, pedestrian and biking) with peripheral parking to promote a walkable campus core with an interconnected pedestrian corridor spine linking colleges and housing to academic and student support destinations.” This integrated transportation strategy and mobility hubs enhances connectivity within campus for students, including better connection between students in various colleges and residential halls and improving access of students to support services; thus, providing better opportunities for students to connect and interact. All of the suggested improvements are not currently included as part of the 2005 LRDP, and as such it is reasonable to assume that they would not occur; thus, continued implementation of the 2005 LRDP (under the No Project Alternative) would impede UC Santa Cruz’s ability to provide the physical improvements that would create such connections/facilities.

Comment O4-9

The Draft further explains why the No Project Alternative does not meet project objectives:

Additionally, because this alternative would provide a lesser amount of new academic/administrative space, it would limit the ability for UC Santa Cruz to continue to create a dynamic environment for learning and discovery through the provision of new academic programs and disciplines.

While it is reasonable to conclude that more academic/administrative space would increase the breadth of programs and disciplines, the Draft EIR does not explain why those programs should not be made available at a new campus or satellite campuses. The EIR makes an unexamined assumption that larger size and more programs equate to a more “dynamic environment for learning and discovery”. The EIR offers no research or analysis of the relationship between the size of enrollment and the quality of education.

The EIR needs to take into account the research on alienation associated with large institutions. UCSC’s founding Chancellor Dean McHenry wanted UCSC to be a major research university, yet his vision for the small colleges was to encourage intimacy.

Response O4-9

With respect to the potential expansion of satellite campuses, the commenter is referred to Response O4-7, as well as the Draft EIR’s discussion of Alternative 4 and “Alternatives Considered But Dismissed” (beginning on page 6-3 of the Draft EIR). The original vision for UC Santa Cruz was to provide a large university that included several small colleges. One of the project objectives is to continue to provide small colleges versus transitioning to a larger, unidirectional university. The statement in the Draft EIR, as quoted by the commenter, refers to the limited ability for UC Santa Cruz to provide new programs and opportunities without additional programming space. None of these comments address the environmental impacts of the 2021 LRDP.

Comment O4-10

Alts 2. The Draft EIR is invalid under CEQA since the decision on assigning enrollment growth among campuses in the UC System has not been subject to environmental review.

It is not legal under CEQA to segment a project so that the cumulative impacts of the total project are not subject to environmental review. The prior UC decision allocating statewide enrollment growth among the UC campuses means that UCSC’s 2021 LRDP is a segment of a larger master plan.

The Draft EIR asserts that the No Project Alternative does not meet the UC system’s goal of enrollment growth to serve California students:

Student enrollment would be limited to 19,500 FTE students approved under the 2005 LRDP, which would be considered counter to the overarching goal of the UC to provide a dynamic learning environment for residents of California...

Because the 2005 LRDP does not reflect the current planning goals of UC Santa Cruz or the State of California’s public education plans and policies, this alternative would not provide the best framework for growth and development within the LRDP area.

The Draft EIR's assumption is that the University of California's decision to allocate a portion of system-wide enrollment growth to UCSC is indisputable and beyond the scope of the EIR. This sidesteps the CEQA requirement to examine a full range of reasonable alternatives to the dramatic growth in population proposed for the Santa Cruz campus. If UC's policy for distributing enrollment growth had been subject to an environmental impact report, the UCSC's 2021 LRDP would be tiered from that EIR. Since no EIR exists for the UC System's enrollment plan, the EIR for UCSC's 2021 LRDP is not compliant with CEQA.

Response O4-10

The comment suggests that the University of California's projected need to provide quality education to a growing number of people throughout the state is a master plan, subject to CEQA. The University of California "attracts the best and brightest. UC undergraduates ... from all over California, and they work hard to make it to college. In fact, 37 percent of UC students come from low-income families" (UC Website, accessed March 24, 2021). The UC projects statewide education needs but does not dictate or allocate specific growth to specific campuses. Each campus uses the statewide projections to anticipate growth and, through each campus LRDP, identify (on a programmatic scale) the physical development that would be necessary to accommodate such growth. Refer to Master Response 2, specifically the discussion under "Planned Development" and "Growth Projections" subsections.

The UC's forecast of the number of students it needs to serve is not a project under CEQA, but a projection. No physical changes to the environment occur based on the forecast. Rather, changes to the environment occur at individual universities, based on their LRDPs, which provide a land use and planning framework to develop land at the universities and provide student capacity. Each university within the UC system is responsible for its own LRDP, but the UC coordinates with the universities on their LRDPs to ensure that, overall, the forecasted needs are met. The LRDP's of all UC campuses could be argued to cumulatively affect the environment if, in fact, they did; that is, if the development at one campus exacerbated the environmental impacts at another campus or group of campuses. The commenter does not provide any evidence that development of the UC Santa Cruz LRDP would collectively result in greater impacts to the environment when considered along with development at UC Berkeley, UC San Francisco, UC San Diego, etc. Simply stated, these campuses are in different regions of the state, and the only possible impact that could be exacerbated is contribution to global climate change, and that analysis considers overall cumulative growth in California.

As to a reasonable range of alternatives that examine different enrollment scenarios, the 2021 LRDP EIR evaluates Alternatives 1 and 2, which consider reduced enrollment, and the No Project Alternative, which limits enrollment to the 2005 LRDP projected total. This allows for informed decision making, as required by CEQA.

Comment O4-11

Alts 3. An Environmental Impact Report on enrollment growth in the UC system is needed

The assumption that the UC system needs to increase enrollment needs to be reconciled with the latest projections for high school graduation rates conducted by the Western Interstate Commission for Higher Education. California's high school graduation rates are expected to peak in 2024 followed by a steady decline. By 2026 the number of high school graduates will be lower than the number who graduated in 2019. (See the graph below taken from the report.)

The EIR on UC's enrollment plan should account for this decline in high school graduation rates. It should also explain UC policy on admitting out-of-state and foreign students and the impact of that policy on growth projections.

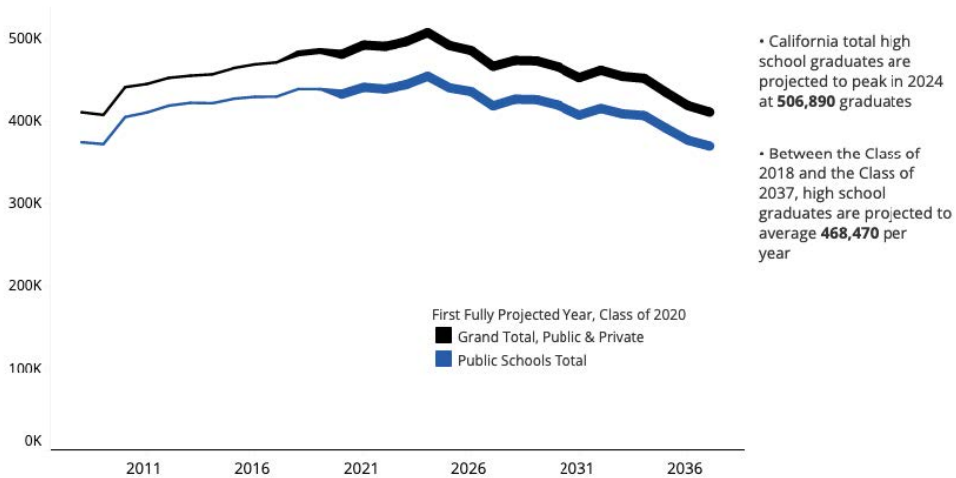
High School Graduates Profile for

California



Projected values are displayed as either thicker or darker in the profile charts. See the notes for more details.

Total & Public High School Graduates, Class of 2008 to 2037

**Response O4-11**

With respect declining enrollment, UC Santa Cruz acknowledges that data has been published recently that suggests declining enrollment is occurring on a national and even regional scale due to 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 estimate of potential new facilities based on the projected enrollment at UC Santa Cruz by 2040 and considers the potential for funding, including through public-private partnerships, part of the overall feasibility of the 2021 LRDP. If enrollment growth does not meet projections, fewer students would attend UC Santa Cruz than are accommodated under the proposed 2021 LRDP, and not as much facility development would occur. The LRDP does not require development of the land uses it includes; it provides a framework to develop campus facilities if they are needed.

Comment O4-12**Alts 4. The Draft EIR Lacks a Reasonable Range of Alternatives**

The Draft EIR names the No Project Alternative as the environmentally superior alternative. All impacts that the EIR considers significant and unavoidable for the 2021 LRDP would be rendered less than significant in the No Project Alternative. The Draft EIR considers three alternatives besides the No Project Alternative. None of those three alternatives have been designed to eliminate the water, housing demand, and other impacts that the EIR names as significant and unavoidable. The EIR should correct this deficiency and formulate alternatives that significantly reduce or eliminate those impacts.

Response O4-12

As provided in Section 15126.6 of the CEQA Guidelines, “[a]n EIR shall provide a range of reasonable alternatives to the project, ... which... would avoid or substantially lessen any (emphasis added) of the significant effects of the project...” The Draft EIR’s range of alternatives, including the No Project Alternative all address reductions in environmental impacts and, along with consideration of other alternatives that were not evaluated in detail for reasons explained in the EIR, provide for informed decision making and permitting a reasoned choice, as required under CEQA. Also refer to Master Response 3.

Comment O4-13

Among the alternatives considered, but dismissed from further consideration is an expansion of UC's MBEST facility at Fort Ord. The reasons for dismissing this option are not substantiated. The Draft EIR states:

The development of a full university campus at MBEST and the addition of another UC campus to the UC system is not considered feasible at this time, given State fiscal constraints.

CEQA case law requires that an EIR must provide substantial evidence why it is not fiscally feasible to pursue an alternative. In this case, this evidence must reconcile this claim of fiscal infeasibility of a new campus or expanding the MBEST campus with the fiscal feasibility of building an additional 5.6 million square feet of building space on the UCSC campus, which is 1.5 times the amount of new building space as currently exists on campus.

Response O4-13

The Draft EIR's determination regarding the financial feasibility of Alternative 4, contrary to the assertions made in this comment, was based on the anticipated level of enrollment, preliminarily anticipated financial costs, and historic costs incurred within the UC system (including the development of UC Merced between 2002 and 2005.) Additionally, the development of UC Merced as a full university campus occurred approximately 17 years after the UC Regents recommended the addition of another campus. In addition, and as noted on page 6-25 of the Draft EIR, the use of UC Monterey Bay Education Science & Technology (UC MBEST) would also require students and employees to travel to an off-site location for academic support and instruction, which would conflict with the objective supporting compact and clustered development, as well as convenient access. In the same location, the Draft EIR also notes that, due to spacing requirements, on-campus student housing would not be available for students at UC MBEST, which would also conflict with objectives related to student and faculty housing.

Comment O4-14

Trans 0. The Draft EIR's choice of VMT per capita as a performance standard is not consistent with state and UC goals for greenhouse gas emissions reduction

California has set a goal of reducing greenhouse gas emissions 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 (SB 32 and AB 32). While lead agencies are given leeway in choice of performance standards for a project's transportation impacts, the Draft EIR's choice of vehicle miles traveled per capita serve to mask large increases in total greenhouse gas emissions that will result from the project. The EIR should plainly state the estimated total increase in vehicle miles traveled and greenhouse gas emissions resulting from the project. Failure to do so prevents the public from understanding the large amount of ghg emissions that contribute to a cumulatively significant climate change impact.

Response O4-14

The comment's suggestion that VMT should not be used to evaluate transportation impacts is inconsistent with the CEQA Guidelines: "Land Use Projects: Vehicle miles traveled exceeding an applicable threshold of significant may indicate a significant impact." (CEQA Guidelines Section 15064.3) The use of VMT per capita as a threshold is a widely accepted and recommended metric to comply with this guideline and is interrelated to GHG reduction goals (see California Governor's Office of Planning and Research's [OPR] Technical Advisory on Evaluating Transportation Impacts in CEQA [2018]). In compliance with this Guideline, adopted in 2018, both the County and City of Santa Cruz have adopted VMT per capita thresholds for use in CEQA documentation. The EIR plainly states the estimated GHG emissions associated with the 2021 LRDP and UC Santa Cruz, in general, within Section 3.8, "Greenhouse Gas Emissions and Climate Change," and projected VMT (both total and per capita) in Table 3.16-6 on page 3.16-34 of the Draft EIR.

Comment O4-15

The California Air Resources Board's 2017 Scoping Plan states, "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." The Scoping Plan does not require net zero emissions. However, it places the burden on a project that does not achieve net zero emissions to "develop evidence-based numeric thresholds (mass emissions, per capita, or per service population) consistent with this Scoping Plan, the State's long-term GHG goals, and climate change science." The

Draft EIR fails to meet this requirement. There is no evidence that the per capita emissions targets will result in reduced ghg emissions commensurate with state goals as legislated in SB 32. The EIR must be able to prove that the choice of per capita emissions does not mislead the public that this project will not create a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

Response O4-15

It is unclear to what threshold (as used in the Draft EIR) is being referred to in this comment. As noted on page 3.8-18 of the Draft EIR, per-capita emissions thresholds were not used to evaluate the potential impacts of the 2021 LRDP.

Comment O4-16

The University of California has signed the American College and University Presidents Climate Commitment (ACUPCC). Each signatory commits to completing an inventory of GHG emissions within one year, and to developing, within two years, an institutional plan to achieve carbon neutrality as soon as possible. This EIR should incorporate UCSC's plan for carbon neutrality. It should be noted that even if all projects in the State of California adopted a goal of carbon neutrality, we would fall short of the SB 32 goal of reducing ghg's 40% by 2030. Nevertheless, a carbon neutrality goal for UCSC transportation is an achievable and worthy goal. We therefore propose that an achievable mitigation most aligned with state and UC goals would be: *Achieve net zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.*

Response O4-16

Carbon neutrality goals, as well as the UC Sustainable Practices Policy, which requires carbon neutrality for Scopes 1 and 2 emissions at all UC campuses prior to SB 32's 2030 goal, is already incorporated as part of the EIR's analysis. Refer to 3.8-8 through 3.8-11 and Impact 3.8-1, beginning on page 3.8-21 of the Draft EIR. Furthermore, as described in Impact 3.8-1 on pages 3.8-21 through 3.8-26 of the Draft EIR, UC Santa Cruz has committed to meet and exceed State-mandated GHG reduction goals and meet UC sustainability goals (as established by the UC Sustainable Practices Policy) of net zero GHG emissions by 2050, and the 2021 LRDP will comply with these mandates. Additional mitigation beyond what is provided in the Draft EIR is not considered necessary to reduce the significant impacts associated with implementation of the 2021 LRDP, and this comment provides no evidence to dispute the EIR conclusions. Refer to Master Response 5 Greenhouse Gas Emission Reductions for additional information regarding UC Santa Cruz commitment to carbon neutrality.

Comment O4-17

Trans 1. The Draft EIR fails to analyze the vehicle miles traveled impact of new roads on campus CEQA requires that agencies must analyze:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project's consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)³⁴

The Draft EIR describes the plan for additional roads on campus, including a new northern entrance to campus. The Draft EIR fails to analyze the increased Vehicle Miles Traveled that would result from the additional roadways. This would require a traffic study. The Draft EIR should use current methods of estimating induced travel resulting from new roadway mileage.

Response O4-17

As described in Impact 3.16-1, the new on-campus roadway connections and new northern entrance from Empire Grade would be supplemented by vehicle access restrictions on limited portions of several campus roadways and new pedestrian/bicycle corridors, to achieve a more inter-connected campus for all modes. The impact discussion notes that the new connections will serve to shorten on-campus trips and thus reduce VMT relative to a condition without these connections. The impact also notes that the new northern entrance would not induce vehicle traffic

growth, because virtually all campus traffic must pass through existing intersections to the south. The new northern access would provide for shorter trips to and from the northern area of campus as compared to existing routes, reducing VMT. It is noted that the OPR guidance document *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018a) provides considerations for the evaluation of roadway projects and suggests that roadways that improve connectivity as opposed to adding capacity may be considered to reduce as opposed to increase VMT. In addition, *Transportation Analysis Under CEQA, First Edition* (Caltrans 2020) states that certain transportation project types, including “addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, bicyclists, and, if applicable, transit” may be unlikely to lead to a measurable and substantial increase in vehicle travel, and thus could potentially be screened from VMT impact analysis. The proposed new roadway connections in the LRDP would function as collectors for campus traffic and would include multi-modal design elements to serve pedestrians and bicyclists. Thus, the Draft EIR’s calculation of VMT for the 2021 LRDP is adequate, and no further analysis is required.

Comment O4-18

Trans 2. The Draft EIR fails to analyze the impact on the transit system of new roads on campus

CEQA requires an analysis of the impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)

The Draft EIR does not analyze the potential for a negative impact on the bus transit system of adding roads to campus, which would necessitate additional loops in transit service. Transit planners understand how adding a forking branch to a bus line diminishes transit frequency downstream of the branch (as bus service is split between branches). This has an adverse impact on travel time and ridership. See *Human Transit*, by Jarrett Walker

Instead, the Draft EIR makes the claim that the new roadway system and transit stops will increase the efficiency of the transit system. The EIR should either drop this claim, or substantiate it by demonstrating how transit service will operate.

Response O4-18

The commenter cites a section of CEQA that addresses transit-oriented infill projects, which are specifically defined in Public Resources Code 21099, however the 2021 LRDP is not such a project. Further, this section of CEQA statute has no requirement to evaluate impacts of transportation projects on multimodal transportation networks. In discussing the requirement that OPR develop new guidelines address “the significance of transportation impacts in transit priority areas...those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Public Resources Code Section 21099(b)(1)) This statutory language does not suggest or require an analysis of impacts on multimodal transportation networks, Nevertheless, this issue is addressed in the EIR. The discussion under Impact 3.16-1 notes that the LRDP’s proposed extension of Meyer Drive will facilitate more efficient on-campus transit service by providing a more direct east-west option for shuttle service; this is considered substantial evidence. The proposed new northern entrance would not necessarily be served by campus shuttles, and thus would not represent a new service branch which would make shuttle services less efficient. UC Santa Cruz manages the campus shuttle system to serve the campus’ transportation needs as it grows, and shuttle frequency and efficiency, and other mobility options to serve these areas are key considerations in that process. No information is provided in the comment to dispute this conclusion.

Comment O4-19

Trans 3. The target for reduced vehicle miles traveled is inconsistent with goals of the Campus Sustainability Plan

The Draft EIR claims that Mitigation Measure 3.16-2 “is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022.”

This statement is not accurate. This mitigation measure intends to “reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average.” Reducing VMT *per capita* is not the same as reducing total commute vehicle miles traveled.

Response O4-19

The VMT reduction portion of the goal is the one that is relevant to Impact 3.16-2, which is a VMT-based transportation impact analysis consistent with OPR guidance document *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018a). The analysis under Impact 3.16-2 is required to assess the VMT impacts of the project and is not required to demonstrate how the project would or would not meet the goals of the Campus Sustainability Plan. The discussion under this impact rather describes how the VMT reducing elements of the project are aligned with the goals of the Campus Sustainability Plan, in that they are expected to reduce, as opposed to increase, the VMT generation rate of the campus as a whole. In addition, as stated on page 3.16-35, Mitigation Measure 3.16-2 requires UC Santa Cruz to prepare and implement a TDM program as part of the 2021 LRDP. The TDM Program is intended to reduce the total daily VMT per capita to 15 percent below the baseline campus average and the employment VMT per employee to 15 percent below the countywide average. This mitigation measure is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022. Therefore, the 2021 LRDP complies with the Campus Sustainability Plan.

Comment O4-20

Goal #3 of the *Campus Sustainability Plan 2019 Update* calls for "reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022. The Draft EIR does not address this goal. Nor will it be possible to achieve this goal with the implementation of the 2021 LRDP, which will result in increased commuter trips to campus.

Response O4-20

The Draft EIR identifies this goal on page 3.8-11 of Section 3.8, "Greenhouse Gas Emissions and Climate Change". The 2021 LRDP is currently anticipated to be considered for approval in the fall of 2021, with initial design and construction of facilities under the 2021 LRDP being initiated in 2022. No new facilities would be constructed under the 2021 LRDP prior to the end of 2022. As a result, the exact timing (i.e., by 2022) of this goal would not apply to any actions associated with the 2021 LRDP. However, the LRDP would require further reduction of single-occupancy vehicle trips to UC Santa Cruz through implementation of the TDM Program (refer to Mitigation Measure 3.16-2), which is considered to be consistent with the direction and trajectory identified in Goal 3. Further, the goals and policies established in the 2019 Campus Sustainability Plan are considered to be a furtherance of the UC Sustainable Practices Policy, which is addressed in the Draft EIR.

Comment O4-21

Trans 4. Mitigation Measure 3.16-2 needs to be made enforceable regarding parking goals.

Mitigation Measure 3.16-2 includes, "Establish 'no net new commuter parking'". The EIR should further define net new commuter parking or how it would be measured. It should also articulate consequences should the goal not be met, such as a moratorium on enrollment growth.

Response O4-21

The title of this measure describes its intent, which is to not increase parking available to new commuters. This mitigation measure provides a menu of items that the campus can consider in development of its TDM program, and this is one element that will be considered in the development of the VMT reduction strategy.

Comment O4-22

Trans 5. New parking planned in the 2021 LRDP is inconsistent with Mitigation Measure 3.16-2 and the UC Sustainable Practice Policy

The LRDP's proposal "to provide some new commuter parking for staff, faculty and students," runs counter to the goal of no net new parking demand. You cannot simultaneously provide more parking and reduce parking demand. A recent study by Adam Millard Ball et al demonstrates that the provision of parking induces additional vehicle ownership, and results in more driving.

The *University of California Sustainable Practices Policy* states:

Each location shall develop a business-case analysis for any proposed parking structures serving University affiliates or visitors to campus to document how a capital investment in parking aligns with each campus' Climate Action Plans and/or sustainable transportation policies.

The Draft EIR does not explain how the capital investment in parking aligns with the *Campus Sustainability Plan* or other campus sustainable transportation policy.

Response O4-22

The 2021 LRDP identify the potential for some new (although largely redistributed) commuter parking to focus commuters parking along the periphery of the academic core to serve the commuters expected with the 2021 LRDP. Further, the UC Santa Cruz Campus Sustainability Plan establishes a goal of reducing per capita parking demand, which (by limiting further parking development) would not be inconsistent with the 2021 LRDP. Further, the Draft EIR proposes, as Mitigation Measure 3.16-2, a TDM program that, as part of on-campus parking management strategies, could include further restrictions on commuter parking. This measure would modify campus parking restrictions in order to achieve a portion of the VMT reduction target described in Mitigation Measure 3.16-2 of the Draft EIR. Mitigation Measure 3.16-2 describes the TDM program development process, performance standards, and monitoring process.

Comment O4-23

Trans 5.1 The Draft EIR does not incorporate the goals of the UC Sustainable Practices Policy, which states:

- Each location shall strive to reduce its percentage of employees and students commuting by single occupancy vehicle (SOV) by 10 percent relative to its 2015 SOV commute rate and have at least 4.5 percent of commuter vehicles be ZEVs by 2025.
- Each location shall strive to have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV and have at least 30 percent of commuter vehicles be ZEVs by 2050.

The Draft EIR should explain how these goals will be implemented, and what the consequences will be for failing to reach the goals.

Response O4-23

UC Santa Cruz has committed to meet and exceed State-mandated GHG reduction goals and meet UC sustainability goals (as established by the UC Sustainable Practices Policy). Refer to Master Response 5 regarding Greenhouse Gas Emissions and Mitigations. As described in Impact 3.16-2, the 2021 LRDP will reduce the total campus VMT per capita relative to the 2019 baseline level, which demonstrates the expectation that the net effect of vehicle travel by all campus commuters and residents will decrease on a per-person basis as the result of the 2021 LRDP. This would be achieved through the provision of EV charging; transit, bicycle, shuttle, and vanpool subsidies; parking management; and the proposed mobility hubs to be located throughout the LRDP Area. Further, Implementation of Mitigation Measure 3.16-2 would require further measures (e.g., alternative work schedules, expanded vanpool programming, peak pricing, and transit coordination) and annual monitoring of measure effectiveness so as to further reduce VMT per capita, consistent with the UC Sustainable Practices Policy. The 2021 LRDP intends to build on existing TDM programs that reduce the number of single occupant vehicle trips made to campus (and the distance they each need to travel – VMT) and for those remaining auto trips, to shift as many as possible to ZEVs to further reduce GHG emissions.

Comment O4-24

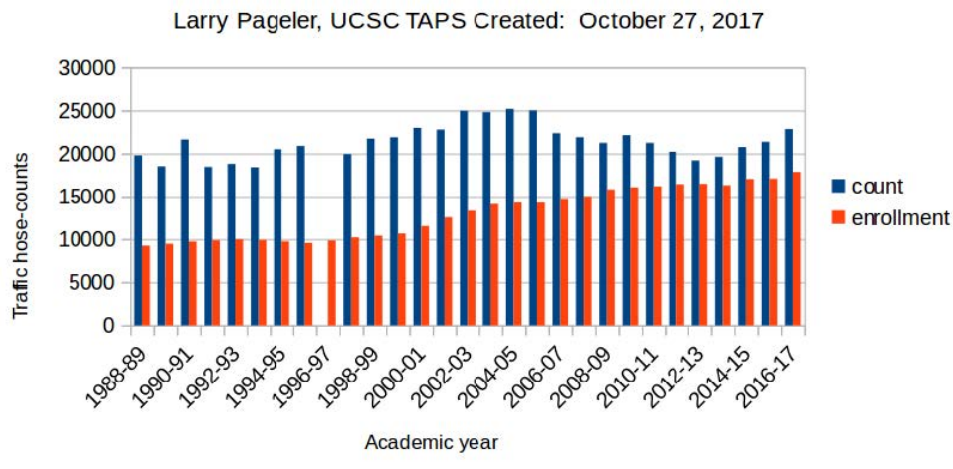
Trans 6. The Draft EIR lacks essential information about parking and commute trips to campus

The Draft EIR acknowledges the importance of parking policy to achieve goals for reducing VMT. Yet the neither the LRDP nor the Draft EIR specifies the number of additional parking spaces proposed.

The Draft EIR presents the number of vehicle trips to campus for one year, spring 2019. The Draft should include information about prior years in order to observe the trend of vehicle trips to campus. The graph below shows the history of trips to campus (blue bars) compared to student enrollment (red bars). It shows that vehicle trips increased to a peak in 2003-2006, and subsequently declined until 2013. Since 2013, vehicle trips to campus are growing at a faster rate than student enrollment.

The EIR should analyze whether this disproportionate growth in vehicle trips results from longer student and staff commutes as a result of the lack of affordable housing near campus. The EIR should present any other information available on the distance commuters are traveling.

Term Weekday Vehicle Traffic through Both UCSC Entrances: Academic Year Ave



Response O4-24

As noted in Chapter 2, "Project Description" of the Draft EIR, parking would be limited for on-campus housing and SOV commuters through changes to parking policies, pricing, and convenience to encourage carpooling, transit, and other non-SOV alternatives. As required by Mitigation Measure 3.16-2, UC Santa Cruz shall develop and implement a TDM Program, which will identify specific TDM strategies that UC Santa Cruz will implement to reduce campus related vehicle travel. In addition, the mitigation measure provides the expectation that vehicle trips must be reduced and that some TDM strategies are likely to be more effective than others given the nature of the impact. A key reason that UC Santa Cruz is developing a tailored TDM Program is to fully evaluate and then implement and adaptively manage a wide variety of TDM strategies to achieve the 15 percent reduction in per capita VMT over baseline to a maximum of 7.7 VMT per capita. Understanding which strategies will be the most effective requires comprehensive analysis of faculty/staff, student, and visitor travel patterns. Regarding the request for an analysis of commute trends and travel distances, UC Santa Cruz monitors commute characteristics and adjusts its transportation programs to meet student and staff commute needs as they change over time. Trend information is not presented in the Draft EIR because the analysis is based on baseline (2019) conditions. Refer to Master Response 1 baseline conditions for the 2021 LRDP EIR.

Comment O4-25

Trans 7. Mitigation Measure 3.16-2 fails to be legally binding and enforceable

CEQA Guidelines require that mitigations be legally binding and fully enforceable.

This mitigation measure is intended to reduce the impact of increased vehicle miles traveled (VMT) to a less than significant level. It calls for implementation of a Transportation Demand Management Program, intended to reduce total campus per capita vehicle miles traveled to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average. As currently drafted, the mitigation measure imposes no consequence for failing to achieve the performance standards for reduced VMT, other than the following:

“an outline of additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years should the VMT performance standard of at least 15 percent below baseline VMT levels is not reached.”

Note that there is no timeline for implementation of corrective measures other than the vague “in subsequent years”. Without language to make this mitigation measure enforceable, such as a moratorium on increases in student enrollment until the VMT performance standards are met, it is quite possible that the campus will never achieve the performance standards.

Response 04-25

UC Santa Cruz is committed to implementing the mitigation measure and complying with the performance standards, monitoring, and corrective actions if and when needed. Further, the mitigation measure, as provided on page 3.16-35 of the Draft EIR provides specific timing for the initiation of the program and the performance metric for the program to achieve. In addition, the mitigation measure requires implementation of an annual monitoring component with requirements for implementing corrective/additional actions as part of the program. As such, the mitigation measure is considered to be appropriate, adequate, and in conformance with CEQA requirements. UC Santa Cruz does not agree that a development moratorium as a consequence for not meeting the VMT reduction goals in a given year is a necessary element to make the mitigation measure effective.

Comment 04-26

Trans 8. Mitigation Measure 3.16-2 lacks simple and transparent performance criteria and a monitoring program that can be independently evaluated.

The Draft EIR proposes a mitigation to reduce vehicle miles traveled and a monitoring program to report performance. However, the method for calculating VMT reductions is so highly complex as to be inaccessible for independent review. Likewise, the cell phone data necessary to make those calculations is inaccessible to the public. No agency or members of the public will be able to independently assess the University’s adherence to their performance criteria. Consider the complexity of measuring performance described by the Draft EIR:

The VMT metrics presented in this chapter were developed using the SCC Travel Model, while the annual monitoring would occur using data collection. Based on current technologies, the campus’ VMT performance could be most effectively monitored by using hose counts to measure the number of trips and anonymous cell phone data, which is “big data” that aggregates trip data using cellphones and navigation divides, to determine trip lengths. Since current technologies, including anonymous cell phone data, do not allow the tracking of employment trip lengths separately from the trip lengths generated by other campus uses (i.e., residential trips), the TDM Program shall develop a performance standard for the employment VMT threshold that is a weighted average of VMT generated by campus commuters and other campus users.

The Draft EIR gives no indication of how any agency or member of the public would be able to access anonymous cell phone data. And reliance on a travel model can result in gross inaccuracies, as the Draft acknowledges:

The Santa Cruz County Model overestimates by approximately 200 to 400% the number of trips generated by resident students and by both the resident and commuter faculty compared with the UCSC tool. The model also underestimates by 90% the trips generated by commuter students.

CEQA Guidelines allow the use of a travel model to estimate vehicle miles traveled from a project. And a lead agency “may revise those estimates to reflect professional judgment based on substantial evidence.” The Draft EIR fails to provide substantial evidence that the revisions that were made in the model can accurately assess vehicle miles traveled in future years. No substantial evidence will be available for several years, since such a complex model is a work in progress, needing continual revision to match existing conditions. The Draft EIR lists revisions to the model that diverge extremely from the model’s original assumptions, e.g.:

- The SCC Travel Model’s commuter student trip rate was increased from 0.22 trips per commuting student to 1.83 trips per commuting student and the resident student trip rate was decreased from 6.31 trips per student to 2.06 trips per resident student

- Campus employees in the SCC Travel Model were estimated at 6.88 daily person trips per employee. This was reduced to 1.8 trips per employee.

The DEIR transportation analysis assumes that 100% of additional students will be housed on campus, but does not offer any analysis of how VMT calculations, resultant impacts, and necessary mitigations will vary in relation to percentage of students actually housed on campus. Not reaching the goal of housing 100% of additional students on campus is a reasonably foreseeable event based on both the past history of campus student housing percentages and the relatively high price of campus housing.

Given the Draft EIR's a) failure to analyze impacts associated with actual percentages of students housed on campus; b) inability of the revisions in the model to be empirically evaluated at this time and c) the inability of the public to independently assess UCSC's compliance with vehicle miles traveled performance, this mitigation fails to be enforceable. We propose a mitigation where monitoring is simple and can be carried out by the City of Santa Cruz:

Proposed Mitigation: Achieve net zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.

Capping the number of vehicle trips to campus would achieve the goal of reducing VMT per capita below significant levels, since growth in person-trips would not result in increased vehicle trips. We know it is feasible to prevent an increase in vehicle trips due to growth through the experience of Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new peak hour vehicle trips to campus. Since 2001, periodic traffic counts at each entrance to campus confirm that Stanford has complied with this condition. During the following 14 year period, 5000 additional people commuted to campus, but peak hour vehicle trips did not increase, according to the former Director of Stanford Parking and Transportation Services.

See the attached article *Getting to Zero New Vehicle Trips for the LRDP* for further discussion of how this mitigation could be implemented.

Response O4-26

The comment accurately describes the Draft EIR's description of the limitations of the Santa Cruz County Travel Demand Model's capability to reflect the unique transportation characteristics of UC Santa Cruz. The Draft EIR's proposed TDM Program (Mitigation Measure 3.16-2) would address these issues: most importantly, it proposes that the monitoring be based on real time data on a year over year basis, as opposed to measuring campus performance with a travel demand model which is not calibrated to accurately reflect incremental changes in housing and employment on the campus and in the surrounding region. The real time data will include traditional "hose" counts of traffic entering and exiting the campus, as well as the noted cell phone data to provide insight on trip lengths for those vehicle trips. Address data for employees may also be used to determine trip lengths. The monitoring reports will provide the raw data which can be reviewed by independent reviewers, and the data vendor(s) can be made available for questions. While the comment is critical of this approach, it is based on real data rather than assumptions in a model and is therefore a more accurate measure by which to determine mitigation performance. The Stanford trip cap affects only peak hour trips, as opposed to daily trips, as it was imposed when peak commute hour congestion was the transportation impact metric. Such a trip cap would not substantively address the daily VMT, however UC Santa Cruz may include monitoring and reporting of campus trips in support of a performance standard, should such data provide a substantive benefit to reducing VMT. The 2021 LRDP's proposed Integrated Mobility Strategy, combined with the Draft EIR's TDM Program and Monitoring, provide a more appropriate and effective mechanism for minimizing the VMT generated by the 2021 LRDP.

Comment O4-27

Trans 9. The EIR should analyze and recommend complete neighborhood strategies for trip reduction.

Under the heading, Complete Neighborhoods, the City of Santa Cruz General Plan states, "Residents...need stores nearby so that they don't have to drive across town to do laundry or buy a few groceries." The Draft EIR assumes a high number of vehicle trips due to on-campus residents traveling off campus to meet their needs. The LRDP should designate areas for on-campus food shopping, hair salons, and other amenities.

Response O4-27

UC Santa Cruz provides many services to campus residents, including meal plans, food/drink resources, and laundry facilities, among other resources. UC Santa Cruz provides these resources within the constraints of its mission as an educational institution. The 2021 LRDP includes a considerable level of development of administrative and support facilities, intended to provide on-campus residents with various needs and wants. As stated on page 2-17 of the Draft EIR, the Colleges and Student Housing land use includes academic space as well as residential amenities such as dining halls, food service, community rooms, social and study spaces, administrative support and allow support services. Similarly, as stated on page 2-18 of the Draft EIR, the Employee Housing land use designation includes childcare, recreation, public services, and other community amenities. Regarding the number of vehicle trips referenced in the comment, the trip estimates provided in the Draft EIR are based on a combination of the trip generation rates of the service population and SCC Travel Model trip assignments, and verified through campus traffic counts, as stated on page 3.16-29 of the Draft EIR. As a result, and considering the level of on-campus services currently provided, these estimates are considered to be reasonably conservative and appropriate for the purposes of evaluation under CEQA.

Comment O4-28

Trans 10. The EIR should analyze the structural obstacles to implementing transit improvements and propose solutions

Transit costs fall on students disproportionately compared to other campuses. Stanford uses parking revenue to pay all public transit costs for students and staff. At UCLA there is no student fee for transportation. Instead, parking revenue subsidizes bus passes available to students at \$33 per quarter (2018). At UCSC there is no parking revenue used for student transit. Students pay for METRO passes and the campus shuttle through a quarterly fee.

The cost burden on students sets a practical limit on expansion of bus service. Under the current manner of financing transit, UCSC students will need to vote a fee increase, just to maintain current levels of service. In Spring 2018 a fee increase measure did not pass due to student voter turnout lower than the required 25%. Due to the failure to raise revenue, UCSC has cut back on campus shuttle service. Given the steepness of the fee increases proposed in the 2018 measure, it is unlikely that a student vote to increase fees can be counted on to fund the expanded METRO service envisioned by the Draft EIR.

The EIR should analyze a policy of using parking revenue to substantially support transit and TDM programs.

Response O4-28

The comment is noted. The Draft EIR is not required to analyze the potential effects of instituting a policy of using parking revenue to substantially support transit and TDM programs as it is not part of the proposed LRDP and is not required to mitigate a significant impact. However, UC Santa Cruz will consider this in its development of the overall TDM Program described in Mitigation Measure 3.16-2.

Comment O4-29

Trans 11. Additional TDM measures for inclusion in the EIR

The Draft EIR's Mitigation Measure 3.16-2 enumerates a number of Transportation Demand Management Measures that UCSC could utilize to reduce vehicle trips to campus. Based on research on the effectiveness of TDM policies, we conclude that the most effective measure on this list may be:

- Replace monthly/annual parking fee with "pay at exit" use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.

We note that this measure is listed for "Implementation level 2". Since this is a policy that could be implemented immediately, we recommend that it be designated for level 1 implementation.

Response O4-29

The comment is noted. UC Santa Cruz will consider the parking measures described in the comment as part of its implementation of Mitigation Measure 3.16-2, "Implementation Level 1." This change is reflected in Chapter 4,

"Revisions to the Draft EIR" of this volume but 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.

Comment O4-30

Additional TDM measures could include:

- UCSC collaboration with a private vendor for a bike-share and/or scooter/share program
- Collaboration with the City of Santa Cruz in placement of a fee for ride-share trips (e.g. Uber & Lyft)
- Exploration with the City of Santa Cruz of a congestion pricing program and/or City tax of on-campus parking to pay for transit and active transportation improvements in the City.

Response O4-30

The comment is noted. UC Santa Cruz will consider these measures when developing the TDM Program as part of Mitigation Measure 3.16-2. Although ride-share trips, such as carpools and vanpools reduce VMT, ride-hailing trips such as Uber and Lyft do not necessarily reduce VMT; for example, they may replace a transit trip or personal car for a trip provided by someone else and may arrive from or depart to a further distance than the UC Santa Cruz commuter trip origin.

Comment O4-31

As explained in section Trans 0, above, the choice of the per capita VMT at the s

Response O4-31

The comment appears incomplete but refers to a previous comment related to the choice of a VMT per capita threshold. Please refer to Response O4-14.

Comment O4-32

W1. Mitigation measure for water impact needs to be strengthened

The City of Santa Cruz is heavily dependent on surface water sources and hence is vulnerable to drought year shortages. Storage of water for use in drought years is diminished by growth in water demand. The City's report, Adequacy of Municipal Water Supplies to Support Development (2004), offers an explanation that is just as relevant today as when it was written:

"It is important to note that, even in normal water conditions, three of the four major sources [North Coast streams, San Lorenzo River, Live Oak wells, and Loch Lomond] are presently being utilized at maximum capacity for a significant portion of the year...What this means operationally is that any future increase in seasonal or annual demand for water will be felt through greater and greater withdrawals from Loch Lomond reservoir."

The Draft EIR acknowledges this impact of growth on the City's water reliability:

"UC Santa Cruz's remaining water demand with implementation of the 2021 LRDP would contribute to the need for the City to further restrict water deliveries or secure a new water source for multiple dry water year conditions... The 2021 LRDP would therefore result in a significant impact."

In order to reduce this impact, the Draft EIR proposes a mitigation that would reduce campus water use through various conservation measures. However, the impact remains significant after the mitigation.

The mitigation measure needs to be strengthened. For example, although the Draft EIR acknowledges that UCSC growth would contribute to the need for a new water source, the mitigation does not include a financial contribution towards developing a new water source. CEQA recognizes that fair-share mitigation fees can ameliorate impacts. When other new development occurs in the City's water service area, developers pay a system development charge. As part of previous LRDP's, UCSC has paid a system development fee to the City.

Response O4-32

The potential for cost-sharing is reasonably assumed to be part of the implementation of measures to address issues or necessary improvements identified as part of the campus water use audit required as required by Mitigation Measure 3.17-1b. Furthermore, the existing agreements between the City and UC Santa Cruz related to utility service already provide stipulations regarding how cost sharing between the two entities should occur. As a result, amendment of the mitigation measures is not considered necessary.

Comment O4-33**W2. UCSC should agree to seek LAFCO approval for water service outside of City service area**

The Draft EIR states,

"UC Santa Cruz does not believe that further compliance with state or local laws, including approval by the Local Agency Formation Commission (LAFCO), is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County."

The EIR must go beyond describing what UC Santa Cruz "believes", and offer an independent judgment about the legal responsibilities of the University. The EIR should acknowledge that under CEQA, LAFCO is the Responsible Agency for proposed expansion of utility service areas and clarify that UCSC must seek LAFCO approval for such expansion.

Response O4-33

Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO).

Comment O4-34**W3. Mitigations should comply with LAFCO policies**

The EIR should create a mitigation for the impact of extending water service outside of the City's service area that complies with LAFCO's policies including the following:

"In cases where a basin is overdrafted or existing services are not sustainable, a boundary change proposal may be approved if there will be a net decrease in impacts on water resources."

Since the Draft EIR is deficient in many respects and fails to include import information to substantiate conclusions regarding impacts and mitigation measures, the University must correct these deficiencies and release a Revised DEIR for public comment.

Response O4-34

Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO). As noted in that response, the application of LAFCO policies to UC Santa Cruz is not considered appropriate. However, UC Santa Cruz has and continues to measure its water demand against the existing agreement with the City of Santa Cruz. This water demand is continually reflected in the City's water demand calculations included as part of its Urban Water Management Plan (UWMP). As such, the demands associated with the 2021 LRDP would not result in additional physical environmental impacts related to water supply. The analysis of the Draft EIR, as amended through responses to comments, is considered appropriate and in accordance with CEQA requirements. Recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the UC Regents for certification.

Letter O5 UC Santa Cruz, History of Consciousness Department

James Clifford, Professor Emeritus
March 6, 2021

Comment O5-1

Our comment focuses on the importance of open spaces, and especially the spectacular grasslands, for campus planning. In 1963, the essential act that shaped UCSC's world-famous campus was the decision to move construction out of the fields and uphill into the trees. Future growth would be accomplished by building in the core area and

developing the north campus. For more than fifty years, keeping the meadows open has been a consistent design principle.

The draft LRDP abandons this principle in several important areas: the lower East Meadow, Meyer Drive extension, construction in the northern portion of the Great Meadow, and development of a large technical support area in its lower portion.

Response O5-1

UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which 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 O5-2

The present draft justifies building in the meadows by invoking the first LRDP and featuring two 1963 maps of UCSC at build-out (pp. 40-41) The maps show construction scattered widely around the campus footprint, with two (of ten) "professional schools" located in the East Meadow (though not in the area currently planned for development). The proposed overall expansion to 28,000 students is represented as simply a delayed completion of the planners' original intention. This is badly misleading.

First, 2021 is a very different historical moment. Important aspects of the original LRDP no longer make sense, for the following reasons: 1) The 1963 maps, along with other early projections of a completed university, were speculative. No serious site surveys or environmental planning had yet been accomplished. 2) The LRDP's 25-year timeline to buildout was wishful thinking, based on an unsustainable economic and political context. The postwar economic boom, which supported rapid UC campus construction, ended abruptly in the 1970s. 3) At that time, the City of Santa Cruz reversed its enthusiastic attitude to growth. Creation of Pogonip preserve closed off the planned eastern access road that was crucial for managing traffic to a large campus. 4) Throughout the State, environmental awareness of the limits to growth (water, fire, power, wildlife protection) has deepened dramatically, undermining the 1963 LRDP's optimistic projections. Its confident march to 28,000, evoked uncritically 55 years later in the present draft, is a vision at odds with a changing reality.

Response O5-2

UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which 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 O5-3

Second, the 1963 LRDP is a complex, and sometimes contradictory, document. While it presupposed the postwar expansionist boom and rapid growth, it also embraced emerging principles of restrained environmental and architectural design: careful construction and sensitivity to terrain, flora and fauna. These practices, championed by UCSC's founding landscape architect, Thomas Church, have been respected and applied by generations of planners and architects. The result is UCSC's unique, and world-famous, campus.

Response O5-3

UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which 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 O5-4

The 2020 draft LRDP invokes this tradition of restraint.

The 1963 UCSC LRDP noted the unmatched natural beauty of the site and the importance of both respecting and celebrating this beauty over the life of the campus. The 1963 LRDP understood that planning and development in this unique space “**must grow out of the problems, restrictions, and potentialities of the site...**” The plan noted that “The general effect ... must be one of sensitive collaboration between the designer and this spectacular environment.” (emphasis added, p. 89)

We applaud this prominent evocation of principles for campus planning and design. But it seems that the tradition which has guided (and appropriately constrained) planners for decades is being reduced to lip service. Many aspects of this current vision for growth to 28,000 students violate its spirit.

In section 3.2 (p.92), the 2020 LRDP draft lists a fundamental goal: “to maintain the unique character of the UC Santa Cruz campus by respecting and reinforcing the Physical Planning Principles and Guidelines” (introduced in section 4.2). Principle # 1, “Preserve integrity of landscapes,” “meadow, ecotone and forest,” and # 3, “Minimize disturbance to open space,” are violated by the construction of outsized buildings at the forest edge and by blocking the iconic campus gateway-view across the East Meadow. The draft LRDP’s very general Physical Planning Principles do not adequately address the specificities of building in grassland, ecotone, and forest landscapes.

Response O5-4

Refer to 2021 LRDP Chapter 5, Section 5.2 “Academic Core South, Clustered Development Along Forest Edge,” regarding design principles for potential development in this area. UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which 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 O5-5

Specific comments:

1) The widely contested plan to develop the lower East Meadow blatantly violates UCSC’s design tradition. The housing sprawl envisaged there--hasty spillover from a project conceived for another place on campus-- in no way “grow(s) out of the problems, restrictions, and potentialities of the site.”

The 1963 LRDP was particularly concerned with the view of the campus when entered from below. “The major decision with regard to siting - **that the great meadow toward the south of the campus should not be built upon, that the first buildings to be encountered in entering the site would be at the crest of the hill where the trees begin.**” (p. 39) The open lower East Meadow and the drive uphill through the fields are essential for this dramatic entry to UCSC. The DEIR improperly excludes this “significant public vista,” (3.1 Aesthetics: policy 5.10.3) from the views it claims it will protect. And overall, it fails to address the crucial views uphill to the campus, whether at the West or East entries.

The present LRDP draft shows the East Meadow portion of the Student Housing West project as a fait accompli when in fact, there is still uncertainty as to whether the development will be built. At the LRDP Advisory Committee meetings last Spring, discussion of the issue was arbitrarily forbidden. The land use plan should at this point show the southern portion of the East Meadow either as Natural Space (in the proposed system of land use designations) or as Campus Resource Land (as in the current system).

Response O5-5

The comment expresses the opinion that no development should occur within the East Meadow (i.e., Student Housing West). It is unclear whether the comment is referring to Student Housing West or the potential extension of Meyer Drive. The Draft EIR presents an evaluation of potential visual impacts to vistas and, more specifically, UC Santa Cruz meadows with respect to the potential extension of Meyer Drive. Refer to the visual simulation for Viewpoint 6 (see page 3.1-17 of the Draft EIR) and impact analysis for Viewpoint 6 provided on page 3.1-41 of the Draft EIR. Additionally, this vista is included as part of Viewpoint 1 on page 3.1-21 and Cumulative Viewpoint 2 on page 4-15 of

the Draft EIR. Therefore, the Draft EIR does not improperly exclude meadow vistas. 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. With respect to the treatment of Student Housing West as part of the 2021 LRDP and within the Draft EIR, refer to Master Response 8.

Comment O5-6

In the same spirit, there should be no development in the upper meadow south of the existing East Remote Parking. The "temporary" corporation yard on the south edge of that parking area must be removed entirely and the land restored. It has been a "temporary" facility for more than a decade, has never been indicated on any LRDP, has never been through any environmental review, and is a shoddy spectacle greeting those arriving on campus.

Response O5-6

UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which 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. In addition, Mitigation Measure 3.1-3c (refer to page 3.1-45) would be implemented as part of 2021 LRDP future development to ensure that substantial degradation of visual character does not occur, including with respect to any future development in the vicinity of the East Remote Parking Lot. 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 O5-7

2) The proposed extension of Meyer Drive to form a connecting road across the top of the Great Meadow to the East Remote parking area is a major abandonment of the open meadows policy. The preservation of unimpeded views across open fields out to the Bay is a campus signature and has been clearly expressed in every LRDP. Claims that the road's impact will be mitigated by contours in the land (p. 164) are disingenuous. It is absurd to imagine that busses and cars passing in the foreground will not disrupt the experience of open space. There are other approaches to campus traffic congestion which do not inflict irreparable damage to an especially sensitive location.

While some limited building along the eastern tree-line, below the ARC Center, may be acceptable within campus design guidelines, it should not extend out into the meadow as shown on DEIR maps. There here must be no development south of the existing structures at the north end of the Great Meadow. The open grassland from the southern edges of University House and the Music Center/Recital Hall down to the north edge of the corporation yard should entirely be designated Natural Space except where designated Natural Reserve.

Response O5-7

UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, which does not address the adequacy of the EIR analysis. With respect to the analysis and conclusions of the Draft EIR with respect to the extension of Meyer Drive, refer to Response O5-5. In addition, Mitigation Measure 3.1-3c (refer to page 3.1-45) would be implemented with future development to ensure that substantial degradation of visual character does not occur, including with respect to any future development in the vicinity of the East Remote Parking Lot. 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 O5-8

3) The growth of the corporation yard at the lower end of the Great Meadow is a cause for concern. While we recognize that recycling and construction require staging areas, the possibility of moving more of the campus building operation to this area would create a built environment radically out of character with the sweeping meadow as well as with the adjacent Farm and Arboretum environments.

Response O5-8

As noted in Impact 3.1-3 on page 3.1-43 of the Draft EIR, all development under the 2021 LRDP would be required to comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and to establish consistency with the Physical Design Framework and Physical Planning Principles and guidelines in the 2021 LRDP, as previously cited

by the commenter. In addition, Mitigation Measure 3.1-3c (refer to page 3.1-45) would be implemented with future development to ensure that substantial degradation of visual character does not occur, including with respect to the potential corporation yard within the lower campus subarea. 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 O5-9

4) We urge that development of the Westside Research Park on Delaware Avenue be maximized. This is an area with adequate space and appropriate zoning of the neighboring blocks. It could encourage a productive interaction of City and University while relieving pressure on sensitive campus sites.

Response O5-9

The comment urges UC Santa Cruz to maximize development at the Westside Research Park. The 2021 LRDP proposes a "Mixed Use" land use designation, in addition to an Academic and Support area of the Westside Research Park. These land use designations recognize the evolving nature of the surrounding area and will help create a diverse, vibrant, and active site. UC Santa Cruz acknowledges the opinion expressed on the project, the 2021 LRDP, and which 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.

Comment O5-10

5) The US Fish and Wildlife Service has long urged the administration to do a campus-wide Habitat Conservation Plan, so that habitat conservation issues do not arise at the last minute, in the push to get a project built, as happened to the detriment of the Student Housing West project. We feel that this should be an immediate priority, concurrent with this LRDP process.

Response O5-10

The comment expresses support for development of a campus-wide HCP. Please refer to Response F1-4.

Letter O6 Sierra Club, Santa Cruz County Group of the Ventana Chapter

Micah Posner, Executive Committee Chair

March 8, 2021

Comment O6-1

This is a response from the Sierra Club to the Draft Environmental Impact Report (DEIR) on the draft 2021 Long Range Development Plan (LRDP), the document which would guide growth at the University of California at Santa Cruz (UCSC) for the next 20 years. The LRDP envisions growing UCSC by approximately fifty percent, with many serious impacts to the natural and human environment as a result. The Sierra Club appreciates being able to work with the University to analyze these potential impacts prior to any plans for growth being enacted.

We appreciate the relevant information and analysis contained DEIR. However, in its draft form, we find it to be deficient in key, critical categories. As such, it requires revision and recirculation in order to act as an accurate measure of the effects of the proposed growth and to comply with the California Environmental Quality Act (CEQA). As is documented below, in numerous cases the potentially significant impacts are understated, inadequate mitigation measures are proposed, feasible mitigation measures and alternatives are missing, and important, available data and evidence are not provided.

The Sierra Club has focused on the following:

- Section 3.13 Population and Housing
- Section 3.16 Transportation
- Section 3.10 Hydrology and Water Quality
- Section 3.5 Biological Resources

Response O6-1

The comment provides introductory information and a statement regarding perceived deficiencies in the Draft EIR's analysis and refers to subsequent comments. This comment is noted and specific responses to the perceived deficiencies are addressed below in Response O6-2 through O6-38.

Comment O6-2

The DEIR's Analysis of Displacement is Inadequate. The DEIR acknowledges the project would result in a potentially significant impact on population and housing if it would displace substantial numbers of people. Then the document claims that the LRDP does not cause displacement but the DEIR's narrow definition of displacement is not reasonable. The US Dept. of Housing and Urban Development explains, (Displacement of Lower-Income Families in Urban Areas Report, 2018), "Displacement can happen in many ways: direct displacement, in which residents are forced to move out because of rent increases, building re-habilitation, or a combination of both." How does the DEIR address the HUD definition of displacement?

Response O6-2

The Draft EIR's evaluation of displacement is provided in a manner consistent with the CEQA Guidelines and with respect to potential physical environmental impacts Please refer to page 3.13-9 of the Draft EIR for a discussion of displacement associated with the 2021 LRDP. Regarding the issue of housing affordability, refer to Master Response 2.

Comment O6-3

The DEIR fails to include relevant information regarding the housing crisis in the City of Santa Cruz thus precluding informed decision making and informed public participation. The DEIR needs to analyze the extent to which housing is unaffordable to large sectors of the community in the county. It needs to particularly study those markets closest to UCSC which provide the majority of housing for off campus students, and it needs to analyze how increased demand due to UCSC growth may affect these housing markets.

The DEIR asserts, *"Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff and non-UC employees for whom on campus housing would not be accommodated."*

This assertion is not consistent with the experience of the general population and its elected officials. What "existing data" is this statement referring too? What is the basis for assuming that planned increases in housing will be available to UC staff and students and not to current City and County workers who participate in long commutes due to the housing shortage?

The DEIR needs to more thoroughly analyze the impact of additional demand on housing due to UCSC expansion. The following are some resources that need to be analyzed in this context:

- "Out of Reach Report," (2019), National Low Income Housing Coalition finds that Santa Cruz is the least affordable small city in the Us.
- "No Place Like Home," (2017) is a research project of UCSC Professors Miriam Greenberg and Steve McKay. Their study shows an unacceptable rent burden (more than 30% of income) for households close to UCSC: 73% for the Westside of Santa Cruz, 68%for Downtown and 76% for Beach Flats/ Lower Ocean.
- Apartment List.com reports that over the last seven years, an average of 60% of renter households in Santa Cruz County are cost burdened.

Response O6-3

With respect to existing data on housing vacancy rates, refer to Table 3.13-3 on page 3.13-5, which identifies a countywide vacancy rate of 7.8 percent based on data from the California Department of Finance. The Draft EIR's statements on planned housing development in the area is based on information collected from the City and County of Santa Cruz and Caltrans regarding other planned development projects in the area. A full list of the projects identified by these agencies is provided in Table 4-2, beginning on page 4-3 of the Draft EIR. With respect to housing affordability, refer to Master Response 2. Also, see response O4-4.

Comment O6-4

The DEIR needs to analyze the affordability of on- and off-campus housing for low-income students. Low-income students have a long history of living in cars or camping in the woods behind campus. How will the proposed LRDP affect the ability of low-income students to obtain appropriate housing?

Response O6-4

Please refer to Response O4-4 and Master Response 2.

Comment O6-5

The DEIR needs to commit to an enforceable mitigation for the LRDP's impact on housing demand. In a broad statement, the DEIR does conclude that *"the total on-campus population increase accommodated by the 2021 LRDP may directly or indirectly induce substantial housing demand in the region."* and admits that *"This impact would be significant."*

However, it fails to provide an enforceable mitigation for this significant impact. In Table 3.113-11, the DEIR does promote the idea of increasing building space under the LRDP to house approximately 8,500 students, or approximately 90% of proposed growth. This appears to be included as a response to a request of the Community Advisory Group convened by the University, which called for "a binding commitment of housing 100 percent of new students", but the mitigation fails to meet that goal on two points:

- **Providing land for housing is in no way the same as building the housing. In fact, UCSC has a history of not meeting its housing goals.** The 1988 LRDP set a goal of housing 70% of undergraduate students, 50% of graduate students and 25% of faculty and staff. In reality, performance never approached that goal with the actual percentage of students housed on campus hovering at around 50%. There is every reason to assume that the structural obstacles that have prevented UCSC from meeting the housing goals of the 1988 LRDP will be repeated with regard to the current draft LRDP.
- **For on-campus housing to occupied it has to be priced so that its cost is competitive with off-campus rents.** The formula under which the UC system builds housing states that rental income has to pay for the costs of housing construction and maintenance. Historically, these costs have triggered rental rates that priced campus housing well over off campus housing. A dorm room shared by three students costs above \$4000 a month, but a typical room in a house with a kitchen and full amenities rents for \$1000. This explains the relatively high vacancy rate of 7.65% on campus, with 711 vacant beds at last count as compared to the vacancy rate on rentals in the County of 1.9% referenced on page 3-13-4. The EIR should do more analysis on the disparities between the relative vacancy rates and include the vacancy rates for rentals in the City of Santa Cruz, which is more relevant to UCSC. As noted in its own documentation, the vacancy rates for housing as a whole, referenced in table 3-13-3, which include vacation housing and second homes, are irrelevant.

Response O6-5

With respect to the binding commitment for increases in enrollment as mitigation, refer to Master Response 9 related to phasing and implementation. With respect to the perceived affordability of on-campus housing, refer to Master Response 2.

Comment O6-6

CEQA law demands that a realistic funding source be available for the project and its mitigations. In the case of the aforementioned mitigation, how will the proposed housing be built in such a way that its costs will be comparable to off campus housing? Given its history and the continuing policies on which its failure to build projected housing are grounded, how can the public be confident that this mitigation will be accomplished, and how is the DEIR accurate if it provides a mitigation that is unlikely to be achieved?

Without a credible plan to provide housing that is reasonably priced, it can be assumed that meeting the housing goal is not feasible. We propose a simpler solution, in line with the request of the Community Advisory Group, which would assure that the LRDP's housing projections are fully mitigated.

Response O6-6

Based on the stipulations of the 2008 CSA (refer to Master Response 2 for further information regarding the 2008 CSA), UC Santa Cruz has achieved the on-campus housing goals in a manner consistent with the terms of that agreement. Further, with respect to how development within the LRDP area, including funding of development, would occur during implementation of the 2021 LRDP, refer to Master Response 2.

Comment O6-7**PROPOSED MITIGATION**

Each incremental step in campus enrollment growth shall be contingent on UCSC actually housing 100% of new students and 25% of new faculty and staff.

Response O6-7

Please refer to Master Response 9 and response to Comment O4-5.

Comment O6-8

If housing mitigations are not successful, the EIR analysis of projected increase in vehicle miles traveled is not accurate. As discussed above the current goals to house students and staff are not feasible, but expected air pollution as represented by projected increases in vehicle miles traveled, are dependent on the housing goals being met. Simply put, if fewer people live on campus than envisioned, there will be more automobile use to bring students and staff living off campus to the University. Therefore, the lack of feasibility of the housing goals (as discussed above) calls into question the accuracy of the section on vehicle miles traveled. Unless binding mitigation as proposed above is adopted into the DEIR and LRDP, the vehicle miles traveled analysis of the document is not accurate.

Response O6-8

Mitigation in the Draft EIR provides for the development of a TDM Program that would be adaptively managed to account for year-over-year shifts in level of on-campus housing provided, student behavior, enrollment, and other conditions, as defined by performance standards developed. The comment speculates that without on-campus housing to match enrollment increases that VMT reductions could not be achieved but does not take into consideration proximity to campus, transit and other alternative transportation improvements, and potential parking restrictions (e.g., parking permits) that also would reduce SOV use and vehicle trips to and from campus. Rather than speculating on these unknown factors, the EIR focuses its programmatic analysis on implementation of the entire LRDP, with mitigation established based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA. Also, please also refer to Master Response 9 regarding plan implementation and phasing of development and Master Response 11 regarding the programmatic level of detail (including use with subsequent project-specific evaluations) presented in the Draft EIR.

Comment O6-9

Target for reduced vehicle miles traveled is inconsistent with goals of the Campus Sustainability Plan. The DEIR claims that Mitigation Measure 3.16-2 is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022. This claim is not accurate. This mitigation measure in-tends to *"reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countrywide average."* Reducing VMT per capita is not the same as reducing total commute vehicle miles traveled.

Response O6-9

Please refer to Response O4-19.

Comment O6-10

Goal 3 of the Campus Sustainability Plan 2019 Update calls for *"reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022."* The DEIR does not address this goal. Nor will it be possible to achieve this goal with the implementation of the 2021 LRDP, which will result in increased commuter trips to campus. If the Campus

Sustainability Plan is a guiding planning document, how can the draft LRDP establish acceptable thresholds that are not in accordance with this plan?

Response O6-10

Please see Response O4-19.

Comment O6-11

Comparing on-campus students to county average VMT is not a reasonable measure of significant impact. The DEIR claims that the addition of some 15,800 additional vehicle trips to be undertaken by additional students and staff (as per table 3-16-6) is not a significant impact. This contradicts the definition of the word significant "*sufficiently great or important to be worthy of attention; noteworthy.*" (Source: The Oxford English Dictionary). This runs contrary to common sense and continuing to assert it as fact undermines the University's credibility.

The claim that 15,800 additional trips is not a significant impact is reasoned by adopting standards developed by the state OCP for the addition of housing developments and businesses. UCSC is significantly different from these types of developments for two reasons: First, the proposed growth is so large that it would add approximately 20% new residents to the City of Santa Cruz, thus causing significant changes to the entire City. This type of impact cannot just be measured using averages and normatives. It needs to be examined with regard to the significance of its impact on its own merits. Second, UCSC provides housing to approximately half of its students, thus already providing both the origin and the primary destination of their potential vehicle miles traveled. Using the OCP guidelines for this kind of institution would mean that a category of projects would be effectively exempt from reducing their VMT and thus participating in statewide reductions in greenhouse gas emissions. This category would include any type of boarding school, nursing homes, sleep over camps, and prisons. UCSC needs to show how the OCP guidelines apply in its particular case. It is not reasonable to judge its vehicular emissions with the same standard used for a small apartment complex or family business.

Response O6-11

This comment suggests that student residents on a university campus should be held to a different standard in terms of VMT generation than housing developments and businesses. The University, in housing new students on the campus where they are "employed" in the business of pursuing their studies, is providing arguably the most efficient jobs-housing balance possible. UC Santa Cruz not only provides housing within walking/biking/shuttle distance of the students' typical daily destinations but provides transit services to link students to their off-campus destinations when they need to travel off-campus.

UC Santa Cruz acknowledges that the OPR guidance does not directly address unique uses such as college campuses, among many other uses. UC Santa Cruz does believe that the Draft EIR provides a fair comparison of the campus residential VMT generation to the countywide average residential VMT generation.

It is noted that OPR, in developing its VMT guidance, did not use absolute VMT in its threshold recommendation, recognizing California was going to continue growing (more people and vehicle trips) and the vehicle fleet was expected to transition to be more GHG-efficient over time (higher mileage, more ZEVs, etc.). In developing its recommended threshold, OPR worked with the California Air Resources Board within the context of the 2017 Scoping Plan and the emissions reduction needed from the transportation sector to achieve long-term GHG goals embodied in SB 32 (40 percent below 1990 GHG levels by 2030, on a trajectory to meet 80 percent below 1990 GHG levels by 2050). The forecast resulted in a recommendation that VMT *per capita* needed to be reduced by 15 percent, compared with the forecasted total (based on continuing on the current trajectory), to meet long-term GHG reduction goals associated with the transportation sector.

Comment O6-12

Having claimed that adding 10,000 new students will have no significant impact, the document then admits that there will be a small but significant impact due to the VMT increases from faculty and staff. The calculation of this VMT increase is greatly reduced by current and planned housing on campus for faculty and staff. This reduction needs to be reexamined based on the same criteria outlined above.

Response O6-12

The Draft EIR finds that the combined effect of student, faculty and staff growth under the 2021 LRDP, along with the new housing proposed, will reduce the VMT per capita below baseline levels, and that the residential VMT per campus resident will be more than 15 percent below regional averages. Thus, based on the thresholds identified, impacts were appropriately determined to be less than significant with mitigation.

Comment O6-13

The way that traffic is being studied effectively exempts UCSC from contributing to state, city and county plans to reduce greenhouse gas emissions. Automobiles are our state's, city's and county's largest source of greenhouse gas emissions. The reason that standards governing vehicular travel were changed to represent VMT instead of congestion standards was so that the reduction of VMT could contribute towards reducing our state's greenhouse gasses. The way in which the DEIR is counting VMT effectively exempts it from any and all legislative action to reduce greenhouse gas emissions by controlling its primary source transportation. **In what way will the draft LRDP come into compliance with state and local climate action plans to reduce overall VMT so as to address climate change?**

Response O6-13

Please see Response O4-14. Further, Section 3.8, "Greenhouse Gas Emissions and Climate Change," analyzes the 2021 LRDP impacts associated with GHG emissions and climate change, including the possibility to conflict with any applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases in Impact 3.8-2, and as discussed in Impact 3.8-2, the project impacts are going to be less-than-significant in this regard.

Comment O6-14**PROPOSED MITIGATION****Overall VMT shall be reduced by 5% as per the Campus Sustainability Plan**

By adopting this standard, the DEIR will actually be in compliance with climate legislation, including its own Sustainability Plan, and the expectations of local citizens and their elected officials. This condition for growth would mirror a successful policy at Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new peak hour vehicle trips to campus. According to the former Director of Stanford Parking and Transportation Services, Stanford added an additional 5000 students and staff/faculty between 2001 and 2015 without adding additional vehicular trips to campus, as measured by periodic traffic counts at each entrance. A reduction in the number of people in California who own automobiles, especially those of college age, will continue to make it easier to reduce automobile trips. Several of the mitigations to unacceptable staff VMT will help to achieve this goal as will additional mitigations proposed below. **We ask you to seriously consider this goal and explain your reasoning why or why not it is not adopted.**

Response O6-14

The UC Santa Cruz Campus Sustainability Plan presents goals that UC Santa Cruz is committed to; the 2021 LRDP is separate from, but related to, the Campus Sustainability Plan. UC Santa Cruz believes the Plans are internally consistent. Both plans contain policies and transportation system goals that aim in the same direction, to reduce automobile trips and VMT. UC Santa Cruz respectfully disagrees that the 2021 LRDP and the Draft EIR attempt to exempt the University from the responsibility to reduce greenhouse gas emissions. Rather, by committing to house all new students and some new faculty, on campus and thus minimize vehicle trips and VMT, UC Santa Cruz is effectively using its unique ability to plan for both the housing and "employment" uses on-site to minimize statewide VMT growth.

Comment O6-15

Mitigations of the increased VMT of faculty and staff are insufficient. Even using the document's aforementioned algorithm, the DEIR admits that its faculty and staff will create VMT above the level it deems acceptable and suggests mitigations for that impact. The projections are flawed and the mitigations need to be fully explored as per below. **Please respond to the proposed mitigations below as well as our criticism of one aspect of the projected VMT per capita calculations.**

Response O6-15

UC Santa Cruz respectfully disagrees with the perceived flaws and insufficiency in the EIR's mitigation measures related to transportation. No evidence is provided to support in this comment to support the statement. Please refer to Responses O6-16 through O6-18 for specific responses to the suggested mitigation.

Comment O6-16

The addition of a new entrance will induce more staff and faculty traffic. This needs to be added to VMT predictions. Vehicle-miles-traveled statistics for staff and faculty use current commute patterns based on two vehicular entrances to campus. Adding a third entrance will make it easier to commute to campus and thus induce traffic thereby increasing VMT per capita. Specifically, a third entrance will increase vehicular access from another neighborhood along Empire Grade not easily accessed by current entrances, thereby encouraging staff and students who live in this neighborhood to drive. It will also encourage staff who live in the proposed housing near the new entrance to drive to campus. **Has this induced traffic been accounted for in the current VMT projections?** Instead of building a road for automobiles the proposed roadway could have a one lane and/or decomposed granite treatment sufficient for it to be used by emergency vehicles and, possibly, transit vehicles. In so doing, it would still serve as the mitigation of potentially reduced emergency access mentioned in the DEIR. Please study this alternative with regard to VMT and impacts on the habitats to be bisected by the proposed road.

Response O6-16

The commenter provides opinions on traffic inducement without providing any evidence to support the claims regarding travel behavior. The new entry is intended to provide more direct/shorter travel routes to existing and future campus development in the north campus area and is consistent with the LRDP strategy to restrict single occupant vehicles in the campus core with periphery parking. As discussed in Draft EIR Impact 3.16-1, the proposed new north entry from Empire Grade would not induce additional travel but would redistribute some of the trips to the north entrance. As such, it is not expected to be a capacity-expanding project, nor would it be expected to comparatively increase VMT. See Response O4-17 for further details regarding new northern entrance not inducing vehicle traffic growth. The recommendation to study an alternative in which the new northern entry is designed to be used for emergency vehicle and transit vehicle use only is noted and may be considered in the future during project-specific planning and design should it be deemed necessary.

Comment O6-17**PROPOSED MITIGATION**

Increase parking fees to pay for transit system. We appreciate the commitment made as part of the TDM mitigation to have "no net increase in parking." Decreasing parking supply on a per capita basis will raise its value, and parking fees should be raised accordingly so as to further disincentivize personal automobile use. Monies gained by raising these fees should be used to pay for public transportation for staff and students. Current policy seems to rely on increasing student fees to pay for transit but as shown by the recent defeat of such a measure in 2018, this funding source is not entirely reliable. If students do agree to raise fees for transit, it should be go for additional service, while parking fees should be used to maintain basic levels of transit service.

Response O6-17

The comment is noted and will be considered as UC Santa Cruz reviews and adjusts its transportation management efforts, including the TDM Program required by Mitigation Measure 3.16-2. As this comment does not address the adequacy of the EIR analysis, no further response is necessary.

Comment O6-18**PROPOSED MITIGATION**

Designate additional parking spaces—currently used by single occupant drivers—as carpool-only spaces. This will provide an incentive to carpool and provide an option for low income staff and students to mitigate the financial impact of increased parking fees.

Response O6-18

The comment is noted, and UC Santa Cruz will include this consideration as part of its development, implementation, and adaptive management of TDM Program, as required by Mitigation Measure 3.16-2. As this comment does not address the adequacy of the EIR analysis, no further response is necessary.

Comment O6-19**PROPOSED MITIGATION**

Provide free electric charging for automobiles and electric bicycles. Incentivizing electric cars over gas cars would not affect VMT, but would reduce air pollution caused by automobiles, which is a primary end goal of VMT legislation.

Response O6-19

The comment is noted; however, it is considered to be already included as part of Mitigation Measure 3.3-2. As noted by the commenter, electric charging of vehicles would not (in and of itself) reduce VMT as electric vehicles still generate VMT. As a result, the inclusion of this measure as part of Mitigation Measure 3.3-2 (on page 3.3-27 of the Draft EIR) is considered appropriate within the context of Impact 3.3-1. The degree to which free electric charging could be made available is subject to financial considerations and the degree to which it would further reduce emissions is uncertain and cannot be quantified.

Comment O6-20**PROPOSED MITIGATION**

Implement traffic calming measures on all campus streets and reduce the speed limit to 25 mph. While this would not necessarily reduce VMT, a reduced speed limit enforced via hardscape changes to the roads (speed reduction platforms being the most common example) would reduce pollution caused by tires, as well as deaths and injuries to human beings and animals.

Response O6-20

The comment is noted, however, this measure is considered to already be included as part of Mitigation Measure 3.3-2, as stated on page 3.3-27 of the Draft EIR. The commenter is specifically referred to the seventh bullet of the aforementioned mitigation measure.

Comment O6-21**Potential Impacts to Karst Aquifer**

The DEIR properly states, *"Potential impacts on groundwater that could result under the 2021 LRDP include 1) reduced spring flows and lowering of aquifer water levels as a result of a reduction in recharge due to increased impervious surfaces, and as a result of a potential groundwater extraction in the event that groundwater pumping is implemented to reduce demand for water from the City's supply...Impacts associated with new development on the karst aquifer would be potentially significant."* (3.10-33) The campus expansion requires millions of square feet of new paving, as well as expanding from 2 million square feet of buildings to 5 million. **How will systems directing water runoff be renovated so as to insure that additional runoff does not damage surrounding habitats including the Kalkar pond on the east side of campus?**

Response O6-21

Please refer to Response O2-2.

Comment O6-22**Water Supply**

The city of Santa Cruz has supplied UCSC with water since its founding in 1965, and will continue to do so, but the city itself relies on the surrounding river and watershed systems. The Santa Margarita Groundwater Basin (SMGWB) underlies 30 square miles of the Santa Cruz Mountains and on top of it is the watershed of the San Lorenzo River, of which the river itself supplies 59% of the city's water. The SMGB has lost an estimated 28,000 acre feet in groundwater storage since data has been recorded, resulting in diminished local water supply and reduced sustaining base flows to streams that support fishery habitats. Although pumping from the SMGB has been reduced by 45% since 1997, and supply and demand have been in balance for the last 10 years, the substantial increase in county

residents projected by the LRDP poses a significant strain on resources, particularly as we face current and future water deficits due to drought, wildfire, and climate change. The Santa Margarita Groundwater Agency (SMGWA), a joint powers authority comprising the Scotts Valley Water District, the San Lorenzo Valley Water District, and the County of Santa Cruz, was formed in 2017 to protect and sustain the overdrafted groundwater basin by the development of a Groundwater Sustainability Plan (GSP). The GSP must be completed by 2022, and the basin must reach sustainability by 2042. Regardless of suggested UCSC mitigation measures, if the campus continues to rely on the city for a majority of its water, the expansion places a significant strain on a limited resource.

How does the University intend to mitigate the long-term strain on water resources placed on the county of Santa Cruz by its growth from 18,500 current students to 28,000 by 2040, as well as an additional 2200 faculty and staff from its current 2800, for a potential total of 33,000?

Response O6-22

The Draft EIR, within Section 3.17, "Utilities and Service Systems," evaluates the potential impact of 2021 LRDP implementation on long-term water supplies, as provided by the City. Refer to Impact 3.10-1, beginning on page 3.17-22, for further clarification. Within this impact analysis, the Draft EIR also provides an evaluation of potential alternative water supplies, consistent with past and current evaluations conducted by the City. Further, based on groundwater conditions within the lower campus subarea, which (as previously noted) is not part of the Santa Margarita Groundwater Basin (SMGB), UC Santa Cruz also considers the potential for and impacts associated with sustainable use of groundwater supplies for potable and non-potable uses. Thus, the DEIR adequately analyzes and discloses impacts and includes appropriate mitigation; no additional analysis is warranted.

Comment O6-23

Comments on UCSC Long Range Development Plan Water Supply Evaluation, Appendix J of the DEIR including the need for an approved habitat conservation plan.

7.0 Determination of Water Supply Sufficiency Based on the Requirements of SB 610. Table 7-1, which lists City of Santa Cruz Water Supply and Demand in Normal Years, Single Dry Years and Multiple Dry Years, MGY, presents unrealistic and inaccurate information for the Supply Totals. With this error, the Demand vs. Supply ratios are not accurate and will not provide proper compliance to SB 610, nor to this environmental review process.

The DEIR must include accurate assessments and this listing of available water supply is not accurate. An accurate assessment of available water supply must include requirements for water to be set aside for fish and wildlife identified by a Habitat Conservation Plan (HCP), but the city of Santa Cruz has not had an approved HCP since 2002. Prior to expanding water supply to UCSC, an HCP must be approved by relevant state and federal agencies.

The LRDP rightly notes, at page 27 of Appendix J, that the HCP issue exists. However, no accounting of the coming reduction in supply is shown in any projections. In a February 10, 2012, letter from NOAA National Marine Fisheries Service (NMFS) to Local Agency Formation Commission (LAFCO), NMFS stated that "it does not appear that current water supplies are sufficient to meet current demand and protect listed salmonoids, let alone allow for increased demands." (Emphasis in original.) The clear and obvious inference is that the City does not and will not have the water supply listed in this DEIR once the mandated allocations are made to account for protection of listed species. **How does this DEIR permit a water supply analysis that is clearly incorrect projecting forward?**

Response O6-23

As described in the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR), the projected future water demand of approximately 307 million gallons per year (MGY) for UC Santa Cruz (including the proposed 2021 LRDP and the Coastal Science Campus) is considerably lower than the 349 MGY previously projected for buildout of the 2005 LRDP, and is lower than the 2035 primary water demand projection for UC Santa Cruz included in the City's 2015 UWMP, which is currently considered the best available and accurate information regarding water supply for and demand from its customers. The issue of whether the City, as the water provider for UC Santa Cruz, has prepared and approved an HCP for its use of available surface water and groundwater supplies is considered outside the scope of analysis of the 2021 LRDP EIR. 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. 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 MGY) within its 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. 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 ensure that the city can 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.

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 3.15, "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.

As noted in Response F1-4, UC Santa Cruz is considering preparing and implementing a campus-wide HCP, which if on-site groundwater use is considered, would be addressed.

Comment O6-24

Water District Boundaries Need Relevant Approvals

The DEIR should acknowledge that expansion of the City water supply into North Campus is subject to approval by LAFCO. Under CEQA, LAFCO is the Responsible Agency for proposed expansion of utility service areas. It is the responsibility of LAFCO to review challenges to the water supply and UCSC's history and projections of reducing water use per capita, and then to make a consideration. In so doing, LAFCO would safeguard the water supply for UCSC as well as other City users. The DEIR acknowledges that providing city water for the projected increase in students and staff is a significant impact even after mitigations are put into place: UCSC's remaining water demand with implementation of the 2021 LRDP would contribute to the need for the City to further restrict water deliveries or secure a new water source for multiple dry water year conditions."

During an earlier process step in this University expansion plan, in 2012, it was deemed necessary to expand the Water District boundaries, as much of the new, expanded development is situated outside the Water District Boundary. LAFCO received significant pressure from the community to not expand this boundary until the City fulfilled its legal obligations with regard to the HCP. The boundary was not expanded.

It is no coincidence that UCSC now claims that the Water District Boundary does not need to be expanded, as that would have required an HCP which will surely reduce available water supply. But the requirement to implement an HCP did not disappear due to assertions that the City water supply can be expanded outside its boundaries without legal approvals from LAFCO.

Response O6-24

Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO).

Comment O6-25

Wildfire impact on wildlife populations is not noted in this section of the DEIR. This is a critical oversight as in August and September of 2020 Santa Cruz and San Mateo Counties experienced the most severe wildfires in their history with the ignition of the CZU Lightning Complex Fire which burned 86,500 acres and resulted in significant habitat loss and displacement of thousands of individuals of many animal species. The fire event is noted in the DEIR's wildfire section (3.18) with the acknowledgement that the CZU fire occurred after the NOP for the 2021 LRDP had been published (3.18-9), but the DEIR Biological Resources section does not account for the fire's impact on wildlife. This is of serious concern as the UCSC campus adjoins forested areas of the Santa Cruz Mountains which were heavily affected by these fires, burning large portions of Bonny Doon, upper San Lorenzo Valley and along the coast, all of

which had a high fuel load accumulated over many decades of fire suppression. In some areas, notably Big Basin California State Park which housed populations of the endangered marbled murrelet, the fires were of crown-destroying intensity, and occurred at a critical juncture in the species' nesting period. It will take decades for these areas to fully recover, if such recovery is possible with the accelerating effects of climate change and human activity. Damage to natural resources is still being assessed, with possibly as much as 40% of redwoods in the Santa Cruz Mountains suffering burns.

Response O6-25

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 as shown in Chapter 4, "Revisions to the Draft EIR" of this volume. 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 Regents for certification. Also see Master Response 4 regarding wildfire.

Comment O6-26

With this in mind, any mitigation offered in the DEIR in consideration of species such as mountain lions, foxes, coyotes, bobcats, etc. is not adequate because it fails to address the disruption of wildlife's normal patterns of migration, denning, hunting and reproduction caused by both the CZU fire and the following months of extensive tree-removal operations, utility work, logging road construction, debris removal, site-scraping, clear-cutting and general construction and repair work taking place in the areas adjacent to UCSC's North Campus, the long-term effects of which on habitat and species may not be known for some time. This creates significant pressure on animal populations in the fire zones, and may result in some individuals entering the LRDP area when they otherwise would not have. How does the University plan to address these concerns?

Response O6-26

Because these response activities are not occurring in the LRDP area, it is appropriate to discuss the impacts of these activities in Section 4.0, "Cumulative Impacts." 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. 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 Regents for certification. Also see Master Response 4 regarding wildfire.

Comment O6-27

In 2017 UCSC Professor of Environmental Studies Chris Wilmers, who operates the joint UCSC/CDFW Santa Cruz Puma Project, estimated the number of mountain lions in the Santa Cruz Mountains. at 50-60, each with a territory of anywhere from 5-100 square miles. When these individuals are displaced by a natural disaster such as the CZU, they come into competition with each other and with humans for resources, increasing population stress, malnourishment, and affecting reproduction as well.

The DEIR acknowledges potentially significant impacts to this population but based on the fact that it does not account for changes in environment caused by the CZU fire, the suggested mitigation is inadequate and should be re-assessed. The LRDP DEIR mitigation measures proposed in regard to mountain lion dens and other predators are insufficient to address potential impacts of construction. Mitigation Measure 3.51a specifies, "Within at least 30 days before commencement of project activities, a qualified wildlife biologist with familiarity with mountain lion...will conduct focused surveys of habitat" (3.5-61) and "If no potential dens are found...no further mitigation will be required." The language given for this survey period is too vague to provide clear data. As worded, the time-frame of the survey allows for it to have occurred ANY TIME prior to 30 days before project activity commences, thus permitting outdated survey data to be used. We request that this mitigation be re-written to provide reasonably current data. Also, since there is no sunset clause, an outdated 2021 survey could be used many years from now if the expansion is delayed (as it has been in the past).

Response O6-27

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. Also see Master Response 4 regarding wildfire. Mitigation Measure 3.5-2k has been edited to state that surveys must occur within 30 days prior to the start of project activities and that if the start of work lapses and more than 30 days pass, an additional survey shall be required. 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 Regents for certification.

Comment O6-28

The LRDP zone includes habitat and terrain for 66 special-status wildlife species and 64 special-status plant species, many holding statuses CRPR 1B (Endangered in CA) and known to occur in the development zone.

Other animals affected by the campus expansion include coyotes, gray foxes, bobcats, bats including Townsend's big-eared bat, western red bats and pallid bats, American badger, ringtails, San Francisco dusky-footed woodrats, invertebrates such as the Ohlone tiger beetle (critically imperiled) and amphibians like the California red-legged frog (a federally listed threatened species), deer, and other vital prey animals. UCSC campus also contains the San Francisco Campion, Point Reyes horkelia, Santa Cruz Manzanita, San Francisco Popcorn Flower and Marsh Microseris, among others, all listed as State Endangered and all known to occur in the LRDP area. What has made UCSC a focus of the UC system for life sciences is exactly this abundance of wildlife in a vibrant ecosystem accessible for observation and study. By so extensively altering the natural landscape of its campus the University runs the risk of damaging the very programs which have made it so attractive to students.

Response O6-28

UC Santa Cruz acknowledges the various wildlife and plant species that are present in the LRDP area as described in Section 3.5, "Biological Resources" of the Draft EIR. This comment does not address the adequacy of the Draft EIR analysis and further response is not 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 O6-29**Ohlone Tiger Beetle**

Native coastal prairie habitat on campus critical habitat for the endangered Ohlone tiger beetle. Future housing development is proposed within and adjacent to coastal prairie habitat mapped at Crown Meadow, and within a short walk or bike ride from Marshall Field. Concentrated bike and traffic and picnicking activity would cause significant "take" of Ohlone tiger beetles in open areas, foot paths, roads and cleared areas, as the beetles concentrate in open areas during breeding season to look for mates, dig burrows and deposit eggs. These potential impacts must be disclosed and addressed through project modification and mitigation.

The proposed development zone would convert to residential uses the entire area of Habitat Conservation Plan Area 1D, a former Ohlone tiger beetle habitat that was restored to support reintroduced tiger beetles. If re-establishment effort has not yet proved successful, the management effort benefits coastal prairie restoration habitat and should be continued. This effort should be one of multiple measures to address the increased cumulative adverse impact on the Ohlone tiger beetle of the closer proximity of development, elevated population and intensified activity associated with the proposed LRDP.

Not only would the UCSC human population increase from 18,500 to 28,000 on campus under the proposed LRDP, but the number of student beds would increase from 9,300 to 17,700 and the number of staff and faculty units would grow from 270 to 828. Much of the proposed residential development would be placed in the north campus area, with easy access to native grassland habitat in Marshall Field that supports one of only a handful of remaining occurrences of Ohlone tiger beetle, a federally endangered species endemic to the marine terraces in Santa Cruz County characterized by Watsonville loam soils.

The increased bicycle and foot traffic associated with a substantially increased population of students, and the increased reliance on outdoor activity, will inevitably result in the increased mortality and disturbance of adult and

larval Ohlone tiger beetles, by roughly doubling human activity in the meadows and open patches of bare ground that the Ohlone tiger beetle depends on for foraging, mating, thermoregulation and oviposition. This is a potential cumulative impact of all the development proposed by the LRDP to cover the next two decades, comprises a “take” of the Ohlone tiger beetle incurred by the action of the UC Regents and cannot be addressed by piecemeal evaluation of individual construction sites. A piecemeal approach to such impacts, without analyzing and mitigating the cumulative impact, comprises “segmentation” and is prohibited under CEQA law. Unless the University develops and implements an adaptive Habitat Conservation Plan approved and supervised by the United States Fish and Wildlife Service, the most important remaining populations of OTB are likely to be extirpated. Simply stated, the LRDP poses an imminent threat to the survival of the species.

Response O6-29

The Ohlone tiger beetle discussion on pages 3.5-56 through 3.5-59 of the Draft EIR includes a discussion about the impacts of development under the LRDP on Ohlone tiger beetle. A habitat assessment by Dr. Richard Arnold, a renowned expert on the species, determined that Crown Meadow does not contain habitat suitable for Ohlone tiger beetle, which is strictly associated with coastal prairie or grassland on Watsonville loam soils. Mitigation Measure 3.5-21 on pages 3.5-58 and 3.5-59 includes development of a comprehensive HCP as one of the potential regulatory strategies for addressing potential impacts on Ohlone tiger beetle. Refer also to Master Response 12 regarding long-term habitat protection and a campus-wide HCP.

The commenter’s statement regarding a piecemeal approach is noted but is not considered to apply to the Draft EIR, as the Draft EIR considers the overall impact of development within the LRDP area and the potential impact of the overall level of development on various resources, including Ohlone tiger beetle. This approach is considered to be consistent with CEQA requirements.

Comment O6-30

The deficiency of the EIR in failing to consider potentially significant recreation impacts to the OTB extends to the recreation section, where the trail network map provided by Figure 3.15-1 omits three trails that pass right through OTB HCP Area 1A-A. This omission is important not only because it fails to disclose a significant source of adverse impacts to OTB, but also because the recreation section proposes a University strategy to increase in outdoor recreation by expanding formal trail links to adjoining State and County parks. This would intensify activity on three trails that intersect within Inclusion Area 1AA. The recreation section (falsely) asserts that, although the campus population and potential demand for recreational facilities would nearly double, the impact on existing recreational facilities would be less than significant even without mitigation and without any commitment of the UC Regents to construct additional recreational facilities. This failure to accommodate recreational demand would place even greater pressure on trails, meadows and outdoor recreation areas, particularly Inclusion Area 1AA, which is located at the intersection of several campus trails and an ad-hoc access point from Meder Street.

The vulnerability of the Ohlone tiger beetle population to increased human presence and outdoor movement underscores the inadequacy of the existing habitat preserve Area 1A-A, which comprises approximately 12 total acres, of which only about 10.8 acres are effective habitat, and the rest is oak woodland. To protect an organism that is clearly in retreat from human activity and development, that has been extirpated from numerous sites adjoining urban development in Soquel and Santa Cruz, larger habitat set-asides are required. The Ohlone tiger beetle will become extinct unless protected areas are large enough to include all of the suitable habitat, characterized by USFWS (reference below) as “shallow, pale, poorly drained clay or sandy clay soil that bakes to a hard crust by summer, after winter and spring rains cease,” including “barren areas among low or sparse vegetation within the grassland. Ohlone tiger beetles require these open areas for construction of larval burrows, thermoregulation, and foraging.” Adequate mitigation for the potential impact to this species of LRDP development must include adding the mima mound habitat west of Empire Grade, comprising approximately 80 acres, and protecting and managing all existing and suitable OTB habitat in upper and lower Marshall Field.



Existing Ohlone tiger beetle Habitat Conservation Area 1AA (dark purple) and recommended conservation area (light purple).

Response O6-30

First and foremost, the Draft EIR, as noted in Chapter 2, "Project Description," includes recreational facilities that would be provided as part of 2021 LRDP implementation, including facilities associated with new student housing and other facilities, as well as enhanced trail connections. However, the Draft EIR also assumes that trail users, including the increased population associated with the 2021 LRDP, would generally adhere to marked trail boundaries and would not otherwise seek to create new trails, which is considered reasonable and in accordance with regulatory requirements. The Draft EIR evaluates (from a programmatic perspective) the potential increased use of facilities and determined that existing funding and operations and maintenance activities related to funding would prevent accelerated deterioration of such facilities, including trails. Further, any proposed trail connections or other recreational improvements would be subject to project-level review under CEQA including a site-specific evaluation of potential impacts to biological resources. The Draft EIR's analysis is considered appropriate for a programmatic-level document and in accordance with CEQA requirements.

This comment also proposes a conservation area for Ohlone tiger beetle. Development under the 2021 LRDP would not occur in the proposed conservation area. This comment does not address the adequacy of the Draft EIR, and further response is not 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 O6-31

The EIR proposes to survey for rare plants and wildlife only "within a project site," and only when the proposed LRDP could result in direct disturbance of OTB. This approach to impact mitigation fails in this regard: it would allow housing development to be placed entirely around the central area of the Crown Meadow on north campus with no biological survey of potential occurrence of the OTB or its habitat within Crown Meadow or nearby Marshall Field. This failure alone renders the EIR deficient in failing to assess the presence of an endangered species or to consider the potential multifold impacts of surrounding sensitive habitat with intensive human activity.

Response O6-31

A habitat assessment by Dr. Richard Arnold, as referenced in the Ohlone tiger beetle discussion on pages 3.5-56 through 3.5-59 of the Draft EIR, determined that Crown Meadow does not contain habitat suitable for Ohlone tiger beetle, which is strictly associated with coastal prairie or grassland on Watsonville loam soils. Thus, the EIR adequately evaluates and discloses impacts, and no further response is warranted.

Comment O6-32

According to "Ohlone Tiger Beetle (*Cicindela ohlone*) 5-Year Review: Summary and Evaluation" prepared by the U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office (Ventura, California, 2009)(https://esadocs.defenders-cci.org/ESAdocs/five_year_review/doc3220.pdf), six of the seven then remaining Ohlone tiger beetle occurrences

were located on open space or park areas accessible to the public and vulnerable to the same types of impacts proposed by the LRDP. By 2013, only five segmented subpopulations of the OTB remained¹ Arnold and Knisley (2018) found the OTB total population at its four primary sites to range between 500 and 1,750 individuals.² It is unknown whether the species can colonize or migrate between colonies, although Cornelisse et.al. (footnote next page) demonstrated that migration reduces the possibility of OTB extinction.

OTB subpopulations are already experiencing significant impacts from invasive vegetation, fire suppression, removal of grazing pressure and direct human disturbance, sufficient to reduce known subpopulations by 30% in less than a decade, and to reduce the area occupied by larval burrows at Marshall field, for example, from 13,000 square feet in 2003 to 770 square feet in 2017, a decrease of 95%. In the absence of grazing at Marshall Field, bare ground areas are maintained primarily by bike traffic, which has a deleterious effect on the OTB but, in the absence of superior management measures, provides a means of maintain bare earth. Any exacerbation of these existing significant impacts of human activity and development on OTB populations must be considered significant.

Without active habitat management, OTB habitats are also likely to be subsumed by invasive vegetation. According to the FWS report, Ohlone tiger beetles have been potentially extirpated from two of the five geographic areas as a result of habitat degradation primarily caused by the lack of a habitat management program. The report stated, *"Habitat degradation continues to be a threat to all remaining Ohlone tiger beetle occurrences. Without management efforts to reduce and control encroachment by nonnative plants, the Ohlone tiger beetle will likely continue to decline and the risk of extinction will increase. Without active habitat management, increased growth of nonnative vegetation can severely reduce the availability of bare or sparsely vegetated ground."*

According to the USFWS report, nonnative plants, including French broom (*Cytisus monspessulanus*), velvet grass (*Holcus* spp.), filaree (*Erodium* spp.), and Eucalyptus spp. are encroaching into grassland habitats and out-competing native grassland vegetation (Morgan, in litt. 1992; Hayes, in litt. 1997; Sculley, pers. obs. 1999, 2000). Nonnative grasses, such as bromes (*Bromus* spp.) and oats (*Avena* spp.), can rapidly invade California grasslands. Filaree is abundantly invasive on the UCSC campus.

OTB populations also cannot survive without an adequate prey base of small invertebrates. OTB prey availability is proportionate to the availability of bare ground. Additionally, the precipitous drop in worldwide insect populations documented by scientific studies is attributed to the lack of large, intact habitat areas away from the proximity of urban and/or agricultural development and the associated impacts of pesticides, air pollutants, dust, noise, light, meso-predation, declines in songbirds, and invasion of exotic plants and wildlife. The increasing proximity of residential and public facilities to native grasslands and OTB habitat may have similar effects. The reasons for the failure of conservation area "Parcel D", which was managed to maintain the required habitat physiography, are apparently not fully understood, but the site was immediately adjacent to a residential development.

Cornelisse, et.al demonstrated that active management of existing subpopulations to increase or maintain bare ground through direct scraping or by imposing livestock grazing, with measures to slow bicycle speeds, had a significant positive effect on beetle populations. Reducing bicycle speed to 8–12 kph increased population growth by 42–58%. The study warned against over-management of existing colonies, however, and recommended "at a landscape level both recently extirpated sites and potential coast prairie habitat should be managed to maintain suitable *C. ohlone* habitat for future colonizations." Adequate mitigation of the potential disturbance impact of the LRDP on existing OTB populations thus requires setting aside enough habitat to allow development of new colonies in suitable habitat areas near each other, and actively managing and monitoring these areas. The University should also obtain offsite conservation easements for OTB habitat management and expansion, including habitat set asides on the Goode property adjacent to the University parcel south of Empire Grade.

1. Tara M. Cornelisse*, Michelle K. Bennett, Deborah K. Letourneau, "The Implications of Habitat Management on the Population Viability of the Endangered Ohlone Tiger Beetle (*Cicindela ohlone*) Metapopulation."
2. Richard A. Arnold and C. Barry Knisley, "Biology and Conservation of *Cicindela ohlone*, the Endangered Ohlone Tiger Beetle." <https://ucscampusreserve.ucsc.edu/documents/arnold-knisley-2018>

Response O6-32

The Ohlone tiger beetle discussion on pages 3.5-56 through 3.5-59 of the Draft EIR includes a discussion and analysis of the impacts of development under the 2021 LRDP on Ohlone tiger beetle. As described in this section, development under the 2021 LRDP would avoid all areas where Ohlone tiger beetle is known to occur, and most areas where habitat suitable for the species (i.e., grasslands and coastal prairie with Watsonville loam soils) is present. In the areas where development is planned and these habitat conditions overlap, Mitigation Measure 3.5-2i on pages 3.5-58 and 3.5-59 of the Draft EIR would require preservation or creation/restoration of additional habitat for the species. The analysis and mitigation are adequate pursuant to CEQA at a programmatic level, and no further evaluation or mitigation is warranted. Refer also to Master Response 12 regarding long-term habitat protection and a campus-wide HCP.

Comment O6-33

The potential adverse impact to Ohlone tiger beetle of the proposed LRDP would not be reduced to “less than significant” unless the following change is made to the proposed mitigation and monitoring plan:

To the extent the project may result in “take” of the species, UC Santa Cruz shall develop and implement an HCP addressing existing and potential Ohlone tiger beetle habitat across the UC Santa Cruz campus, consistent with Mitigation Measure 3.5-2a, which would require authorization by USFWS under Section 10 of the ESA.

Further, in order to ensure that the required HCP is effective in protecting beetle populations, and in to support a finding of less than significant impacts to the OTB, the EIR will remain deficient unless the HCP include the following measures:

- Manage the location, extent and timing of foot and bicycle traffic, and bicycle speed, to maintain appropriate habitat and limit the risk to adult and larval Ohlone tiger beetles.
- Implement manual habitat scraping and compaction rather than relying on incidental foot and bicycle traffic.
- Control residual dry matter in OTB habitats through effective implementation of grazing, fire management, mowing, hand removal and shrub mastication.
- Control invasive vegetation, particularly invasive forbs and grasses in grassland habitats, by grazing, manual removal, controlled burning or flaming, chemical control, scraping, shallow scarifying, or other means as appropriate.
- Employ adaptive management: Test the efficacy of the above management measures and adapt changes to ensure that the measures achieve reduction in RDM and increase bare soil areas. Monitor OTB populations and adjust management measures to arrest population declines.
- Require the HCP to, at minimum, maintain OTB populations with no decrease.

Response O6-33

Mitigation Measure 3.5-2i on pages 3.5-58 and 3.5-59 of the Draft EIR includes the requirement to develop a comprehensive HCP as one of the potential regulatory strategies for addressing potential impacts on Ohlone tiger beetle. Refer also to Master Response 12 regarding long-term habitat protection and a campus-wide HCP. The analysis and mitigation are adequate pursuant to CEQA at a programmatic level, and no further evaluation or mitigation is warranted.

Comment O6-34**Coastal Prairie/Grassland**

The Ohlone tiger beetle is one of the most important, but not the only rare or declining wildlife species in Santa Cruz County that requires grasslands and Coastal prairie habitat to survive. Coastal native grassland prairie in Santa Cruz County supports a wide variety of special status birds, mammals, plants and insects. The DEIR states that on the UC campus, five special status plant species are known to occur on campus, all in the Marshall Field complex, as follows:

San Francisco popcorn flower (*Plagiobothrys diffusus*)

Point Reyes horkelia (*Horkelia marinensis*)

Marsh microseris (*Microseris paludosa*)

Santa Cruz clover (*Trifolium buckwestiorum*)

Pacific Grove clover (*Trifolium polyodont*)

The list omits Shreve Oak (*Quercus parvula var. shrevei*), a species describes as “near threatened” on the International Union for Conservation of Nature’s Red List of Threatened Species.

In addition to the listed plant species, a number of special status bird and mammal species rely on Coastal prairie habitats found on campus. As the EIR observes, two species of State Special Concern, burrowing owls and Bryant’s savannah sparrow, breed in campus grasslands. Northern harrier (Protected, SSC) and loggerhead shrike (SSC) occur during breeding season. American badger, a State mammal of special concern, also appears to breed on campus. Protected Golden eagles, a species only recently delisted that incorporate the campus into their breeding territories, some seasons visiting virtually every day to exploit the prey base of ground squirrels, rabbits and other small mammals.

California’s relatively intact grasslands are reservoirs of biodiversity. Grassland birds, mammals, reptiles, insects, pollinators and other animals depend on the resources these plants and spaces provide. “Old-growth” grasslands are ancient ecosystems characterized by high herbaceous species richness, high endemism, and unique species compositions. Native grasslands support about 40% of California’s total native plant species (Wigand 2007:55). An astounding 90% of California’s rare and endangered plant species reside in grasslands (Skinner & Pavlik, 1994). Currently 73 grassland-associated species are listed by the state and federal Endangered Species Acts: 14 vertebrates and 59 plants, and 14 invertebrates, including 6 butterfly species. This count does not include unlisted native pollinators and other plants and animals experiencing sharp declines. The importance of UCSC coastal prairie habitat to a diversity of plant species and insect pollinators was documented by the late naturalist Randall Morgan, whose insect collection is housed at the Kenneth S. Norris Center for Natural History, where it inspires and serves as a reference point for student and faculty research, providing a rich cultural tradition on campus.

Randall Morgan, who discovered and named several of the special status plant species potentially occurring on the UCSC campus, ranked “native grassland/flowerfield” as one of the most sensitive habitats in Santa Cruz County, with the greatest number of endemic or special status taxa, the most severe threats, immediate and continuing, and the greatest percentage lost or degraded, in a formal habitat rating system developed for open space acquisition purposes:

Habitat Evaluation Matrix

Natural communities/habitat types occurring in Santa Cruz County, ranked on a scale of 1-5 (one being highest) on each of six parameters

Natural communities/ habitat types	Evaluation parameters					
	Greatest number of endemic or special-status taxa	Most severe threats, immediate and continuing	Greatest percentage lost or degraded	Smallest total area remaining	Smallest area under legal “protection”	Lowest potential for recovery once lost or degraded
Sand parkland	1	2	2	1	2	1
Central maritime chaparral ¹	3	1	2	1	1	2
Native grassland/ flowerfield	1	1	1	4	2	2
Coastal headlands	2	2	3	2	1	1
Freshwater wetlands	3	2	3	3	2	3
Beaches, coastal dune	2	2	3	3	3	4
Riparian deciduous forest	4	3	2	3	3	2
Northern maritime chaparral ²	2	3	4	4	2	3

Estuaries, salt marches	3	3	4	2	2	4
Primary forest (conifer)	3	3	1	4	4	4
Perennial streams	4	3	4	3	2	4
Northern mixed chaparral ³	3	3	5	4	3	3
Coastal sage scrub	4	5	4	4	2	5
Non-native grassland	2	4	5	4	4	5
Ocean	3	5	5	5	5	5
Mixed hardwood forest	4	5	5	5	5	5
Secondary forest (conifer)	5	5	5	5	5	5

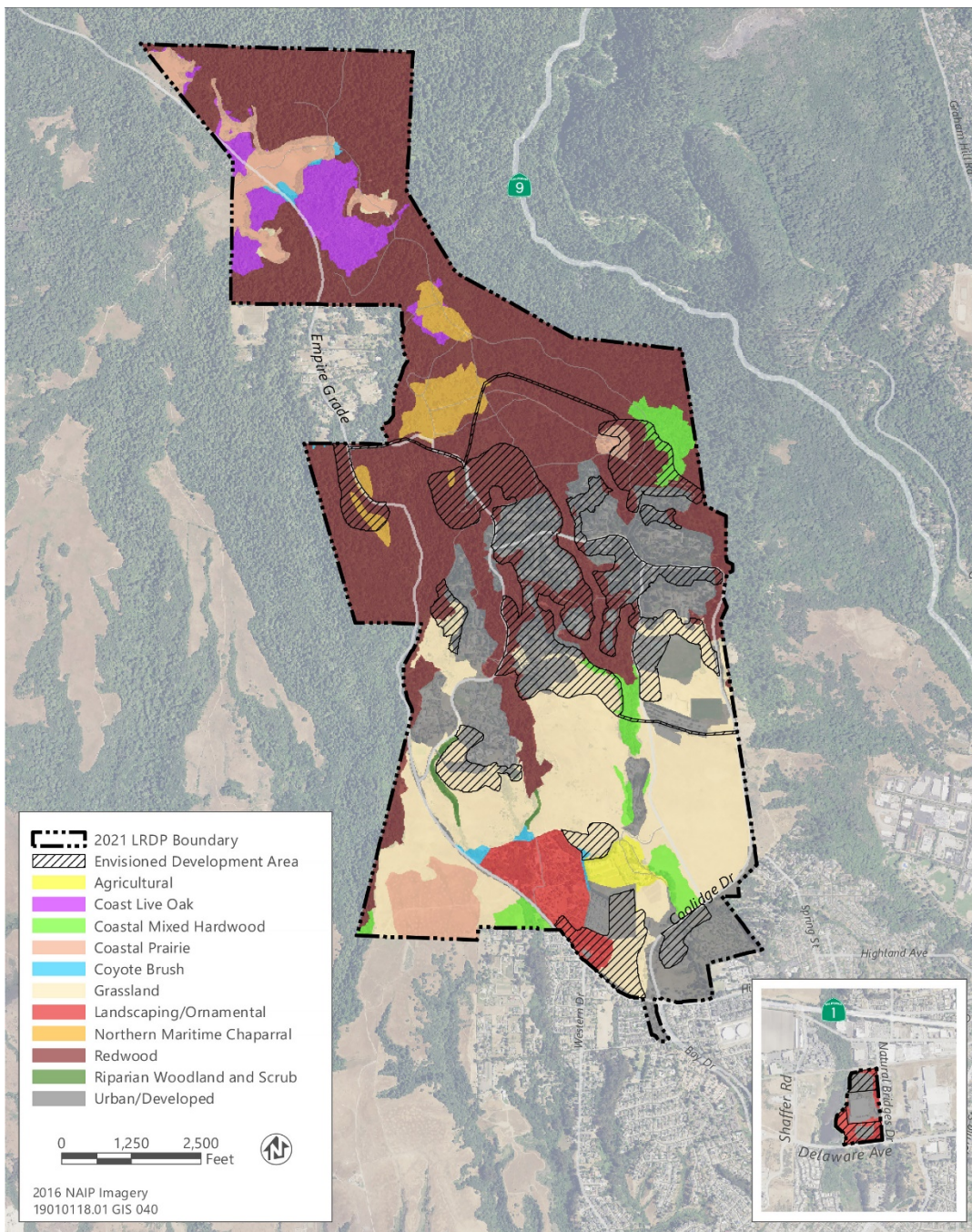
The decline in native grasses and grasslands in the last two centuries has been caused by intensive cultivation, poorly managed grazing, urbanization, fire suppression, and the introduction of invasive, nonnative species. Agriculture, invasion by exotic species, development, and other human-related activities have reduced California native grasslands by 99 percent.

Response O6-34

Section 3.5.2, "Environmental Setting," on page 3.5-32 of the Draft EIR identifies Shreve oak forest as a sensitive natural community that could occur in the LRDP area. Shreve oak as a species does not meet the typical requirements of a special-status species under CEQA (i.e., listing under the federal of California Endangered Species Acts, California rare plant rank of 1, 2, or 3). This comment otherwise does not address the adequacy of the Draft EIR, and further response is not 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 O6-35

The proposed LRDP would convert to housing and office buildings approximately 70 acres of grassland habitat, including 2-4 acres of coastal prairie habitat at Crown meadow on north campus that would experience a combination of direct conversion and indirect adjacent impacts from proposed housing. Residential uses immediately adjacent to sensitive grassland resources would introduce trampling, disturbance, litter, non-native vegetation and fire hazards that would undermine habitat quality or change the plant composition to a ruderal habitat type. The proposed residential zone is deformed towards the meadow and was evidently designed to encircle the habitat. A slight modification of the proposed development area at Crown meadow to avoid the habitat and provide a habitat buffer setback would eliminate the direct impact and significantly reduce indirect effects. This reconfiguration could easily be accomplished by adding height to the proposed buildings or by extending the habitat to the north and east, where it would affect mixed hardwood and second growth conifer forest, rated the least sensitive habitat by Morgan. The EIR is obligated to avoid identified sensitive habitat where feasible. At minimum, the EIR should evaluate the feasibility of reconfiguring the North Campus housing zone as a project alternative, to provide a buffer area between the development area and the grassland.



Response O6-35

Within Impacts 3.5-1 and 3.5-2, beginning on page 3.5-38, the Draft EIR evaluates the potential impacts to sensitive species, including the loss of habitat (e.g., grassland), as a result of implementation of the 2021 LRDP and provides mitigation to reduce significant impacts to less-than-significant levels, where appropriate, including with respect to impact to sensitive habitat. Further, site-specific design (including structure placement, buffer distances, etc.) has yet to be conducted and may implement site features as requested by the commenter and would be subsequently evaluated at a project level under CEQA. However, the EIR is not obligated to provide alternatives/mitigations unless significant impacts would not be reduced to less-than-significant levels. The Draft EIR's analysis, as provided, is considered appropriate, adequate, and in accordance with CEQA requirements. For comments on the 2021 LRDP project, please refer to Master Response 2.

Regarding the Draft EIR's presentation of a reasonable range of alternatives, refer to Master Response 3. Alternative 3, as presented on page 6-17 of the Draft EIR would remove the housing within the north campus subarea, consistent with the commenter's request.

Comment O6-36

The University has already damaged or destroyed 16-20 acres of existing grassland habitat on campus, including all of area proposed for the campus facilities and operations adjacent to the Great Meadow, and part of Inclusion Area D, the site restore coastal prairie and Ohlone tiger beetle restoration. The affected areas have been cleared of vegetation and used for refuse management, including discharge of debris piles and fill and storage of waste receptacles. Development prior to environmental review constitutes a violation of CEQA and the responsible parties should be identified and held responsible. This type pre-emptive habitat destruction is a commonplace occurrence in private development but reprehensible at an institution that is supposed to set an example of the highest ethical standards for its students and faculty. The photographs below document the CEQA violation:

Proposed Campus Facilities and Operations, 2007:



Proposed Campus Facilities and Operations, 2020:



Dumpsters, debris boxes and other waste receptacles at the "proposed" facilities site:



Inclusion Area D, 2016 to 2020 (left to right), indicating recent vehicular activity and dumping:



Response O6-36

This comment addresses previous development activities in the LRDP area, as part of the 2005 LRDP and this is unrelated to the 2021 LRDP. For background, the 2005 LRDP was amended in 2016 for the Recycling Yard Project Phase 1, with a Campus Support land use designation to support campus operations. The purpose of the Recycling Yard Project is to consolidate various campus recycling activities into one area and support the campus' zero-waste goal. UC Santa Cruz prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for the project in 2015 and a Notice of Determination (NOD) was filed with the Office of Planning and Research on April 19, 2016. The aerial imagery showing Inclusion Area D in 2020 depicts construction activities associated with a campus utility sewer replacement project, not dumping of materials as suggested by the commenter. A categorical exemption was prepared for the project in accordance with CEQA. UC Santa Cruz consulted with the USFWS regarding the project with respect to the Ranch View Terrace Habitat Conservation Plan during preparation of the categorical exemption and prior to construction. Within the context of the Draft EIR and the evaluation of impacts related to the 2021 LRDP, CEQA does not require the evaluation of potential improvements to existing conditions and instead requires that a project is responsible for proportionally mitigating its contribution to a physical environmental condition. This comment does not address the adequacy of the 2021 LRDP 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 O6-37

Impacts

The DEIR proposes essentially three measures to mitigate potential impacts to sensitive plants and plant communities: avoidance at the project phase, or transplantation/offsite restoration where avoidance is not feasible.

These mitigation measures are all inadequate. Avoidance of sensitive plants must be implemented at the program phase, when roads, proposed development zones and infrastructure can be reconfigured to avoid plant habitats. When roads, neighboring buildings and infrastructure already have been constructed, avoidance is no longer feasible. It is not effective or realistic to avoid sensitive plants by retaining them in a tiny island of open space surrounded by development, and such cannot be used as a basis for a finding of less than significant.

Transplantation or creating habitat is rarely effective. The high degree of failure of transplantation and habitat creation is such that it cannot be used to justify a determination of "less than significant" impact at the project phase. As coastal prairie expert Randall Morgan observed, if plants were meant to grow in the new location, they would be there already.

In terms of restoring existing degraded habitat, the campus should be managing its sensitive coastal prairie habitat to prevent degradation, not waiting for an opportunity to restore them in response to development. This incentivizes neglectful management. Numerous scientific papers have documented the existing, ongoing degradation of coastal prairie within and around campus lands by invasive European grasses and non-native trees and shrubs. Degradation,

either deliberate or neglectful, is also affecting prairie habitat and wildlife through off-road vehicular use, dumping, mountain biking and other human activities. Not only to maintain the quality of this existing sensitive plant community, but to maintain the Ohlone tiger beetle and other special status wildlife, the University should be implementing, improving and expanding grassland management measures.

The following mitigation measures shall be required to adequately address CEQA:

1. The 50 to 60 intact acres of grassland habitat affected by proposed development zones shall be subject to a comprehensive data, literature and on-the-ground surveys to identify sensitive plants and wildlife currently existing, prior to EIR certification.
2. Areas with sensitive plants, animals or plant communities shall be avoided by redrawing proposed development zones.
3. If the extent or location of the sensitive species precludes full avoidance, the resultant habitat degradation shall be mitigated by purchasing conservation easements or fee-simple acquisition of comparable offsite habitat at a 3:1 area ratio as the LRDP is implemented.
4. Inclusion Area D, an established habitat restoration area with soil substrate that supports coastal prairie management, shall be removed from the development area.
5. The residential zone surrounding Crown Meadow shall be redrawn to avoid the habitat and provide a 200-foot buffer from housing development.
6. The LRDP shall call out the proposed phasing of development, and place development of more sensitive habitats and potential habitat last in order. The development zone proposed along the north side of the Great Meadow is sensitive, and should be among the last sites developed, if developed at all, for multiple reasons:
 - a. Intact grassland habitat blocks are important to preserve, to avoid fragmentation;
 - b. The Great Meadow is inhabited by American badger, which is sensitive to vibration, dust noise and human activity, and is likely to be extirpated if this area is developed. The proposed strategy of identifying dens and fencing these off until they are abandoned is not a mitigation, it is an adverse impact;
 - c. Special status raptors, Bryant's savannah sparrow and loggerhead shrikes breed in the meadow or include in breeding territory for foraging;
 - d. Part of the development area proposed on the edge of the Great Meadow is believed to be potentially suitable habitat for OTB, according to a report prepared by entomologist Richard Arnold (citation above).
 - e. The proposed development would impose in an ecotone along the north border that is important habitat and a wildlife corridor for movement.
 - f. The proposed development would have visual impacts and intrude /disturb / disrupt recreational and research uses.
 - g. The topography may suggest possible karst / geologic constraints.
7. The University shall permanently protect the Marshall Field Complex from any future development of roads, structures, recreational facilities or other uses that could damage sensitive plant species found in the coastal prairie habitat.
8. The University shall prepare and implement a comprehensive habitat conservation plan (HCP) to maintain and expand native and mixed native coastal prairie habitat in the Marshall Field complex and in Inclusion areas A and D.

Response O6-37

The comment raises alternative mitigation approaches compared to those shown in the Draft EIR, but with the exception of transplantation, provides no substantial evidence regarding the effectiveness of proposed mitigation. The comment about the Draft EIR's requirement to mitigate after construction is not accurate; mitigation would be

imposed at the project planning stage, when detailed site-specific surveys and avoidance/compensatory measures can be effectively implemented.

Mitigation Measure 3.5-1b on pages 3.5-40 and 3.5-41 of the Draft EIR includes requirements for identification of special-status plants in a future project site, avoidance of these plants if feasible, and compensation for unavoidable impacts with established performance measures and success criteria. Regarding the commenter's statements pertaining to relocation, it is acknowledged that there are certain risks associated with translocation of special-status plants but it is considered an acceptable method of conservation if avoidance is not possible by USFWS, CDFW, and CNPS. The hierarchy provided in Mitigation Measure 3.5-1b provides for avoidance first (if the species is identified), including the establishment of buffer distances. The performance standard that must be achieved with translocation is no net loss and provides for a minimum 1:1 mitigation ratio such that no net loss will be achieved.

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 recommended mitigation measures included in this comment concerns the envisioned development areas in the 2021 LRDP. For comments on the 2021 LRDP project, please refer to Master Response 2. Refer to Master Response 12 regarding the potential for permanent protection of habitat and Master Response 9 regarding the level of detail of the analysis presented in the Draft EIR.

Comment O6-38

Summary

The Sierra Club appreciates this opportunity to comment on the University of California Santa Cruz 2021 Long Range Development Plan Draft Environmental Impact Report. We appreciate the educational mission of the University and its contributions locally, regionally, and beyond. We look forward to working with the University to determine the scope of its proposed growth over the next 20 years based on a complete and accurate analysis of its potential impact to the environment.

Response O6-38

This comment includes a closing statement. The comment is noted, and further response is not required.

Letter O7 Habitat and Watershed Caretakers

March 8, 2021

Comment O7-1

Dear Ms. Carpenter:

The University of California at Santa Cruz ("UCSC") campus is situated in an extraordinary environment whose deep, lush redwood forests give way to sweeping meadows overlooking Monterey Bay. This breath-taking setting hosts a vast array of sensitive plants and animals, and is blessed with iconic landscapes and world-class vistas. To date, the campus has been carefully interwoven into the natural fabric of its environment, sparing the most significant and sensitive natural features from irreparable ecologic and scenic harm. Indeed, "commitment to environmental stewardship and community engagement are central to the core values of UC Santa Cruz." UCSC, *Campus Overview: About UC Santa Cruz*, available at: <https://www.ucsc.edu/about/campus-overview.html> (last accessed March 4, 2021) ("*Campus Overview*").

However, that thoughtful balance is now threatened. The rapid and unsustainable growth contemplated in the University's 2021 Long Range Development Plan ("LRDP" or "Project") hints darkly of a jumbled, urban-style mega-campus oblivious to the unique natural amenities of this site and the heuristic values they hold. While UCSC is obliged to update its LRDP to address potential growth pressures, it must also recognize the opportunities thus presented to identify, analyze and protect the vulnerable and irreplaceable natural resources that inspired its The Draft Environmental Impact Report ("DEIR") for the campus's 2021 LRDP fails to identify and protect those important resources, and instead accepts the cookie-cutter premise that the campus will grow to the standard-issue UC campus size of about 28,000 students by the 2040-2041 school year. DEIR at 1-3. It then trumpets its supposed need to "accommodate the increased campus population" it preordained to justify plans to construct "an additional 3.1 million

assignable square feet of academic and support building space.” DEIR at 1-3. The 2021 LRDP must not presume such unsustainable growth in the student population, and it certainly should not rely on that improvident growth to justify unnecessary campus expansion.

The DEIR also fails to fully analyze that Project’s impacts, and consider a broad range of creative alternatives – including in particular those that encourage and nourish off-site learning –that would avoid or lessen those impacts, as discussed below. Because the California Environmental Quality Act (“CEQA”) requires fact, not fiction, and demands environmental accountability, the DEIR violates CEQA. It must be revised to adequately consider the Project’s impacts, and protect the campus’ place as “one of the most visually spectacular settings in higher education.” *Campus Overview*.

Response O7-1

The comment provides introductory statements and the commenter’s opinion that the 2021 LRDP and Draft EIR do not identify, analyze, and protect natural resources. The comments criticize the Draft EIR but do not provide specific comments on the contents, so a specific response cannot be provided.

Comment O7-2

An adequate project description is an essential starting point for analysis of a project’s environmental impacts, and all environmental impact reports must provide one. 14 California Code of Regulations [“CEQA Guidelines”] § 15124. As directed by the CEQA Guidelines, the project description “shall contain . . . A statement of objectives sought by the proposed project[, which] will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR The statement of objectives should include the underlying purpose of the project.” CEQA Guidelines § 15124(b). It must not be so narrow as to unduly constrain the consideration of alternatives to the project. *North Coast Rivers Alliance v. Kawamura* (“North Coast”) (2016) 243 Cal.App. 4th 647, 668-669. “An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *County of Inyo v. City of Los Angeles* (“County of Inyo”) (1977) 71 Cal.App.3d 185, 193.

The DEIR provides an artificially narrow Project description that constrains the alternatives and impacts analysis in violation of CEQA. CEQA Guidelines § 15124(b); *North Coast*, 243 Cal.App. 4th at 668-669. It admits that 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 of [UCSC].” DEIR at 2-8. Yet the objectives discussed immediately thereafter demand rapid student growth despite its impacts on housing, traffic, water and other resource constraints, and ignores off-site alternatives for growth including remote learning that would accommodate those constraints. DEIR at 2-8 to 2-9. Such a narrowly constrained set of objectives precludes any other outcome besides the proposed Project, thereby subverting CEQA’s entire purpose.

The DEIR’s artificially narrow objectives require the University to “[e]xpand campus facilities and infrastructure to allow for projected increases in student enrollment,” “[e]nsure compact and clustered development,” create “two new college pairs at the main residential campus,” and “allow the campus to function as a center of public cultural life.” DEIR at 2-8 to 2-9. These objectives leave no room for any proposal aside from the Project. And notably, they are not necessary to accomplish the “overall objectives” of the 2021 LRDP – UCSC’s teaching, research, and public service missions.

Response O7-2

The project objectives stated in the Draft EIR were developed by UC Santa Cruz and reflect the historic campus planning experience (including campus growth and the founding vision for the campus), as well as extensive public outreach and input received with respect to the 2021 LRDP. The comment that the objectives are too narrow is an opinion; the examples provided (expand the campus to allow increases in enrollment, creating new college pairs, providing for cultural life) allow for consideration of the fundamental purposes of the project and guidance for how it would develop, but it is difficult to discern how they constrain alternatives, and a reasonable range of alternatives is evaluated in the Draft EIR. See Master Response 3.

Nevertheless, the commenter’s opinion regarding objectives will be provided to the UC Regents as part of the record for consideration on the project.

Comment 07-3

UCSC's public service mission is especially important here, because UCSC specifically prides itself on its "uncommon commitment to . . . public service." Campus Overview. The DEIR must ensure that all aspects of UCSC's mission are valued and considered when defining the Project's objectives. Yet, this vital public service mission is almost entirely overlooked in order to promote campus growth. DEIR at 2-8 to 2-9. The LRDP "anticipates . . . potential enrollment of 28,000 [full-time equivalent "FTE"] students (three-quarter average) by the 2040-2041 academic year," and plans to construct "an additional 3.1 million assignable square feet of academic and support building space" to "accommodate the increased campus population." DEIR at 1-3. This reflexive obeisance to the premise of rapid campus growth precludes the careful and detailed consideration of less impactful alternatives that CEQA demands.

The DEIR claims that "the 2021 LRDP does not mandate growth or the provision of new facilities," but then commits to providing for up to 28,000 FTE students. DEIR at 1-3. It asserts that the proposed 28,000 student assumption is "based on overall UC and campus population projections, demonstrated need for additional public university capacity in California, and an understanding of campus needs." DEIR 2-9. This reasoning stands CEQA on its head by allowing the "growth projection" tail to wag the environmental planning dog. If growth on the UCSC campus occurs, it will be because the University allows it. The DEIR's framing of student enrollment growth as an unstoppable force that it must accommodate infects the entire DEIR, starting with the Project description.

Indeed, the "growth projection" tail is directing the scope of the entire 2021 LRDP. Unlike past LRDPs – which were effective for set periods of time – the proposed 2021 LRDP is effective for as long as it takes to reach the ultimate goal of 28,000 FTE students. DEIR at 1-3. "[T]he 2021 LRDP does not sunset, and there is no set timeframe for when a new LRDP would be needed. However, for analytical purposes, [the DEIR] assumes that the forecasted student and faculty/staff growth would occur by the 2040-2041 academic year, along with development of related facilities and housing." DEIR at 1-3. But this change in scope is not warranted, and it unduly places growth objectives above all other important educational goals, including public service and environmental protection and sustainability.

In summary, the DEIR prematurely commits and subordinates the LRDP to the rapid and unsustainable "anticipated growth in on-campus student population from an estimated 18,518 FTE students (three-quarter average) for the 2018–2019 academic year to a potential enrollment of 28,000 FTE students (three-quarter average) by the 2040–2041 academic year." DEIR at 2-9. This embedded premise that rapid on-campus growth is unavoidable because it is pre-ordained in the University's "growth projection" defeats the entire purpose of the long-range planning process. It is akin to announcing the winner of a race before the starting gun is fired. It subverts UCSC's public service commitment and renders the CEQA process a hollow exercise. It must not be allowed to constrain the EIR's statement of objectives.

Response 07-3

The 2021 LRDP is intended to accommodate potential growth of the UC Santa Cruz campus to 28,000 students. Refer to Master Response 2 for a discussion of projections evaluated in the Draft EIR. Despite its initial correlation to a stated objective of the 2021 LRDP, this comment is not a comment on the adequacy of the EIR but on the proposed land use changes identified in the 2021 LRDP. In addition to assessing facility needs for the increased enrollment, the 2021 LRDP also reflects public input received during plan development regarding the level of on-campus support facilities for student life, etc. Based on UC Santa Cruz's history and its initial function as an institution of higher education, UC Santa Cruz considers the maintenance of natural spaces and environmental field research facilities close to the central campus as essential to its identity and academic operations. Contrary to statements made in this comment, the project objectives to which this comment refers are considered reasonable, appropriate, consistent with CEQA requirements, and necessary to inform the 2021 LRDP and evaluation of potential CEQA alternatives. As a result, the objectives are not considered unreasonably constrained, such that an adequate range of alternatives would be precluded. Please see Master Responses 2 and 3 for a discussion of the Plan Development and Public Engagement, and Alternatives, respectively.

Comment 07-4

Normally, the "EIR must include a description of the physical environmental conditions in the vicinity of the project . . . as they exist at the time the notice of preparation is published." CEQA Guidelines § 15125(a) (emphasis added).

However, this presumption does not apply to a project approval that the University knows the courts have already set aside. Because the Student Housing West Project's approval was vacated by the Santa Cruz County Superior Court on October 30, 2020, and indeed, additional challenges to its legality remain pending – one on appeal and one in Superior Court – the DEIR must not indulge the fiction that this project whose approval has been vacated by the courts remains within the existing environmental setting. Indeed, the DEIR admits that the Student Housing West Project approvals were overturned by the Superior Court, and that it cannot proceed unless and until it is re-approved – which is not yet, and may never, be the case. DEIR 3.13-7. Therefore, it must not be included in the baseline conditions. Rather, and as required by Guidelines section 15125(a), the environmental setting should describe the campus as it now exists, with sweeping ocean views and untrammelled open spaces, including most prominently, its iconic East Meadow. But the DEIR fails to abide by this mandate, and instead includes a project it knows was illegally approved and properly set aside by the Superior Court – as if the Judicial Branch does not exist. DEIR at 3.3-29.

In an apparent attempt to mask the fact that the Student Housing West Project has been set aside and the University failed to timely appeal that judgment, and thus this project is not part of the environmental setting, the DEIR also refers to the Student Housing West Project as a cumulative project. DEIR 4-3. But this project is never actually analyzed as a cumulative project. Instead, this reference is in name only. Rather, the Student Housing West Project is discussed throughout the environmental setting section of the DEIR as if it were already part of the existing environment, and the student beds it might have provided had it been lawfully approved – instead of being set aside by the court – are presumed to already exist in the DEIR's discussion of impacts. DEIR at 3.6-12, 3.10-29, 3.13-2, 3.13-7, 3.16-34.

This erroneous presumption is particularly marked in the DEIR's discussion of Project alternatives. As further discussed below, the no project alternative mistakenly includes the Student Housing West Project. DEIR at 6-10. But the Student Housing West Project is not built and therefore cannot be considered an existing condition that will be present. The disconnect between the DEIR's conflicting claims that this project is a "cumulative project" yet subject to "baseline" treatment is at best confusing and at worst, a contrived fiction to evade required CEQA review.

Response 07-4

As of March 2021, Student Housing West has been reapproved by The Regents. The Draft EIR appropriately acknowledged the status of Student Housing West and UC Santa Cruz's intent to address the deficiencies identified by the court and reapprove the project. Furthermore, at no point does the Draft EIR consider Student Housing West part of the existing conditions of the LRDP area but appropriately reflects it as a planned-but-not-yet-operational project, including at all the locations identified by the commenter. In addition, and with respect to alternatives, the decision of whether or not to approve the 2021 LRDP is not material to Student Housing West, and as such, Student Housing West is appropriately considered to be part of the cumulative baseline and potential environmental conditions that may occur under Alternative 1 (No Project). Per the CEQA Guidelines (Section 15130), cumulative projects are "past, present, and probable future projects" and Student Housing West fits this definition as a probable future projects, which typically are those projects that are proposed at the time the NOP is released. The commenter's opinion is noted, but no further response is necessary.

Comment 07-5

CEQA requires an EIR to describe a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of its significant effects. CEQA Guidelines § 15126.6(a) and (f). "An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making." *Laurel Heights Improvement Association v. Regents of the University of California* ("Laurel Heights") (1988) 47 Cal.3d 376, 404. An alternative may "not be eliminated from consideration solely because it would impede to some extent the attainment of the project's objectives." *Habitat and Watershed Caretakers v. City of Santa Cruz* ("HAWC") (2013) 213 Cal.App.4th 1277, 1304; CEQA Guidelines § 15126.6(b). "The EIR is required to make an in-depth discussion of those alternatives identified as at least potentially feasible." HAWC, 213 Cal.App.4th at 1303

(emphasis and quotation omitted).

As discussed above, protecting UCSC's unique environment and advancing its public service mission are central objectives to the University and thus must be achieved in the LRDP. Therefore, the DEIR should have considered alternatives that assure those objectives will be achieved. Alternatives that temper on-campus population growth in order to protect the campus's extraordinary environment must be given full consideration, as they can be fashioned to achieve the LRDP's stated objective to "support [] the teaching, research, and public service missions of [UCSC]." DEIR at 2-8. Limiting FTE on-campus student enrollment will allow UCSC to put more resources toward education and research for its students, while at the same time achieving its public service and environmental preservation objectives.

Yet, not a single one of the DEIR's alternatives considered shifting some student growth to other UC campuses that have greater carrying capacities, such as greater water supplies and fewer environmental impacts and constraints. DEIR at 6-3 to 6-6. While two alternatives did consider a proposed enrollment of 26,400 FTE, a mere 1,600-student reduction from the proposed Project would still amount to an unnecessary and excessive expansion that would allow construction of 2.5 million assignable square feet of academic and administrative facilities. DEIR at 6-11, 6-13, 6-17. Such intense growth on a site hosting vulnerable and irreplaceable environmental resource must be weighed against an alternative that shifts growth elsewhere, such as other campuses that have the space and the resources to expand. Instead of assuming that UCSC's on-campus student population must be expanded, and keep expanding, to accommodate more and more students on a campus that cannot support that growth, the LRDP should limit UCSC's on-campus growth to a more sustainable population, and explore off-campus alternatives.

Indeed, the University is contractually obliged to conduct a "comprehensive analysis of potentially feasible alternative locations to accommodate proposed UCSC enrollment growth" including "satellite campuses [and] remote-classrooms." Comprehensive Settlement Agreement between the University and the local residents on whose behalf these DEIR Comments are submitted, attached as Exhibit A to the Judgment filed September 22, 2008 in the matter *Don Stevens, et al. v. University of California Santa Cruz, et al.* Civ. Nos. CV 155583, et al. Santa Cruz County Superior Court, § 5.1.

But the DEIR dismissed all but one of those alternatives, violating its contractual duty to provide – and the Superior Court's Judgment requiring – a comprehensive analysis of alternative locations to accommodate growth. DEIR at 6-3 to 6-6. Based on a single perfunctory and conclusory paragraph each, the DEIR dismisses four off-campus site alternatives, and one remote/distance alternative, on the erroneous premise that they do not meet the project objectives. DEIR at 6-3 to 6-6. But as discussed above, those objectives are artificially contrived to preclude consideration of the reasonable range of alternatives that CEQA requires. *HAWC*, 213 Cal.App.4th at 1304; CEQA Guidelines §§ 15124(a), 15126.6(b). Indeed, the DEIR dismisses every off-campus alternative on the basis that it fails to meet the "objective of placing new facilities near existing facilities to enhance synergies between existing and new educational and research programs." DEIR at 6-4 to 6-6. But there is more than one way to "enhance synergy" between new and existing educational resources. Restricting all alternatives to on-campus ones – in a time where we can readily observe how successful remote learning can be – subverts CEQA's core purpose of exploring a reasonable range of alternatives to avoid and reduce environmental harm.

UCSC has an unprecedented opportunity to analyze the challenges that the world is facing, and utilize some of the new procedures and practices to its benefit. A distance learning alternative would alleviate many of the potential effects of campus growth, including water and transportation impacts, while still enabling sustainable growth and public service, and potentially opening up enrollment to students who may not have been able to attend otherwise. And, as noted, "comprehensive" consideration of this alternative is already required under the Comprehensive Settlement Agreement the University signed in 2008 with the local residents on whose behalf these DEIR Comments are submitted. The DEIR's cursory dismissal of this alternative violates both CEQA and the Comprehensive Settlement Agreement. DEIR at 6-6.

Response O7-5

It is acknowledged that shifting enrollment growth to an offsite location would reduce impacts within the LRDP area; however, as noted in the Draft EIR's discussion of Alternative 4, additional impacts (especially where new facility development would be required) would have new/different impacts at the off-site location(s). With respect to the

Draft EIR's evaluation of a reasonable range of alternatives in light of the project objectives in compliance with CEQA requirements, refer to Response O4-7 and Master Response 3. With respect to the applicability of the 2008 CSA to the 2021 LRDP, refer to Master Response 2. The 2008 CSA applies to the 2005 LRDP and its EIR, not to development under the 2021 LRDP. Regarding distance learning, the 2021 LRDP does not preclude the campus from providing additional distance learning opportunities in the future. Also refer to Response O4-7.

Comment O7-6

The DEIR also fails to consider an alternative "that could avoid or lessen the significant environmental impact of [campus expansion] on the [City of Santa Cruz's] water supply." HAWC, 213 Cal.App.4th at 1305. As discussed below, UCSC relies on the City of Santa Cruz ("City") for its water supply and that water supply is "anticipated [to have] shortfalls under drought conditions." UC Santa Cruz LRDP 2005-2020 ("2005 LRDP"), 88; DEIR at 3.17-24. While UCSC did reduce its water use after 2005, it has been increasing again since 2014. And the City of Santa Cruz expects the demand for water to exceed supplies by 2025. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6, 6-24. Because UCSC campus growth will necessarily increase water demand, the EIR must consider an alternative that reduces that impact on the City's water supply. DEIR at 3.17-19 to 3.17-21.

Response O7-6

The analysis provided in Chapter 6 of Alternative 1, 2, and 3 clearly state that three alternatives would reduce potable water demands, consistent with the commenter's request and CEQA requirements. Refer to Table 6-2 on page 6-33 for further clarification. Also, please see Master Response 7 concerning the analysis of water supply.

Comment O7-7

The DEIR's no project alternative likewise violates CEQA. As discussed above, the Student Housing West Project is not currently constructed, and may never be built. As noted, the Student Housing West Project approvals were overturned by the Superior Court and it cannot proceed unless it is reapproved and the reapproval survives the pending legal challenges. DEIR at 3.13-7. Yet this speculative project is presumed constructed under Alternative 1—the no project alternative. DEIR at 6-10. "The no-project analysis is required to discuss 'the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved.'" DEIR at 6-7. But the Student Housing West Project is not built, and at the time of the notice of preparation was the subject of litigation making its future uncertain. Its inclusion in the no project alternative despite the Superior Court's October 30, 2020 Judgment vacating its approval, and the additional legal challenges still pending, ignores the proper role of the courts in enforcing CEQA's mandate, and therefore violates CEQA. CEQA Guidelines § 15126.6(e)(2).

Response O7-7

Please refer to Response O7-4, which notes that the Draft EIR appropriately acknowledged the status of Student Housing West as a planned-but-not-yet-operational project.

Comment O7-8

CEQA mandates that the DEIR adequately analyze a project's effects to foster informed decisionmaking and allow the public to understand those impacts. Public Resources Code ("PRC") § 21002.1; CEQA Guidelines §§ 15121, 15126, 15126.2. Where possible, the lead agency must employ feasible mitigation measures that could minimize the project's significant adverse impacts. PRC § 21002; CEQA Guidelines §§ 15121, 15126.4. The EIR must provide information in "an analytically complete and coherent" manner to foster CEQA's informational purpose. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* ("Vineyard") (2007) 40 Cal.4th 412, 440; *Berkeley Keep Jets Over the Bay Committee v. Board Port of Commissioners* (2001) 91 Cal.App.4th 1344, 1355-1356; CEQA Guidelines §§ 15121, 15144. Yet, the DEIR failed to adequately discuss and mitigate the Project's impacts in at least the following nine ways.

Response O7-8

The comment expresses the opinion that the Draft EIR is inadequate but does not provide specific support for this statement. More detailed comments on this subject are addressed below.

Comment 07-9

"The visual character of the campus is defined initially by its spectacular natural environment of open meadow spaces, coastal oak forests and redwood groves." DEIR at 3.1-10. According to the 2005 LRDP, the campus site was selected because it was "overlooking Santa Cruz and the Monterey Bay.... Often called the most spectacular university site in the world, the campus landscape has played a vital role in shaping UCSC's physical and academic development." 2005 LRDP, 16. "The natural landscape is the formative, iconic element of the UCSC campus and the dominant component of its powerful array of open spaces." 2005 LRDP, 33. Notably, the proposed 2021 LRDP does not discuss the history of why this site was chosen and simply distills the campus' beauty down to single sentence that does not do it justice: "The campus enjoys panoramic views overlooking the Monterey Bay and the Pacific Ocean." Draft 2021 LRDP at 51.

Rather than ensure that these "vital," "spectacular" and "iconic" views are preserved and protected by the 2021 LRDP, the DEIR brushes potential impacts aside and declares that the addition of nearly 10,000 new students and 3.1 million square feet of facilities and infrastructure will not have a significant affect on any scenic views. DEIR at 3.1-38 to 3.1-39.

For example, "[e]xpansive meadows at the campus's main entrance gradually transition to the rugged redwood forests of the Santa Cruz mountains, providing an incomparable natural setting." 2005 LRDP, 16. But UCSC has apparently already committed to develop "[a]n enhanced historic district at the entrance to the main residential campus." DEIR at 2-9. And the DEIR fails to provide any discussion of what that "enhanced" historic district will entail or how it will impact the current views of the "incomparable" East Meadow. The failure to evaluate these impacts, and analyze alternatives and mitigation measures that would avoid or reduce them, violates CEQA.

Response 07-9

As noted in Response O2-2 and Master Response 11, the Draft EIR's analysis is programmatic and while initial areas for development of future campus buildings have been identified, it does not provide a project-level consideration of potential impacts related to the placement of structures and specific site design considerations. However, contrary to the assertions made in this comment, the Draft EIR does provide an evaluation of and assesses potential impacts both on-site and off-site, including those with respect to the historic district. Refer to visual simulations provided on pages 3.1-20 through 3.1-33 of the Draft EIR (and carried forward into the analysis of Impact 3.1-1 on pages 3.1-38 through 3.1-42 of the Draft EIR, as well as Impact 3.1-2 (beginning on page 3.1-42 of the Draft EIR). As noted in these exhibits and in the impact analysis provided in pages 3.1-38 through 3.1-42, development under the 2021 LRDP would largely be obscured from view such that substantial adverse changes in visual character would not occur with respect to long-distance views. Therefore, the Draft EIR appropriately determines that impacts would be less than significant.

With respect to the term "enhanced historic district" provided on page 2-9 of the Draft EIR, this was provided in reference to the 2021 LRDP's intent (as noted on page 80 of the Draft LRDP) to "improve the district for use as a campus and community amenity." As noted on page 3.4-22 of the Draft EIR, enhancements under the 2021 LRDP may be provided for academic & support facilities, community-facing programs, and visitor resources. The degree to which further improvements within the historic district may occur are dependent on site-specific design but may include seismic stabilization and rehabilitation of structures within the district (refer to page 113 of the 2021 LRDP). Enhancements within the district would likely be limited in mass and scale so as not to affect the integrity of the district (as required by Mitigation Measure 3,4-4a, beginning on page 3.4-22 of the Draft EIR). As noted in this mitigation measure, new development would be evaluated for compliance with a 200-foot buffer and, at a minimum, would be required to comply with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" for any development within 500-feet of the district. As such, the Draft EIR's programmatic analysis already includes the requested analysis, consistent with CEQA requirements.

Comment 07-10

Impacts to the East Meadow cannot be dismissed from careful analysis because UCSC wants to build the Student Housing West Project. As discussed above, this project's structures do not exist currently and the project must be re-approved and survive additional legal challenges before it may proceed. The impacts from the proposed Student

Housing West Heller site likewise cannot be ignored on the mistaken grounds that this project is already part of the existing environment. It isn't. Just like the University's approval of the Hagar site's student housing proposed for the East Meadow, the University's approval of the Heller site's student housing near the West Campus entrance to the campus was set aside by the Santa Cruz Superior Court on October 30, 2020. That project cannot proceed unless and until (1) it is lawfully reapproved by the University and (2) it survives two lawsuits raising additional legal challenges. The EIR must consider the impacts of the Student Housing West Project on the campus at both locations as they currently exist – without this project.

Response O7-10

Please refer to Response O7-4 and Master Responses 8 regarding Student Housing West.

Comment O7-11

The fact that additional new development is also planned for areas of the campus on which there is existing development does not negate the impacts that additional new development, and its thousands of new students, will have on the extraordinary aesthetic resources of this unique campus. The DEIR must, as CEQA requires, recognize and describe the "iconic" and "incomparable" nature of these scenic resources, fully disclose and analyze the severe impacts that contemplated campus development will have on them, and evaluate a broad range of alternatives and mitigation measures that would avoid or lessen those impacts. Unless the DEIR is revised to address these significant impacts, these extraordinary and irreplaceable scenic resources are at serious risk of irreparable degradation and loss due to contemplated, but insensitive and unnecessary, rapid and unsustainable campus growth.

Response O7-11

The Draft EIR comprehensively addresses the potential impacts on visual character and resources (refer to Impacts 3.1-2 and 3.1-3, beginning on page 3.1-42 of the Draft EIR). These two analyses evaluate the potential impacts of 2021 LRDP development in and around existing campus development, with special consideration for the Cowell Lime Works Historic District and for protection of view within scenic area such as East Meadow. Mitigation for these potentially significant impacts is identified. The mitigation requires site-specific consideration of each development under the 2021 LRDP near aesthetic resources and scenic areas, consistent with the UC Campus Standards Handbook and the Physical Design Framework. Regarding the range of alternatives presented in the Draft EIR, refer to Master Response 3. Consistent with CEQA requirements, the Draft EIR evaluates the potential impacts to visual character and resources and provides mitigation, where appropriate to reduce significant impacts. Refer also to Response L7-28 regarding building heights considered in the Draft EIR. Further revision of the Draft EIR is not necessary to address or mitigate for the potential impacts of the 2021 LRDP. The commenter's opinion regarding the proposed building program of the 2021 LRDP is noted, but no further response is necessary.

Comment O7-12

In the past, the United States Fish and Wildlife Service ("USFWS") has noted that "[t]he piecemeal approach that UCSC has taken in terms of implementing individual development projects over time makes it difficult for the Service to adequately assess cumulative impacts." DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 2, p. 2. USFWS also expressed similar concerns about the 2005 LRDP DEIR, "includ[ing] the following: '1) underestimating the effects of various development projects on federally listed species, 2) [inadequate] UCSC land use designations regarding conservation of federally listed species, and 3) the lack of a comprehensive management plan for listed species at UCSC.'" DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 2, p. 2 (citing USFWS January 11, 2006 comment letter to UCSC on the 2005 LRDP DEIR).

These same concerns apply here. Because the DEIR fails to fully address the cumulative and indirect habitat impacts from all the development that the LRDP would allow over its life, those impacts will be hidden within piecemealed, individual project assessments. Thus buried from public and agency view, those impacts may never be recognized, leaving USFWS, the City and County, other agencies, and the public without a clear and complete understanding of the LRDP's cumulative and indirect biological impacts. Leaving agencies and the public in the dark places those impacted resources at unnecessary risk.

An agency must review the entire activity – in this case, the LRDP over its entire life – as a whole, rather than segment it into smaller parts. *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1230; *Laurel Heights Improvement Association v. UC Regents* (1988) 47 Cal.3d 376, 406; CEQA Guidelines § 15378(a), (c), (d). Because UCSC campus development has the potential, over the course of the LRDP's implementation, to significantly impact a long list of vital and vulnerable biological resources, the EIR must address all of those potential impacts, both short-term and long-term, now – when the go/no-go long-range planning decision is made – and before any further development may be allowed to proceed. But the DEIR defers all surveys, studies, plans, and avoidance measures to project-specific analyses. DEIR at 3.5-39 to 3.5-70. The failure to consider these impacts as a whole diminishes their perceived significance, ignores the impacts at the critical planning stage when the ability to avoid or mitigate those impacts is greatest, and thereby needlessly risks harm to these resources.

Response 07-12

The commenter's request to assess the potential impacts to biological resources that may occur within the entire campus as a result of 2021 LRDP implementation is reflected in the analysis already presented in the Draft EIR. Based on recent and available habitat mapping, recent biological survey information, and consultation with long-standing campus biologists extensively experienced with biological resources in the LRDP area, as well as sensitive species occurrence information, the Draft EIR provides a summary of the potential sensitive biological resources that may occur within the LRDP area and could be affected by the 2021 LRDP. Due to the size of the LRDP area, certain development, depending on site-specific conditions, may have different effects than other development under the 2021 LRDP, which is why the Draft EIR requires site-specific confirmation of habitat and potential sensitive species (which would also allow for campus to adjust to changes in on-site conditions.) As noted in the comment letter submitted by the USFWS, their previous requests regarding a holistic approach were related to habitat conservation, and the campus has pro-actively initiated discussion with USFWS (as part of Mitigation Measure 3.5-2a) to prepare a campus-wide HCP to conserve habitat for listed species, which could ultimately contribute to their recovery and could be applied for future development within the LRDP area. Contrary to the opinion provided in this comment, the Draft EIR's programmatic analysis of the 2021 LRDP is considered appropriate, adequate, and in accordance with CEQA requirements. No impacts to biological resources are ignored, and the comments do not raise any specific omissions.

Comment 07-13

The EIR's biological resources analysis also entirely fails to include a discussion of the Student Housing West Project. As noted above, that project has not been reapproved, let alone constructed, and therefore is not part of the existing environment. If it is eventually constructed, it will have significant impacts on biological resources. Even if this unlawful project is later approved under the 2021 LRDP, at that point it will be part of that larger, 2021 LRDP Project and yet will not have been examined as such. Therefore, the EIR's failure to consider the impacts of the Student Housing West Project together with the impacts of the other development

Response 07-13

See Master Response 8 regarding the Student Housing West and its treatment within the context of the Draft EIR. Also refer to Response 07-4, above.

Comment 07-14

As the "physical development and land use plan to meet the academic and institutional objectives," the LRDP has the potential to significantly affect greenhouse gas ("GHG") emissions on campus. DEIR at 1-1. Indeed, "the 2021 LRDP would result in a net increase in campus-wide GHG emissions caused by additional construction activity; on-road VMT [vehicle miles traveled]; building energy consumption; water, waste, and wastewater emissions; and additional stationary source emissions." DEIR at 3.8-21. But the DEIR fails to adequately analyze and mitigate that significant impact.

Response 07-14

Page 3.8-17 of Section 3.3, "Greenhouse Gas Emissions and Climate Change" lists the significance criteria used to evaluate the impacts associated with GHG emissions, and Table 3.8-5 reports the total annual GHG emissions that would result under the 2021 LRDP as they relate to the State's targets relative to 1990. As noted in Master Response 5,

the Draft EIR's analysis of potential GHG impacts takes into consideration statewide targets, the UC Sustainable Practices Policy and UC-specific GHG reduction targets and mandates, and the potential increases in GHG emissions associated with the 2021 LRDP's building program. In addition, it provides appropriate mitigation, along with a performance standard that must be achieved, that prioritizes on-site mitigation. As such, the Draft EIR's analysis is considered adequate and provides appropriate mitigation of the potential increase in GHG emissions.

Comment 07-15

The DEIR admits that the quantity of GHG "emissions that has accumulated in the atmosphere is enormous and has resulted in climate change, which is a significant cumulative impact." DEIR at 4-30. But the DEIR still limits its analysis to the impacts in and around the UCSC campus only. DEIR at 3.8-21 to 3.8-27. GHG emissions are not confined by the borders of the University, or the City. GHG emissions by UCSC have the potential to impact much more than just the campus and the City, and those cumulative impacts cannot be ignored. As the DEIR states, "[b]ecause climate change is a global phenomenon, the impacts of GHG emissions are inherently cumulative," and must be analyzed on a regional level. DEIR at 4-30. Because the DEIR's GHG emissions analysis fails to provide that regional (and global) evaluation, it violates CEQA.

Response 07-15

As shown in Table 3.8-5, GHG emissions generated by the 2021 LRDP are compared against statewide GHG reduction target, which are the regional evaluation requested by the commenter. The targets evaluated in Table 3.8-5 include reducing emissions by 40 percent under 1990 levels by 2030 and 60 percent under 1990 levels by 2040, which was interpolated from the State's target of reducing emissions by 80 percent by 1990 levels by 2050. As a result, the Draft EIR's analysis is considered to be consistent with CEQA requirements.

Comment 07-16

Under CEQA, GHG emissions must also be analyzed in a manner that recognizes the entirety of the project's "lifecycle" impact, including the emissions from the mining and gathering, cultivation and harvest, and manufacturing of the project's components, their fabrication, their transportation to the site, the on-site grading and construction of the project, and its long-term operation and ultimate decommissioning. This comprehensive review of a project's GHG emissions, widely known as a lifecycle analysis, is required by CEQA but never completed for the DEIR. DEIR 3.8-21 to 3.8-27. The LRDP should require a lifecycle analysis of all development that is proposed pursuant to the LRDP. Such an analysis would provide a more accurate and complete understanding of the Project's GHG emissions and its impact on the surrounding environment. Without such an analysis, the public and decisionmakers are left in the dark about the Project's true GHG impacts.

Response 07-16

The comment's statement regarding the need for a lifecycle analysis is noted but not "required" under CEQA. The California Association of Environmental Professionals (AEP) prepared a white paper on the need for lifecycle analyses within the context of CEQA and climate action planning efforts. Page 5-2 of this study states that:

If a project-level inventory were to include additional upstream embedded emissions associated with consumption of goods and services, or downstream transportation emissions, outside of the state, it would no longer be comparable to the state inventory and a threshold based on state reduction targets could not be used to evaluate the project's GHG emissions. Given the California Supreme Court's determination that it is appropriate under CEQA to compare project GHG emissions to a threshold related to the state reduction goals, there is no current requirement in CEQA to include GHG emissions that are not included in the state's GHG inventory, nor to use methodologies to account for emissions different from those employed in the state's GHG inventory (AEP 2017).

Further, the most commonly used tool for evaluating GHG emissions under CEQA is CalEEMod, which was used for the 2021 LRDP Draft EIR, and is universally recommended by local air districts, including MBARD, for the quantification of criteria air pollutants and carbon dioxide equivalents. CalEEMod, however, does not include the ability to calculate the emissions suggested by the commenter. Further, the emissions associated with the activities suggested by the commenter are generally accounted for in project inventories for the land uses and facilities to

which they more directly pertain. As noted on page 5-3 of the AEP study, “the addition of such emissions would not add any information necessary to make conclusions about the significance of project emissions compared to statewide reduction goals.” As such, inclusion of such analysis is considered to neither be required or recommended to understand the impact of the 2021 LRDP.

Comment 07-17

Campus development under the LRDP will impact the site’s hydrology and water quality. The campus is underlain by extremely complex and readily erodible geologic formations known as “karst,” as hydrologist and karst specialist Tom Aley explains in his accompanying comments, which are attached as Exhibit 1. The karst system is a landform that is “produced primarily through the dissolving of rock” and features “sinkholes, caves, large springs, dry valleys and sinking streams.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 11. Because of these features, karst landscapes pose unique hazards for surface development, and are very difficult to evaluate for potential use of groundwater stored in them. “In karst areas, water commonly drains rapidly into the subsurface at zones of recharge and then through a network of fractures, partings, and caves, [and] emerges at the surface in zones of discharge at springs, seeps, and wells.” Id.; Thomas Aley, Hydrogeologic Review of University of California Santa Cruz 2021 Long Range Development Plan EIR, March 4, 2021, p. 1-2, 7-8 (attached hereto as Exhibit 1).

Karst landscapes present numerous environmental uncertainties that make development pursuant to the LRDP and its impacts especially problematic. “Karst regions require special care to prevent contamination of vulnerable groundwater supplies and to avoid building in geologically hazardous areas.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 7. “Most of the rain that falls in a karst area drains into the ground rather than flowing to a surface stream.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 28. LRDP development, such as construction of the Student Housing West Project, can increase “pollution of groundwater by sewage, runoff containing petrochemicals derived from paved areas, domestic and industrial chemicals, and trash.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 7. “Contamination is common in karst aquifers beneath urban areas with high population densities.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 30.

Despite all of these perils and uncertainties, the DEIR makes assumptions about the karst aquifer and its availability for groundwater storage and pumping that ignore its inherent unsuitability for development and vulnerability to contamination and dewatering. Exhibit 1, pp. 3-8. For example, the DEIR makes baseless assumptions that overstate the groundwater storage capacity of the karst aquifer in order to sidestep hard questions about providing an adequate year-round water supply for the LRDP’s rapid growth should the University be unable to secure adequate water supplies from the City of Santa Cruz. The City has already concluded, as noted above, that it will face water shortages by 2025. “While human demands for water on the University campus with a dramatically enlarged population will be relatively constant, the key issue is the adequacy of groundwater from the karst aquifer . . . under dry weather conditions.” Exhibit 1, p. 2. But rather than analyzing the impact of pumping groundwater during dry periods when water supplies are limited, the DEIR erroneously bases its analysis on a groundwater pumping study that was conducted when the karst formation’s discharges to down gradient springs and creeks were 15 times greater than those watercourses’ minimum flows. Exhibit 1, p. 6.

As Mr. Aley explains, “UCSC failed to collect adequate spring flow data during the period 1984 through 2019. As a result, the University has no credible estimate of the rates at which water has been discharged from the karst aquifer during this 35 year period and how rapidly water that enters the aquifer is discharged through the springs.” Exhibit 1, p. 3. UCSC contends that pumping water from these aquifers may fill any deficit in water supply during dry years, but the karst system may not support the “113,700 gallons per day . . . projected demand.” Exhibit 1, pp. 3-4. “An adequately comprehensive network of monitoring wells for routinely measuring water level elevations is a key part of understanding and managing groundwater basins,” but the DEIR entirely failed to conduct adequate hydrologic investigations. Exhibit 1, pp. 4-5; DEIR 3.10-20, 3.10-24. Indeed, there are only 4 wells on campus and three are located within approximately 40 feet of one another. Id. More is needed to comply with CEQA’s informational mandate.

As Mr. Aley concludes, “[t]here is insufficient information available on the marble aquifer to conclude that it is capable of providing a daily volume of 113,700 gallons of water to extraction wells that would serve the University during dry periods without causing significant environmental problems. Those environmental problems include cessation of flow from springs and an increased risk of land subsidence or sinkhole collapse on University property.” Exhibit 1, p. 8. Because the DEIR fails to provide the University, the City, the Santa Cruz County Local Agency Formation Commission (“LAFCO”) and the public with the information necessary to make an informed and thoughtful decision regarding this Project’s impacts on water quality and supplies, it violates CEQA.

Response O7-17

Please refer to Master Response 10 regarding available groundwater data and the Draft EIR’s conclusion and significance determination for Impact 3.10-5.

Comment O7-18

Furthermore, the DEIR fails to address other obvious impacts on water resources. For example, it overlooks the impacts on water resources from the Project’s creation of large areas of impervious surfaces. It admits that “[s]everal currently undeveloped areas along the upper/north campus are proposed for development under the 2021 LRDP,” which will create new impervious surfaces. DEIR at 3.10-33, 4-34. “Infiltration of rainfall is a significant source of recharge of the shallow aquifer on the north campus. Although this shallow groundwater is not extracted as a water source on the campus, it supplies water to springs and seeps located throughout the north campus and in adjacent drainages.” DEIR at 3.10-33; see also DEIR 3.10-10, 3.10-25 to 3.10-26, 4-34 to 4-35; Exhibit 1, p. 2, 7-8. Therefore, any changes in impervious surfaces can have a significant effect on the shallow aquifers of the area. Yet, while the DEIR notes that these changes are likely, it entirely fails to address the potential impacts on these vulnerable water resources from that reduced infiltration. DEIR at 3.10-33 to 3.10-34.

As with the upper/north campus, likewise throughout the campus, surface discharge from shallow aquifers supplies headwater streams and saturates low areas and depressions. DEIR at 3.10-10, 3.10-25 to 3.10-26, 3.10-33; Exhibit 1, p. 2. Although small in acreage, these streams provide myriad habitats that support diverse plants and animals, as well as shelter, food, spawning sites and wildlife movement corridors. DEIR at 3.5-8, 3.5-10, 3.5-12 to 3.5-13, 3.5-16, 3.5-20, 3.5-26, 3.5-31, 3.5-33. However, the Project’s addition of impervious ground cover could result in reduced rainfall infiltration, and adverse effects on headwater stream flow, seeps, saturated depressions, and springs, and to the biota that rely on them. Because these shallow aquifers are often small, a single acre of added impervious surface can have a significant impact. DEIR, Appendix G at Table G1-2. The smaller the watershed the greater the impact. But despite these facts, the DEIR fails to address the reduction in infiltration to these aquifers from the Project’s construction of greater impervious surfaces.

Response O7-18

As noted in Response O2-20, the Draft EIR evaluates the potential for new impervious surfaces to affect groundwater recharge within Impact 3.10-5, which begins on page 3.10-33. As noted in Impact 3.10-5, compliance with UC Santa Cruz Post-Construction Requirements would involve the retention of runoff to pre-development conditions which would prevent a reduction in flows to springs and seeps and overall groundwater conditions as a result of increased impermeable surfaces. As a result of regulatory compliance, no mitigation measures are considered necessary to address the impact of 2021 LRDP implementation.

Comment O7-19

The DEIR likewise fails to provide an adequate discussion of the Project’s cumulative impacts on hydrological resources. It claims that “on-site retention of stormwater” is required “to comply with UC Santa Cruz Post-Construction Requirements,” and “therefore, continued compliance prevents a reduction in flow to springs and to recharge the karst aquifer.” DEIR at 4-35. But that assessment is incomplete. It implies – but does not explain if or how – runoff would be impounded close to the new, added impervious surfaces, or address how the impoundments will be designed to readily infiltrate the captured water in a manner that mimics the natural process. Without this information, the cumulative hydrological effects analysis is incomplete, and leaves the public in the dark about the Project’s hydrological impacts.

Response O7-19

As noted previously, the Draft EIR presents a programmatic analysis of the potential physical environmental impacts of 2021 LRDP implementation, and therefore provides an analysis of the full range of impacts that could occur. Existing regulations and requirements, including NPDES requirements and UC Santa Cruz Post-Construction Requirements, establish specific criteria related to the level of runoff that must be retained on-site to prevent significant impacts related to runoff from new development. These may include the use of pervious pavement, on-site detention facilities, on-site retention facilities, etc., that would be determined on a site-specific and project-specific basis but always in a manner consistent with the existing and overarching applicable regulations.

Comment O7-20

As discussed above, the karst formation below the UCSC campus is fragile and presents numerous hazards and impacts. "The portion of the main residential campus underlain by karst is pockmarked with dolines (or sinkhole)." DEIR at 3.7-12. In addition to the hydrologic uncertainties posed by an underlying karst formation, the topography also creates geologic risks. "Problems occur when the landscape is altered by urban development. Erosion is a common side effect of construction, transporting soil to the lowest part of the sinkhole where it clogs the drain." DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 3, p. 28. Development also "increases the risk of induced sinkhole collapse." *Id.* at p. 27. Yet the DEIR all but dismisses this impact. DEIR at 3.7-27 to 3.7-28. After admitting that "[c]onstruction in karst terrain is potentially hazardous because many karst features are not visible at the surface," and that "boring data from prior investigations [shows] the surface of the marble bedrock is highly irregular, varying in elevation by more than 100 feet over a horizontal distance of 10 feet or less," the DEIR erroneously concludes that the Project's impacts will be less than significant. DEIR at 3.7-27. But the conclusion does not follow from the facts. The irregularity of the karst formation makes the impacts of any construction potentially significant. There are numerous alternatives that could lessen or avoid those impacts, including offsite learning options as noted above, that must be considered in light of these serious concerns. The DEIR's failure to adequately assess and mitigate these impacts violates CEQA.

Response O7-20

The Draft EIR properly assesses the potential impacts associated within development within Karst formations within Section 3.7, "Geology and Soils" at a programmatic level in accordance with CEQA. For example, Impact 3.7-5, beginning on page 3.7-27 of the Draft EIR, assesses the potential increased risk of exposure of people or buildings to unstable conditions due to Karst topography. As noted in this impact, all structures constructed or redeveloped would be required to comply with the CBC, UC Seismic Safety Policy, and UC Santa Cruz Campus Standards Handbook, which require site-specific geotechnical studies and soil engineering reports to address potential karst hazard risks. Because project-specific design requirements and conditions of approval would be incorporated for all development pursuant to the 2021 LRDP, the potential for structural damage due to karst topography would be less than significant. Further discussion of this statement is included in this section on page 3.7-28. "Consistent with the aforementioned CBC [California Building Code] requirements and taking into account location-specific information provided by geology studies conducted by UC Santa Cruz (e.g., UC Santa Cruz Campus Geology Report [UC Santa Cruz 2005]), full consideration of potential hazards from dolines would include collapse of cavern roofs, settlement of doline fill or low-density soil zones on top of the marble, and failure or sliding of materials adjacent to the cavities. Foundations adjacent to the solution chambers, and not just those overlying the voids or chambers, are therefore potentially at risk and will be evaluated in the site-specific geotechnical studies and soil engineering reports."

This approach of completing site specific studies for specific buildings is typical in regions where geological hazards are ubiquitous. Proposed development in known karst hazard areas since the first campus geology report was issued in 1993 has followed the standard protocol of characterizing the geological hazard and attendant risks to the proposed development and then reducing the risk to an acceptable level where warranted with typical engineering solutions (i.e. spread footings with grade beams to span low-density zones, structural mats and post-tensioned slabs, pier and grade beam foundations with either end-bearing or side-wall friction for support, driven piles, geotextile-reinforced compacted fill, pressure or compaction grouting of underlying sediments combined with the aforementioned footings, and deep dynamic compaction).

The comment regarding the irregularity of the karst formation and that any impacts of construction should be potentially significant" appears to disregard the fact that existing karst conditions and the hazards and risks presented to proposed developments are not ignored on campus. The campus follows the California Building Code and their campus geological report when conducting the required site specific geological, geotechnical engineering and sometimes geophysical investigations in areas where the structures might be underlain by dolines that could present a hazard to the structure. The engineering properties of the underlying soil that are contained in a doline are evaluated by the geotechnical engineer and the team comprised of the geologist, geotechnical engineer and structural engineer look at the strength of the soil and loading created by the building to calculate the settlement and potential ground displacements that could occur under the building. Foundation and/or ground improvements are considered where warranted to mitigate the risk and bring it to an acceptable level.

As noted above, there are foundation design and ground improvement alternatives available to the architect and team of engineers to mitigate risks to structures due to calculated settlement and ground displacement for a site underlain by a doline. This approach results in reducing risks to the structures to an acceptable level where warranted. As a result, the Draft EIR's analysis is considered appropriate, adequate, and in accordance with CEQA requirements.

Comment 07-21

The DEIR declares that the 2021 LRDP would not conflict with existing land use plans. DEIR at 3.11-8. It claims that "UC Santa Cruz is not subject to municipal regulations of surrounding local governments, such as the City and County of Santa Cruz general plans or land use designations, for uses on property owned or controlled by UC Santa Cruz." DEIR at 3.11-11. But as discussed below, development proposed in the LRDP includes area outside the City's approved water service area, and the City's General Plan demands that any extension of a water service area must be approved by LAFCO. DEIR at 3.17-11, citing City of Santa Cruz General Plan, Policy CC3.7. Accordingly, the EIR's failure to identify the potential need for LAFCO review should the Project require an extension of the City's water service area violates CEQA.

Response 07-21

Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO). Further, the Draft EIR (e.g., on page 1-7) acknowledges this information as well as the conditions of the 2008 CSA. Regardless, the University of California is not subject to City or County regulations or policies.

Comment 07-22

The area around UCSC has traditionally been a "very tight housing market, especially as it relates to rental housing." DEIR at 3.13-5. According to the 2005 LRDP, housing is a "key issue[] essential to the planning processes of UCSC." 2005 LRDP, 23. The "housing market is influenced by several factors, including proximity to major job centers, low for-sale inventory, and an "extremely tight" rental market." DEIR at 3.13-5.

Yet the University still plans to expand the campus by nearly 10,000 students. DEIR at 1-3. Furthermore, it plans to add an additional 2,200 FTE faculty and staff members, but it will only house 25% of that additional faculty and staff. DEIR at 1-3. The LRDP will therefore leave an additional 1,650 faculty and staff members to find housing in an already scarce and problematic market. The University claims that it plans to work with the City, yet its current plan will significantly drive up housing costs. And the DEIR fails to adequately discuss this impact and consider alternatives and mitigation measures to lessen it, including the use of off-site alternatives such as satellite campuses and remote classrooms. The assumption that on-campus student population growth is an inevitable force that the campus must accommodate underlies the entire DEIR, and creates a false barrier to consideration of alternatives that would lessen these significant impacts.

Response 07-22

Refer to Master Response 2 regarding housing affordability and other socioeconomic considerations. It is important to note that, under the cumulative condition, which would include construction on campus of Student Housing West, substantially more housing than students would be provided under the LRDP plus cumulative conditions, alleviating some of the pressure on the local housing market. Further, the Draft EIR includes an evaluation of reduced student

enrollment within the LRDP area under all four alternatives, which would reduce the significant and unavoidable housing impact identified in Section 3.13, "Population and Housing" of the Draft EIR. More specifically, Alternative 1 evaluates no increase in student enrollment; Alternatives 2 and 3 evaluate a student enrollment of up to 26,400 FTE; and Alternative 4 evaluates a student enrollment of up to 25,800. Furthermore, several alternatives (including off-site alternatives) that were also considered during development of the Draft EIR are also presented, beginning on page 6-3 of the Draft EIR. Contrary to the opinion expressed in this comment, the Draft EIR appropriately evaluated the potential impacts of the 2021 LRDP, as well as mitigation measures and alternatives that would reduce significant impacts, in accordance with CEQA requirements.

Comment 07-23

At our request, a nationally-recognized expert in evaluating the viability and impacts of real estate development, Lewis ("Lew") Goodkin, evaluated the DEIR's analysis of the Project's impacts on housing for students and others. His analysis is attached as Exhibit 2. His conclusions are sobering, and demonstrate severe flaws in the DEIR's review. Mr. Goodkin concluded that the DEIR's conclusion that the Project would have "less-than significant impact [on housing] overlooks two salient facts that are never acknowledged, let alone analyzed." Exhibit 2, p. 2. First, "The DEIR fails to address the fact that the price of [the Project's] student housing is so high relative to the price of off-campus housing that the occupancy of the new student housing units will fall far short of the DEIR projections, causing a large percentage of the new students to seek housing off-campus." *Id.* Mr. Goodkin then explains that "[t]he new, unmet demand for off-campus housing will have several impacts that the DEIR fails to analyze, such as the much greater traffic, and the related parking demands and associated air emissions from this additional traffic, from new students who will commute to, rather than live on, campus." *Id.*

Response 07-23

As noted in Master Response 2, housing affordability is not directly considered within the context of CEQA. As the campus has historically had very high occupancy rates for on-campus housing, the potential that new on-campus housing under the 2021 LRDP, which would be subject to similar pricing, would force students off-campus and result in additional physical environmental impacts is unsupported and without evidence. Furthermore, traffic congestion (as of the 2018 amendments to the CEQA Guidelines) is no longer considered a direct physical environmental impact within the context of CEQA. Regarding the plan implementation and the phasing of development, see Master Response 9.

Comment 07-24

Second, Mr. Goodkin points out that "the DEIR fails to address the fact that as an increasing number of new students are forced to find housing off campus because it is far less expensive, the resulting and growing unmet demand for off-campus housing will displace existing renters from the off-campus units that the new students will be able to occupy due to their greater purchasing power compared to the average renter in Santa Cruz County. The DEIR never analyzes the resulting environmental and socio-economic impacts on the surrounding community as existing renters of off-campus residential units are displaced to other areas farther from their existing places of employment, the schools their children attend, and the other urban services such as stores they presently utilize." *Id.* at p. 3.

For these compelling reasons, Mr. Goodkin concludes that "the DEIR is substantially deficient." *Id.*

In summary, the severe adverse impacts on the environment from the Project's failure to provide affordable housing to its students and staff (or alternatively, to provide for off-site learning alternatives) are ignored, in violation of CEQA.

Response 07-24

Please refer to Response O4-4, O7-23 and Master Response 2.

Comment 07-25

As the DEIR admits, the Project will create significant fire risks including both ignition and response risks during construction. DEIR at 3.18-13 to 3.18-16. But it is not simply construction that would cause these impacts. Off-shore winds blowing from the north toward Monterey Bay occur frequently, especially during the peak fire season in the

fall. In the event of a big fire propelled by off-shore winds blowing from the north, LRDP development in the West Campus area will create immediate and obvious fire evacuation hazards. DEIR at 3.18-13.

Many of the nearly 10,000 proposed additional students on the main campus, along with the faculty and staff housing proposed in the Coastal Zone, could only evacuate a wildfire via Empire Grade Road by exiting through the current West Campus entrance and the proposed bridge over Cave Gulch to Empire Grade. In certain likely fire scenarios, all of the population of Bonny Doon would have only Empire Grade Road available as an evacuation route.

This outflux of people frantically evacuating to the south via Empire Grade Road would create instant gridlock, backing up south-bound traffic on Empire Grade Road toward the north—in the direction of the on-coming fire. Adding thousands of evacuees from the LRDP's proposed new development would create a death trap. Building up the West Campus would thus be a blueprint for disaster similar to the traffic gridlock that trapped and killed residents of Paradise fleeing from the Camp Fire in October 2018. It behooves the University to pay careful attention to this critical public safety issue, yet it only considered the potential wildfire impacts during construction.

Response 07-25

Contrary to statements made in this comment, the Draft EIR properly evaluated potential impacts associated with 2021 LRDP implementation, including the risks associated with new development (construction and operation) and issues related to emergency response and evacuation plans in Impacts 3.18-1 and 3.18-2, and determines that impacts would be less than significant with mitigation. Refer to Master Response 4.

Comment 07-26

Likewise, Mitigation Measure 3.9-4, calling for the preparation of Site-Specific Construction Traffic Management Plans, fails to mitigate any impacts from the 10,000 new FTE students that the 2021 LRDP allows. DEIR at 3.9-25 to 3.9-26, 3.18-14. Construction Traffic Plans will not help the thousands of students who will utilize Empire Grade Road to try to evacuate in an emergency.

Response 07-26

Please refer to Master Response 4.

Comment 07-27

1. The City's Water Supply Is Insufficient

Most of the UCSC campus is within the City of Santa Cruz Water Department ("SCWD") water service area. DEIR at 3.17-5. But "[t]he City of Santa Cruz is facing several obstacles in meeting its present and future water supply needs." DEIR at 3.17-14. "While the City of Santa Cruz water supply system is essentially the same as in 1960, the service population has increased 190 percent and is expected to increase. In normal and wet years, the water supply system is capable of meeting the needs of the current population, but even without population increases, the system is highly vulnerable to shortages in drought years." 2005 LRDP, 25. According to the City's Urban Water Management Plan ("UWMP"), "the City has had to declare a water shortage in five of the . . . seven years" between 2009 and 2015. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, p. 8-1. And the UWMP predicts that the SCWD will face a shortfall by 2025. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6 (projected water use in 2025 is 3,225 mgy), 6-24 (projected water supply in 2025 is 3,164 mgy).

"Adequate water supply is a primary issue for UCSC and the City of Santa Cruz given future anticipated shortfalls." 2005 LRDP, 23, 88 (quote). Increased development under the LRDP would necessarily increase water demand, and as the DEIR admits, "UC Santa Cruz's water demand under the 2021 LRDP would contribute to the need for the City to secure a new water supply source to address the shortfall under multiple dry water year conditions." DEIR at 3.17-24. The DEIR claims that "groundwater can be extracted from [a well within the karst aquifer] without substantially reducing the flow rates of any individual spring in the area." DEIR at 3.10-25. But as shown above, that is simply not true and would have detrimental effects on the perilous karst system. Exhibit 1, pp. 1-4, 7-8.

This impact is not unavoidable, as the DEIR claims. The DEIR throws up its hands claiming that it "would be speculative to assume that implementation of additional measures would reduce the campus's water demand sufficiently to avoid or substantially reduce the 2021 LRDP's significant impact on water supply." DEIR at 3.17-35. But

that logic only holds true under the erroneous premise that rapid and massive UCSC student population growth is inevitable. It is not, and consideration of an alternative that shifts campus growth to other off-site alternatives would significantly minimize this impact in compliance with CEQA and the Comprehensive Settlement Agreement.

Response O7-27

With respect to the evaluation of water supply within the Draft EIR, refer to Master Response 7. Regarding the applicability of the 2008 CSA to the 2021 LRDP, refer to Master Response 2. Regarding the Draft EIR's evaluation of alternatives, including off-site alternatives, refer to Responses O7-5 and O7-22, as well as Master Response 3. Further, it is acknowledged that shifting enrollment growth to an offsite location would reduce impacts within the LRDP area; however, as noted in the Draft EIR's discussion of Alternative 4, additional impacts (especially where new facility development would be required) would have new/different impacts at the off-site location(s). The Draft EIR provides a reasonable range of alternatives and feasible mitigation measures to reduce the impacts associated with implementation of the 2021 LRDP.

Comment O7-28

2. Increased Water Demand Will Be Detrimental to Special-Status Fish Species

The City's water sources support populations of Central California Coast ("CCC") Distinct Population Segment steelhead (*Oncorhynchus mykiss*), a threatened species (62 Fed. Reg. 43937 (August 18, 1997)), and CCC Evolutionarily Significant Unit (ESU) coho salmon (*Oncorhynchus kisutch*), an endangered species. 70 Fed.Reg. 37160 (June 28, 2005); 64 Fed.Reg. 24049 (May 5, 1999). The endangered CCC coho relies on the San Lorenzo River watershed for recovery. 64 Fed.Reg. 24049. The prospects for recovery of the CCC steelhead and coho are dependent on suitable habitat being restored and maintained. Certain minimum levels of flow and temperature are required in streams for the proper development, growth and spawning of salmonids.

"The City of Santa Cruz is facing several obstacles in meeting its present and future water supply needs." DEIR at 3.17-14. Currently, in critically dry years, the City does not have enough water to meet the City's existing needs, including the instream needs for fish. 2005 LRDP, 88. And the City projects a water supply shortfall by 2025. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6, 6-24. During dry years maintenance of instream flow is critically important for the survival of the salmonids, as rearing juveniles are typically unable to rear in small tributaries and will need adequate water flow in the main stem of the San Lorenzo River. As climate change continues to alter ambient temperatures, the need for cool water flows will increase, requiring corresponding reductions in water supplies for human uses, further limiting the City's ability to meet water demands. Yet the DEIR entirely fails to address this concern when calculating the City's ability to meet water demand in light of UCSC's proposed development. This omission violates CEQA. *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 874-875 (EIR must address cumulative impacts of upstream and downstream diversions of water for human uses on salmonid species in the river); *Vineyard*, 40 Cal.4th at 448-449 (EIR must examine impact of seasonal reductions in river flow on both salmonids and human water supply).

Response O7-28

As noted in the Draft EIR (refer to page 3.17-22), the 2021 LRDP would not increase water demands beyond existing agreements and evaluations previously conducted by the City with respect to its water diversions as the water retailer to UC Santa Cruz. Further, the City of Santa Cruz utilizes the Confluence model to analyze the variability of water supplies to determine whether existing supply would be adequate or whether water supply shortages would occur and if so, what the magnitude of the shortage would be. The City has been utilizing the Confluence model to support water supply planning activities since 2003 and this model was used to generate the results for the 2010 UWMP. The model takes into account the variation in demand both within and between years, the availability of water from various sources, and the capacity of infrastructure to pump and treat the water. As described in Chapter 7 of the City's 2015 UWMP, the results provide perspective on the City's water supply reliability based on accepted planning criteria and projected conditions in the water system, concurrently taking into account external factors that could affect the water supply. The City's Confluence model takes into account diversions from San Lorenzo River that may be required to protect special-status fish species, such as steelhead and Coho salmon, during critically dry years. The supply shortages that are identified in the UWMP are primarily because of the protections needed to protect the fish.

The 2015 UWMP states that historically, in normal water years, the City experienced a slight surplus of supply and this trend can be expected to continue until the HCP agreement is approved and maintenance of higher instream flows goes into effect. With the addition of the ecosystem protection conditions likely to begin prior to 2020, a small shortage (1 to 3 percent) can be expected in future normal water years. The City predicts the supply and demand volumes to be in balance for 90 percent of all normal water years for 2020 through 2035. The City plans to address the shortfall in supply by implementing a number of recycled water and aquifer storage and recharge projects, which are described in the Draft EIR along with a discussion of their potential environmental impacts. A further evaluation of potential effects of reduced river flows on special-status fish species is not required.

Comment O7-29

The development proposed in the LRDP includes areas outside the City's approved water service area. Providing water to such areas requires the approval of the Santa Cruz County LAFCO, which is therefore a responsible agency for this Project under CEQA. DEIR at 3.17-11, citing City of Santa Cruz General Plan, Policy CC3.7. Accordingly, the EIR must address impacts on water supply in a manner that addresses the informational needs of LAFCO. HAWC, 213 Cal.App.4th at 1305.

But instead, the DEIR fails to address LAFCO's informational needs entirely. It states that UCSC "does not believe that . . . approval by [LAFCO] is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County." DEIR at 3.17-5. Rather than comply with this mandate, UCSC "requested judicial intervention to seek clarity regarding the City's legal obligations," which is currently pending before the court. DEIR at 3.17-5. CEQA demands more.

Response O7-29

Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO) with respect to the 2008 CSA and LAFCO jurisdiction.

Comment O7-30

Because the UC campus possesses extraordinary, yet vulnerable and irreplaceable, environmental resources that the LRDP's proposed development threatens, those unique concerns merit heightened analysis and creative solutions - including off-site alternatives such as remote learning and satellite campuses - in the EIR. CEQA requires a thorough evaluation of the Project's potential impacts and alternatives that informs the public and decision makers about how best to avoid and lessen these potentially severe impacts. Yet the DEIR failed in this informational goal. The DEIR defined the Project objectives too narrowly, ignored plausible and beneficial alternatives, and failed to consider and mitigate significant Project impacts. The DEIR therefore violate CEQA and must be revised.

Please include these comments in the public record for this Project.

Response O7-30

Regarding the project objectives, refer to Responses O4-7 and O7-2. With respect to the presentation of feasible alternatives and mitigation measures, feasible mitigation measures and alternatives are identified and evaluated, where appropriate, and in accordance with CEQA requirements. Refer also to Master Response 3 regarding alternatives and the presentation of a reasonable range of alternatives within the Draft EIR. Responses to more specific instances where these deficiencies are perceived by the commenter are provided in Responses O7-9, O7-11, and O7-22. In general, the Draft EIR (including its presentation of project objectives, mitigation measures, and alternatives) is considered appropriate, adequate, and in accordance with CEQA requirements. Consistent with the commenter's request, 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 O7-31

I have been retained by Stephan C. Volker, Esq., to conduct a review of hydrogeologic statements in the UC Santa Cruz 2021 Long Range Development Plan Draft Environmental Impact Report (DEIR). A copy of my resume is attached to this hydrogeologic review as Appendix A. I hold BS and MS degrees from the University of California, Berkeley and have spent my career as a professional hydrogeologist specializing in karst hydrogeology and

groundwater tracing studies using fluorescent tracer dyes. I hold national certification as a Professional Hydrogeologist (#179) from the American Institute of Hydrology and am licensed as a Registered Geologist or Professional Geologist in the states of Missouri, Arkansas, Kentucky, and Alabama. I am the author of a chapter on groundwater tracing with fluorescent dyes in the textbook "Practical Hydrogeology Principles and Field Applications" published by McGraw Hill (Aley, 2019) and have taught numerous professional short courses on karst hydrology and groundwater tracing.

Response 07-31

The comment provides information related to the professional qualifications of supporting comments included with the letter. This comment does not address the adequacy of the EIR analysis.

Comment 07-32

Comment 1. A basic understanding of the nature of porosity in karst aquifers and their ability to store and transport groundwater will assist readers of this evaluation in understanding subsequent comments.

Karst aquifers have three types of porosity; some authors have assigned slightly different terms but the following are commonly used.

- **Matrix porosity** is intergranular porosity and in this marble aquifer is insignificant and does not produce any significant water that could be extracted by wells. DEIR page 3.10-20 describes a boring drilled 300 feet deep within 30 to 50 feet of an inferred north-south fracture zone in Lower Jordan Gulch that *"did not encounter groundwater"*.

This illustrates matrix porosity; areas with matrix porosity must be expected to routinely form effective barriers to lateral and vertical water movement in the karst aquifer under the UCSC campus.
- **Fracture porosity** is the primary provider for wells that do not intersect solutionally enlarged karst conduits. Page 3.10-23 of the DEIR summarizes construction details on four wells on the UCSC campus. No well yield is given for MW-1B but it is undoubtedly small and is reflective of water yields from fracture porosity. DEIR page 3.10-24 states: *"Monitoring Well MW-18 is located approximately 37 feet west of [Water Supply We/11] WSW#1, at the western edge of Jordan Gulch. Although this well is completed in fractured marble at a similar ground surface elevation and depth as WSW#1 and MW-1A, it is evidently completed in a separate hydraulic fracture regime and shows a distinctly higher water level (i.e., 40 to 50 feet higher), and no pumping influence from pumping in WSW#1 in 1989 or 2007."* Water stored in most brecciated zones are part of fracture porosity. Water derived from fracture porosity supplies much of the water discharging from karst springs under dry weather conditions.
- **Conduit porosity** is provided by solutionally enlarged openings. WSW#1 (described in the DEIR at page 3.10-20) encountered conduit porosity described as: *"abundant open to rubble-filled fractures and void spaces. Problems with borehole collapse and loss of circulation were frequent."* The ability of this well to extract 92.5 gallons per minute (gpm) is consistent with a well encountering conduit porosity. Conduit porosity is likely associated with what are identified as "major fractures" on the UC Santa Cruz campus (DEIR Figure 3.10-4). WSW#1 was constructed at the intersection of two of the major fractures. Sinkholes that can accept water at rates of at least 5 or 10 gpm are commonly directly connected with conduit porosity. DEIR page 3.10-18 states: *"More than 50 sinkholes are located throughout the marble-underlain area on the main residential campus and these features are estimated to capture up to 40% of campus runoff (Johnson 1988)."* Conduit flow accounts for most of the water discharging from springs surrounding the UCSC campus.

Response 07-32

The comment provides expository information regarding groundwater conditions with respect to the LRDP area and includes quotations from the Draft EIR. As the comment presents expository information and does not address the adequacy of the EIR analysis, 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 07-33

Comment 2. Based on data in the DEIR approximately 1,000 acres of land is underlain by the marble aquifer. The marble aquifer is a conduit-dominated aquifer that is recharged by surface water derived from lands not underlain by marble and by precipitation that falls on lands that are underlain by marble. Substantial recharge to the karst conduits occurs through sinkholes of which there are more than 50 known on campus. Many of the conduits are expected to be preferentially located along mapped major fracture zones (see DEIR Figure 3.10-4). It appears that most water that enters the aquifer is rapidly transported to one or more of 14 identified springs located west, south, and east of the campus. Flow rates of the springs vary widely as a direct result of precipitation events and stormwater runoff onto the marble.

Response 07-33

The comment provides the commenters interpretation of groundwater supplies within the LRDP area. As the comment presents expository information and does not address the adequacy of the EIR analysis, 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 07-34

Comment 3. The DEIR focuses on average hydrologic conditions rather than on conditions when water supplies are limited. While human demands for water on the University campus with a dramatically enlarged population will be relatively constant, the key issues is the adequacy of groundwater from the karst aquifer to supply adequate amounts of water under dry weather conditions without creating significant adverse impacts. Information in the DEIR does not adequately address this key issue.

Response 07-34

Please refer to Master Response 10 regarding the Draft EIR's evaluation of hydrology and water quality conditions, especially the need for monitoring and evaluation by water year type, and Master Response 7 regarding the water supply analysis provided in Section 3.17, "Utilities and Service Systems."

Comment 07-35

Comment 4. A conclusion I reached in a report on a 1992 groundwater tracing study on the UCSC campus (Aley and Weber & Associates, 1994) related to extracting a relatively minor amount of water from WSW#1 to supply a greenhouse. That statement should not be viewed as suggesting that more than relatively small amounts of water can be extracted from this well under dry weather conditions without substantially reducing the flow rates of individual springs in the area.

At page 3.10-25 of the DEIR under the heading "Dye Trace Studies" a dye tracing study I directed in 1992 in cooperation with Weber & Associates is discussed. The statement is made: "*The study concluded that WSW#1 is hydraulically connected to major portions of the karst aquifer and that groundwater can be extracted from well WSW#1 without substantially reducing the flow rates of any individual spring in the area.*" That statement in the DEIR fails to recognize that the dye tracing study conducted during the period January to March, 1992 and reported upon in 1994 (Aley and Weber & Associates, 1994) was conducted to assess potential impacts on springs of putting well WSW#1 into production to supply a greenhouse and perhaps some outside plants in the vicinity of the greenhouse. This is a relatively minor amount of water. The DEIR at page 3.17-20 shows an average daily water demand for a greenhouse as 62 gallons per day; I presume that is the same greenhouse.

Response 07-35

Please refer to Master Response 10 regarding the presentation of groundwater data and groundwater resources in the Draft EIR. Also, regarding groundwater extraction, as stated on page 3.10-36, Mitigation Measures 3.10-5b would require UC Santa Cruz to monitor water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume.

Comment 07-36

Comment 5. UCSC failed to collect adequate spring flow data during the period 1984 through 2019. As a result, the University has no credible estimate of the rates at which water has been discharged from the karst aquifer during this 35 year period and how rapidly water that enters the aquifer is discharged through the springs. Adequate measurements would have shown whether or not the University could withdraw water from the karst aquifer at a projected mean rate of 113,700 gallons per day under dry weather conditions without depleting the aquifer and/or decreasing or eliminating flow from springs fed by the aquifer. The 113,700 gallons per day value is the projected demand for University activities located outside the service area for the City of Santa Cruz which the University contends could be met by extracting water from the on-campus karst aquifer.

Except for a 7-day duration pumping test at WSW#1 in February, 1989 at an apparent constant rate of 100 gpm; a 3-day duration pumping test at WSW#1 in November, 2007 at an average rate of 92.5 gpm; and pumping to develop wells; the only known discharges from the campus aquifer from 1984 to present have been through approximately 14 springs located generally east, south, and west of University property. The University did make occasional flow rate measurements during the period 1984 through 2019. The most consistent of these were made during the period from 1999 through 2019. During this period flow measurements were usually made on one day in March and one day in September of each year at 13 of the 14 springs for the period 1999 through 2008 and at 9 of the 14 springs for the period 2009 through 2019.

As shown in DEIR Table 3.10-5 the measured flow rates of all 14 springs vary widely.

Seven of the 14 springs have intermittent flow with zero flow for an unknown number of days per year. Of the remaining 7 springs maximum measured flow at Bay Street Spring is 11 times greater than minimum measured flow; the ratio is 66 times greater at Messiah Lutheran Spring; 9 times greater at Pogonip Creek System; 272 times greater at Pogonip Spring #1; 53 times greater at Pogonip Spring#2; 714 times greater at Lower Cave Gulch; and 640 times greater at Wilder Creek Spring. This wide variation between maximum and minimum measured flow rates means that a disproportionate amount of the total annual flow from the springs occurs during a relatively few days of each year.

Approximately half of the flow rate measurements of springs were made during months (and especially March) when periods of high spring discharge are likely to occur and the other approximately half of the measurements were made during months (and especially September) when low discharges are likely to occur. The DEIR calculates average spring flow rates as the mean of all measured values. This is a specious value that has no technical credibility; the same applies to the statement that the springs discharge an average of 181 MGY. There is no way to recover the critical data on flow rates of the springs, especially flow rates during dry weather periods.

Continuous records of flow should have been measured from the 14 springs believed by UCSC to drain the karst aquifer during the period 1984 to 2019. Automatic monitoring equipment serviced monthly would have provided adequate information. This is not difficult; there are thousands of stream and spring flow rate measuring stations in the United States that routinely and continuously record similar information. Absent that information, the University lacks credible data for determining how much water could be withdrawn from the karst aquifer without lowering groundwater elevations in the aquifer and/or increasing the frequency and duration of zero or unacceptably low flow volumes from aquifer-related springs.

Response 07-36

To clarify, surface and groundwater data are summarized on pages 3.10-7 and 3.10-27 of the Draft EIR. Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type. Refer also to Master Response 7 regarding the water supply analysis provided in Section 3.17, "Utilities and Service Systems," under Impact 3.17-1.

Comment 07-37

Comment 6. UCSC has failed to conduct adequate hydrogeologic investigations to characterize the campus aquifer and assess normal fluctuations in groundwater levels at multiple points in the aquifer.

The campus wells are identified on page 3.10-20. Water Supply Well#1 (WSW#1) is located on a major fracture near the southern end of the aquifer. Monitoring Well 1A is located 54 feet northeast from the water supply well and

Monitoring Well 1B is located 37 feet west from the water supply well. The only other well on campus is the Upper Quarry Well which is located near the northern end of the marble deposit. At the time the Quarry Well was constructed the static water level elevation was 619 feet which is about 200 feet higher than the static elevation within WSW#1 at the time it was drilled. There is no indication in the DEIR that water levels are routinely monitored in the Quarry Well.

The marble aquifer underlies approximately 1,000 acres. Springs inferred (but not proven) to receive most or all of their water supplies from the campus aquifer are at elevations between 110 feet and 540 feet above mean sea level. An adequately comprehensive network of monitoring wells for routinely measuring water level elevations is a key part of understanding and managing groundwater basins. Given the size of the aquifer, the large elevational range indicated by the springs, and the proposed massive-scale development, one would expect a good comprehensive network of monitoring wells with multiple years of records that had been used as critical data for the DEIR. Unfortunately, that is clearly not the case.

Response 07-37

To clarify, surface and groundwater data are summarized on pages 3.10-7 and 3.10-27 of the Draft EIR. Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type.

Comment 07-38

Comment 7. UCSC conducted pumping tests of WSW#1 on two occasions and a test in 1989 indicated: that: " ... the well is completed in a highly permeable karst aquifer, with the ability to provide a sustained pumping rate of 100 gpm without dewatering the well, or creating any pumping drawdown at identified spring locations over 2000 feet away". I disagree with the conclusions because they are contradicted by the data.

Although the well is located in a highly permeable fracture zone and did in fact maintain a pumping rate of 100 gpm for 7 days, this occurred when the flows from down gradient springs were 15 times greater than minimum measured flow rates from these springs for the period 1984-2019, indicating average rather than dry conditions. The data show that this is a highly permeable section of the karst aquifer. It is not true, however, that the karst aquifer as a whole, is highly permeable and that the pumping test shows aquifer resilience under dry weather conditions. This testing is not indicative of aquifer resilience during dry weather conditions, let alone over a large area, for four separate and independent reasons.

First, this is not a highly permeable karst aquifer. Highly permeable karst aquifers routinely have very low groundwater gradients, frequently only a few vertical feet per thousand horizontal feet. The steeper the gradient, the lower the overall permeability of the aquifer. The straight-line distance between the Quarry Well and WSW#1 is approximately 5,300 feet. Based on well completion data in the DEIR the difference in water level elevation between the two wells is about 200 feet; this represents 37.7 feet per 1,000 feet. This is a steep gradient, indicating the presence of barriers to groundwater movement rather than "highly permeable" conditions. Both wells are on mapped major fractures, and a continuous system of mapped fractures exists between the two wells. This steep groundwater gradient is inconsistent with "a highly permeable karst aquifer".

Second, the karst aquifer underlying UCSC is not homogeneous and isotropic. The term isotropic means that the hydraulic conductivity is the same in all directions. Isotropic conditions have been clearly demonstrated in the DEIR to not be present within the karst aquifer on the UCSC campus. Examples of data demonstrating the lack of isotropic conditions include Figure 3.10-4 illustrating the complex network of fractures and conduits and the location of a dry well drilled within 30 - 50 feet of a fracture zone. Most numerical solutions to pumping tests assume that the aquifers and aquitards under investigation are homogeneous and isotropic. If the assumptions of the equations are not reasonably well met, the equations are not valid and therefore a credible answer cannot be expected. That is the case here.

Third, the testing occurred during a period when flows from down gradient springs were 15 times greater than the minimum flows recorded over the last 35 years for those springs. These conditions are not representative of dry weather conditions when the flows in the down gradient springs are most vulnerable to interruption from pumping

from the aquifer. The DEIR states that the 7-day pumping test conducted in 1989 occurred during a year of severe and prolonged drought. Still, the combined flow rates from the five springs monitored during the test were approximately 89% of the DEIR calculated combined average flow at the springs. It is the time of the 7 day test, rather than general conditions during the year, that are relevant to the test conditions. As a result, the test more appropriately characterized average rather than dry weather conditions. This is shown by the fact that the combined flow rates of the five springs during the pumping test were 15-fold greater than the minimum measured flow rates from these springs for the period 1984-2019.

A 72-hour pumping test was conducted at WSW#1 in November, 2007. Combined flow rates at measured springs were somewhat closer to low flow conditions. However, during the five day period when spring flows were monitored at three springs the total flow volume of the springs increased by 84% indicating that precipitation had occurred and resulted in significant recharge to the aquifer. The karst aquifer is clearly capable of rapid recharge. However, pumping tests conducted during appreciable recharge events do not enhance understanding of the storage component of the aquifer. While the results of the two pumping tests are similar, they do not demonstrate that sustained pumping of 113,700 gallons per day from the aquifer during dry weather periods would not have significant adverse impacts on spring flow or the aquifer.

The primary insights gleaned from the pumping tests relates to the transport ability of the karst aquifer within a few hundred feet of the extraction well under average flow conditions and not to the potential ability of this portion of the aquifer to yield water from storage under dry weather conditions. The DEIR data do not adequately characterize the storage component of the karst aquifer. Absent this information, the University lacks credible data for determining a sustainable volume of water that could be withdrawn from the karst aquifer without adverse impacts.

Fourth, the testing was limited to a small fraction of the total karst aquifer and the test results are unlikely to apply to the majority of the karst aquifer. As explained, the aquifer underlying the UCSC campus is neither homogeneous nor isotropic. Instead, it is highly fractured and contains both barriers to and conduits for groundwater movement. As noted above, examples of data demonstrating the lack of isotropic conditions include DEIS Figure 3.10-4 illustrating the complex network of fractures and conduits and the location of a dry well drilled within 30 - 50 feet of a fracture zone.

The DEIR states that the storage capacity within the saturated zone of the karst aquifer is estimated to be at least 3,000 acre-feet as demonstrated by aquifer pumping tests. The data do not support this conclusion. The pumping test data were collected from only 3 wells within a 60-foot radius (0.25 acres). The area sampled represents a minute fraction of the total area expected to be underlain by the marble aquifer. With this level of coverage, it is unreasonable to expect the data to be representative of the system. Furthermore, the matrix porosity of the marble is insignificant and does not produce water, indicating that all water storage is likely restricted to zones where fractures or conduits are present. Without an extended monitoring network across the karst aquifer to understand the lateral extent of the aquifer and the spatial and temporal variability of the groundwater table, a reasonable estimate of storage capacity cannot be made. Because such a monitoring network has not been created, the storage capacity of the aquifer is unknown.

Response 07-38

To clarify, surface and groundwater data are summarized on pages 3.10-7 and 3.10-27 of the Draft EIR. Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type.

Comment 07-39

Comment 8. There is a steep groundwater gradient between the Quarry Well and WSW#1. In addition, 14 springs presumed to receive water from the marble aquifer are located west, south, and east of the marble aquifer and at a maximum elevational difference among the springs of 430 feet. These factors suggest that the karst aquifer is unlikely to function as a single aquifer and is likely divided into multiple compartments each of which is associated with one or more springs. If this is the case then it enhances the risk that groundwater extraction during dry weather periods will result in significant adverse environmental impacts.

Determination of compartment boundaries in karst aquifers typically involves groundwater tracing with tracer dyes. Only limited tracing has been done at the University. Potentiometric head maps are also useful in this work.

Response 07-39

To clarify, surface and groundwater data are summarized on pages 3.10-7 and 3.10-27 of the Draft EIR. Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type.

Comment 07-40

Comment 9. The marble aquifer beneath the campus provides three beneficial environmental services and maintenance of these services necessitates very careful protection and management. These environmental services are:

- **Detains surface runoff by conveying it into and through the karst groundwater system.**
- **Supplies water to springs and watercourses that border the campus. Some of these apparently provide habitat for the federally threatened Red-legged Frog.**
- **Provides buoyant support for unconsolidated materials located above karst cavities.**

Previous discussions have adequately covered the environmental services except the last one listed. The discussion in the DEIR of catastrophic sinkhole collapse and land subsidence in areas underlain by the marble aquifer fails to evaluate the risk of these events if limited water availability were to result in pumping of the marble aquifer supplies. Under natural conditions the springs are the only points where water is extracted from the marble aquifer. When water levels in particular compartments of the aquifer become so low that associated springs cease flowing there will be no further lowering of the aquifer unless there is some component of deeper seepage. Pumping of wells has the potential to lower water levels substantially below those that ever naturally occurred.

Investigation of human-induced sinkholes (called collapse dolines in the DEIR) has been a substantial part of my practice and I have seen well over a thousand of them. Many are induced by pumping that substantially lowers groundwater levels. Important factors in collapses are groundwater levels declining to elevations lower than those that naturally occurred, the presence of open voids in the underlying bedrock, and a very irregular karst bedrock surface existing beneath overlying soils, alluvium, colluvium, or residuum.

Catastrophically formed sinkholes most commonly occur when groundwater levels that naturally supported overlying unconsolidated material decline to the point that the unconsolidated material has lost the buoyant support previously provided by groundwater.

Heavy groundwater pumping by a marble quarry near Opelika, Alabama induced the formation of over 200 sinkholes at points up to about 7,000 feet from the quarry. Sinkholes formed in a county highway, beneath a bridge abutment, under an electric transmission tower, beneath a natural gas pipeline, and beneath a parked truck. Sinkhole depths can range from a few feet to depths somewhat below the top of the underlying soluble rock. At the University those depths can be over 100 feet.

Irregular bedrock surfaces above solutional features are favorable sites for sinkhole collapses because they make it relatively easy for pieces of undissolved rock to bridge underlying cavities. DEIR page 3.7-18 states: "Boring data from prior investigations for the campus for the last decade show a variation in the elevation of the marble surface of more than 100 feet over a horizontal distance of 10 feet or less." These are the kinds of situations that can result in land subsidence or collapse.

Response 07-40

Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type. Also, regarding groundwater extraction, as stated on page 3.10-36, Mitigation Measures 3.10-5b would require UC Santa Cruz to monitor water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. Further, Impact 3.7-5 in Section 3.7, "Geology and Soils," of the Draft EIR evaluates the risk of exposure of people or buildings to unstable conditions due to karst topography.

Comment 07-41

Comment 10. There is insufficient information available on the marble aquifer to conclude that it is capable of providing a daily volume of 113,700 gallons of water to extraction wells that would serve the University during dry periods without causing significant environmental problems. Those environmental problems include cessation of flow from springs and an increased risk of land subsidence or sinkhole collapse on University property.

The hydrogeologic information that UCSC management has developed and supplied in their DEIR is woefully inadequate for characterizing the small and unquestionably complex karst aquifer at the University. Expansion of the University is clearly not a new idea for University management and it is concerning that University management has not funded investigations to gather hydrogeological information essential for this major project.

Response 07-41

Please refer to Master Response 10 regarding hydrology and water quality analysis presented in the Draft EIR and supplemental modeling of groundwater conditions by water year type. Also, regarding groundwater extraction, as stated on page 3.10-36, Mitigation Measures 3.10-5b would require UC Santa Cruz to monitor water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume.

Comment 07-42

At the request of Habitat and Watershed Caretakers' President Don Stevens, I have reviewed the Draft Environmental Impact Report ("DEIR") for the University of California at Santa Cruz's 2021 Long Range Development Plan ("2021 LRDP") and prepared the following comments regarding the DEIR's discussion of the 2021 LRDP's impacts on population and housing demand.

I have more than 40 years of experience in the real estate industry and am widely recognized as one of the nation's leading real estate consultants, advising investors, lenders, builders, developers, and property owners. I provide expert analysis on local and regional market trends, identifying target buyers and tenants, recommending appropriate product de-signs, and projecting potential financial results. I have directed more real estate research on large-scale planned communities, golf resort communities, condominium communities and residential resorts than any other market analyst in the United States. In 2007, I was recognized by the Community Development Council of the Urban Land Institute as an "Industry Legend." I have written more than 1,500 articles for the trade, business associations, news-papers and magazines. I was the author of the highly acclaimed book, "When Real Estate and Home Building Becomes Big Business" that was selected by the Library Journal as one of the year's best business books for the year it written and which was the subject of a special addendum in the New York Times financial section. I served as past Chair of the South Florida Chapters of The Urban Land Institute and National Association of Business Economics and Counselors of Real Estate. I serve on the Real Estate Advisory Board of the University of Florida and the Advisory Board of the School of Design at the University of Florida. I was in national strategic alliances on residential development for both Arthur Andersen and Price Waterhouse. I am a designated member of the Institute of Residential Marketing, the Lambda Alpha International (an honorary land economics society), and a Life Member of the World Future Society. Prior to founding my current Goodkin Consulting firm, I was president of the California-based Sanford R. Goodkin Research Corporation (Peat Marwick/Goodkin Real Estate Consulting Group).

In early 2020, at the request of Habitat and Watershed Caretakers, I conducted a study of the Santa Cruz housing market for the purpose of understanding the likely impacts and absorption rate of the multi-story high density housing units of the proposed UCSC Student Housing West Project (SHW) intended for upper division undergraduate students. My review included studying over 5 years of data available from the Campus Community Rentals Office, the April 2018 Student Housing Demand Analysis by Brailsford & Dunlavy, and the December 21, 2018 Brailsford & Dunlavy Memorandum (attached as Exhibits 1 and 2, respectively). I also conducted a site visit to Santa Cruz and the UCSC campus on February 21st, 2020 to view and compare student housing on campus with housing rented by students off-campus. My site visit included interviewing two property managers/owners with large student rental inventories. I found that the April 2018 Housing Demand Analysis had serious flaws and grossly over-estimated the potential demand for SHW units due in part to the rental price disparity between SHW units and off-campus housing. Nevertheless, the information contained in the above referenced documents should have been included and analyzed in the DEIR in order to facilitate informed public review.

The DEIR states that the 2021 LRDP will increase the UCSC campus student population by 9,482 students (defined as three-quarter average enrollment), and increase the UCSC campus faculty and staff population by 2,200 employees. DEIR p. 3.13-11, Table 3.13-9. To address this new housing demand, it states that it will provide new housing sufficient to provide 8,500 bed for these new students and 558 homes for these new employees. DEIR p. 3.13-12, Table 3.13-11. It then concludes that because "UC Santa Cruz is planning to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP," "with incorporation of cumulative projects on and off campus, . . . it will be able to provide housing to all students projected under the LRDP and the impact associated with student housing demand is expected to be less than significant." DEIR p. 3.13-14.

This conclusion of less-than-significant impact overlooks two salient facts that are never acknowledged, let alone analyzed.

Response O7-42

The comment provides introductory information regarding an expert consulted by the commenter with respect to housing and states that the Draft EIR should have included the conclusions of two analyses conducted in 2018. The conclusions of the Draft EIR's analysis were based on available data and vacancy rates, including consideration of available housing on campus and within the local community. Further, the studies cited were prepared specific to Student Housing West, which as noted in previous responses to comments provided for Letter O7, was considered and approved under the 2005 LRDP.

Comment O7-43

First, the DEIR fails to address the fact that the price of student housing is so high relative to the price of off-campus housing that the occupancy of the new student housing units will fall far short of the DEIR projections, causing a large percentage of the new students to seek housing off-campus. Data available from the Campus Community Rentals Office (attached as Exhibit 3), which was part of and consistent with my own market investigation, show that average student rental rates off campus are between \$500 and \$1,000 per month. These existing rental rates for off-campus student housing are typically less than one-half of the rates the University will be charging for the new on-campus student housing based on comparisons with current dormitory rates and projected rates as of 2018 for SHW units. Examples of projected SHW unit rates include: \$5,580 per month for a 2 bedroom, 1 bath unit for four students with no kitchen; \$5,880 per month for a 2 bedroom, 2 bath unit for four students with a small kitchenette; and \$10,020 per month for a 5 bedroom, 2 bath unit for 6 students. The average per-student rate for these on-campus units thus ranges from \$1,395 to over \$1,670 per month.

The new, unmet demand for off-campus housing will have several impacts that the DEIR fails to analyze, such as the much greater traffic, and the related parking demands and associated air emissions from this additional traffic, from new students who will commute to, rather than live on, campus. These direct and indirect impacts, and mitigation measures and alternatives to avoid or reduce them, must be fully addressed in the DEIR.

Response O7-43

Please refer to Response O7-23. The comment does not address that new housing would be provided under a public-private partnership, and that real estate markets respond to unmet demand by lowering prices. There is no reason to assume that if prices are high on campus and vacancies occur, the price would be lowered to make rentals more attractive. See also Master Response 2.

Comment O7-44

Second, the DEIR fails to address the fact that as an increasing number of new students are forced to find housing off campus because it is far less expensive, the resulting and growing unmet demand for off-campus housing will displace existing renters from the off-campus unit that the new students will be able to occupy due to their greater purchasing power compared to the average renter in Santa Cruz County. The DEIR never discloses and analyzes the resulting environmental and socio-economic impacts on the surrounding community as existing renters of off-campus residential units are displaced to other areas farther from their existing places of employment, the schools their children attend, and the other urban services such as stores they presently utilize. This displacement will have its

own series of ripple and cumulative impacts in the more remote communities where the displaced renters will be forced to resettle.

These direct and indirect environmental and socio-economic impacts that will result from displacement of existing off-campus renters by new students seeking less expensive housing off campus must be fully analyzed, along with mitigation measures and alternatives that might avoid or reduce those impacts.

Response O7-44

Please refer to Response O7-23, Response O7-43, and Master Response 2.

Comment O7-45

In the many years that I have done studies and consulting assignments for both the private and public sectors, I have never provided an analysis or reviewed one done by another firm where project and or unit cost wasn't a critical element in determining either market feasibility or, in the case of government or non-profits, subsidy requirements.

Response O7-45

As noted in previous responses (including Response O7-23 and Master Response 2), socioeconomic considerations and student housing affordability are not considered directly applicable to CEQA analyses. The Draft EIR presents an objective evaluation of the potential physical environmental impacts of the 2021 LRDP that is considered adequate, appropriate, and in accordance with CEQA requirements. Further, as this EIR is programmatic and housing development under this LRDP has not been proposed; therefore, a market feasibility analysis would be premature. However, given the housing shortage in the region, as stated in the EIR and in many comments, it appears there is a robust market for student housing on campus.

Letter O8 Coalition for Limiting University Expansion

March 8, 2021

Comment O8-1

I am writing on behalf of the Coalition For Limiting University Expansion (CLUE), and to make comments on the Draft Environmental Impact Report (DEIR) which the University has prepared on its proposed 2021 Long Range Development Plan (LRDP) for its Santa Cruz campus. CLUE strongly believes that the University must make significant changes to the LRDP, and to the Draft EIR, and must then recirculate the DEIR for additional public review and comment.

We are aware of and endorse a number of very significant comments filed by others, including but not limited to comments filed by individual CLUE members, by the Advocate for the Santa Cruz City-County Task Force on UCSC Growth, and by the individual members of an advisory committee established by the Task Force. CLUE representatives sit on that advisory committee, and CLUE has been deeply engaged in reviewing the University's plans for expansion of the UCSC campus. We endorse the comments made by the Advocate, and others, and submit the following comments, in addition:

Response O8-1

The comment provides introductory information and expresses general support for comments made by other commenters. This comment does not address the adequacy of the EIR analysis.

Comment O8-2

1. Because CLUE represents local residents directly impacted by the off-campus effects of what UCSC does on-campus, and because the proposed enrollment growth on campus will clearly have major impacts in and on the community, it is absolutely required that the University redesign its proposed project to incorporate effective mitigation measures into the project, minimizing, and eliminating where feasible, the expected off-campus impacts of the proposed on-campus project.

Response O8-2

The comment's opinion regarding the need for the project to be redesigned is noted. Where appropriate and where impacts related to implementation of the 2021 LRDP, the Draft EIR identifies feasible mitigation measures that would reduce the impacts, including off-site impacts, to less-than-significant levels, where possible. As noted in Master Response 3, the Draft EIR also identifies and evaluates a reasonable range of alternatives that would satisfy most of the basic project objectives. The comment does not provide specific comments as to what is considered inadequate or provide evidence to support its statements. No further response is necessary. The commenter is referred to Master Response 2 regarding requirements related to economic/social issues.

Comment O8-3

2. CLUE wishes to highlight the inadequacy of the DEIR with respect to the off-campus housing impacts of the proposed plan. The University plans to add something like 8,500 new students to the UCSC campus (and with 5,000 additional staff and faculty members to be added, as well). The University's plan and the DEIR states that it will be the University's "objective" to house, on campus, 100% of the new student enrollment, and up to 25% of new faculty and staff. Unfortunately, no evidence has been supplied to indicate that this is anything more than what it says it is, an "objective." Though not adequately addressed in the DEIR, the housing impacts in the community – which have physical consequences even beyond the economic impacts – would be extreme. Thus, in order for the DEIR to comply with CEQA, the University must design its project to ensure that the just-identified "objective" is attained in fact. Otherwise, this "objective" counts as nothing more than a pious wish. Transforming the stated objective into an enforceable condition governing the project (which is what CEQA requires) can be accomplished by making the proposed on-campus housing goals an actual condition precedent to any enrollment growth allowed. In other words, the LRDP and the Final EIR must make clear that any new enrollment growth that is proposed can take place only after the required amount of on-campus housing for students, faculty, and staff is actually constructed and is actually available for occupancy prior to or concurrently with any enrollment increase.

Response O8-3

Please refer to Master Response 9 regarding the plan implementation and phasing of development. Refer also to Master Response 11 regarding the level of detail presented in the Draft EIR.

Comment O8-4

3. Fire Danger is an extreme threat in the so-called "North Campus" area –and wildfires in the adjacent Bonny Doon area, last year, were devastating. Yet, the LRDP proposes to locate housing for 3,700 students in this area of extreme wildfire danger. The impact analysis contained within the DEIR is inadequate, and the impacts are inaccurately characterized as "less than significant." Any development proposed for the "North Campus" area must be mitigated by effective measures to eliminate wildfire dangers, and if this cannot be accomplished then the extensive development proposed in that area should be relocated.

Response O8-4

Please refer to Master Response 4.

Comment O8-5

4. The DEIR fails properly to recognize the role that the Santa Cruz County Local Agency Formation Commission (LAFCO) is required to play in any development beyond the City's current water service area, which does not include the "North Campus" area. By state law, water service may not be extended beyond the current boundaries of the City's water service area without LAFCO approval, and LAFCO is a responsible agency for the purposes of CEQA.

Response O8-5

The comment asserts that the Draft EIR should acknowledge LAFCO jurisdiction for any development north of the City's water service area boundary. Please refer to Master Response 2 and responses to comments provided in Letter L2 (LAFCO).

Comment O8-6

5. CLUE was a participant in a "Community Advisory Group" established by the University, as the University prepared to develop the 2021 LRDP. The DEIR should explicitly consider the proposed "Guiding Principles" adopted by the Community Advisory Group and analyze them as alternatives to the current LRDP proposal. (A copy is attached to this letter as Appendix A).

Response O8-6

As noted in Master Response 2, UC Santa Cruz considered a variety of public input from the various committees and groups (including the Community Advisory Group referred to in this comment) during plan development. Further, many of the guiding principles (e.g., 3, 4, 5, 6, and 7) are reflected in the current 2021 LRDP. It is unclear how the suggested guiding principles would be considered alternatives that are consistent with CEQA requirements. The Draft EIR's evaluation of potential alternatives, including alternatives considered but dismissed, presents a reasonable range of alternatives and is considered adequate, appropriate, and in accordance with CEQA requirements. Also refer to Master Response 3.

Comment O8-7

6. The DEIR dismisses a possible alternative, the "Main Residential Campus Infill" alternative, and cites, among other reasons for dismissing this alternative, that the Main Residential Campus Infill alternative would, "by developing existing meadows ... have significant impacts with regard to research, aesthetics and recreation." This statement is disingenuous (as is the similar dismissal of the "High Rise Development" alternative) in that the University has already approved a Student Housing West project that makes major incursions into the scenic East Meadow area and that proposes high-rise construction in connection with this student housing proposal. Both the "Main Residential Campus Infill" alternative, and the "High Rise Development" alternative should be considered as possible alternatives in a rewritten and recirculated DEIR.

Response O8-7

As noted in Master Response 8, Student Housing West is a development project under the 2005 LRDP, and its consideration in light of the 2021 LRDP CEQA objectives is not considered applicable. Under CEQA, the Draft EIR is required to evaluate potential alternatives in light of project objectives, which are provided in Chapter 2, "Project Description" and restated in Chapter 6, "Alternatives" of the Draft EIR. Refer to Master Response 3 for further information regarding the presentation of a reasonable range of alternatives within the Draft EIR.

Comment O8-8

7. The DEIR also fails properly to consider alternatives that would direct some or all of the proposed new student growth at UCSC (8,500 students) to other locations and to other campuses controlled by the University of California. It is not correct to state that the "project" must be restricted solely to a consideration of how proposed new student growth might best be accommodated at the UCSC campus. Alternatives that would reduce future enrollment at UCSC while directing such student growth elsewhere within the University of California system must be considered as potentially feasible alternatives.

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the proposed 2021 University of California Long Range Development Plan. CLUE looks forward to a revised DEIR, and will welcome the opportunity to comment on such a revised and recirculated DEIR.

Response O8-8

Please refer to Response O4-7 and Master Response 3 regarding the EIR's presentation of a reasonable range of alternatives, consistent with CEQA requirements. Regarding the consideration of growth at other locations within the UC system, as stated on page 6-6 of the Draft EIR Alternative 4 would reallocate growth to the UC MBEST site. However, as stated on page 6-25 of the Draft EIR, the use of UC MBEST would require students and employees to travel to an off-site location for academic support and instruction, which would conflict with the objective supporting compact and clustered development, as well as convenient access. As noted previously, the Draft EIR's evaluation of the 2021 LRDP is considered adequate, appropriate, and in accordance with CEQA requirements.

Letter O9 Santa Cruz Waldorf School

Nadia Peralta
March 7, 2021

Comment O9-1

I bring this comment in today on behalf of the independent Waldorf School located Northwest of the proposed Northwest Housing and College Expansion Area. SCWS has been a long-time neighbor to UCSC opening its own doors over 20 years ago. The campus trails in Upper Campus connect directly to our school lands serving as a gateway of wonder and joy for students who attend our school to explore the forest.

Response O9-1

This comment provides introductory information regarding the Waldorf School, 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 O9-2

The proposed Northwest housing and College Expansion Area and the new roads through the Cave Gulch Community put our community at significant higher risk of danger and disaster for both traffic on Empire Grade on normal days and possible disaster in the event of ever-increasing wild fires we are now yearly experiencing in California. Already if there was a rapidly-spreading fire, the Bonny Doon and Cave Gulch community would be using Empire Grade as an escape route, this is also our proposed escape route to get our 166 student population of K-8th grade-aged students to safety. Adding more cars and people to the evacuation route could potentially result in a disastrous outcome we have already witnessed like during the Camp Fire of 2018 that destroyed the town of Paradise and killed 86 people many of whom were escaping in their cars. There is no mention of SCWS as your neighbor and what impact this new East-West Rd. may have during an active wildfire. We deem this as unacceptable and not well explored.

Response O9-2

Regarding the use of Empire Grade and wildfire risk, including evacuation route considerations, refer to Master Response 4. Contrary to statements made by the commenter, the Draft EIR does consider the Waldorf School as an off-site sensitive receptor and includes an evaluation of the school where appropriate. For example, the Waldorf School is identified on pages 3.1-17, 3.3-16, and 3.12-14, as well as several locations within Section 3.9, "Hazards and Hazardous Materials," and carried through the Draft EIR's analysis of potential off-site impacts (including construction noise). With particular respect to the issue of the additional access point to campus, the east-west connection, as provided in Figure 2-6 of the Draft EIR, generally follows an existing fire break access road and would not substantially exacerbate wildfire risk (refer to Impact 3.18-2 on page 3.18-14 of the Draft EIR) or safety considerations related to evacuation and consistency with emergency operations planning efforts (refer to Impact 3.18-1 on page 3.18-13.)

Prior to construction and operation of the proposed roadway connection, UC Santa Cruz would evaluate the design of the proposed roadway to ensure that adequate design features (i.e., compliance with Uniform Fire Code) are implemented to prevent geometric design hazards. Further, and as demonstrated by the August 20, 2020 evacuation procedures, UC Santa Cruz provides specific instructions regarding the manner in which campus should be evacuated. In the case of the August 20, 2020 evacuation order, the on-campus population was instructed to exist campus via the main entrance at the intersection of Bay Street and High Street. As further design and a refined alignment for the east-west connection to Empire Grade are developed, UC Santa Cruz will also consider the need to restrict access along the proposed connection during emergency evacuation procedures, as prescribed in the EOP for the main residential campus. However, evacuation of campus would generally proceed towards Empire Grade under all circumstances, which has previously demonstrated that it can be used effectively during emergency evacuation and in compliance with applicable plans (e.g., UC Santa Cruz EOP, the City of Santa Cruz EOP, and Santa Cruz County Emergency Management Plan). Regardless, the Draft EIR considered the potential impacts related to wildfire, including the evacuation of residents on campus and off, as a result of 2021 LRDP implementation.

Comment O9-3

Further, adding student housing and colleges in this proposed area of relatively flat mixed chaparral and old-growth Douglas Fir forests poses a significant threat to what we understand to be culturally valuable sites for the Amah Mutsun Tribal Band whom we are unequivocally in support of through our anti-racist alliance-building we are forming at our school. We are aware that the legacies of white supremacy in the United States have had significant impact on CA Native Tribes. The disenfranchisement of CA Native Tribes from their ancestral lands pose a significant threat to all people if tribal people are not able to tend to their cultural and sacred sites. The land upon which UCSC was built is one of those lands for the Amah Mutsun. We understand that the Amah Mutsun Tribal Band are now culturally responsible for the protection of ecological lands that we are living on, and we are aware through our study of this DEIR that the University of California Santa Cruz will make significant impact on tribal cultural resources if this development plan is embraced by the UC Regents. We stand with the tribe in a stance of solidarity, love, and compassion as an example to our students of what an anti-racist and collaborative world can look like. We recommend that no development be approved in the land that exists between SCWS and UCSC.

Response O9-3

The Amah Mutsun Tribal Band was engaged in consultation during preparation of the Draft EIR, as required under Assembly Bill 52. No specific tribal cultural resources as defined by Public Resources Code Section 21074, were identified, and no areas of concern were noted by the Tribe. Please refer to Response PH2-6 for more information regarding consultation with the Amah Mutsun Tribal Band. In addition, as described on page 3.4-21 of the Draft EIR, Mitigation Measure 3.4-1(1) provides the culturally affiliated tribe the opportunity to monitor construction and requires appropriate and respectful treatment (i.e., proper care as determined through preparation and implementation of a treatment plan that is approved by the tribe) of artifacts if they are recovered. The comment does not raise any environmental issues related to the adequacy of the EIR analysis, and no further response is required. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O9-4

My name is Nadia Peralta and I am commenting on behalf of the Santa Cruz Waldorf School located at 2190 Empire Grade.

I bring this comment in today on behalf of the independent Waldorf School located Northwest of the proposed Northwest Housing and College Expansion Area. SCWS has been a long-time neighbor to UCSC opening its own doors over 20 years ago. The campus trails in Upper Campus connect directly to our school lands serving as a gateway of wonder and joy for students who attend our school to explore the forest.

Response O9-4

Similar to Comment O9-1, this comment provides background information related to the commenter and the perceived relationship between UC Santa Cruz and the Waldorf School, 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 O9-5

The proposed Northwest housing and College Expansion Area and the new roads through the Cave Gulch Community put our community at significant higher risk of danger and disaster for both traffic on Empire Grade on normal days and possible disaster in the event of ever-increasing wild fires we are now yearly experiencing in California. Already if there was a rapidly-spreading fire, the Bonny Doon and Cave Gulch community would be using Empire Grade as an escape route, this is also our proposed escape route to get our 166 student population of K-8th grade-aged students to safety. Adding more cars and people to the evacuation route could potentially result in a disastrous outcome we have already witnessed like during the Camp Fire of 2018 that destroyed the town of Paradise and killed 86 people many of whom were escaping in their cars. There is no mention of SCWS as your neighbor and what impact this new East-West Rd. may have during an active wildfire. We deem this as unacceptable and not well explored.

Response O9-5

Similar to Comment O9-02, the comment expresses concern regarding evacuation routes and traffic along Empire Grade and states that the Waldorf School was not considered as part of the Draft EIR. Refer to Response O9-2.

Comment O9-6

Further, adding student housing and colleges in this proposed area of relatively flat mixed chaparral and old-growth Douglas Fir forests poses a significant threat to what we understand to be culturally valuable sites for the Amah Mutsun Tribal Band whom we are unequivocally in support of through our anti-racist alliance-building we are forming at our school. We are aware that the legacies of white supremacy in the United States have had significant impact on CA Native Tribes. The disenfranchisement of CA Native Tribes from their ancestral lands pose a significant threat to all people if tribal people are not able to tend to their cultural and sacred sites. The land upon which UCSC was built is one of those lands for the Amah Mutsun. We understand that the Amah Mutsun Tribal Band are now culturally responsible for the protection of ecological lands that we are living on, and we are aware through our study of this DEIR that the University of California Santa Cruz will make significant impact on tribal cultural resources if this development plan is embraced by the UC Regents. We stand with the tribe in a stance of solidarity, love, and compassion as an example to our students of what an anti-racist and collaborative world can look like. We recommend that no development be approved in the land that exists between SCWS and UCSC.

Response O9-6

The comment recommends no development of land between the Waldorf School and current development at UC Santa Cruz and expresses support for the Amah Mutsun Tribal Band. Please refer to Response PH2-6 for more information regarding consultation with 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. No further response is necessary. However, for responses to tribal concerns as raised by the Amah Mutsun Tribal Band, refer to responses provided below to Comment Letter O10. 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 O10 Amah Mutsun Tribal Band of Costanoan/Ohlone Indians

Valentin Lopez, Chairman

March 8, 2021

Comment O10-1

Please find the following comments and requests submitted by the Amah Mutsun Tribal Band regarding the Draft Environmental Impact Report for the 2021 UCSC Long Range Development Plan. These comments are also intended as an addendum within our Tribe's ongoing AB52 consultation process concerning the 2021 Long Range Development Plan.

Response O10-1

The comment provides introductory information from the Amah Mutsun Tribal Band. It should be noted that consultation, pursuant to Assembly Bill (AB) 52, was conducted as part of the overall preparation of the Draft EIR. This consultation process, which was initiated in February 2020 by UC Santa Cruz, is documented in Table 3.4-1 on page 3.4-14 of the Draft EIR. Following release of the Draft EIR, UC Santa Cruz has appreciated the opportunity to continue its consultation process. At the time the Draft EIR was issued, no specific tribal cultural resources, as defined by Public Resources Code Section 21074, had been identified. As noted and responded to below, the Amah Mutsun Tribal Band has since identified certain known tribal cultural resources, for which mitigation in the Draft EIR (as modified herein) would continue to sufficiently address. As of August 30, consultation pursuant to AB 52 has concluded. 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 O10-2

The Amah Mutsun Tribal Band is comprised of descendants of the Indigenous peoples taken to Mission Santa Cruz and Mission San Juan Bautista during the Spanish colonization of the Central Coast region. Today, the Amah Mutsun

Tribal Band is carrying the cultural responsibilities of stewarding and protecting Mutsun and Awaswas ancestral lands including those of the Awaswas-speaking Uypi tribe on which UC Santa Cruz is situated. Our tribe's Creation Story tells us that it is our sacred obligation to take care of Mother Earth and all living things. We honor our ancestors by working to protect and restore these sacred lands and by restoring and renewing the knowledge and cultural practices of our ancestors.

The UC Santa Cruz campus is located on the southern end of Ben Lomond Mountain, where ancient marine terraces form a promontory overlooking the Monterey Bay. The campus area is defined by its scenic geography, freshwater springs and streams, unique geological features including karst caves, and strikingly rich diversity of native habitats and species. The land now known as UC Santa Cruz campus was a significant location for the precontact Indigenous peoples of the area including the Awaswas-speaking people of the Uypi Tribe. This is demonstrated by the presence of significant prehistoric habitation and cultural sites on campus and in adjacent areas such as the Westlake neighborhood of Santa Cruz.

Response O10-2

UC Santa Cruz is committed to continuing to understand and honor the Indigenous history on our lands, including the prehistoric habitation and cultural sites on campus and in the vicinity. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O10-3

While acknowledging and appreciating the positive steps that representatives of UC Santa Cruz have taken in recent years to respectfully engage in consultation and collaboration with the Amah Mutsun Tribal Band, we also recognize that for most of the history of UC Santa Cruz since construction of campus facilities began in the 1960's, no meaningful consultation or engagement took place. As a result, there is a long legacy of construction-related impacts to campus lands, in which impacts to the cultural heritage of Indigenous peoples were not formally acknowledged or mitigated. The cumulative impacts of that legacy must be taken into account, when additional impacts to the native soils and cultural and biological resources of campus lands are being contemplated.

A general direction towards respecting Indigenous sovereignty is provided by the framework of *co-management*, in which agencies such as the University of California partner with tribes through mechanisms such as memorandums of understanding (MOU's) and cultural conservation easements, to facilitate stewardship, protection and tribal access to lands and cultural resources.

In considering matters of co-management with tribal partners, guidance is offered by the California Office of the Governor's September 25, 2020 *Statement of Administration Policy Native American Ancestral Lands*. This policy statement is accessible online at [<https://www.gov.ca.gov/wp-content/uploads/2020/09/9.25.20-Native-Ancestral-Lands-Policy.pdf>]. This policy statement directs state entities to "partner with California tribes to facilitate tribal access, use, and co-management of State-owned or controlled natural lands and to work cooperatively with California tribes that are interested in acquiring natural lands in excess of State needs." The stated goals of this policy include "facilitating the access of California Native Americans to sacred sites and cultural resources, improving the ability of California Native Americans to engage in traditional and sustenance gathering, hunting and fishing, and partnering with California tribes on land management and stewardship utilizing Traditional Ecological Knowledges."

Response O10-3

The comment expresses important information regarding past development and the importance of the UC Santa Cruz land to the Amah Mutsun Tribal Band, which UC Santa Cruz acknowledges and appreciates. UC Santa Cruz looks forward to continuing to work with the Amah Mutsun Tribe to explore the framework of co-management between the University and the tribe in order to facilitate stewardship, protection, and tribal access to lands and cultural resources. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O10-4

In regard to cultural resource preservation at UC Santa Cruz, we note the significant amount of resources that have been dedicated over time to the stewardship, preservation and interpretation of historic era cultural resources associated with the Cowell Ranch and other settler activities. The Cowell Historic District of UC Santa Cruz enjoys notoriety and is regarded as a defining aspect of the unique character of the campus. By contrast, the rich cultural heritage of Indigenous peoples on campus lands, including precontact village and cultural sites and the legacy of Indigenous environmental stewardship that shaped the natural landscapes of campus, have received little recognition or visibility.

The campus community remains largely unaware of the rich prehistory of Indigenous stewardship and presence on campus lands, and our tribe would like to see that remedied. Co-management, MOU's and cultural conservation easements provide avenues by which the Amah Mutsun Tribal Band can bring Indigenous stewardship, culture and history to light in a culturally appropriate manner. We look forward to further discussing and developing meaningful partnerships and co-management agreements with UC Santa Cruz.

Response O10-4

The comment's description of the region's prehistory is noted. UC Santa Cruz, as evidenced by its Land Acknowledgment with deference to the tribe, understands the importance of land stewardship and continued collaboration by tribal members and UC Santa Cruz. UC Santa Cruz is committed to continued cooperation and consultation with tribal members regarding the importance of tribal cultural resources, including treatment, preservation, and understanding. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O10-5

The UC Santa Cruz main residential campus is the location of Tribal Cultural Resources (TCR's) of significance to the Amah Mutsun Tribal Band, including ancestral village sites, burial sites, tool and bead manufacture locations, shellmounds, ceremonial sites and sacred landscapes/viewsheds, as well as biological and abiotic natural resources that have traditionally been utilized for cultural purposes. While many significant cultural resources have been identified on campus lands, we emphasize that the majority of campus lands have never been surveyed by archaeologists or tribal members. An Integrative Cultural Resources Survey program (discussed below), would allow the tribe, in partnership with professional archaeologists and UCSC research partners, to systematically identify and assess the significance of tribal cultural resources on campus lands.

Specific Tribal Cultural Resources identified by the Amah Mutsun Tribal Band on the UC Santa Cruz main campus include prehistoric Native American archaeological sites identified in the DEIR. The Amah Mutsun Tribal Band considers all precontact Native American sites on campus where artifacts and specific evidence of the presence and activities of ancestors have been encountered to be Tribal Cultural Resources of interest and concern to our Tribe.

Response O10-5

UC Santa Cruz acknowledges that tribal cultural resources are located within the UC Santa Cruz main residential campus. These resources have been identified and evaluated in the EIR, as amended through the Final EIR. See pages 3.4-14 and 3.4-20 in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," of the Draft EIR, page 4-23 in Section 4, "Revisions to the DEIR," of this document. UC Santa Cruz, separate from the 2021 LRDP, would look to further efforts and coordination between UC Santa Cruz and the Amah Mutsun Tribal Band, including potential development and implementation of an Integrative Cultural Resources Survey Program. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process. Please also see responses to comments O10-6 through O10-8.

Comment O10-6

(Redacted by the Amah Mutsun Tribal Band for confidentiality purposes)

Response O10-6

The comment provides information regarding specific tribal cultural resources within the LRDP area, which were redacted for confidentiality purposes and to protect tribal cultural resources. Based on information provided by the Amah Mutsun Tribal Band in this comment, Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources" of the Draft EIR is updated as follows (see also Chapter 4, "Revisions to the Draft EIR" of this volume to review the changes made).

Page 3.4-14, the first sentence has been revised to read:

As shown in Table 3.4-1, only one Tribe requested consultation with UC Santa Cruz. ~~To date, no specific tribal cultural resources have been identified.~~ The Amah Mutsun Tribal Band has identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources. This includes the three habitation sites (CA-SCR-3/P-44-00011; CA-SCR-160/P-44-000163; and CA-SCR-4/P-44-00012), five lithic scatter sites (CA-SCR-94/P-44-00098; CA-SCR-142/P-44-000145; CA-SCR-143/P-44-000146; CA-SCR-180/P-44-000182; and CA-SCR-181/P-44-000183).

Page 3.4-20, Impact 3.4-2 has been revised to read:

Impact 3.4-2: Substantial Adverse Change in the Significance of a Tribal Cultural Resource

Future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. ~~Although no specific tribal cultural resources have been identified, there are~~ The eight prehistoric archaeological sites that currently exist on the main residential campus have been identified as tribal cultural resources, and ground-disturbing construction activities could unearth previously unrecorded resources. This impact would be **potentially significant**.

As described previously, UC Santa Cruz sent notification letters to six tribes February 22, 2020 per PRC 21080.3.1 (b)(1). UC Santa Cruz had a verbal communication with Mr. Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band. ~~Chairman Lopez did not identify any specific resources they would consider eligible to be tribal cultural resources but requested consultation with UC Santa Cruz.~~ The Amah Mutsun Tribal Band identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources.

~~Although no tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus or the Westside Research Park,~~ Additionally, the campus is located in a region where significant resources have been documented. The NAHC Sacred Lands database search revealed that Native American cultural sites (i.e., sites that have either not been evaluated or do not meet the definition of a tribal cultural resource under PRC Section 21074) have been previously documented within both the UC Santa Cruz main residential campus and the Westside Research Park site. While none of the envisioned development areas are located on sites of known prehistoric archaeological materials, there remains a potential that unrecorded prehistoric archaeological resources that may meet the definition of tribal cultural resources could be unearthed or otherwise discovered during ground-disturbing construction activities. Therefore, this impact would be **potentially significant**.

Page 4-23, the paragraph under the heading "Tribal Cultural Resources" has been revised to read:

Future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. ~~Although no specific tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus or the Westside Research Park,~~ the campus is located in a region where significant resources have been recorded. The Amah Mutsun Tribal Band identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources. Compliance with PRC Section 21080.3.2 and Section 21084.3 (a) would ensure that treatment and disposition of the tribal cultural occurs in a manner consistent

with the California Native American Heritage Commission guidance. Further, implementation of Mitigation Measure 3.4-2 would require UC Santa Cruz to provide the culturally affiliated tribe the to monitor construction and by requiring appropriate and respectful treatment (i.e., proper care as determined through preparation and implementation of a treatment plan that is approved by the tribe) of artifacts if they are recovered. With compliance with existing regulations and implementation of Mitigation Measure 3.4-2, development under the 2021 LRDP would not contribute to a cumulative loss of tribal cultural resources in the area, and as a result would not be cumulatively considerable.

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 as it does not result in a new or substantially more significant impact. 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.

It should also be noted that none of the resources identified overlap with the envisioned development areas of the 2021 LRDP. As a result, the identification of these tribal cultural resources does not necessitate further evaluation or a change in the significance conclusions of the Draft EIR.

Comment O10-7

The Amah Mutsun Tribal Band is concerned with the scale of proposed ground disturbance in native soils that is outlined in the 2021 Long Range Development Plan, and the potential of this activity to disturb previously undiscovered precontact archeological resources. Significant ground disturbance would result not only from building and facility construction activities, but also from the construction of two major new east-west roads on campus lands, as well as the subsurface installation of new electrical, water, and sewer lines and other infrastructure.

The scale of ground disturbance that would be required to install such infrastructure, which would require trenching or boring in sensitive, undisturbed locations such as the North Campus, represents a significant potential impact that we believe merits further quantification and analysis in the DEIR. Development on campus lands should be designed so as to minimize the disturbance of native soils. The Amah Mutsun Tribal Band requests consultation, beginning in the early planning stages, regarding all projects that will result in significant disturbance of native soils on campus including new roads, electrical, water, and sewer line infrastructure.

Response O10-7

Site-specific projects implemented under the 2021 Long Range Development Plan will be subject to additional CEQA review, and AB 52 consultation will be conducted as needed or required. . As with the 2021 LRDP Draft EIR, UC Santa Cruz will notify the Native American Tribes of proposed projects per PRC Section 21080.3.1 (b)(1), and provide an opportunity to consult under AB 52. Additionally, as described below under Response O10-15, revised Mitigation Measure 3.4-1(1) states that for project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall invite a representative of the Amah Mutsun Tribal Band to participate. As described in Mitigation Measure 3.4-2, the Amah Mutsun Tribal Band will also be provided an opportunity to monitor during ground disturbance for potential archaeological materials and human remains within 400 feet of a known prehistoric archaeological deposit.

Comment O10-8

(Redacted by the Amah Mutsun Tribal Band for confidentiality purposes)

Response O10-8

The comment states that avoidance is the preferred method of treatment. Consistent with the commenter's request, avoidance of tribal cultural resources is identified as the preferred method of treatment in Mitigation Measure 3.4-2, and the LRDP EIR does not propose development in any area where a known tribal cultural resources is located. Further, any treatment other than avoidance would be subject to a Tribe-approved treatment plan that is outlined as performance criteria in the mitigation measure.

Comment O10-9

(Redacted by the Amah Mutsun Tribal Band for confidentiality purposes)

Response O10-9

The redacted comment states that the Amah Mutsun Tribal Band is not familiar with the Westside Research Park site. The comment does not raise any environmental issues related to the adequacy of the EIR analysis, and no further response is required.

Comment O10-10

Please note that all statements and requests made in this comment letter regarding tribal consultation, surveying, monitoring, and treatment of Tribal Cultural Resources on the UCSC main campus also apply to the Westside Research Park Site. Prior to any significant disturbance of native soils at the Westside Research Park Site, AMTB requests tribal consultation.

Response O10-10

Please see Response O10-7.

Comment O10-11

Identification and testing of known prehistoric archaeological sites on the main UCSC residential campus occurred primarily in the 1960's, 70's and 80's. As a result, these assessments are largely outdated in light of advances in modern archaeological science and because they failed to include tribal perspectives.

In order to truly understand the boundaries and significance of these sites and to protect them, they must be systematically surveyed and defined by tribal members, professional archaeologists and other research partners. To this end, the Amah Mutsun Tribal Band and Amah Mutsun Land Trust (AMLT) advocates a proactive and integrative approach to the identification and protection of tribal cultural resources such as archaeological sites, sacred sites, ethnobotanical resources, and other culturally significant features through a well-developed systematic Integrative Cultural Resource Survey (ICRS) program. Such a program would be conducted by tribal members and professional archaeologists selected by the Amah Mutsun Tribal Band and its subsidiary organization, the Amah Mutsun Land Trust, in coordination with UC Santa Cruz and in association with UCSC research partners (e.g., archaeology faculty members) with relevant expertise.

The Amah Mutsun Tribal Band and Amah Mutsun Land Trust requests consultation and collaboration with the University to support and fund an ICRS program to define and protect culturally significant sites and resources.

The Amah Mutsun Tribal Band also requests notification in advance of any activities that will significantly disturb native soils on the UC Santa Cruz campus, so that appropriate cultural resource surveying and monitoring by representatives of the Amah Mutsun Tribal Band may be arranged. Monitoring and surveying activities will be coordinated by the Amah Mutsun Land Trust, a subsidiary organization of the Amah Mutsun Tribal Band which manages the Tribe's archaeological monitoring work.

Response O10-11

As noted in Response O10-2, UC Santa Cruz is committed to further cooperation and collaboration with the Amah Mutsun Tribal Band. This may include the development and implementation of an ICRS program, as requested by the commenter. It is assumed that such a program could be designed to expand and complement the current Amah Mutsun Relearning Program that is currently provided on campus. Further and separate from the potential program, UC Santa Cruz will continue to coordinate with the Amah Mutsun Tribal Band and in accordance with AB 52 requirements to identify, monitor, and protect tribal cultural resources, as appropriate. The Draft EIR mitigation measures, as amended through the Final EIR, adequately address the potentially significant impacts of the 2021 LRDP. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process. Please see Response O10-7 related to notification of ground disturbing activities.

Comment O10-12

Based on the results of a tribal-led Integrative Cultural Resource Survey (ICRS) program, the Amah Mutsun Tribal Band requests that culturally significant sites and landscapes on campus be protected in perpetuity by means of cultural conservation easements, or other legally equivalent mechanisms, with provisions that formally allow for tribal access and stewardship of culturally significant landscapes and sites. Stewardship activities may include ceremony,

management and harvest of ethno-botanically significant species, and restoration activities including the removal of invasive species and enhancement of specific patches of native plants.

Response O10-12

The request for protection of tribal cultural resources is acknowledged and is not inconsistent with Mitigation Measure 3.4-2 (as presented on page 3.4-21 of the Draft EIR), which states that "the preferred method of treatment is avoidance and preservation of... resources." Additionally, the aforementioned Amah Mutsun Relearning Program (and potential ICRS program) include cultural and ecological understanding, consistent with the stewardship goals identified in this comment. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O10-13

Impact 3.4-2: Substantial Adverse Change in the Significance of a Tribal Cultural Resource states *that "Although no specific tribal cultural resources have been identified, there are eight prehistoric archaeological sites that currently exist on the main residential campus..."* and that *"no tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus."*

In fact, the Amah Mutsun Tribal Band identifies many significant Tribal Cultural Resources on the UC Santa Cruz main campus, including sites defined as prehistoric archaeological sites in the DEIR. Please correct statements throughout the DEIR that incorrectly indicate the absence of known Tribal Cultural Resources on campus lands, including on page 4-23 (Cumulative Impacts).

Response O10-13

Please see Response O10-6 which addresses the requested revisions.

Comment O10-14

CRHR Eligibility: On pages 3.4-12 and 3.4-18 of the DEIR, it is stated that three precontact cultural sites at UCSC campus "may be eligible for listing in the CRHR," none having been formally evaluated for listing. We recommend instead stating that these sites are "presumed eligible for listing in the CRHR," which is the language that was utilized in the 2005 LRDP EIR.

As part of an Integrated Cultural Resource Survey program, the Amah Mutsun Tribal Band would like to engage in comprehensive studies of prehistoric archaeological sites and tribal cultural resources on campus lands, which would allow for eligibility for CRHR nomination to be evaluated. Following evaluation, the Amah Mutsun Tribal Band may choose to formally nominate eligible TCR's on campus lands to the California Register of Historic Resources and/or the National Register of Historic Places, as appropriate.

Response O10-14

Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," of the Draft EIR states that eight prehistoric archaeological sites have been identified on campus and that while they have not been formally evaluated, they are presumed eligible for listing. For clarity, the Draft EIR is revised as follows (modifications are shown in Chapter 4, "Revisions to the Draft EIR"):

Third paragraph under "Prehistoric Archaeological Sites" on page 3.4-12:

The remaining five sites are recorded as lithic scatters (scattered chipped stone tool manufacture debris), several with Monterey-banded chert: CA-SCR-94/P-44-00098, CA-SCR-142/P-44-000145, CA-SCR-143/P-44-000146, CA-SCR-180/P-44-000182, and CA-SCR-181/P-44-000183. The last site, CA-SCR-181/P-44-000183, was not relocated during a 2005 archaeological survey. In general, the boundaries of these sites are not well defined, it has been difficult to accurately relocate these sites in subsequent surveys, and it is unclear whether the deposits have subsurface components. These eight sites have been assumed eligible for listing in the CRHR for management and preservation purposes until their significance can be documented through archaeological testing.

Second paragraph under Impact 3.4-1 on page 3.4-18:

Eight prehistoric archaeological sites have been recorded on the main campus. None has been formally evaluated for listing in the CRHR. Three habitation sites have the potential to yield important information and may be eligible for listing in the CRHR. The remaining five sites are recorded as lithic scatters. These eight sites have been assumed eligible for listing in the CRHR, however for management and preservation purposes until their significance can be documented through archaeological testing.

The above-listed change provides clarity and consistency within the Draft EIR but 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 Regents for certification.

Comment O10-15

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

Section 3.4-1.1 of the DEIR states,

"For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. "

Consistent with AMTB's request for the adoption of an Integrative Cultural Resource Survey (ICRS) program, as delineated earlier in this comment letter, AMTB recommends the addition of the following provisions to Mitigation Measure 3.4-1.

If the subject location on UC Santa Cruz campus where ground disturbance activities are planned has not previously been surveyed by a professional archaeologist and tribal member of the Amah Mutsun Tribal Band as part of an Integrative Cultural Resource Survey (ICRS) program, AMTB requests to be provided the opportunity to conduct a survey of the subject area prior to the initiation of ground disturbance activities. A complete intensive surface survey should be conducted by a qualified archeologist in addition to a tribal representative, in consultation with the Amah Mutsun Tribal Band.

Inclusion of a tribal representative in the surveying of areas of planned ground disturbance is essential for reducing the risks posed by construction-related activities to Tribal Cultural Resources, including significant ethno-botanical resources and landscape features of cultural significance that non-tribal members may not properly identify.

Response O10-15

In response to the Amah Mutsun Tribal Band's request to participate in archaeological surveys for locations that have not previously been surveyed, Mitigation Measure 3.4-1 on pages 3.4-19 and 3.4-20 is revised as described in Response L12-2 (modifications are shown in Chapter 4, "Revisions to the Draft EIR"), consistent with the commenter's request. The modified mitigation measure is presented below for convenience of review, as follows:

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally-affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project's area of effects:

- 1) For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified

archaeologist, who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project's area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC Santa Cruz and/or archaeologist shall ~~notify~~ consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program ~~the appropriate Native American tribe and extend an invitation for monitoring.~~

- 2) Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.
- 3) If it is determined that ~~the resource~~ a known archaeological site extends into the project's area of potential effects, UC Santa Cruz shall ensure that the ~~resource~~ site is evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project's area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.
- 4) If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.
- 5) If archaeological material within the project's area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or ~~other means~~ more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified

archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).

- 6) If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe's nonprofit organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.

The aforementioned change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 because it does not change the significance of any impacts. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by The Regents for certification.

Comment O10-16

For the Amah Mutsun Tribal Band and many other Native American tribes, biological and abiotic natural resources that were used traditionally for cultural purposes are essential for contemporary cultural practitioners and for tribal cultural revitalization efforts. These resources frequently occur in association with prehistoric archeological sites and other tribal cultural resources, as a key component of tribal cultural landscapes. Documenting and stewarding such natural resources in the traditional territory of the Amah Mutsun Tribal Band is an integral part of the mission of the tribe and Amah Mutsun Land Trust.

The Amah Mutsun Tribal Band, through the Amah Mutsun Land Trust and its stewardship and cultural monitoring programs, has gained extensive field experience in surveying, mapping, and managing biological and cultural resources at sites across Santa Cruz, San Benito, Monterey, and Santa Clara counties. Through AMTB's relationship with UC Santa Cruz and the Amah Mutsun Relearning Program—an ongoing partnership with the UCSC Arboretum—tribal members have developed relationships with the lands of UCSC campus, including the rich native habitats of the UCSC campus at large. Amah Mutsun tribal members frequent the Arboretum to manage and harvest ethno-botanical resources from the California Conservation Gardens and related gardens and habitat areas.

The coastal prairie ecosystem is of particular cultural significance to the Amah Mutsun Tribal Band. Combining traditional ecological knowledge with ongoing collaborative scientific research, the Amah Mutsun Land Trust engages in coastal prairie restoration on a landscape scale, most notably at the State Parks Quiroste Valley Cultural Preserve in San Mateo County. Coastal prairie ecosystems are rich in many of the native plant species that tribal cultural practitioners utilize for food, medicine, basketry, etc.

Response O10-16

UC Santa Cruz is committed to continuing its partnership with the Amah Mutsun Tribal Band with regard to protecting all resources of tribal and cultural importance. The comment is included within the record for consideration by the decisionmakers as part of the 2021 Long Range Development Plan approval process.

Comment O10-17

Section 3.5.2 of the DEIR provides a table of the approximate distribution by acreage of vegetation communities on the UC Santa Cruz campus. We found this data to be highly coarse and speculative, and also inconsistent with habitat typing data provided in the UCSC's previous (2005) LRDP EIR. For example, the treatment of "redwood forest" as a monolithic forest type spanning 860.4 acres of campus lands is notably out of touch with the diverse range of habitat associations that are present in the North Campus and other forested areas of campus.

The vegetation communities table in Section 3.5.2 states that UCSC campus lands contain 399 acres of grassland and only 107.9 acres of coastal prairie. Coastal prairie is considered a sensitive natural community, while grassland is regarded as less sensitive. The DEIR defines coastal prairie habitat as

"similar to other grassland habitat within the LRDP area, but with greater incidence of native grass species, including California oat grass and western panic grass (Panicum acuminatum). Coastal prairie habitat also supports a diverse assemblage of native forbs, including coyote thistle (Eryngium armatum), wild hyacinth (Triteleia hyacinthina), dwarf brodiaea (Brodiaea terrestris), and yampah (Perideridia kelloggii)."

We note that the distinction made in the DEIR between coastal prairie and grassland ecosystems is a very arbitrary and subjective one. Over time, as a result of poor management of coastal prairie ecosystems and cumulative habitat degradation, loss of species diversity occurs, and native forbs become more sparse. Rather than downgrading historic/former coastal prairie ecosystems as grasslands, we recommend viewing these as **degraded coastal prairie with significant restoration potential**.

As highlighted in the DEIR, the Marshall Field complex and the "Mima Meadow" in the far SW corner of the main UCSC campus both contain a rich assemblage of coastal prairie species including special-status plant species and the federally endangered Ohlone Tiger Beetle. These are immensely valuable sites for coastal prairie research which, in addition to their biological richness, are regarded by the Amah Mutsun as important cultural heritage areas. We believe the Marshall Field complex and Mima Meadow are worthy of the highest level of protection in perpetuity. The Amah Mutsun Tribal Band is interested in exploring avenues towards co-management and preservation in perpetuity of these important cultural and ecological landscapes.

Response O10-17

As stated in Section 3.5.2, "Environmental Setting" on page 3.5-8 of the Draft EIR, the 2019 mapping was favored because it was more recent than the mapping used in the 2005 EIR; however, where specific, known sensitive natural communities (i.e., coastal prairie, northern maritime chaparral) were mapped, the 2005 LRDP layers were amended to the 2019 mapping. As stated in this section, some vegetation communities may be overrepresented or underrepresented due to changes in the more recent mapping. Nevertheless, Mitigation Measure 3.5-1a, on page 3.5-39 of the Draft EIR would require project-level review of future projects under the 2021 LRDP and would require project-level mapping of vegetation communities at a finer scale than provided in the Draft EIR. However, the full range of potential impacts are disclosed, as are measures to mitigate these impacts.

This comment also states that areas mapped as grassland habitat in the Draft EIR should be considered degraded coastal prairie habitat. See Response S3-19.

This comment also states that the Marshall Field complex and the "Mima Meadow" are worthy of the highest level of protection in perpetuity. 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 the protection of on-campus lands associated with sensitive species (including Ohlone tiger beetle) under the 2021 LRDP, please also refer to Master Response 12.

Comment O10-18

A defining feature of the North Campus is the "seep zone," a sensitive habitat type. These pocket wetlands formed by perennial seeps support distinct assemblages of native plant species, including giant chain ferns, azaleas, rushes and large concentrations of sedges. The unique concentration of ethno-botanically significant plant species found in the seep zone area is valued by Amah Mutsun cultural practitioners for specific cultural uses, including sedges (*Carex* sp.) and rushes (*Juncus* sp.). Each of the three projected development areas in the North Campus as outlined in the 2021

LRDP overlaps with the North Campus seep zone, however, potential impacts to the seep zone are not properly analyzed in the DEIR.

Response O10-18

Under Impact 3.5-4 on pages 3.5-69 through 3.5-70 of the Draft EIR, seep habitat is identified as state-protected wetland habitat and it is addressed that much of this seep habitat has not been previously mapped. Impacts on state and federally protected wetlands, including seeps, were appropriately considered potentially significant in the Draft EIR. As a program-level analysis, the Draft EIR does not quantify every resource for every future project under the 2021 LRDP. Prior to implementation of future projects under the 2021 LRDP, Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR, would require project-level surveys to identify sensitive habitats, including seeps. If potential seep habitat is identified on the project site, Mitigation Measure 3.5-4 on pages 3.5-69 and 3.5-70 of the Draft EIR would require delineation of these features, avoidance of these features, or permitting and compensation (e.g., restoration, replacement) for unavoidable impacts such that there is no net loss of the habitat. Refer also to Master Response 12 regarding long-term habitat protection.

Comment O10-19

Impact 3.5-4: Please map and quantify the extent of seep zone wetlands relative to proposed development areas in North Campus. The DEIR should also provide a specific figure of how many acres of the seep zone could be impacted by proposed development in the North Campus, and discuss how development within the seep zone area could alter drainage patterns, leading to additional impacts.

Response O10-19

Please see Response O10-18 regarding evaluation of state and federally protected wetlands, including seeps, in the Draft EIR.

Comment O10-20

Figure 3.5-3, Aquatic Habitat Mapped by the County of Santa Cruz and USFWS in the LRDP Area fails to identify any portions of the North Campus seep zone.

Response O10-20

Please see Response O10-18 regarding evaluation of state and federally protected wetlands, including seeps, in the Draft EIR.

Comment O10-21

Impact 3.5-4 incorrectly states that seeps on campus have not been previously mapped. Please contact the UCSC Campus Natural Reserve and the Kenneth S. Norris Center for Natural History to request maps and documentation regarding the seep zone and other wetland areas on campus. Note that a poorly scanned map of the seep zone areas was submitted as a public comment to the 2005 LRDP EIR.

Response O10-21

Please see Response O10-18 regarding evaluation of state and federally protected wetlands, including seeps, in the Draft EIR. Additionally, please note that the UC Santa Cruz Natural Reserves staff provided input regarding seeps on campus. This information was included in the evaluation of state and federally protected wetlands under Impact 3.5-4. As explained in Master Response 11, Level of Detail, the 2021 LRDP EIR is intended to be used in conjunction with review of individual 2021 LRDP projects, consistent with CEQA's tiering provisions. Accordingly, Impact 3.5-4 notes that some features, including seeps were not comprehensively mapped.

Comment O10-22

The Amah Mutsun Tribal Band is concerned with potential impacts to biological and ethno-botanical resources in the area identified in the 2021 LRDP as the Northwest Housing and College Expansion area, located roughly north of Kresge College and W/SW of the North Remote Parking Lot. This area, and in particular the relatively flat section roughly in the center of it and west of the UCSC camper park, is of a unique character, defined by the presence of a

grove of old growth douglas fir trees with a relatively open understory, bordered on the southeast by a distinctive stand of dwarf redwood trees.

As noted in a UCSC-commissioned June 25, 1996 Biotic Study of this site by the distinguished late Santa Cruz County naturalist Randall Morgan, “the large Douglas-firs noted above are mostly concentrated within a one-acre area in the center of the site. Such a stand of large, old growth firs is unusual if not unique on the campus. The stand is certainly worthy of protection; it provides valuable bird habitat in addition to its obvious aesthetic value.”

Douglas fir, known as *rappak* in the Mutsun language, is a culturally significant tree to the Amah Mutsun Tribal Band, and old growth stands of such grandeur are uncommon, and rarely so easily accessible—which is a relevant matter for our tribal elders. A number of understory plant species within the Northwest Housing and College Expansion Area are of ethno-botanical value, including *sirak* (California hazel), western anemone (*Anemone oregano*), and *mamawkwa* (California rose).

Morgan also notes that “another specialized native plant assemblage is located in a roughly triangular area at the southern end of the study area...the area is characterized by an overstory of madrones and an unusually rich herbaceous understory containing woodland aster, western anemone, pussy ears, milkmaids, California hazel, trail plant, and western fescue. The assemblage is small, but botanically significant in the context of the campus. Three of the species (trail plant, hazel, and oniongrass) are considered ‘significant’ in the 1987 Buck report. One additional species, western anemone, is relatively rare in Santa Cruz County.”

Although not observed by Randall Morgan in his 1996 observations, we note from field experience the presence of multiple patches of western rattlesnake plantain (*Goodyera oblongifolia*) within the proposed Northwest Housing and College Expansion Area. This occurrence of western rattlesnake plantain (denoted as a locally rare species on the UCSC Plant List) may represent the very southern end of this species’ distribution in the California Coast Ranges.

Response O10-22

PRC Section 21074 defines “tribal cultural resources” as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. While culturally significant plants referenced do not meet this definition because they are not eligible as resources under the CRHR, UC Santa Cruz is committed to continuing its partnership with the Amah Mutsun Tribal Band to honor and protect all resources of tribal and cultural importance on campus. Through continued coordination with tribal representatives and implementation of mitigation measures related to biological resources, implementation of the 2021 LRDP would not significantly affect sensitive native plants within the LRDP 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 O10-23

LRDP impacts to special-status species and locally significant populations

Amah Mutsun tribal members consider ourselves to be culturally obligated to be vocal advocates for our plant and animal relatives. We are concerned about the potential impacts of development projects outlined in the 2021 LRDP to native habitats and species of UCSC campus lands. Many of the species of special status identified as potentially being adversely affected by proposed campus development projects are of cultural significance to the Amah Mutsun, including *weecici* (burrowing owl), *siirih* (golden eagle), *wakracmin* (red-legged frog), *tikwiS* (American badger), *Simtikla* (bats), *hireh* (woodrat) and *peyay* (loggerhead shrike).

The mosaic of native habitats and soil types encompassed by the UCSC main campus supports an extraordinary level of biodiversity, with over 500 recorded species of plants, about 500 recorded species of mushrooms (Haff, et al. 2008), and 50 species of mammals known to occur on campus. Over 70 invertebrate species have been identified within the karst cavern system found in UCSC’s Cave Gulch (Ubick 2001), including narrow endemic species such as the Empire Cave Pseudoscorpion (*Fissilicreagris imperialis*) that have been found nowhere else on earth.

Multiple species new to science have been discovered on UCSC campus lands, including the federally-endangered Ohlone Tiger Beetle (named by naturalist Randall Morgan for the proximity of the species type locality to a shellmound cultural site), the Dolloff cave spider (discovered in UCSC's Cave Gulch, considered one of the rarest spiders of North America), and a unique purple agaric mushroom species, *Pseudobaeospora deckeri*, discovered north of the Engineering 2 building on the North Campus in 2012. It must be noted that the 2021 LRDP slates the portion of North Campus north of the Engineering 2 building for development.

Many plant species that are locally rare in Santa Cruz County are found within UCSC's unique assemblage of habitats. Some of these species, which are characteristic of the northern coastal ranges of California, appear to reach their southern distribution limit in UCSC's North Campus (eg. *Calypso bulbosa*, *Vaccinium parvifolium*). The deceiving sedge (*Carex saliniformis*, 1B.2) was believed to be extirpated from Santa Cruz County, but was re-discovered in 2000 in the North Campus of UCSC.

Response O10-23

As noted above in Response O10-22, the plant species identified do not meet the definition of a tribal cultural resource, as evaluated under CEQA. However, the Draft EIR does assess the potential impacts of the 2021 LRDP and provides appropriate mitigation measures to prevent significant impacts to special-status species and sensitive habitat within Section 3.5, "Biological Resources." 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 O10-24

Although CEQA does not require analysis of impacts to populations of plants or other species that are not listed as threatened, endangered or special-status, it must be understood that further development on campus lands is likely to significantly impact distinct populations of rare plants which are regionally significant from a biological standpoint, and in some cases are also culturally significant to the Amah Mutsun Tribal Band. These impacts should be assessed through project-level surveys by botanists and UCSC researchers familiar with campus lands, and through University support and funding for a campus-wide survey program and natural biodiversity database for recording observations of plant species on campus lands, with an emphasis on species identified as uncommon on campus and uncommon within Santa Cruz County.

Response O10-24

Please see Response O10-22 with respect to the significance of biological resources to the Amah Mutsun Tribal Band. 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 O10-25

We note that mitigation measures for special-status species are frequently ineffective or misleading. Habitat "creation" for listed species, such as was attempted at UCSC's Inclusion Area A (IAA) preserve, is often unsuccessful, as the DEIR acknowledges in the case of the IAA. Removal and relocation of species and nests or roosts is also commonly unsuccessful and detrimental. The designation of "compensatory habitat" to offset the impacts of destroying known, occupied habitat is often only effective on paper, ultimately resulting in net habitat loss, and local species absence.

Response O10-25

The comment provides a general discussion of the commenter's opinion regarding replacement and relocation of sensitive biological resources. The Draft EIR's mitigation measures pertaining to biological resources, which include some provisions for relocation and replacement/restoration of habitat if avoidance is not possible, are considered appropriate, adequate, and in accordance with current guidance provided by CDFW and USFWS. Further and with respect to IAD (not IAA as stated by the commenter), the area was identified as a preserve as part of the Ranch View Terrace HCP but did not involve habitat "creation."

Comment O10-26

The failure of surveys to detect species at a project site does not necessarily indicate the absence of that species. Some species, such as the burrowing owl, may be present some years at a given site and absent on some years—but once a habitat is destroyed, the species can never return.

Response O10-26

The Draft EIR assesses potential impacts based on the potential presence, which accounts for intermittent habitation, and provides species-specific mitigation to prevent impacts to individuals that may be present prior to construction. 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 O10-27

As part of the DEIR's discussion of cumulative impacts and biological resources, we recommend that the DEIR provide an accounting of species, such as the coast horned lizard, that were formerly recorded on the UCSC campus and are now considered to be extirpated on campus. The disappearance of species from campus lands serves as a sobering indicator of the health of campus ecosystems that reflects factors including the cumulative impacts associated with the scale of existing campus development as well as the adequacy of current land management practices.

Native plant species reported as extirpated from campus lands by the UCSC Campus Natural Reserve (derived from Haff, et al. 2008) include *Allium unifolium* (one-leaved onion—locally rare), *Sisyrinchium californicum* (yellow-eyed grass—locally rare), *Muilla maritima* (sea mullia—a coastal prairie species), *Schoenoplectus acutus* (hardstem bulrush), *Pyrola picta* (white-veined wintergreen—locally rare), *Vaccinium parvifolium* (red huckleberry—the only recorded SC County occurrence outside of Big Basin), *Lupinus polyphyllus* (bigleaf lupine), *Quercus chrysolepis* (canyon oak), *Castilleja ambigua* ssp. *ambigua* (johnny nip—locally rare), and *Plantago subnuda* (Mexican plantain—locally rare). Per local botanist and restoration ecologist Dr. Grey Hayes (2011), additional native plant species now extirpated from campus lands include *Isoetes nuttallii* (Nuttall's quillwort—locally rare), *Limnanthes douglasii* (meadowfoam—locally rare), *Heterocodon rariflorum* (rareflower heterocodon), and *Spiranthes romanzoffiana* (hooded lady's tresses).

Response O10-27

Most of the plant species listed in this recommendation do not qualify as special-status species under CEQA (i.e., listing under the federal of California Endangered Species Acts, California rare plant rank of 1, 2, or 3). Additionally, the special-status plant species impact analysis on pages 3.5-38 through 3.5-42 of the Draft EIR included analysis of special-status plant species known to occur in the eight U.S. Geological Survey quadrangles surrounding the LRDP area (see Table 3.5-2 on pages 3.5-41 through 3.5-19 of the Draft EIR), which would likely account for any special-status species that occur in the region but have been extirpated from the LRDP area. Further, potential impacts to coast horned lizard are evaluated on pages 3.5-49 and 3.5-50. As stated on page 3.5-50, implementation of Mitigation Measures 3.5-1a and 3.5-2d would reduce potential impacts on coast horned lizard by requiring reconnaissance-level surveys for projects under the LRDP to determine the likelihood of presence of the species, focused visual surveys for the species if determined to be likely to occur, and relocation of individual lizards by a qualified biologist with an appropriate CDFW Scientific Collecting Permit, if detected.

Comment O10-28

The scenic UCSC campus is often described as a "living laboratory," owing to its exceptional levels of biodiversity. It must be understood that the native ecosystems of campus are delicate and finite, and have already experienced significant degradation as a result of the cumulative impacts of the existing level of UCSC campus development. The best policy to reduce impacts on native species, including special status species, is to avoid the destruction and further fragmentation of intact native habitats whenever possible. For this reason we recommend LRDP alternatives that result in a reduced development footprint on the main UCSC residential campus.

Response O10-28

The comment expresses preference for an alternative that considers a reduced development footprint (e.g., Alternative 3) and is noted. This comment expresses an opinion regarding 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 O10-29**DEIR Section 3.10— Hydrology and Water Quality**

Please refer to the passage in "Tribal Cultural Resources" section of this comment letter for a discussion of the cultural significance of springs to the Amah Mutsun Tribal Band and specific requests regarding tribal consultation and the preservation of these resources.

Response O10-29

Please refer to Response O10-6.

Comment O10-30

The Amah Mutsun Tribal Band is concerned about the potential impacts of well development and groundwater pumping as well as the development of additional impervious surfaces (roads, buildings, parking lots, etc) on subsurface aquifers that are the source of freshwater springs.

Response O10-30

It should be noted that the 2021 LRDP does not include the development of additional wells, but assesses the potential for groundwater pumping within the capacity of an existing well in the lower campus subarea of the main residential campus. These impact evaluations related to groundwater pumping and impervious surfaces are provided within Section 3.10, "Hydrology and Water Quality" of the Draft EIR. Refer to 3.10-3 (Alteration of Drainage Patterns and Increased Runoff) and 3.10-5 (Impacts to Karst Aquifer Supply, Recharge and Groundwater Quality), beginning on page 3.10-31 of the Draft EIR, as well as in Master Response 10, Hydrology and Water Quality, including impacts to water quality from post-construction runoff and groundwater conditions.

Comment O10-31

We are additionally concerned about the potential for an increase in urban pollutants entering these aquifers as a result of increased parking lot and roadway runoff during rain events.

Response O10-31

Impact 3.10-5, beginning on page 3.10-33 of the Draft EIR, provides analysis of increased urban runoff. Also refer to Mater Response 10 related to Hydrology and Water Quality.

Comment O10-32

DEIR Figure 3.15-1, "Trail Network On the Main Residential Campus" depicts the fire roads and a very small number of official trails maintained by the University, which is not reflective of the large number of unofficial trails that criss-cross campus lands.

Response O10-32

UC Santa Cruz acknowledges that Figure 3.15-1 on page 3.15-5 of the Draft EIR does not attempt to identify unofficial trails within the main residential campus. The presence of unofficial trails is subject to ongoing planning, and is not considered recreational facilities within the context of the analysis of Section 3.15, "Recreation." This comment does not address the adequacy of the EIR analysis. No further response is necessary. The Draft 2021 LRDP (page 138) states, "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."

Comment O10-33

In DEIR Figure 3.16-1, "Existing Circulation Roadway Network," a maze-like network of unsanctioned single-track mountain bike trails and footpaths in the North Campus appear to be incorrectly depicted as "local streets."

Response O10-33

Please refer to Response S4-3.

Comment O10-34

The ever-increasing number of unsanctioned recreational trails in the forest and coastal prairie of the North/Upper Campus has caused significant degradation to habitats and has also impacted Tribal Cultural Resources including prehistoric archaeological sites. Recreational mountain biking on unsanctioned, single track trails—many constructed and maintained by mountain bikers themselves—has been allowed to continue expanding unchecked for decades, with many damaging effects. Although campus regulations prohibit mountain bike use in the North Campus outside of fire roads, mountain bikers widely disregard these regulations because they are not enforced by the University in any apparent manner.

The DEIR should evaluate the impacts that a significant increase in the campus population would likely have on unsanctioned trail use and the continued degradation of campus habitats due to over-visitation and high-impact recreation. In order to mitigate this significant existing problem and its probable intensification with an increase in campus population, we recommend that the University allocate resources to provide for proper stewardship of the habitats and natural areas of the campus, especially those areas that are not designated as Campus Natural Reserve lands.

Response O10-34

The Draft EIR provides an evaluation of the potential impacts associated with the increased population, including impacts to recreational opportunities (refer to Section 3.15, "Recreation" of the Draft EIR). The evaluation of potential impacts to biological (Section 3.5) and tribal cultural (Section 3.4) resources, also considers impacts related to increased population within the LRDP area. However, within the context of CEQA, it is reasonable to assume regulatory compliance when evaluating the potential physical environmental impacts of a project. Regarding the use of unauthorized trails, refer to Response S3-12. See Response O10-32 regarding the ongoing planning efforts for the unsanctioned trails. UC Santa Cruz looks forward to continued discussions with the Amah Mutsun Tribe on measures to protect the TCRs in the vicinity of these unsanctioned trails.

Comment O10-35

While other resource issues evaluated for cumulatively considerable impacts in Table 4-1 such as Biological Resources, Hydrology and Air Quality are evaluated within a *regional* geographic area, "Archaeological, Historical, and Tribal Cultural Resources" are instead noted as being evaluated within the *local (LRDP) area*.

The Amah Mutsun Tribal Band objects to this view of the Tribal Cultural Resources of campus lands in isolation from surrounding regional impacts of Tribal Cultural Resources such as sacred sites, burial sites, and village sites. The cultural impact of adverse changes to tribal cultural resources and landscapes at UC Santa Cruz campus is not experienced by the Amah Mutsun Tribal Band and our members as separate or isolated from the severe impacts our tribe has experienced as a result of the desecration of the majority of our cultural and sacred sites in the region. Please also note that the destruction of sacred sites and TCR's represents a distinct form of cumulative impact from the scientific impact of the loss of archaeological deposits and sources of data. The destruction and diminishment of TCR's may be understood as a form of cultural violence connected to the devaluation of Indigenous history and places in western science.

We believe the cumulative impacts of the destruction and fragmentation of cultural heritage sites by means of residential construction, road construction, historic quarry development, and other forms of development must be taken into account when evaluating the local impacts of potentially disrupting or desecrating our Tribal Cultural Resources at UCSC campus.

Response O10-35

Although Table 4-1 states, "Local (LRDP area)" for the geographic area, the discussion of cumulative impacts, which begins on page 4-23, of the Draft EIR states, "The cumulative context for archaeological resources, human remains, and tribal cultural resources is the former territory of the Ohlone tribelet, recorded in Mission Santa Cruz records as Uypi." Table 4-1 in Chapter 4, "Cumulative Impacts," of the Draft EIR is revised as follows (modifications are shown in Chapter 4, "Revisions to the Draft EIR"):

Table 4-1 Geographic Scope of Cumulative Impacts

Resource Issue	Geographic Area
Aesthetics	Local (LRDP area and surrounding public viewpoints)
Agriculture and Forestry Resources	Regional (Santa Cruz County)
Air Quality	Regional (North Central Coast Air Basin for pollutant emissions that have regional effects) Local (immediate vicinity for pollutant emissions that are highly localized such as Carbon Monoxide)
Archaeological, Historical, and Tribal Cultural Resources	Historical Resources: Local (LRDP area and City of Santa Cruz) Archaeological and Tribal Cultural Resources: Regional (historic lands of the Uypi people)
Biological Resources	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Energy	Regional (Pacific Gas and Electric Company grid in Santa Cruz County)
Geology and Soils	Local (LRDP area)
Greenhouse Gas Emissions and Climate Change	Global
Hazards and Hazardous Materials	Local (LRDP area)
Hydrology and Water Quality	Regional (Santa Cruz County) and local (LRDP area)
Land Use and Planning	Local (LRDP area and immediately surrounding area)
Noise	Local (immediate project vicinity where project-generated noise could be heard concurrently with noise from other sources)
Population and Housing	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Public Services	Local service areas of service providers
Recreation	Regional (Santa Cruz County) and local (LRDP area)
Transportation	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Utilities and Service Systems	Local service areas of utility providers
Wildfire	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 as it resolves a typo/inconsistency between the table and the analysis presented in the Draft EIR. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by The Regents for certification.

Comment O10-36

In addition, we believe that the cumulative effects of the desecration of existing prehistoric archaeological sites and Tribal Cultural Resources within UCSC campus lands merit consideration. This includes the removal of ancestral remains from UCSC lands by University-sanctioned archaeologists, trails and roads that bisect or adjoin prehistoric archeological sites, and past campus development projects that have resulted in impacts to Tribal Cultural Resources and culturally significant landscape features. This also should include consideration of the untold number of cultural sites and artifacts that were looted and destroyed on UCSC campus lands without ever being recorded or documented, in the historic period— possibly including earlier chapters of UCSC development before cultural or archaeological resource protection laws meaningfully existed.

Response O10-36

The cumulative context of tribal cultural resources has been expanded. The following has been added as the first paragraph under “Tribal Cultural Resources” on page 4-23 of the Draft EIR (modifications are shown in Chapter 4, “Revisions to the Draft EIR”):

The cumulative context for the cultural resources cumulative analysis considers the broad regional system of which the resources are a part. The cumulative context for archaeological resources, human remains, and tribal cultural resources is the former territory of the Ohlone tribelet, recorded in Mission Santa Cruz records as Uypi. The historic lands of the Uypi people have been affected by development since the arrival of the Portolá expedition in 1769. Division of the land into land grants was soon followed by limestone production and related commercial development through the 1800s. Development of the Uypi lands continued with agricultural growth, residential growth throughout the county and city of Santa Cruz, and the establishment of UC Santa Cruz in 1965. These activities have resulted in an existing significant adverse effect on tribal cultural resources. The cumulative context for historical resources is UC Santa Cruz and the city of Santa Cruz, where common patterns of historic-era settlement have occurred over roughly the past two centuries.

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5 because it provides additional context regarding tribal cultural resources but does not change the significance of any impacts. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by The Regents for certification.

Comment O10-37

4.3.4.4—Historical Resources:

“...It is possible that a historic building would need to be demolished or altered in such a way that it would no longer convey its historic significance. Therefore, the project’s contribution to cumulative historic resource impacts would be potentially cumulatively considerable. No additional mitigation, beyond that identified in Section 3.4, “Archaeological, Historical, and Tribal Cultural Resources,” is available to reduce the 2021 LRDP’s contribution.”

This appears to represent a double standard in regard to how impacts to cultural resources are evaluated in the DEIR. In reference to cumulative impacts to Tribal Cultural Resources, Section 4.3.4 of Cumulative Impacts states that

“With compliance with existing regulations and implementation of Mitigation Measure 3.1-2 [note: this is a typo in the DEIR, it should say 3.4-2], development under the 2021 LRDP would not contribute to a cumulative loss of tribal cultural resources in the area, and as a result would not be cumulatively considerable.”

However, just as “it is possible that a historic building would need to be demolished or altered in such a way that it would no longer convey its historic significance,” the DEIR states in Cultural Resources Impact 3.4-2 that “future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource... this impact would be potentially significant.” and that “if avoidance or preservation is not possible, potential curation or reinterment (either on-site or at an appropriate off-site location)... of the encountered tribal cultural resources would be coordinated and approved by the tribe.” Just as demolishing or altering a historic building could alter it in such a way that it “would no longer convey its historical significance,” demolishing or altering part of an Indigenous cultural heritage site, sacred site, burial site or other Traditional Cultural Resource could also alter it in such a way that it would no longer convey its historical (and more importantly for tribal members, spiritual) significance.

In regard to historic period resources, the DEIR states that the University cannot alter, relocate or demolish a historic building without potentially impacting its cultural and historical significance in a manner that cannot be mitigated. Yet in regard to prehistoric Tribal Cultural Resources, the DEIR acknowledges that the University can alter, relocate or demolish a Traditional Cultural Resource if deemed necessary in order to complete a development plan— while stating that the resulting impacts after relocation of (all or portions of) the resource would be “less than significant” and, inexplicably, “would not contribute to a cumulative loss of tribal cultural resources in the area.”

We view this as a double standard which appears to reflect a cultural bias. This can be understood as a form of discrimination, because it results in disparate impacts to Native American tribes. It is not possible, from our Indigenous viewpoint, to disrupt and relocate portions of a sacred site, burial site, or ancient village site without causing substantial harmful disruption of that site. We believe the significance of these potential and largely unmitigable impacts should be fully acknowledged within the analysis of Cultural Resources impacts as well as Cumulative Impacts—not minimized.

Response O10-37

The EIR reached different conclusions regarding these impacts based on (1) the information available to UC Santa Cruz regarding the existence of potential historic resources and tribal cultural resources at the time the Draft EIR was published, and (2) the location of planned LRDP projects, and the reasonably foreseeable impacts on historic resources and tribal cultural resources as a result of those projects.

The Draft EIR recognized the existence of known historic resources within the LRDP area, including the Cowell Lime Works Historic District and a potential discontinuous Campus Core historic district. The 2021 LRDP focuses the majority of development in and around existing development, including several historic structures (e.g., within these districts), and it is reasonably foreseeable that development under the 2021 LRDP would result in the removal or potential modification of known resources that are considered historic features. Typical mitigation for the loss of an historic structure, including documentation of the structure, may not be sufficient to reduce the impact to less than significant.

In contrast, no specific tribal cultural resources had been identified to UC Santa Cruz within the LRDP area at the time the Draft EIR was released. Consistent with AB 52 requirements, UC Santa Cruz staff shared the archaeological investigation and consulted with representatives of the Amah Mutsun Tribal Band (the commenter) in an effort to ascertain the types, scale, and locational information regarding tribal cultural resources that may occur within the LRDP area. (See Draft EIR at 3.4-13 and 3.4-14 for details regarding outreach and consultation). As noted in Table 3.4-1 elsewhere on page 3.4-14 of the Draft EIR, although a general sensitivity of the area was noted no specific tribal cultural resources were identified by the Amah Mutsun Tribal Band at publication of the Draft EIR.

Accordingly, because there were no known specific tribal cultural resources at the time, significant impacts were not reasonably foreseeable. However, because there was the potential that unknown tribal cultural resources could be encountered during earthwork activities, UC Santa Cruz staff consulted with the Amah Mutsun Tribal Band regarding appropriate mitigation for previously unidentified resources, the results of which are reflected in Mitigation Measure 3.4-2, which provides, in part:

...a Native American monitor of the Amah Mutsun Tribal Band will be provided the opportunity to monitor grading within 400 feet of the find. If the find is Native American in origin, the Amah Mutsun Tribal Band shall coordinate with UC Santa Cruz regarding appropriate treatment, including preparation and implementation of a formal treatment plan. As described in Mitigation Measure 3.4-1(5), the preferred method of treatment is avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. If avoidance or preservation is not possible, potential curation or reinterment (either on-site or at an appropriate off-site location, as designated and previously approved by the tribe), of the encountered tribal cultural resources would be coordinated and approved by the tribe.

Pursuant to this measure, if unknown tribal cultural resources were encountered, they would be avoided and protected if possible. If avoidance were not possible, the resource would be curated or reinterred. As described in the mitigation measure, any treatment of previously unidentified tribal cultural resources would be done in cooperation with the Amah Mutsun Tribal Band and in a manner that is respectful of the history and cultural importance of the resources.

Therefore, the differences between the evaluations of historical and tribal cultural resources were based on the fact that there were known historic resources on the site, but there were (at that time) no known tribal cultural resources

on the site at the time of publication of the Draft EIR, and the footprint of the project demonstrated that impacts to known historic resources were reasonably foreseeable, whereas potential impacts to unknown tribal cultural resources were not reasonably foreseeable.

As noted in earlier comments provided by the commenter, additional location-specific information regarding tribal cultural resources within the LRDP Area has been provided since release of the Draft EIR. UC Santa Cruz has evaluated the tribal cultural resources, including confidential location-specific information, identified by the commenter and has determined that implementation of the 2021 LRDP and associated development will avoid the known resource(s), which would reduce impacts to a less-than-significant level. This includes potential extension of infrastructure within the north campus area (e.g., water and wastewater infrastructure). As noted previously, the location of infrastructure identified in Chapter 2, "Project Description" was determined based on a planning level analysis and is diagrammatic; the actual alignment require additional design and siting study considerations prior to implementation, including the location of nearby sensitive resources and slopes. As such, the alignment shown reflects preliminary siting consistent with the program-level analysis in the Draft EIR, but may change during the project-level design phase. Based on initial siting, no known resources would be affected.

Further, development under the 2021 LRDP would be subject to project-specific environmental review, as appropriate, and in accordance with CEQA requirements. If additional tribal cultural resources are identified as part of this project-specific review, UC Santa Cruz would coordinate with the Amah Mutsun Tribal Band in accordance with AB 52 requirements to determine the location and manner in which the tribe would like to proceed.

Comment O10-38

In consideration of the scale of potential impacts to cultural and biological resources that would result from the 2021 LRDP land use plan and enrollment growth targets, we recommend the adoption of Alternative 3, "Reduced Development Footprint."

Although the DEIR concludes that impacts to native species and habitats as well as potential impacts to Tribal Cultural Resources can be mitigated to a less than significant level, in our view, it is probable that the risks and impacts posed by the scale of proposed development would remain significant, despite the implementation of mitigation measures.

Response O10-38

The commenter's preference for Alternative 3 is noted and will be included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP. With respect to the significance conclusions for biological resources and tribal cultural resources, which would also apply to the conclusions related to implementation of Alternative 3, refer to Responses O10-16 through O10-28 and O10-37.

Comment O10-39

While the State of California requires the UC system as a whole to grow in order to accommodate an increasing population of California high school graduates, it is up to UC Santa Cruz and other individual campuses to determine their actual capacity to accommodate increased enrollment growth. We encourage the further exploration of solutions to address the UC system-wide need for enrollment growth that would not require the destruction of the sensitive native ecosystems of UCSC campus and would decrease the risk of disturbing Tribal Cultural Resources.

Response O10-39

This comment expresses an opinion on the project, the 2021 LRDP, as well as the UC system to accommodate increased enrollment. Refer to Master Response 2, regarding enrollment and planned development. With respect to impacts to the native ecosystems, including archaeological and tribal cultural resources, the Draft EIR concludes within Sections 3.4, "Archaeological, Historical, and Tribal Cultural Resources" and 3.5, "Biological Resources" that all impacts to natural resources (excluding impacts to historic resources associated with the built environment) would be mitigated to less than significant. 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 O10-40

The Amah Mutsun Tribal Band requests consultation and collaboration on any future projects that may impact tribal cultural resources as well as continued consultation and collaboration to facilitate the protection of known resources and tribal access to these resources in perpetuity.

Response O10-40

UC Santa Cruz, as was done for the 2021 LRDP EIR, will continue to consult with the Amah Mutsun Tribal Band in accordance with CEQA requirements and in furtherance of UC Santa Cruz's dedication to restore traditional stewardship practices within the LRDP area.

2.3.5 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) winter 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 car-dependent 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 L_{dn} , 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, vireos, 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 through 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/2011/06/26/whY.-We-must-reconnect-with-nature/>

<https://www.12syhreg.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=af1kB8912lsw>

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 [CNDDDB] 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 (CNDDDB 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 LRDP. 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 LRDP 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 cinereoargenteus*]). 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 cinereoargenteus*]). 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

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 conducive 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 (*Lasiurus noctivagus*), 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 LRDP 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 LRDP **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 3.5-59 of 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 LRDP **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 LRDP 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 through 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) Lightning 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 Lightning 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 Lightning 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 Lightning 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 CNDDDB; however, no new occurrences have been added to the CNDDDB **since the mid-1990s** when funding was cut for this portion of the CNDDDB 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 LRDP 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>

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 constructed ¹	Percent additional space needed for 2021 LRDP ²
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 require 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 to 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 *Phytophthora*, 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 *Phytophthora* (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 achieved 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 advocates 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 critical 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 factors 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 barbecues 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.](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 do 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 event 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 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 LRDP (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 LRDP, 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](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 unequalled 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 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).

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 achieved. 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 form 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-existent. 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 year-round 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 pick-ups, 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 criss-crossing 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-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 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 176-2**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 176-2

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 176-3**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 LRDP'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 upper-level 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 ENVIS/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 be 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 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 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 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 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 noting 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 no-longer 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 UC-system (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 vague-sounding 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 land-use 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-rodged 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 human-scale 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 carbon-free. 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.

2.3.6 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 through 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 is 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. 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," 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 pages 122 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 to 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 of the Draft EIR include the conversion of FTE to headcount. As noted 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 COSENTINE: 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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3 MITIGATION MONITORING AND REPORTING PROGRAM

In accordance with the California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et seq.), UC Santa Cruz prepared an Environmental Impact Report (EIR) (State Clearinghouse No. 2020029086) that identified significant impacts related to: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Geology, Soils, and Seismicity; Greenhouse Gas Emissions and Climate Change; Hazards and Hazardous Materials; Hydrology and Water Quality; Noise; Population and Housing; Public Services; Transportation; Utilities and Service Systems; and Wildfire. Significant cumulative impacts would occur with respect to Air Quality; Historical Resources; Noise; Population and Housing; and Water Supply. The EIR also identifies mitigation measures that would reduce the identified impacts to a less-than-significant level, where feasible.

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies “to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment.” A Mitigation Monitoring and Reporting Program (MMRP) is required for the proposed project because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measure have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the 2021 LRDP.

3.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner prior to implementation of the proposed ordinance. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the impact, mitigation measures (as amended through the Final EIR), monitoring responsibility, mitigation timing, and provides space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the EIR. Mitigation measures that are referenced more than once in the Draft EIR are not duplicated in the MMRP table.

3.2 ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, UC Santa Cruz is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. UC Santa Cruz, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor or other designated agent. Section 21081.6 of the Public Resources Code requires the lead agency to identify the “custodian of documents and other material” which constitutes the “record of proceedings” upon which the action on the project was based. The UC Santa Cruz Physical and Environmental Services Department, or designee, is the custodian of such documents for the 2021 LRDP. Inquiries should be directed to:

Erika Carpenter
Senior Environmental Planner
Email: eircomment@ucsc.edu

The location of this information is:

University of California, Santa Cruz
Physical and Environmental Services Department
Physical Planning, Development, and Operations

1156 High Street
Santa Cruz, CA 95064

UC Santa Cruz is responsible for overall administration of the MMRP and for verifying that UC Santa Cruz staff and/or the construction contractor has completed the necessary actions for each measure. The responsible party for implementation of each item will identify the staff members responsible for coordinating with UC Santa Cruz on the MMRP.

3.3 REPORTING

UC Santa Cruz shall, or may require the contractor(s) to, maintain records documenting compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required.

3.4 MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- ▶ Impact – This column provides the verbatim text of the identified impact.
- ▶ Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure.
- ▶ Mitigation Procedure – This column summarizes the steps to implement the mitigation measure.
- ▶ Mitigation Timing – This column identifies the time frame in which the mitigation will be implemented.
- ▶ Mitigation Responsibility – This column identifies the party responsible for implementing the mitigation.
- ▶ Monitoring and Reporting Procedure – This column identifies discrete actions to be implemented as part of the broader mitigation measure.

The following list of abbreviations are found in the MMRP table:

PPDO: Physical Planning, Development & Operations,

DAB: Design Advisory Board,

EH&S: Environmental Health and Safety,

TAPS: Transportation and Parking Services,

OES: Office of Emergency Services,

Grounds: Grounds Services,

CNR: Campus Natural Reserve,

CDFW: California Department of Fish and Game, and

USFWS: U.S. Fish and Wildlife Service.

Table 3-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Aesthetics					
<p>Impact 3.1-2: Result in Adverse Effects on the Aesthetic Quality of the Cowell Lime Works Historic District</p>	<p>Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District (See the mitigation below under Impact 3.4-4)</p>	<p>As specified below.</p>	<p>As specified below.</p>	<p>As specified below.</p>	<p>As specified below.</p>
<p>Impact 3.1-3: Degrade Existing Visual Character or Quality</p>	<p>Mitigation Measure 3.1-3a: Require Setback Distance from Empire Grade UC Santa Cruz shall require that development located north of the Arboretum and Botanic Garden entrance under the 2021 LRDP, which could be seen from Empire Grade, include a minimum setback of 200 feet from Empire Grade. If establishment of a 200-foot buffer is not feasible, a vegetated barrier or screen that prevents a direct line of site between a resource and developed structures shall be provided. Vegetation shall be native to California and selected to match existing vegetation located nearby.</p>	<p>Require either the described setback or, if the setback is not feasible, a vegetated barrier or screen as described.</p>	<p>Prior to construction.</p>	<p>PPDO</p>	<p>Include the setback or vegetated barrier or screen in the design and document site specific considerations in the project file</p>
	<p>Mitigation Measure 3.1-3b: Implement Design Measures for Protection of Views Along Empire Grade Development within 500 feet of Empire Grade and west of the Santa Cruz city limits and the Arboretum and Botanic Garden within the UC Santa Cruz main residential campus shall be subject to review by the Campus Design Advisory Board to ensure that design of new facilities shall be visually unobtrusive and not unduly interfere with existing views. Review of future development by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework and Physical Planning Principles and Guidelines in the 2021 LRDP.</p>	<p>Implement design measures, as specified.</p>	<p>Following initial selection of sites</p>	<p>PPDO and DAB</p>	<p>Document design measures in the project file.</p>
	<p>Mitigation Measure 3.1-3c: Implement Design Measures for Protection of Views within Scenic Areas For any development within primary campus viewsheds identified as scenic areas, UC Santa Cruz shall require that siting, development patterns, and architecture is consistent with the 2021 LRDP Physical Planning Principles and Guidelines, including those related to building height and massing, in order to ensure that the visual character and quality of scenic areas are not substantially degraded. Primary campus viewsheds include primary views of the main residential campus</p>	<p>Implement design measures, as specified.</p>	<p>Following initial selection of sites</p>	<p>PPDO and DAB</p>	<p>Document design measures in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>including the Great Meadow, East Meadow, and three smaller meadows (Porter, Crown, and Kerr), as well as prominent scenic views from Cowell College Plaza, the Arts area in the Academic Core, University House, the knoll at Porter College, and the field at Oakes College. Review of future developments by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall also comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework.</p>				
<p>Impact 3.1-4: Create a New Source of Light or Glare</p>	<p>Mitigation Measure 3.1-4: Minimize Light and Glare Resulting from New Development UC Santa Cruz shall incorporate site-specific consideration of the orientation of the building, use of landscaping materials, and choice of primary façade materials to minimize potential off-site spillover of lighting and glare from new development. As part of this measure and prior to project approval, UC Santa Cruz shall require the incorporation of site- and project-specific design considerations to minimize light and glare including, but not limited to, the following:</p> <ul style="list-style-type: none"> ▶ The use of non-reflective exterior surfaces and non-reflective (mirrored) glass. ▶ Safety lighting along proposed pedestrian/bicycle pathways shall be limited to non-glare, downlit, low-bollard style lights that focus illumination to the pathway surface, consistent with the exterior lighting standards identified in the UC Santa Cruz Campus Standards Handbook. ▶ All new outdoor lighting shall utilize directional lighting methods with shielded and cutoff type light fixtures to minimize glare and upward directed lighting such that light spillover onto adjacent structures does not occur. Verification of inclusion in project design shall be provided at the time of design review. <p>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.</p>	<p>Incorporate site-specific considerations to minimize light and glare associated with new development as specified.</p>	<p>At the time of design review; prior to design approval</p>	<p>PPDO</p>	<p>Document site-specific considerations in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Air Quality					
<p>Impact 3.3-1: Construction-Generated Emissions of Criteria Air Pollutants and Precursors</p>	<p>Mitigation Measure 3.3-1: Reduce Construction-Generated Emissions of NO_x Per contract specification requirements, UC Santa Cruz shall require that the contractor(s) develop and implement a plan demonstrating that the off-road equipment used on-site to construct 2021 LRDP projects would achieve a fleet-wide average 45 percent reduction in NO_x exhaust emissions, compared to uncontrolled aggregate statewide emission rates for similar equipment. One feasible plan to achieve this reduction would include the following:</p> <ul style="list-style-type: none"> ▶ At least 80 percent of diesel-powered off-road equipment operating on the project site for more than two days continuously shall be equipped with engines meeting US EPA emissions standards for Tier 3 engines or equivalent, and use of Tier 4 engines shall be encouraged; ▶ Use of renewable diesel or other zero emissions alternative (e.g., electric) construction equipment to the degree available and feasible; ▶ Plan construction projects such that multiple project components (i.e., bridge or roadway construction) will not occur on the same days; and ▶ Alternatively, if UC Santa Cruz can demonstrate through preparation of an air quality assessment report prepared by an air quality specialist that large or contemporaneous 2021 LRDP construction projects would not exceed MBARD thresholds, then the above mitigation requirements may be waived. 	<p>Contractor(s) will develop and implement a plan to reduce NO_x exhaust emissions as specified.</p>	<p>Prior to and throughout construction.</p>	<p>PPDO and contractor(s)</p>	<p>Plan will be reviewed and approved by PPDO. Contractor(s) will document compliance in the project mitigation monitoring report.</p>
<p>Impact 3.3-2: Operational Emissions of Criteria Air Pollutants and Precursors</p>	<p>Mitigation Measure 3.3-2: Reduce Operational Emissions of ROG and PM₁₀ from All Sources The majority of ROG emissions are a result of aerosolized and evaporation of consumer products, which include cleaning solutions, personal care products, and pesticides. The calculation of ROG emissions from consumer products was based on the ability to control personal products over the use of consumer products, such as personal care products and household cleaners used off-campus. However, UC Santa Cruz is responsible for facility-related purchases, such as commercial cleaning and sanitizing solutions. Additional</p>	<p>Implement measures to reduce operational emissions of ROG and PM₁₀ as specified.</p>	<p>During project design, prior to design approval, and during project operation.</p>	<p>PPDO, Grounds, and Sustainability Office</p>	<p>Document measures in final project plans and specifications. Document the mitigation strategy for on an annual basis.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>measures should also be taken to reduce ROG emissions from other sectors, such as mobile sources, landscaping equipment, and architectural coatings.</p> <p>As such, UC Santa Cruz shall make every effort to reduce ROG emissions generated under the 2021 LRDP. With respect to the new construction and operations that would occur under the 2021 LRDP, UC Santa Cruz shall implement the following measures for on-campus activities:</p> <ul style="list-style-type: none"> ▶ Use zero or low-VOC consumer products and cleaning supplies that exceed CARB's consumer product VOC standards (as defined in CCR Title 17, Division 3, Chapter 1, Subchapter 8.5, Articles 1 through 5), such as those using electrolyzed water, where available. ▶ Use zero-VOC architectural coatings with a VOC content no greater than 5 grams per liter. ▶ Increase the level of zero emission landscaping equipment over time, such as electric lawnmowers, leaf blowers, and chainsaws, to attain 95-100 percent of zero emission landscaping equipment use on campus. ▶ Choose zero emission vehicles for all new light-duty fleet purchases. ▶ Choose zero or low emission vehicles for all new heavy-duty fleet purchases, where available and feasible. ▶ Encourage the use of zero emission vehicles by installing electric vehicle charging stations in parking facilities. ▶ Reduce campus vehicle speed limits to the extent feasible and install traffic calming or signal coordination to reduce the intensity of vehicle braking and acceleration. 				
	<p>Mitigation Measure 3.16-2: Implement Transportation Demand Management (TDM) Program and Monitoring (See the mitigation below under Impact 3.16-2)</p>	As specified below.	As specified below.	As specified below.	As specified below.
<p>Impact 3.3-3: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan</p>	<p>Mitigation Measure 3.3-2: Reduce Operational Emissions of ROG and PM₁₀ from All Sources (See the mitigation above under Impact 3.3-2)</p>	As specified above.	As specified above.	As specified above.	As specified above.

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Archaeological, Historical, and Tribal Cultural Resources					
<p>Impact 3.4-1: Impacts to Unique Archaeological Resources</p>	<p>Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project’s area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally-affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project’s area of effects:</p> <p>1) For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior’s Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project’s area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC</p>	<p>Define the area of potential effects. Conduct records search to determine whether the project site has been surveyed and whether known resources are present.</p> <p>For sites that have not been subject to prior complete intensive archaeological survey, a qualified archaeologist will conduct a complete intensive surface survey of and prepare a site record if an archaeological deposit is discovered. UC Santa Cruz will invite a tribal representative of the Amah Mutsun Tribal Band to participate in the survey to either manage or co-manage the survey. If a find is located in the area of potential effects, a qualified archaeologist will design and conduct an archaeological subsurface investigation and/or a construction monitoring plan.</p>	<p>During planning and environmental review.</p> <p>Prior to the start of earth moving.</p>	<p>PPDO</p> <p>PPDO and qualified archaeologist</p> <p>PPDO</p>	<p>Document in the project file that the records search was conducted.</p> <p>If a site record is prepared, file it with the California Historical Resources Information System.</p> <p>Include the construction monitoring plan in the project file.</p> <p>Document in the project file that the tribal band was contacted and whether a tribal representative</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Santa Cruz and/or archaeologist shall consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program.</p> <p>2) Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.</p> <p>3) If it is determined that a known archaeological site extends into the project’s area of potential effects, UC Santa Cruz shall ensure that the resource is evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project’s area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.</p> <p>4) If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and</p>	<p>Provide training session.</p> <p>Qualified archaeologist will assess each identified resource for California Register of Historical Resources (CRHR) eligibility through research or testing.</p> <p>Include a stop-work requirement in bid documents.</p> <p>In the event of a find, a qualified archaeologist will assess to determine the extent and significance and will carry out data recovery as described in Mitigation Measure 3.4-1(2) and (3).</p>	<p>Prior to the start of earth moving.</p> <p>Prior to the start of earth moving.</p> <p>Prior to the beginning of construction.</p> <p>During construction.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>managed or co-managed the survey.</p> <p>Confirm that training was conducted.</p> <p>Document results of evaluation in environmental document.</p> <p>Confirm that a stop-work requirement is included in bid documents.</p> <p>See Mitigation Measure 3.4-1(2) and (3).</p> <p>Confirm that consultation has been conducted and that the project has been modified to avoid impacts or that Mitigation Measure</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.</p> <p>5) If archaeological material within the project’s area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).</p> <p>6) If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe’s nonprofit organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to</p>	<p>Consult with the qualified archaeologist to consider means to avoid or reduce ground disturbance within the site boundaries for archaeological material determined to qualify as a historical resource or a unique archaeological resource.</p> <p>If avoidance or preservation in place is not possible, a qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, will prepare a research design and will plan and conduct archaeological data recovery and monitoring. Prepare and file a written report.</p>	<p>During construction.</p> <p>Before the property is excavated, damaged, or destroyed.</p>	<p>PPDO</p> <p>PPDO</p>	<p>3.4-1(6) has been implemented.</p> <p>Ensure that appropriate technical analyses are performed, file the report with the California Historical Resources Information System, and provide for the permanent curation of recovered materials.</p> <p>Ensure that appropriate technical analyses are performed, file the report with the California Historical Resources Information System, and provide for the permanent curation of recovered materials.</p>

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	<p>be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.</p>				
<p>Impact 3.4-2: Substantial Adverse Change in the Significance of a Tribal Cultural Resource</p>	<p>Mitigation Measure 3.4-2: Protect Tribal Cultural Resources No less than 2 weeks prior to ground disturbance within 400 feet of a known prehistoric archaeological deposit (eight prehistoric archaeological sites are currently known to exist on the main residential campus), UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the potential ground disturbance. As part of the notification, a Native American monitor of the Amah Mutsun Tribal Band will be provided an opportunity to monitor during ground disturbance for potential archaeological materials and human remains within 400 feet of a known prehistoric archaeological deposit. In addition, as described in Mitigation Measure 3.4-1(1), if a previously unknown prehistoric archaeological deposit is uncovered during construction, a Native American monitor of the Amah Mutsun Tribal Band will be provided the opportunity to monitor grading within 400 feet of the find. If the find is Native American in origin, the Amah Mutsun Tribal Band shall coordinate with UC Santa Cruz regarding appropriate treatment, including preparation and implementation of a formal treatment plan. As described in Mitigation Measure 3.4-1(5), the preferred method of treatment is avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. If avoidance or preservation is not possible, potential curation or reinterment (either on-site or at an appropriate off-site location, as designated and previously approved by the tribe), of the encountered tribal cultural resources would be coordinated and approved by the tribe.</p>	<p>Contact Amah Mutsun Tribal Band before potential ground disturbance within 400 feet of a known prehistoric archaeological deposit as specified.</p> <p>Coordinate with the Amah Mutsun Tribal Band regarding any finds that are Native American in origin and prepare and implement a formal treatment plan.</p> <p>If avoidance or preservation in place is not possible, potential curation or reinterment of the tribal cultural resources would be</p>	<p>Prior to ground disturbance.</p> <p>During project design and project-level environmental review.</p> <p>Before the resource is excavated, damaged, or destroyed.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file that the tribal band was contacted and whether a tribal representative requested to participate as a monitor.</p> <p>Confirm that consultation has been conducted and that the project has been modified to avoid impacts or that curation or reinterment of the resource has been conducted.</p> <p>Include the formal treatment plan in the project file.</p> <p>Confirm coordination and approval by the tribe of curation or reinterment.</p>

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		coordinated and approved by the tribe.			
<p>Impact 3.4-4: Impacts to Historical Resources</p>	<p>Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project’s area of effect for historic buildings and structures as early as possible. If the project is located within or adjacent to the Cowell Lime Works Historic District, UC Santa Cruz shall take the following measures into account in project design to preserve the historic visual quality of the historic district:</p> <ul style="list-style-type: none"> ▶ To the greatest extent feasible, a buffer of at least 200 feet shall be maintained between the boundaries of the Cowell Lime Works Historic District and new building development that would be visible against the backdrop of historic buildings from significant campus viewpoints. ▶ Any development, including new buildings, structures, access improvements, within a 500-foot buffer or within the district boundaries shall be evaluated by an architectural historian prior to implementation and conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995). ▶ New buildings or structures within 500 feet of the district boundaries shall be subject to design review by the Design Advisory Board, to ensure that design does not interfere with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained. 	<p>Define the project’s area of effect for historic buildings and structures. If the project is located in or adjacent to the Cowell Lime Works Historic District, incorporate specified measures into the project design.</p> <p>To the greatest extent feasible, maintain a buffer as specified.</p> <p>A qualified architectural historian will carry out appropriate documentation and treatment as specified.</p> <p>DAB will review the project design of new buildings or structures within 500 feet of the district boundaries for compatibility as specified.</p>	<p>Prior to final design approval.</p> <p>During initial project siting.</p> <p>Prior to development.</p> <p>At the time of DAB review, prior to design approval.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Include in documentation of plan review.</p> <p>Confirm during plan review, and document in the project file.</p> <p>Confirm that documentation has been included in the campus cultural resources database and in the project file.</p> <p>Include DAB agenda and meeting notes in the project file. Report results of the DAB assessment in the environmental document.</p>
	<p>Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project’s area of effect for historic buildings and structures as early as possible. For projects affecting any building identified as a potential contributor to the potential Campus Core discontiguous historic district, UC Santa Cruz shall implement the following procedures:</p>	<p>Define the project’s area of effect for historic buildings and structures. If the project is located in or adjacent to the historic district, incorporate specified measures into the project design.</p>	<p>Prior to final design approval.</p>	<p>PPDO</p>	<p>Document in the project file.</p>

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	<ul style="list-style-type: none"> ▶ For all buildings located within the potential Campus Core discontinuous historic district, projects involving interior alterations or routine maintenance work do not need review by an architectural historian. ▶ For minor exterior repairs that do not alter the visual appearance of the building-such as caused by water damage-to buildings that could be contributors to the potential Campus Core discontinuous historic district, if the repairs meet the "Secretary of the Interior's Standards for the Treatment of Historic Properties," then review by an architectural historian is not required. Buildings that contribute to the potential Campus Core discontinuous historic district are Classroom Unit 1, Cowell College, Cowell Student Health Center (original construction), Crown College, East Field House, Hahn Student Services, Jack Baskin Engineering Building, Kerr Hall, Kresge College, McHenry Library, Merrill College, Nat Sci 2 Annex, Nat Sci 2 Main Building, Porter College, Stevenson College, Student Music East-KZSC Radio Station, Theater Arts, Thimann Laboratories, Thimann Lecture Hall, Thimann Receiving Building, and the University House. ▶ For larger exterior repairs, building additions, or demolition of buildings that could be contributors to the potential Campus Core discontinuous historic district, UC Santa Cruz shall retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors. If large repairs, alterations, or demolitions are proposed at Cowell, Crown, Merrill, Porter, or Stevenson colleges, those groups of buildings shall be evaluated for their potential to comprise separate, individual sub-districts. (Note: Kresge College is not included in this group because Kresge College has been previously been evaluated at a district level; due to lack of integrity, the college is not eligible for listing on the NRHP or CRHR.) The qualified architectural historian shall record the buildings on the appropriate California Department of Parks and Recreation DPR 523 forms and evaluate the buildings against NRHP and CRHR significance criteria. If the building or group of buildings does not meet the CEQA criteria for a historical resource, no further mitigation is required. If the buildings qualify as a historic resource, the architectural historian and UC Santa Cruz shall consult to 	<p>For larger exterior repairs, building additions, or demolition of buildings, retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors to the potential historic district. The qualified architectural historian will record the buildings on the appropriate California Department of Parks and Recreation DPR 523 forms and evaluate the buildings against NRHP and CRHR significance criteria.</p>	<p>Prior to final design approval.</p>	<p>PPDO</p>	<p>Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>consider measures that would enable the project to avoid direct or indirect impacts to the potential Campus Core discontinuous historic district or contributing building.</p> <p>If the project cannot avoid modifications to the building, UC Santa Cruz shall ensure that documentation and treatment shall be carried out by a qualified architectural historian, as follows:</p> <ul style="list-style-type: none"> a) If the building or structure can be preserved on-site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995). b) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, UC Santa Cruz shall ensure that a qualified architectural historian thoroughly documents the building and associated landscaping and setting. Documentation shall include still and video photography and a written documentary record of the building to the standards of the Historic American Building Survey (HABS) or Historic American Engineering Record (HAER), including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. A copy of the record shall be deposited in the McHenry Library Special Collections, and with the California Historical Resources Information System. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate. c) If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and, when it is physically and financially feasible, it shall be moved and preserved or reused. d) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its 	<p>If the project cannot avoid modifications to the building, a qualified architectural historian will carry out appropriate documentation and treatment as specified.</p> <p>If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, ensure that a qualified architectural historian thoroughly documents and submits the building and associated landscaping and setting.</p> <p>If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and shall be moved and preserved or reused.</p>	<p>Prior to final design approval.</p> <p>Prior to final design approval.</p> <p>Prior to final design approval.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Confirm documentation and treatment in the project file.</p> <p>Deposit a copy of the documentation in the McHenry Library Special Collections and with the California Historical Resources Information System. Include it also in the project file.</p> <p>Deposit a copy of the documentation in the McHenry Library Special Collections and with the California Historical Resources Information System. Include it also in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>demolition or destruction cannot be fully mitigated through documentation, UC Santa Cruz shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications, where feasible, to the proposed project that would limit the degree of modification or allow the structure to be preserved intact. These could include project redesign, relocation, or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (b).</p> <ul style="list-style-type: none"> ▶ For new infill construction within the potential historic district that does not involve building demolition: <ul style="list-style-type: none"> a) Infill projects outside Cowell, Crown, Merrill, Porter, or Stevenson colleges would not affect the potential college sub-districts or the potential Campus Core discontinuous historic district, and do not need review by an architectural historian; and b) Infill projects within Cowell, Crown, Merrill, Porter, or Stevenson College will require review by an architectural historian for elements such as form, massing, and scale, to ensure visual compatibility with the college, and the review shall be conducted in compliance with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995). 	<p>If demolition or destruction of the building cannot be fully mitigated through documentation, reconsider project plans in light of the high value of the resource, and implement more substantial modifications, where feasible, to the proposed project. If no such measures are feasible, the historical building shall be documented as described in item (b).</p> <p>For infill construction within Cowell, Crown, Merrill, Porter, or Stevenson College that does not involve building demolition, retain an architectural historian to review the projects for compatibility with the college as specified.</p>	<p>Prior to final design approval.</p> <p>Prior to final design approval.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Depending on approach, either revise project plans or, if plans are not revised, deposit a copy of the documentation in the McHenry Library Special Collections and with the California Historical Resources Information System.</p> <p>Document in the project file.</p> <p>Confirm that documentation has been included in the project file and campus cultural resources database.</p>
	<p>Mitigation Measure 3.4-4c: Conduct Project-Specific Surveys and Implement Measures to Protect Previously Unidentified Historic Resources</p> <p>For areas outside the Cowell Lime Works Historic District and the potential Campus Core discontinuous historic district, as early as possible in the project planning process, UC Santa Cruz shall define the project’s area of potential effect for historic structures. UC Santa Cruz shall determine the potential for the project to result in impacts to or alteration of historic structures, based on the extent of site and building modifications anticipated for the proposed project.</p> <p>Before altering or otherwise affecting a building or structure 50 years old or older that has not been evaluated previously, UC Santa Cruz shall retain a qualified architectural historian to record it at professional</p>	<p>Define the area of potential effects.</p> <p>Retain a qualified architectural historian to record buildings or</p>	<p>During planning and environmental review.</p> <p>Before the buildings or structures are</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>If a site record is prepared, file it with the California Historical</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>standards and assess its significance under CEQA Guidelines Section 15064.4. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the history of the UC system, the campus, and the region. For historic buildings, structures or features that do not meet the CEQA criteria for historical resource, no further mitigation is required, and the impact would be less than significant.</p> <p>For a building or structure that qualifies for listing on the CRHR, UC Santa Cruz shall consult with the architectural historian to consider measures that would enable the project to avoid direct or indirect impacts to the building or structure. These could include preserving a building on the margin of the project site, using it "as is," or other measures that would not alter the building.</p> <p>If the project cannot avoid modifications to a significant building or structure, UC Santa Cruz shall ensure that documentation and treatment shall be carried out by a qualified architectural historian, as described below:</p> <p>a) If the building or structure can be preserved on site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).</p> <p>b) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, UC Santa Cruz shall ensure that a qualified architectural historian thoroughly documents the building and associated landscaping and setting. Documentation shall include still and video photography and a written documentary record of the building to the standards of the Historic American Building Survey (HABS) or Historic American Engineering Record (HAER), including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. A copy of the record shall be deposited in the McHenry Library Special Collections, and with the California Historical Resources Information System. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be</p>	<p>structures 50 years old or older that have not been evaluated previously, as specified.</p> <p>For a building or structure that qualifies for listing on the CRHR, consult with the architectural historian to consider measures that would enable the project to avoid direct or indirect impacts to the building or structure.</p> <p>If modifications to a significant building or structure would occur, ensure that documentation and treatment are carried out by a qualified architectural historian as specified.</p> <p>For significant historic buildings or structures proposed for major alteration or renovation, or to be moved and/or demolished, ensure that a qualified architectural historian thoroughly documents the buildings and associated landscaping and setting as specified.</p>	<p>altered or otherwise affected.</p> <p>Before the buildings or structures are altered or otherwise affected.</p> <p>Before the buildings or structures are altered or otherwise affected.</p> <p>Before the buildings or structures are altered or otherwise affected.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Resources Information System.</p> <p>Document consultation in the project file.</p> <p>Include the documentation and confirmation of treatment in the project file.</p> <p>Confirm documentation in the project file.</p> <p>Deposit a copy of the documentation in the McHenry Library Special Collections and with the California Historical Resources Information System.</p>

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	<p>gathered through site specific and comparative archival research, and oral history collection as appropriate.</p> <p>c) If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and, when it is physically and financially feasible, it shall be moved and preserved or reused.</p> <p>d) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, UC Santa Cruz shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would limit the degree of modification or allow the structure to be preserved intact. These could include project redesign, relocation, or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (b).</p>	<p>If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and, when it is physically and financially feasible, it shall be moved and preserved or reused.</p> <p>If the qualified architectural historian believes that the nature and significance of the building are such that its destruction cannot be fully mitigated through documentation, UC Santa Cruz will reconsider project plans and implement more substantial modifications to the proposed project that would limit the degree of modification or allow the structure to be preserved intact.</p>	<p>Before and during construction.</p> <p>During project design.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Include documentation and confirm activity in the project file.</p> <p>Document reconsideration in the project file.</p>
Biological Resources					
<p>Impact 3.5-1: Result in Disturbance or Loss of Special-Status Plant Species</p>	<p>Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey</p> <p>During the early planning stages of projects under the 2021 LRDP, the following measure shall apply:</p> <ul style="list-style-type: none"> ▶ A data review and biological reconnaissance survey will be conducted within a particular 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. The qualified biologist must be familiar with the life histories and ecology of species in Santa Cruz County and must have experience conducting field surveys of relevant species or resources, including protocol-level surveys for individual species, if applicable. The data 	<p>Retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct a data review and biological reconnaissance survey as specified to determine whether special-status species and sensitive habitats are present on a particular project site.</p>	<p>Before project activities.</p> <p>Before project activities.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Confirm that measures were implemented. Document in the project file.</p> <p>Confirm that the data review and survey were conducted. Document in the project file.</p> <p>Include the report in the project file.</p>

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	<p>reviewed will include the biological resources setting, species tables, and habitat information in this EIR. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDDB, CNPS Inventory of Rare and Endangered Plants of California, consultation with appropriate campus experts (e.g. Campus Natural Reserve Manager) to obtain information on biological resources that may not be captured in other databases, relevant Biogeographic Information and Observation System (BIOS) queries, and relevant general and regional plans. BIOS is a web-based system that enables the management and visualization of biogeographic data collected by CDFW and partner organizations. The qualified biologist will assess the habitat suitability of the project site for all special-status plant and wildlife species as well as sensitive habitats identified as having potential to occur in the LRDP area (refer to Section 3.5.2, "Environmental Setting"), and will identify any wildlife nursery sites (e.g., heron rookeries, bat maternity roosts, monarch butterfly overwintering colonies, deer fawning areas) within the LRDP area and potential ESHAs within project sites that fall within the coastal zone. The qualified biologist will also conduct a preliminary delineation of sensitive habitats (e.g., wetlands, streams, seeps, sensitive natural communities, ESHAs) within the project site. The biologist will provide a report to UC Santa Cruz with evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur within the project site.</p> <ul style="list-style-type: none"> ▶ If the reconnaissance survey identifies no potential for special-status plant, wildlife species, or sensitive habitats to occur, UC Santa Cruz will not be required to apply any additional mitigation measures under Impact 3.5-1 through 3.5-4. ▶ If the qualified biologist determines that there is potential for special-status species or sensitive habitats to be present within the project site, the appropriate biological mitigation measures, identified herein shall be implemented. 	<p>Prepare and submit a report that supports a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur within a particular project site.</p> <p>If the qualified biologist determines that special-status species or sensitive habitats may be present on a particular project site, the appropriate biological mitigation measures presented below will be implemented.</p>	<p>Before, during, and after project construction as specified for the various mitigation measures presented below.</p>	<p>PPDO</p>	<p>Confirm that the mitigation measures were implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Mitigation Measure 3.5-1b: Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation</p> <p>If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for special-status plant species is present within a particular project site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site, as determined during implementation of Mitigation Measure 3.5-1a, a qualified botanist will conduct protocol-level surveys for special-status plants within the project site following survey methods from CDFW's Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities (CDFW 2018 or most recent version). The qualified botanist will: 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the Santa Cruz region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW 2018, 4) be familiar with the California Manual of Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal and state statutes and regulations related to plants and plant collecting. ▶ If special-status plants are not found, the botanist will document the findings in a report to UC Santa Cruz, and no further mitigation will be required. ▶ If special-status plant species are found, the plant will be avoided completely, if feasible (i.e., project objectives can still be met). This may include establishing a no-disturbance buffer around the plants and demarcation of this buffer by a qualified biologist or botanist using flagging or high-visibility construction fencing. The size of the buffer will be determined by the qualified biologist or botanist and will be large enough to avoid direct or indirect impacts on the plant. 	<p>If habitat suitable for special-status plant species is present on a particular project site, retain a qualified botanist to assist with implementing the specified measures.</p> <p>Conduct protocol-level surveys for special-status plants on a particular project site as specified.</p> <p>If special-status plants are not found, document the findings in a report.</p> <p>If special-status plant species are found, avoid</p>	<p>Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a project site.</p> <p>Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site.</p> <p>Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site.</p> <p>Prior to implementation of</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that the surveys were conducted. Document in the project file.</p> <p>Include a copy of the report in the project file.</p> <p>Confirm use of a buffer or other means.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>▶ If special-status plants are found during special-status plant surveys and cannot be avoided, UC Santa Cruz shall, in consultation with CDFW or USFWS as appropriate depending on the particular species, develop and implement a site-specific mitigation strategy to achieve no net loss of occupied habitat or individuals. Mitigation measures shall include, at a minimum, preserving and enhancing existing populations, establishing populations through seed collection or transplantation from the site that is to be affected, and/or restoring or creating habitat in sufficient quantities to achieve no net loss of occupied habitat or individuals. Potential mitigation sites could include suitable locations within or outside of the LRDP area, with a preference for on-site mitigation. Habitat and individual plants lost shall be mitigated at a minimum 1:1 ratio, considering acreage as well as function and value. Success criteria for preserved and compensatory populations will include:</p> <ul style="list-style-type: none"> ▪ The extent of occupied area and plant density (number of plants per unit area) in compensatory populations will be equal to or greater than the affected occupied habitat. ▪ Compensatory and preserved populations will be self-producing. Populations will be considered self-producing when: <ul style="list-style-type: none"> • plants reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; and • reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. • If off-site mitigation includes dedication of conservation easements, purchase of mitigation credits, or other off-site conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. 	<p>them completely if feasible, possibly by establishing a no-disturbance buffer.</p> <p>If special-status plant species cannot be avoided, UC Santa Cruz will, in consultation with CDFW or USFWS as appropriate depending on the species, develop and implement a site-specific mitigation strategy to achieve no net loss of occupied habitat or individuals as specified.</p>	<p>project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site.</p> <p>Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a project site.</p>	<p>PPDO</p>	<p>Document in the project file.</p> <p>Document the agency consultation and the mitigation strategy in the project file.</p> <p>Confirm that the mitigation strategy was implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
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Table MM3.5-1 Normal Blooming Period for Special-Status Plants That are Known to Occur or May Occur within the LRDP Area

Species	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Blasdale’s bent grass					X	X	X					
Bent-flowered fiddleneck			X	X	X	X						
Santa Cruz manzanita	X	X	X	X	X						X	X
Santa Cruz Mountains pussypaws					X	X	X	X				
Bristly sedge					X	X	X	X	X	X	X	X
Deceiving sedge						X						
Monterey spineflower				X	X	X						
Scott’s Valley spineflower				X	X	X	X					
Robust spineflower				X	X	X	X	X	X			
San Francisco collinsia			X	X	X							
Minute pocket moss ¹	-	-	-	-	-	-	-	-	-	-	-	-
Short-leaved evax			X	X	X	X						
Santa Cruz cypress ¹	-	-	-	-	-	-	-	-	-	-	-	-
Butano Ridge cypress ¹	-	-	-	-	-	-	-	-	-	-	-	-
Santa Cruz tarplant						X	X	X	X	X		
Point Reyes horkelia					X	X	X	X	X			
Arcuate bush-mallow				X	X	X	X	X	X			
Mt. Diablo cottonweed			X	X	X							
Marsh microseris				X	X	X						
Northern curly-leaved monardella					X	X	X					
Woodland woolythreads			X	X	X	X	X					
Kellman’s bristle moss	X	X										
Dudley’s lousewort				X	X	X						
Santa Cruz Mountains beardtongue					X	X						
White-rayed pentachaeta			X	X	X							

Impact	Mitigation Measure												Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	Species	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov				
Monterey pine ¹	-	-	-	-	-	-	-	-	-	-	-	-	-			
White-flowered rein orchid					X	X	X	X	X							
Choris' popcornflower			X	X	X	X										
San Francisco popcornflower			X	X	X	X										
San Francisco campion			X	X	X	X										
Santa Cruz microseris				X	X											
Santa Cruz clover				X	X	X	X	X	X	X						
Pacific Grove clover				X	X	X										

¹ Non-blooming bryophyte or gymnosperm species

Source: Data compiled by Ascent Environmental in 2020; CNPS 2020

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Mitigation Measure 3.5-1c: Implement Measures to Avoid Introduction or Spread of Invasive Plant Species and Plant Pathogens The following measures shall be implemented prior to vegetation removal and ground disturbance activities to avoid the introduction or spread of plants classified as invasive plant species by the California Invasive Plant Council and plant pathogens including Sudden Oak Death:</p> <ul style="list-style-type: none"> ▶ UC Santa Cruz shall develop educational information (e.g., brochures, pamphlets) regarding invasive plants and Sudden Oak Death, the implication of the spread of invasive plants and plant pathogens, and proper sanitation practices to prevent the spread of invasive plants and plant pathogens. Construction crews and crews conducting vegetation removal will be provided with this information and instruction from a qualified professional (e.g., arborist, biologist) prior to working in infested or potentially infested areas and will be required to abide by the sanitation practices therein. ▶ Prior to work within areas with species susceptible to Sudden Oak Death, UC Santa Cruz shall retain a qualified professional (e.g., arborist, biologist) who will assess the risk of project activities and will identify and implement measures to reduce or avoid the risk of pathogen spread, including quarantine areas and proper measures for disposal of infested materials (e.g., branches, split wood, wood chips). ▶ Sanitation and prevention measures implemented by UC Santa Cruz or by contractors as specified in contract specifications to reduce or avoid the risk of pathogen spread or proliferation of invasive plant species shall include, but not be limited to, the following and will be further developed and updated based on the best available science and project-specific conditions: <ul style="list-style-type: none"> ▪ Crews that will be working in infested or potentially infested areas will be provided with or required to carry sanitation kits. Sanitation kits will contain the following: Chlorine bleach [10/90 mixture bleach to water] or Clorox Clean-up or Lysol, scrub brush, metal scraper, boot brush, and plastic gloves. ▪ Shoes, pruning gear, and other equipment will be sanitized using the above-mentioned materials before and after working in areas with species susceptible to Sudden Oak Death. 	<p>Implement the measures listed below to avoid introducing or spreading invasive plant species and plant pathogens.</p> <p>Develop educational information (e.g., brochures, pamphlets) related to invasive plants and Sudden Oak Death, and provide it, along with instruction from a qualified professional (e.g., arborist, biologist), to construction crews and crews conducting vegetation removal.</p> <p>In areas with species susceptible to Sudden Oak Death, retain a qualified professional (e.g., arborist, biologist) to assess the risk of project activities and identify and implement measures to reduce or avoid the risk of pathogen spread as specified.</p>	<p>Prior to vegetation removal and ground disturbance activities.</p> <p>Before work is conducted in infested or potentially infested areas.</p> <p>Before work is conducted in areas with species susceptible to Sudden Oak Death.</p>	<p>PPDO, Grounds, and CNR</p> <p>PPDO, Grounds, and CNR</p> <p>PPDO, Grounds, and CNR.</p>	<p>Confirm that the measures were implemented.</p> <p>Retain education information in the project file and confirm that training was conducted.</p> <p>Document in the project file that the assessment was conducted, and measures were identified and implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ Clothing, footwear, and equipment used during project activities will be cleaned of soil, seeds, vegetation, or other debris or seed-bearing material before entering the project site or when leaving an area with infestations of invasive plants and noxious weeds. ▪ Heavy equipment and other machinery used in areas with infestations of invasive plant species or Sudden Oak Death will be inspected for the presence of invasive species before use on the project site and will be cleaned before entering the site, to reduce the risk of introducing invasive plant species or plant pathogens. ▪ Equipment will be staged in areas free of invasive plant infestations. 				
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat</p>	<p>California Red-Legged Frog Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2a: Conduct Site-Specific Habitat Suitability Analysis for California Red-Legged Frog, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures If it is determined through implementation of Mitigation Measure 3.5-1a that aquatic or upland habitat determined to be suitable for California red-legged frog migration, dispersal, foraging, or refuge is present within a particular project site, the following measures shall be implemented during the planning stages for each individual project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ A qualified biologist will conduct a site-specific habitat suitability verification analysis to confirm the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in California red-legged frog life history and ecology, 2) be able to correctly identify California red-legged frogs and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW’s CNDDDB. The habitat assessment will include, but will not be limited to: 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p>	<p>During the planning stages of a project.</p>	<p>PPDO</p>	<p>Retain results of analysis in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ Identification or verification of the vegetation communities present in the project site. ▪ Consideration of known occurrences within the LRDP area; ▪ Description of the project, including proposed project construction activities; ▪ Analysis of the type and likelihood of impacts on California red-legged frog as a result of project implementation; and ▪ Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of California red-legged frog and habitat. <p>▶ Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration.</p> <p>▶ Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: injury or mortality of California red-legged frog; or disturbance of individuals or adverse effects on California red-legged frog breeding, upland refugia, or dispersal habitat.</p> <ul style="list-style-type: none"> ▪ If a qualified biologist determines that the individual project would have no substantial adverse effect on red-legged frog or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed. ▪ For those areas where adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frog cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization for construction-related impacts (e.g., installation of exclusion fencing around the project construction site) and compensatory actions for habitat impacts, including purchase of credits at a conservation bank or creation of additional habitat at a minimum 1:1 mitigation ratio, as well as adaptive management strategies to ensure long-term conservation of mitigation lands. No actions that could adversely affect California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures are implemented. 	<p>Submit results of analysis to UC Santa Cruz for review and consideration.</p> <p>Where disturbance, injury, or mortality of red-legged frog cannot be avoided, UC Santa Cruz will, in consultation with USFWS, implement impact minimization and compensatory actions as specified. No actions that could adversely affect the California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures, as required by USFWS, are implemented.</p>	<p>During the planning stages of a project.</p> <p>During the planning stages of a project.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Include a copy in the project file.</p> <p>Document consultation with USFWS and the impact minimization and compensatory actions in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>To the extent the project may result in “take” of the species, UC Santa Cruz shall pursue incidental take coverage by either pursuing consultation and biological opinion under Section 7 of the federal ESA (where there is some federal nexus) or by developing a Habitat Conservation Plan (HCP), which would require authorization by USFWS under Section 10 of the ESA. Such an HCP could provide long-term conservation and incidental take coverage for species listed under ESA with potential to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Typically, HCPs include the following:</p> <ul style="list-style-type: none"> ▶ Measures that UC Santa Cruz will undertake to monitor, minimize, and mitigate for such impacts, the funding available to implement such measures, and the procedures to deal with unforeseen or extraordinary circumstances. ▶ Alternative actions to the taking analyzed by UC Santa Cruz, and the reasons why the alternatives were not adopted. ▶ Biological goals and objectives, which would define the expected biological outcome for each species covered by the HCP. ▶ Adaptive management, which includes methods for addressing uncertainty and also monitoring and feedback to biological goals and objectives. ▶ Monitoring for compliance, effectiveness, and effects. ▶ Permit duration which is determined by the time-span of the project and designed to provide the time needed to achieve biological goals and address biological uncertainty. 	<p>If the project may result in “take,” pursue incidental take coverage through USFWS.</p>	<p>During the planning stages of a project.</p>	<p>PPDO</p>	<p>Confirm USFWS consultation. Document consultation with USFWS or include HCP in the project file.</p>
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>California Giant Salamander, Foothill Yellow-Legged Frog, Santa Cruz Black Salamander</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified for California red-legged frog, above.</p>	<p>As specified for California red-legged frog, above.</p>	<p>As specified for California red-legged frog, above.</p>	<p>As specified for California red-legged frog, above.</p>
	<p>Mitigation Measure 3.5-2b: Conduct Preconstruction Surveys for Special-Status Amphibians and Implement Avoidance Measures If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for California giant salamander, foothill yellow-legged frog, or Santa Cruz black salamander is present within a particular project site, the following measures shall be implemented no more than 48 hours prior to commencement of project activities (e.g.,</p>	<p>If habitat suitable for these species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p>	<p>No more than 48 hours before project activities commence.</p>	<p>PPDO</p>	<p>Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>vegetation removal, ground disturbance, staging) of a project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ A qualified biologist familiar with the life cycle of California giant salamander, foothill yellow-legged frog, and Santa Cruz black salamander will conduct preconstruction surveys within the project site. Preconstruction surveys for special-status amphibian species will be conducted throughout the project site and a 400-foot buffer around the project site. Surveys will consist of "walk and turn" surveys of areas beneath surface objects (e.g., rocks, leaf litter, moss mats, coarse woody debris) for salamanders, and visual searches for frogs. Preconstruction surveys will be conducted within the appropriate season to maximize potential for observation for each species, and appropriate surveys will be conducted for the applicable life stages (i.e., eggs, larvae, adults). ▶ If special-status amphibians are not detected during the preconstruction survey, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and further mitigation will not be required. ▶ If special-status amphibians are detected during the preconstruction survey, UC Santa Cruz shall, in consultation with CDFW, develop and institute, at a minimum, project design modifications (e.g., specific building materials and surfacing requirements), relocation of individual animals, installation of exclusionary fencing, and/or other measures recommended by CDFW as necessary to ensure that no injury to or mortality of these species would occur. ▶ If "take" of foothill yellow-legged frog under CESA is unavoidable, UC Santa Cruz shall seek and obtain an incidental take permit from CDFW and implement any additional measures necessary to minimize, compensate for, and fully mitigate impacts on foothill yellow-legged frog. These additional measures shall include, at a minimum, some combination of the following measures: installation of exclusion fencing around project sites, purchase of credits at a conservation bank, creation of additional habitat, and/or adaptive management strategies. 	<p>Conduct preconstruction surveys for special-status amphibians as specified.</p> <p>If special-status amphibians are not detected during the survey, submit a report on the results of the analysis.</p> <p>If special-status amphibians are detected, in consultation with CDFW, develop and institute, at a minimum, project design modifications, relocate individual animals, install exclusionary fencing, and/or other measures recommended by CDFW.</p> <p>If the project may result in "take," obtain an incidental take permit from CDFW, and implement the additional required measures.</p>	<p>No more than 48 hours before project activities commence.</p> <p>No more than 48 hours before project activities commence.</p> <p>No more than 48 hours before project activities commence.</p> <p>No more than 48 hours before project activities commence.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Confirm that surveys were conducted. Document in the project file.</p> <p>Include a copy in the project file.</p> <p>Confirm CDFW consultation. Document consultation with CDFW and measures in the project file. Confirm implementation of the measures.</p> <p>Confirm CDFW consultation. Retain a copy of the incidental take permit in the project file. Confirm implementation of the additional measures.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Mitigation Measure 3.10-5a: Procedures for Building on Karst Where Groundwater is Encountered and Where Pressure Grouting is Considered (See the mitigation below under Impact 3.10-5)</p>	As specified below.	As specified below.	As specified below.	As specified below.
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>Southwestern Pond Turtle</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1)</p>	As specified above.	As specified above.	As specified above.	As specified above.
	<p>Mitigation Measure 3.5-2c: Conduct Preconstruction Surveys for Southwestern Pond Turtle, Implement Avoidance Measures, and Relocate Individuals If it is determined through implementation of Mitigation Measure 3.5-1a that aquatic or upland habitat suitable for southwestern pond turtle is present or that southwestern pond turtle was otherwise determined to be historically present within a particular project site, the following measures shall be implemented no more than 48 hours prior to commencement of project activities (e.g., vegetation removal, ground disturbance, staging) of a project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ A qualified biologist familiar with the life history of southwestern pond turtle and experienced in performing surveys for southwestern pond turtle will conduct a focused survey of habitat suitable for the species within the project site. If aquatic habitat potentially suitable for the species is present within a project site (e.g., streams, ponds, drainages), upland habitat within approximately 1,600 feet of this aquatic habitat will also be surveyed. The qualified biologist will inspect the project site for southwestern pond turtles as well as suitable burrow habitat. ▶ If southwestern pond turtles are not detected during the focused survey, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and further mitigation will not be required. ▶ If southwestern pond turtles are detected, a no-disturbance buffer of at least 100 feet will be established around any identified nest sites or overwintering sites. A qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles will be present during initial ground 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct surveys as specified.</p> <p>If southwestern pond turtles are not detected, submit a report summarizing the results of the survey.</p> <p>If southwestern pond turtles are detected, establish a no-disturbance buffer around any identified nest sites or</p>	<p>No more than 48 hours prior to commencement of project activities.</p> <p>No more than 48 hours prior to commencement of project activities.</p> <p>No more than 48 hours prior to commencement of project activities.</p> <p>No more than 48 hours prior to commencement of project activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Confirm that the buffer was established. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	disturbance activities and will inspect the project site before initiation of project activities. If southwestern pond turtles are detected, the qualified biologist will move the turtles downstream and out of harm's way.	overwintering sites as specified. A qualified biologist may relocate turtles out of harm's way, as needed.	During initial ground disturbance activities.	PPDO	Document in the project file.
Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)	Coast Horned Lizard Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)	As specified above.	As specified above.	As specified above.	As specified above.
	Mitigation Measure 3.5-2d: Conduct Preconstruction 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 lizard (e.g., chaparral, coyote brush) is present within a particular project site, the following measures shall be implemented no more than 48 hours prior to commencement of project activities (e.g., vegetation removal, ground disturbance, staging) of a particular project under the 2021 LRDP: <ul style="list-style-type: none"> ▶ A qualified biologist familiar with the life history of coast horned lizard and experienced in performing surveys for the species will conduct a focused visual survey of habitat suitable for the species within the project site, which will include walking linear transects of the project site. ▶ If coast horned lizards are not detected during the focused survey, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and further mitigation will not be required. ▶ If coast horned lizards are detected, a qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles will be present during initial ground disturbance activities and will inspect the project site before initiation of project activities. If coast horned lizards are detected, the qualified biologist will move the lizards into nearby habitat and out of harm's way. 	If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures. Conduct a preconstruction survey as specified. If coast horned lizards are not detected, submit a report summarizing the results. If coast horned lizards are detected, a qualified biologist will be present and will inspect the project site before initiation of project activities. The biologist also will move the lizards out of harm's way.	No more than 48 hours prior to commencement of project activities. No more than 48 hours prior to commencement of project activities. No more than 48 hours prior to commencement of project activities. Before initial ground disturbance activities.	PPDO PPDO PPDO PPDO	Document in the project file. Confirm that the survey was conducted. Document in the project file. Submit the report to UC Santa Cruz, and include a copy in the project file. Document in the project file.

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>Burrowing Owl</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2e: Conduct Protocol-Level Surveys for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for burrowing owl is present within a project site, the following measures shall be implemented prior to and during construction of a particular project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ A qualified biologist will conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of habitat suitable for the species identified during the reconnaissance-level survey (e.g., ruderal grassland, successional grassland, scrub habitat with sparse shrub cover) on and within 1,500 feet of the project site. Surveys will be conducted before the start of project activities and in accordance with Appendix D of the <i>CDFW Staff Report on Burrowing Owl Mitigation</i> (CDFW 2012, or most current version) (CDFW Staff Report). ▶ If no occupied burrows are found, the qualified biologist will submit a report documenting the survey methods and results to UC Santa Cruz, and no further mitigation will be required. ▶ If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), UC Santa Cruz shall establish and maintain a minimum protection buffer of 165 feet around the occupied burrow throughout construction. The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan will be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls will not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct surveys as specified.</p> <p>Submit a report documenting the survey methods and results.</p> <p>If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season, establish and maintain a protection buffer as specified or as adjusted through consultation with CDFW. If occupied burrows cannot be avoided or adequately protected with a</p>	<p>Prior to and during construction of particular projects.</p> <p>Before construction activities begin.</p> <p>Before construction activities begin.</p> <p>Prior to ground disturbance.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Document the use of a buffer or exclusion, as well as consultation with CDFW, in the project file.</p> <p>Document the protected area on the final grading plan.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>The exclusion plan will include a compensatory habitat mitigation plan (see below).</p> <ul style="list-style-type: none"> ▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows will not be disturbed and will be provided with a protective buffer at a minimum of 650 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report. ▶ If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, UC Santa Cruz will mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) will be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. UC Santa Cruz will retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards: <ul style="list-style-type: none"> ▪ Mitigation lands will be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range. 	<p>buffer, a burrowing owl exclusion plan will be developed as specified.</p> <p>If an active burrow is found during the breeding season, establish and maintain a protection buffer as specified or as adjusted through consultation with CDFW. After fledglings are capable of independent survival, the owls can be evicted and the burrow destroyed per the terms of a CDFW-approved burrowing owl exclusion plan.</p> <p>If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, mitigate the loss of occupied habitat as specified. Retain a qualified biologist to develop a burrowing owl mitigation and management plan as specified.</p>	<p>Prior to ground disturbance.</p> <p>During and after project construction.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document the use of a buffer or exclusion, as well as consultation with CDFW, in the project file.</p> <p>Document the protected area on the final grading plan.</p> <p>Include the burrowing owl mitigation and management plan in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> <li data-bbox="478 232 1083 418">▪ If feasible, mitigation lands will be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity. <li data-bbox="478 431 1083 743">▪ If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and will aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW. <li data-bbox="478 756 1083 1255">▪ If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan will include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures (e.g., measures required if performance standards and success criteria are not met). Success will be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors. 				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>American Peregrine Falcon, Bald Eagle, Black Swift, Bryant’s Savannah Sparrow, Golden Eagle, Loggerhead Shrike, Northern Harrier, Olive-Sided Flycatcher, Purple Martin, Tricolored Blackbird, Vaux’s Swift, White-Tailed Kite, Yellow Warbler, Yellow-Breasted Chat, and Other Native Nesting Birds</u></p> <p>Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2f: Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for nesting birds is present within a project site, the following measures shall be implemented prior to and during construction of a project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., tree removal, other vegetation removal, ground disturbance, staging) will be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist), if feasible. If project activities are conducted during the nonbreeding season, no further mitigation will be required. ▶ Within 14 days before the onset of project activities during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native birds and will identify active nests within 0.5 mile of the project site. ▶ 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. If olive-sided flycatcher, yellow warblers, or yellow-breasted chats are observed calling, exhibiting territorial displays, 	<p>If habitat suitable for nesting birds is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct project activities during the nonbreeding season if feasible.</p> <p>Conduct nesting bird surveys as specified.</p> <p>Conduct surveys as specified and determine occupancy of nests by determining occupancy in habitat suitable for the species.</p>	<p>Before and during construction.</p> <p>During construction.</p> <p>Within 14 days before construction activities begin.</p> <p>Before construction activities begin.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>carrying nest materials, carrying prey, or other signs of breeding behavior, the habitat will be considered occupied. This protocol for determining occupancy of a nest may be extended to other bird species with nests that are difficult to locate at the discretion of the qualified biologist.</p> <ul style="list-style-type: none"> ▶ Impacts on nesting birds will be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity will not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer will not likely result in nest abandonment. 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. Factors to be considered for determining buffer size will include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. The size of the buffer may be adjusted if a qualified biologist, determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for a special-status species will require consultation with CDFW. Periodic monitoring of the nest by a qualified biologist during project activities will be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist. ▶ Removal of bald eagle and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald eagle or golden eagle nests are found during focused surveys, then the nest will not be removed. 	<p>Establish buffers around active nest sites as specified in consultation with CDFW. Nests will be periodically monitored during project activities if the activity has potential to adversely affect the nest, the buffer has been reduced, or birds within active nests are showing behavioral signs of agitation.</p>	<p>Before and during construction.</p>	<p>PPDO</p>	<p>Confirm that buffers were established and that nests were periodically monitored. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>Cave Invertebrate Species</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2g: Limit Human Disturbance of Cave Ecosystems UC Santa Cruz shall continue to limit visitation of caves on campus and discourage activities by members of the public that could jeopardize the physical integrity, condition, or scientific value of the caves, through exclusion of access to the caves with bat-friendly fencing (i.e., fencing that allows unimpeded ingress and egress by bats), appropriate signage and educational literature, Campus Natural Reserve website information, or other appropriate measures.</p>	<p>Continue to limit visitation of caves on campus and discourage activities by members of the public that could jeopardize the physical integrity, condition, or scientific value of the caves, as specified.</p>	<p>Before, during, and after construction.</p>	<p>PPDO</p>	<p>Document in the project file.</p>
	<p>Mitigation Measure 3.10-5a: Procedures for Building on Karst Where Groundwater is Encountered and Where Pressure Grouting is Considered (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>Monarch Butterfly</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures If it is determined through implementation of Mitigation Measure 3.5-1a that a monarch overwintering colony or suitable overwintering habitat is present within a particular project site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ 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. ▶ Within 14 days before the onset of project activities that include vegetation removal between October 1st and March 31st, a qualified biologist familiar with monarchs and monarch 	<p>If a monarch overwintering colony or suitable overwintering habitat is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct project activities during the nonbreeding season if feasible.</p> <p>Conduct surveys for monarch colonies as specified.</p>	<p>Before and during construction.</p> <p>During construction.</p> <p>No more than 14 days before construction activities begin.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>overwintering habitat will conduct focused surveys for monarch colonies within habitat suitable for the species in the project site and will identify any colonies found within the project site.</p> <ul style="list-style-type: none"> ▶ Monarch overwintering colonies that are identified within a project site will be demarcated with flagging or high-visibility construction fencing to prevent removal of the stand of trees containing the overwintering colony and encroachment by heavy machinery, vehicles, or personnel. Monarch overwintering colonies shall be protected throughout the duration of their presence within a project site. ▶ If modification or removal of a where overwintering monarchs have been identified overwintering colony is required for project implementation, and the project cannot be redesigned to avoid modification or removal of the stand, then UC Santa Cruz will prepare and implement a site-specific plan for the stand with the goal of maintaining habitat function for the monarch overwintering colony, following recommendations from <i>Protecting California's Butterfly Groves Management Guidelines for Monarch Butterfly Overwintering Habitat</i> (Xerces 2017). Examples of management strategies that could be considered include: <ul style="list-style-type: none"> ▪ remove or trim hazard trees; ▪ selectively remove or trim of trees to create a heterogeneous habitat that provides access to sunlight and shade for monarchs; ▪ maintain suitable wind protection in the stand; and ▪ replace removed trees with native trees in strategic locations to provide additional wind protection. 	<p>Identify monarch overwintering colonies as specified.</p> <p>Prepare and implement a site-specific plan as specified to maintain habitat function for the monarch overwintering colony if it much be modified or removed for project implementation.</p>	<p>Before construction activities begin.</p> <p>Before construction activities begin.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document locations of colonies in the project file.</p> <p>Include a copy of the plan in the project file.</p> <p>Verify that the measures have been implemented.</p>
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>Ohlone Tiger Beetle</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2i: Conduct Site-Specific Habitat Suitability Analysis for Ohlone Tiger Beetle, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for Ohlone tiger beetle is present within a</p>	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to conduct a site-specific</p>	<p>During the planning stages of a project.</p>	<p>PPDO</p>	<p>Retain results of analysis in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>particular project site (i.e., grassland or coastal prairie with Watsonville soils, Figure 3.5-8), the following measures shall be implemented during the planning stages of a project under the 2021 LRDP:</p> <ul style="list-style-type: none"> ▶ A qualified biologist will conduct a site-specific habitat suitability verification analysis within a project site to determine the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in Ohlone tiger beetle life history and ecology, 2) be able to correctly identify Ohlone tiger beetles and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW's CNDDDB. The habitat assessment will include, but will not be limited to: <ul style="list-style-type: none"> ▪ Identification or verification of the vegetation communities present in the project site. ▪ Consideration of known occurrences within the LRDP area; ▪ Description of the project, including proposed project construction activities; ▪ Analysis of the type and likelihood of impacts on Ohlone tiger beetle as a result of project implementation; and ▪ Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of Ohlone tiger beetle and habitat. ▶ Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration. ▶ Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: loss of habitat function for Ohlone tiger beetle; injury or mortality of Ohlone tiger beetle; or disturbance of Ohlone tiger beetle that could substantially disrupt essential behavior patterns (e.g., breeding, feeding, or sheltering) to such an extent that injury or mortality is likely. <ul style="list-style-type: none"> ▪ 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 	<p>habitat suitability analysis to confirm the likelihood of the species to be present, as specified.</p> <p>Submit results of analysis to UC Santa Cruz for review and consideration.</p> <p>Where disturbance, injury, or mortality of Ohlone tiger beetle cannot be avoided, UC Santa Cruz will, in consultation with USFWS,</p>	<p>During the planning stages of a project.</p> <p>During the planning stages of a project.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Submit results of analysis to UC Santa Cruz, and include a copy in the project file.</p> <p>Document consultation with USFWS and the impact minimization and</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>mortality, implementation of that individual project may proceed.</p> <ul style="list-style-type: none"> ▪ For those areas where disturbance, injury, or mortality of Ohlone tiger beetle cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization (e.g., preconstruction surveys and biological monitoring) and compensatory actions, including purchase of credits at a conservation bank, creation of additional habitat, and adaptive management strategies. No actions that could adversely affect Ohlone tiger beetle will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures, as required by USFWS, are implemented. <p>To the extent the project may result in “take” of the species, UC Santa Cruz may pursue incidental take coverage either by pursuing consultation and biological opinion under Section 7 of the federal ESA (where there is some federal nexus) or by developing an HCP, as described in Mitigation Measure 3.5-2a, which would require authorization by USFWS under Section 10 of the ESA. Such an HCP would provide incidental take coverage for species listed under ESA with potential to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Typically, HCPs include the following elements, among others:</p> <ul style="list-style-type: none"> ▶ Measures that UC Santa Cruz will undertake to monitor, minimize, and mitigate for such impacts, the funding available to implement such measures, and the procedures to deal with unforeseen or extraordinary circumstances. ▶ Additional measures that USFWS may require. ▶ Biological goals and objectives, which would define the expected biological outcome for each species covered by the HCP. ▶ Adaptive management, which includes methods for addressing uncertainty and also monitoring and feedback to biological goals and objectives. ▶ Monitoring for compliance, effectiveness, and effects. ▶ Permit duration which is determined by the timespan of the project and designed to provide the time needed to achieve biological goals and address biological uncertainty. 	<p>implement impact minimization and compensatory actions as specified. No actions that could adversely affect the beetle will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures, as required by USFWS, are implemented.</p> <p>If the project may result in “take,” pursue incidental take coverage through USFWS.</p>	<p>During the planning stages of a project.</p>	<p>PPDO</p>	<p>compensatory actions in the project file.</p> <p>Confirm USFWS consultation. Document consultation with USFWS or include HCP in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p>American Badger Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2j: Conduct Focused American Badger Survey and Establish Protective Buffers If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for American badger is present within a particular project site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ Within 30 days before commencement of project activities, a qualified wildlife biologist with familiarity with American badger 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 American badger dens. ▶ If occupied dens are not found, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and further mitigation will not be required. ▶ 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. 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct surveys as specified.</p> <p>Submit a report documenting the survey methods and results.</p> <p>If occupied dens are found, establish exclusion zones, in which no project activities may occur until denning activities are complete or the den is abandoned, as confirmed by a qualified biologist, as specified. Monitor each den once per week to track the status of the den and to determine when it is no longer occupied.</p>	<p>Prior to and during construction of particular projects.</p> <p>Within 30 days before commencement of project activities.</p> <p>Before construction activities begin.</p> <p>Before construction activities begin, with den monitoring occurring once per week.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Document the use of exclusion zones in the project file.</p> <p>Document the protected area on the final grading plan.</p>
	<p>Mountain Lion Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Mitigation Measure 3.5-2k: Conduct Focused Noninvasive Surveys for Mountain Lion Dens and Implement Avoidance Measures</p> <p>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:</p> <ul style="list-style-type: none"> ▶ Within 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 [<i>Canis latrans</i>], bobcat [<i>Lynx rufus</i>], gray fox [<i>Urocyon cinereoargenteus</i>]). 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. <ul style="list-style-type: none"> ▪ 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. 	<p>If den habitat potentially suitable for mountain lion is present on a project site, or signs of mountain lion activities are observed, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct surveys as specified.</p> <p>Submit a report summarizing the survey results.</p> <p>Conduct follow-up surveys as specified.</p> <p>Submit a report summarizing the survey results.</p>	<p>Prior to and during construction of particular projects.</p> <p>Within 30 days before commencement of project activities.</p> <p>Before construction activities begin.</p> <p>Before construction activities begin.</p> <p>Before construction activities begin.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ 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. 	Establish a no-disturbance buffer and consult with CDFW to identify additional seasonal restrictions and/or no-disturbance buffers to avoid disturbance, injury, or mortality of mountain lion.	Before construction activities begin.	PPDO	<p>include a copy in the project file.</p> <p>Confirm that buffer was established.</p> <p>Document the protected area on the final grading plan.</p> <p>Confirm that CDFW was consulted.</p> <p>Document in the project file.</p>
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p>Ringtail Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	As specified above.	As specified above.	As specified above.	As specified above.
	<p>Mitigation Measure 3.5-2l: Conduct Focused Surveys for Ringtail 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:</p> <ul style="list-style-type: none"> ▶ 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. ▶ 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 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct project activities during the nonbreeding season if feasible.</p> <p>Conduct ringtail surveys as specified and identify sightings.</p>	<p>Prior to and during construction of particular projects.</p> <p>During construction.</p> <p>Within seven days before initiation of project activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Document in the project file.</p> <p>Confirm that surveys were conducted. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>qualified biologist will identify sightings of individual ringtails, as well as potential dens.</p> <ul style="list-style-type: none"> ▶ If individuals or potential or occupied dens are not found, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and further mitigation will not be required. ▶ If ringtails are identified or if potential dens are located, an appropriate method will be used by the qualified wildlife biologist to confirm whether a ringtail is occupying the den. This may include use of remote field cameras, track plates, or hair snares. Other devices, such as a fiber optic scope, may be utilized to determine occupancy. <ul style="list-style-type: none"> ▪ If no ringtail occupies the potential den, the entrance will be temporarily blocked so that no other animals occupy the project site during project activities, but only after it has been fully inspected. The blockage will be removed once the project activities are completed. ▪ If a den is found to be occupied by a ringtail, a no-disturbance buffer will be established around the occupied den. The no-disturbance buffer will include the den tree (or other structure) plus a suitable buffer as determined by the biologist in coordination with CDFW. Project activities in the no-disturbance buffer will be avoided until the den is unoccupied as determined by the qualified wildlife biologist in coordination with CDFW. 	<p>Submit a report summarizing the survey results.</p> <p>Confirm whether ringtails occupy the potential dens.</p> <p>If a den is found to be occupied by a ringtail, temporarily block the entrance to unoccupied potential dens.</p> <p>If a den is found to be occupied by a ringtail, establish a no-disturbance buffer around the den in coordination with CDFW.</p>	<p>Before construction activities begin.</p> <p>Before construction activities begin.</p> <p>Before and during construction Activities.</p> <p>Before and during construction activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Document in the project file.</p> <p>Confirm that den entrance was blocked. Document in the project file.</p> <p>Confirm that buffers were established. Document in the project file.</p>
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p><u>San Francisco Dusky-Footed Woodrat</u> Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p> <p>Mitigation Measure 3.5-2m: Conduct Focused Surveys for San Francisco Dusky-Footed Woodrat, Implement Avoidance Measures, or Relocate Nests If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for San Francisco dusky-footed woodrat is present within a particular project site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ Within seven days before initiation of project activities, a qualified biologist with familiarity with woodrats and experience 	<p>As specified, above.</p> <p>If habitat suitable for this species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct a survey for San Francisco dusky-footed woodrat nests.</p>	<p>As specified above.</p> <p>Before and during, project construction as specified for the various mitigation measures presented below.</p> <p>Within seven days before initiation of project activities.</p>	<p>As specified above.</p> <p>PPDO</p> <p>PPDO</p>	<p>As specified above.</p> <p>Document in the project file.</p> <p>Confirm that the survey was conducted. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>conducting woodrat surveys will conduct a focused survey for San Francisco dusky-footed woodrat nests within the project site.</p> <ul style="list-style-type: none"> ▶ If no woodrat nests are found during the focused survey, 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 woodrat nests are detected within the project site, the qualified biologist will determine whether the nest is active. The status of a nest is typically determined through the presence of large amounts of scat. If active woodrat nests are present that can be avoided, the perimeter of these nests will be demarcated with high-visibility construction fencing to prevent accidental encroachment by vehicles, equipment, or personnel. ▶ 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. ▶ When the disassembly process is completed, the nest materials will be collected and moved to another suitable nearby location to allow for nest reconstruction. 	<p>If no woodrat nests are found, submit a report summarizing the results of the survey.</p> <p>If woodrat nests are detected, determine whether they are active. If active woodrat nests are present that can be avoided, the perimeter of these nests will be demarcated with high-visibility construction fencing.</p> <p>If active woodrat nests cannot be avoided, and project activities are planned to occur during the woodrat breeding season, these active nests must be avoided until the end of the breeding season.</p> <p>If active woodrat nests 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, to allow adult woodrats to escape. If young are discovered, the adult woodrats will be given at least 24 hours to relocate their young on their own.</p>	<p>Within seven days before initiation of project activities.</p> <p>Within seven days before initiation of project activities.</p> <p>During project activities.</p> <p>During project activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Submit the report to UC Santa Cruz, and include it in the project file.</p> <p>Demarcate the perimeter of active nests. Document in the project file.</p> <p>Document in the project file.</p> <p>Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
<p>Impact 3.5-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat (Continued)</p>	<p>Pallid Bat, Townsend’s Big-Eared Bat, and Western Red Bat Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-2n: Conduct Focused Bat Surveys and Implement Avoidance Measures If it is determined through implementation of Mitigation Measure 3.5-1a that suitable roost habitat for pallid bat, Townsend’s big-eared bat, and western red bat is present within a particular project site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ In the early planning stages of individual projects under the 2021 LRDP, a qualified biologist with familiarity with bats and bat ecology, and experienced in conducting bat surveys will conduct surveys for bat roosts in suitable habitat (e.g., large trees, crevices, cavities, exfoliating bark, bridges, unoccupied buildings) within and adjacent to the particular project site. ▶ If no evidence of bat roosts is found, the qualified biologist will submit a report summarizing the results of the survey to UC Santa Cruz, and no further study will be required. ▶ If evidence of bat roosts is observed, the species and number of bats using the roost will be determined. Bat detectors shall be used if deemed necessary to supplement survey efforts by the qualified biologist. ▶ 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. ▶ If roosts of pallid bat, Townsend’s big-eared bat, or western red bat are determined to be present and must be removed, the bats will be excluded from the roosting site before the tree, building, or other structure is removed. A program addressing compensation, exclusion methods, and roost removal procedures will be developed in consultation with CDFW before implementation. Exclusion methods may include use of one-way doors at roost entrances (bats may leave but not reenter) or sealing roost entrances when the site can be confirmed to contain 	<p>If roost habitat suitable for these species is present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct a survey for bat roosts in suitable habitat in and adjacent to the project site.</p> <p>If no evidence of bat roosts is found, submit a report summarizing the results of the survey.</p> <p>Establish buffers as specified.</p> <p>Develop a program addressing compensation, exclusion methods, and roost removal procedures in consultation with CDFW. If roosts of pallid bat, Townsend’s big-eared bat, or western red bat must be</p>	<p>During the planning stages for each individual project.</p> <p>During the planning stages for each individual project.</p> <p>During the planning stages for each individual project.</p> <p>During the planning stages for each individual project.</p> <p>During the planning stages for each individual project.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that the survey was conducted. Document in the project file.</p> <p>Submit the report to UC Santa Cruz, and include a copy in the project file.</p> <p>Confirm that buffers were established. Document in the project file.</p> <p>Confirm that the program was development in consultation with CDFW and is being followed. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). The loss of each roost (if any) will be replaced in consultation with CDFW and may require construction and installation of bat boxes suitable to the bat species and colony size excluded from the original roosting site. If determined necessary during consultation with CDFW, replacement roosts will be implemented before bats are excluded from the original roost sites. Once the replacement roosts are constructed and it is confirmed that bats are not present in the original roost site by a qualified biologist, the roost tree, building, or other structure may be removed.</p>	<p>removed, the bats will be excluded from the roosting site before the tree, building, or other structure is removed, using methods identified in the program. If necessary, implement replacement roosts before bats are excluded from the original roost sites.</p>			
<p>Impact 3.5-3: Result in Degradation or Loss of Riparian Habitat or Other Sensitive Natural Communities</p>	<p>Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-1c: Implement Measures to Avoid Introduction or Spread of Invasive Plant Species and Plant Pathogens (See the mitigation above under Impact 3.5-1.)</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>	<p>As specified above.</p>
	<p>Mitigation Measure 3.5-3a: Conduct Protocol-Level Surveys for Sensitive Natural Communities and Riparian Habitat and Implement Avoidance Measures If it is determined through implementation of Mitigation Measure BIO-3.5-1a that sensitive natural communities or riparian habitat may be present within a particular project site, the following measures shall be implemented before implementation of project activities:</p> <ul style="list-style-type: none"> ▶ A qualified botanist will perform a protocol-level survey of the project site for sensitive natural communities and sensitive habitats (including riparian habitat and ESHAs) following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW 2018). Sensitive natural communities will be identified using the best available and current data, including keying them out using the most current edition of <i>A Manual of California Vegetation</i> (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). 	<p>If sensitive natural communities or riparian habitat may be present on a project site, retain a qualified biologist to assist with implementing the specified measures.</p> <p>Conduct the survey as specified.</p>	<p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm that the survey was conducted. Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▶ Before implementation of project activities, development setbacks will be established around all sensitive habitats identified during surveys, and these setbacks will be flagged or fenced with brightly visible construction flagging and/or fencing under the direction of the qualified biologist and no project activities (e.g., vegetation removal (including herbicide application), ground disturbance, staging) will occur within these areas. Setback distances will be dependent on various factors (e.g., presence of special-status wildlife or plant species) and determined by a qualified biologist in consultation with the appropriate agency (e.g., CDFW, CCC), but will generally be at minimum of 50 feet. Foot traffic by personnel will also be limited in these areas to prevent the introduction of invasive or weedy species or inadvertent crushing of plants. Periodic inspections during construction will be conducted by the monitoring biologist to maintain the integrity of exclusion fencing/flagging throughout the period of construction involving ground disturbance. ▶ If sensitive natural communities are identified within a project site that cannot be avoided, Mitigation Measure 3.5-3b shall apply. ▶ If project implementation cannot avoid and thus may adversely affect the bed, bank, channel, or associated riparian habitat subject to CDFW jurisdiction under California Fish and Game Code Section 1602, Mitigation Measure 3.5-3c shall apply. 	<p>Establish setbacks as specified and in consultation with the appropriate agency.</p> <p>Conduct periodic inspections of the exclusion fencing/flagging.</p> <p>Implement Mitigation Measure 3.5-3b if sensitive natural communities on a project site cannot be avoided.</p> <p>Implement Mitigation Measure 3.5-3c if project implementation may adversely affect the bed, bank, channel, or associated riparian habitat subject to CDFW jurisdiction.</p>	<p>Before implementation of project activities.</p> <p>Throughout the period of construction involving ground disturbance.</p> <p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Confirm that the setbacks were established following agency consultation. Document in the project file.</p> <p>Document in the project file.</p> <p>Confirm that the mitigation measure was implemented. Document in the project file.</p> <p>Confirm that the mitigation measure was implemented. Document in the project file.</p>
	<p>Mitigation Measure 3.5-3b: Compensate for Unavoidable Loss of Sensitive Natural Communities</p> <p>If after implementation of Mitigation Measure 3.5-3a sensitive natural communities are determined to be present within a particular project site and these habitats cannot be avoided, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ Compensate for unavoidable loss of any sensitive natural community habitat function such that no net loss of habitat function occurs by: 	<p>If after Mitigation Measure 3.5-3a is implemented, sensitive natural communities on a particular project site cannot be avoided, retain a qualified biologist to assist with implementing the specified measures.</p>	<p>Before implementation of project activities.</p>	<p>PPDO</p>	<p>Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ restoring sensitive natural community habitat function within the project site (e.g., using locally collected seed or cuttings); ▪ restoring degraded sensitive natural communities outside of the project site at a sufficient ratio to offset the loss of habitat function (at least 3:1 for coastal prairie and at least 1:1 for other sensitive natural communities); or ▪ preserving existing sensitive natural communities of equal or better value to the sensitive natural community affected through a conservation easement at a sufficient ratio to offset the loss of habitat function (at least 3:1 for coastal prairie and at least 1:1 for other sensitive natural communities). <p>▶ Prepare and implement a Compensatory Mitigation Plan that includes the following:</p> <ul style="list-style-type: none"> ▪ 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 (e.g., holder of conservation easement or fee title). UC Santa Cruz will provide evidence in the plan that the necessary mitigation has been implemented or that UC Santa Cruz has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. ▪ For restoring or enhancing habitat within the project site or outside of the project site, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. ▪ Success criteria required to maintain habitat function for preserved and compensatory populations would include: 	<p>Compensate for unavoidable loss of sensitive natural community habitat function such that no net loss of habitat function occurs.</p> <p>Prepare and implement a Compensatory Mitigation Plan as specified.</p>	<p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document the compensation method(s) used in the project file.</p> <p>Confirm that the plan was implemented.</p> <p>Include a copy of the plan in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> • The extent of occupied area and density of plants associated with the sensitive natural community (number of plants per unit area) in compensatory habitats would be equal to or greater than the affected occupied habitat. • Compensatory and preserved sensitive natural communities would be self-producing. Populations would be considered self-producing when: • Plants associated with sensitive natural communities reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; and • Reestablished and preserved habitats contain an occupied area and density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. <p>▶ Impacts on sensitive natural communities considered ESHAs within the coastal zone will require a coastal development permit pursuant to the CCA and compliance with any requirements therein.</p>	<p>If impacts would occur on sensitive natural communities considered ESHAs within the coastal zone, obtain a coastal development permit pursuant to the CCA and comply with its requirements.</p>	<p>Before implementation of project activities.</p>	<p>PPDO</p>	<p>Confirm that a coastal development permit was obtained. Document in the project file.</p>
	<p>Mitigation Measure 3.5-3c: Compensate for Unavoidable Loss of Riparian Habitat</p> <p>If after implementation of Mitigation Measure 3.5-3a riparian habitat is determined to be present within a particular project site and the habitat cannot be avoided, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ A Streambed Alteration Notification will be submitted to CDFW, pursuant to Section 1602 of the California Fish and Game Code. If proposed project activities are determined to be subject to CDFW jurisdiction, UC Santa Cruz will abide by the measures to protect fish and wildlife resources required by any executed agreement prior to any vegetation removal or activity that may affect the resource. Measures to protect fish and wildlife resources shall include, at a minimum, a combination of the following mitigation. ▶ UC Santa Cruz will compensate for the loss of riparian habitat such that no net loss of habitat function and values occurs by: 	<p>If after Mitigation Measure 3.5-3a is implemented, riparian habitat on a particular project site cannot be avoided, implement the following measures.</p> <p>Submit a Streambed Alteration Notification to CDFW. If proposed project activities are subject to CDFW jurisdiction, abide by the measures to protect fish and wildlife resources required by any executed agreement prior to any</p>	<p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Document in the project file.</p> <p>Confirm submittal of the notification to CDFW. Include a copy of the executed agreement, including a record of all required measures, in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ restoring riparian habitat function and value within the project site; ▪ restoring degraded riparian habitat outside of the project site; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the affected riparian habitat through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function (at least 1:1). <p>▶ UC Santa Cruz will prepare and implement a Compensatory Mitigation Plan that will include the following:</p> <ul style="list-style-type: none"> ▪ For preserving existing riparian 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 (e.g., holder of conservation easement or fee title). UC Santa Cruz will provide evidence in the plan that the necessary mitigation has been implemented or that UC Santa Cruz has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. ▪ For restoring or enhancing riparian habitat within the project site or outside of the project site, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. ▪ Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by UC Santa Cruz (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above. 	<p>vegetation removal or activity that may affect the resource, as specified.</p> <p>Compensate for loss of riparian habitat such that no net loss of habitat function occurs.</p> <p>Prepare and implement a Compensatory Mitigation Plan as specified.</p> <p>If impacts would occur on riparian habitat considered an ESHA within the coastal zone,</p>	<p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p> <p>Before implementation of project activities.</p>	<p>PPDO</p> <p>PPDO</p> <p>PPDO</p>	<p>Document the compensation method(s) used in the project file.</p> <p>Confirm that the plan was implemented.</p> <p>Include a copy of the plan in the project file.</p> <p>Confirm that a coastal development permit was obtained.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> Impacts on riparian habitat considered an ESHA within the coastal zone will require a coastal development permit pursuant to the CCA and compliance with any requirements therein. 	obtain a coastal development permit pursuant to the CCA and comply with its requirements.			Document in the project file.
Impact 3.5-4: Result in Degradation or Loss of State or Federally Protected Wetlands	Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1.)	As specified above.	As specified above.	As specified above.	As specified above.
	<p>Mitigation Measure 3.5-4: Identify State or Federally Protected Wetlands, Implement Avoidance Measures, and Obtain Permits for Unavoidable Impacts on Wetlands</p> <p>If it is determined through implementation of Mitigation Measure BIO-3.5-1a that state or federally protected wetlands may be present within a particular project site, the following measures shall be implemented before implementation of project activities:</p> <ul style="list-style-type: none"> UC Santa Cruz will retain a qualified biologist, hydrologist, or wetland ecologist to prepare a formal delineation of the boundaries of state or federally protected wetlands within the project site (including 1602 jurisdictional waterways) according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the Arid West regional supplement (USACE 2008). The qualified biologist will also delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (SWRCB 2019). This delineation report will be submitted by UC Santa Cruz to USACE and a preliminary jurisdictional determination will be requested. If state or federally protected wetlands are determined to be present within a project site that can be avoided, the qualified biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified biologist and will depend on the type of wetland present (e.g., stream, seep, pond), the timing of project activities (e.g., wet or dry time of year), 	<p>If habitat suitable for the species is present on a project site, retain a qualified biologist to prepare a delineation report.</p> <p>If state or federally protected wetlands are identified and can be avoided, establish a buffer as specified.</p>	<p>Before implementation of project activities.</p> <p>During the planning stages for each individual project.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Provide documentation of results of delineation in project file.</p> <p>Confirm during plan review, and document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>whether any special-status species may occupy the wetland and the species' vulnerability to the project activities, environmental conditions and terrain, and the project activity being implemented.</p> <p>Project activities (e.g., ground disturbance, vegetation removal, staging) will be prohibited within the established buffer. The qualified biologist will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided.</p> <ul style="list-style-type: none"> ▶ If it is determined that fill of waters of the United States would result from project implementation, authorization for such fill will be secured from USACE through the Section 404 permitting process. Any waters of the United States that would be affected by the project will be replaced or restored on a no-net-loss basis in accordance with the applicable USACE mitigation guidelines in place at the time of construction. In association with the Section 404 permit (if applicable) and prior to the issuance of any grading permit, Section 401 Water Quality Certification from the Central Coast RWQCB will be obtained. For impacts on waters of the state that may not be covered by the 401 Water Quality Certification, UC Santa Cruz will secure Waste Discharge Requirements, which are described in Section 3.10, "Hydrology and Water Quality." ▶ If it is determined that disturbance or fill of state protected streams or riparian habitat cannot be avoided, UC Santa Cruz will notify CDFW before commencing activity that may divert the natural flow or otherwise alter the bed, bank, or riparian corridor of any 1602 jurisdictional waterway. If project activities trigger the need for a Streambed Alteration Agreement, the proponent will obtain an agreement from CDFW before the activity commences. The applicant will conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect the fish and wildlife resources, when working within the bed or bank of waterways or in riparian habitats associated with those waterways. These measures may include but not be limited to demarcation of the construction area, biological monitoring, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management). 	<p>Where fill of waters cannot be avoided, UC Santa Cruz will, initiate agency consultation, permitting process, and compensatory action as warranted.</p> <p>Where fill of state protected streams or riparian habitat cannot be avoided, UC Santa Cruz will, initiate agency consultation and the Streambed Alteration Agreement process.</p>	<p>During project design and prior to design approval.</p> <p>During project design and prior to design approval.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Confirm consultation, permitting, and compensatory actions (as warranted) were implemented Document in the project file.</p> <p>Confirm consultation and Streambed Alteration Agreement process documentation in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▶ Impacts on wetlands considered ESHAs within the coastal zone (if any) will require a coastal development permit pursuant to the CCA and compliance with any requirements therein. 				
Impact 3.5-5: Interfere with Wildlife Movement Corridors or Impede the Use of Wildlife Nurseries	Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey (See the mitigation above under Impact 3.5-1.)	As specified above.	As specified above.	As specified above.	As specified above.
	Mitigation Measure 3.5-3a: Conduct Protocol-Level Surveys for Sensitive Natural Communities and Riparian Habitat and Implement Avoidance Measures (See the mitigation above.)	As specified above.	As specified above.	As specified above.	As specified above.
	Mitigation Measure 3.5-3b: Compensate for Unavoidable Loss of Sensitive Natural Communities (See the mitigation above.)	As specified above.	As specified above.	As specified above.	As specified above.
	Mitigation Measure 3.5-3c: Compensate for Unavoidable Loss of Riparian Habitat (See the mitigation above.)	As specified above.	As specified above.	As specified above.	As specified above.
	Mitigation Measures 3.5-5a: Utilize Wildlife-Friendly Building and Fencing Designs The following measures shall be implemented during the early planning stages of projects under the 2021 LRDP: <ul style="list-style-type: none"> ▶ Buildings and other permanent structures that would be constructed during implementation of projects under the 2021 LRDP shall be designed to minimize impacts on wildlife, including disruption to wildlife movement, bird strikes, and wildlife entanglement. <ul style="list-style-type: none"> ▪ 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) or other appropriate resources (e.g., International Dark Sky Association). 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. 	Implement appropriate building and fencing design measures	During project design and planning.	PPDO	Confirm implementation of design measures.

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ Fencing associated with new development under the 2021 LRDP will utilize wildlife-friendly fencing design to minimize the risk of entanglement or impalement of wildlife. UC Santa Cruz will require the review of fencing design by a qualified biologist prior to installation. The fencing design shall meet, but not be limited to the following standards: <ul style="list-style-type: none"> • Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes). • Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. • Allow smaller wildlife to pass under easily without injury or entrapment. 				
	<p>Mitigation Measure 3.5-5b: Retain Wildlife Nursery Habitat and Implement Buffers to Avoid Wildlife Nursery Sites</p> <p>If it is determined through implementation of Mitigation Measure 3.5-1a that wildlife nursery sites are present within a particular project site, the following measures shall be implemented prior to and during construction of a project:</p> <ul style="list-style-type: none"> ▶ A qualified biologist will identify the important habitat features of the wildlife nursery and, prior to commencement of project activities (e.g., ground disturbance, vegetation removal, staging), will mark these features for avoidance and retention during project implementation to maintain the function of the nursery habitat. ▶ 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 	<p>If wildlife nursery sites are present, retain a qualified biologist to implement the specified measures.</p>	<p>Prior to implementation of project activities.</p>	<p>PPDO</p>	<p>Document in the project file.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>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.</p>				
<p>Impact 3.5-7: Conflict with the Provisions of an Adopted Habitat Conservation Plan or Natural Community Conservation Plan</p>	<p>Mitigation Measure 3.5-7: Establish Alternative Preserves to Replace Inclusion Area D, and Amend the Ranch View Terrace HCP with Approval from USFWS</p> <p>The following measures shall be implemented prior to any development activities within Inclusion Area D (IAD):</p> <ul style="list-style-type: none"> ▶ UC Santa Cruz shall, in consultation with USFWS, seek an amendment to the Ranch View Terrace HCP to accommodate replacement of IAD with replacement habitat that may be suitable, created, or restored for Ohlone tiger beetle. ▶ In consultation with USFWS, UC Santa Cruz will determine whether a new preserve(s) could be established to replace IAD. New proposed preserves will be characterized by equal (12.5 acres) or greater size, and better habitat (e.g., intact coastal prairie, Watsonville loam soils, bare soil available, presence of Ohlone tiger beetle) than IAD. ▶ If USFWS concurs that replacement of IAD is appropriate, the Ranch View Terrace HCP will be amended to exclude IAD. Any new preserve(s) would be managed through yearly monitoring and vegetation management activities with the objective of fostering occupation by Ohlone tiger beetle. ▶ If USFWS does not concur that replacement of IAD is appropriate, the existing incidental take permit and associated measures in the Ranch View Terrace HCP will apply, and no development will occur within IAD. ▶ As noted in Mitigation Measures 3.5-2a and 3.5-2i, UC Santa Cruz may elect to pursue a comprehensive HCP, which shall be accomplished either by amending the Ranch View Terrace HCP or by incorporating and replacing the existing Ranch View Terrace HCP. 	<p>UC Santa Cruz shall initiate consultation with USFWS to implement the specified measures.</p>	<p>Prior to implementation of project activities within the IAD.</p>	<p>PPDO</p>	<p>Confirm implementation of measures and document results.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Geology and Soils					
<p>Impact 3.7-6: Directly or Indirectly Destroy Unique Paleontological Resources</p>	<p>Mitigation Measure 3.7-6: Treatment of Paleontological Resources For development within the potential fossil-bearing formations in the LRDP area, namely marine formations of Santa Margarita sandstones, Santa Cruz mudstone, and Quaternary marine terrace deposits, and sedimentary formations of Quaternary non-marine terrace deposits and doline deposits, UC Santa Cruz shall require, as part of contract specifications, that the contractor provide a paleontological resources awareness training program to all construction personnel active on the project site during earth moving activities. The first training will be provided prior to the initiation of ground disturbing activities. The training will be developed and conducted in coordination with a qualified paleontologist. The program will include relevant information regarding fossils and fossil-bearing formations that may be encountered. The training will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site.</p> <p>If any paleontological resources are encountered during ground-disturbing activities, the contractor shall ensure that activities in the immediate area of the find are halted and that UC Santa Cruz is informed. UC Santa Cruz shall retain a qualified paleontologist to evaluate the discovery and recommend appropriate treatment options pursuant to guidelines developed by the Society of Vertebrate Paleontology, including development and implementation of a paleontological resource impact mitigation program by a qualified paleontologist for treatment of the particular resource, if applicable. These measures may include, but not be limited to the following:</p> <ul style="list-style-type: none"> ▶ salvage of unearthed fossil remains and/or traces (e.g., tracks, trails, burrows); ▶ screen washing to recover small specimens; ▶ preparation of salvaged fossils to a point of being ready for curation (e.g., removal of enclosing matrix, stabilization and repair of specimens, and construction of reinforced support cradles); and ▶ identification, cataloging, curation, and provision for repository storage of prepared fossil specimens. 	<p>Conduct paleontological resources awareness training.</p> <p>If paleontological resources are encountered, halt activities and retain a qualified paleontologist to evaluate the find, recommend appropriate treatment, and prepare a paleontological resource impact mitigation program</p>	<p>Prior to initiation of earth moving activities.</p> <p>During construction activities.</p>	<p>PPDO</p> <p>PPDO</p>	<p>Verify the contracted conducted training.</p> <p>Document findings and confirm preparation and implementation of a paleontological resource impact mitigation program.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Greenhouse Gas Emissions and Climate Change					
<p>Impact 3.8-1: Generate Greenhouse Gas Emissions that May Have a Significant Impact on the Environment</p>	<p>Mitigation Measure 3.8-1: Reduce Annual Greenhouse Gas Emissions UC Santa Cruz shall commit to reducing annual GHG emissions by at least 6,907 MTCO₂e by 2040. This reduction shall be achieved through the combination of on-campus GHG reduction projects and, if necessary, purchase of carbon offsets.</p> <p><i>On-Campus or Other Regional Lands Reductions</i></p> <p>UC Santa Cruz shall prioritize GHG reductions through on-campus GHG-reduction projects and actions or at other university-owned properties in the region. UC Santa Cruz could also pursue joint GHG-reduction efforts with other local/regional agencies (e.g., City and County of Santa Cruz.) Reductions in GHG emissions shall be achieved through the combination of any of the following:</p> <ol style="list-style-type: none"> 1. Replanting removed trees or planting equivalent new trees displaced by construction at a 1:1 ratio and ensuring the continued health of the replanted trees. A 100 percent replanting rate would offset 2,160 MTCO₂e per year by 2040. Tree planting at a higher rate would provide further GHG reductions. 2. Reducing new non-fleet mobile source emissions from commuting, vendor trips, and delivery trips by 2040. A 10 percent reduction in anticipated emissions from these sources would reduce emissions by 1,083 MTCO₂e per year in 2040. These reductions can be achieved through an enhanced Transportation Demand Management Program (see Mitigation Measure 3.16-2). This program would include parking management, expanded vanpool program, improved transit service, and increased telecommuting. 3. Requiring renewable diesel or other zero carbon emissions alternatives to be used in place of conventional diesel use in equipment for all construction activity, even those occurring after this 2021 LRDP plan period. A 100-percent renewable diesel construction fleet would reduce emissions in 2040 by 942 MTCO₂e per year. 4. Reducing waste and increasing recycling and composting within the LRDP area as part of UC Santa Cruz's Zero Waste goal under UCOP's Sustainable Practices Policy, including additional on-campus education and opportunities for waste recycling. 	<p>UC Santa Cruz shall implement the specified measures.</p>	<p>During implementation of the 2021 LRDP.</p>	<p>PPDO, TAPS, Sustainability Office, and Grounds</p>	<p>Confirm implementation of measures to reduce annual GHG emissions.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>5. Pursuing innovative on-site wastewater treatment alternatives, such as waste-to-energy projects, that reduce N₂O and CH₄ process emissions compared to those generated at off-site wastewater treatment.</p> <p>6. Pursuing electrification of existing buildings and requiring that all new buildings be electric only.</p> <p>7. Any other on-campus or regional projects or measures identified during the course of the 2021 LRDP that would effectively and quantifiably reduce emissions.</p> <p><i>Acquire Carbon Offset Credits in Conformance with CARB Guidance that are Demonstrably Real, Permanent, Additional, Quantifiable, Verifiable, and Enforceable</i></p> <p>As part of this mitigation measure, UC Santa Cruz would make the following separate, though overlapping, GHG emission reduction commitments: (1) UC Santa Cruz will maintain compliance with carbon offset accreditation requirements under CARB's Cap-and-Trade program, and (2) per existing UC Policy, UC Santa Cruz's GHG emissions shall, commencing in 2025, be entirely carbon neutral.</p> <p><u>Compliance with CARB's Cap-and-Trade Program:</u> Any carbon offset credits obtained for the purpose of compliance with CARB's Cap-and-Trade program shall be purchased from an accredited carbon credit market. Based on the current program as of January 2021, such offset credits (or California Carbon Offsets) shall be registered with, and retired by an Offset Project Registry, as defined in 17 California Code of Regulations § 95802(a), that is approved by CARB, such as, but not limited to, Climate Action Reserve (CAR), American Carbon Registry, and Verra (formerly Verified Carbon Standard), that is recognized by The Climate Registry, a non-profit organization governed by U.S. states and Canadian provinces and territories.</p> <p><u>Compliance with UC Policy:</u> Compliance with UC's policies for carbon neutrality by 2025 and UC's own policy to reduce Scope 1, 2, and transportation-related Scope 3 emissions below 1990 levels pursuant to AB 32 will be accomplished through reductions in direct emissions, the purchase of renewable electricity, and the purchase of carbon offset credits. UC Santa Cruz will purchase voluntary carbon offset credits as the final action to reach the</p>				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>GHG emission reduction targets. Internal guidelines will be developed per the UC Carbon Neutrality Initiative to ensure that any use of offsets for this purpose will derive from verified GHG emissions reductions resulting from actions that align, as much as possible, with UC’s research, teaching, and public service mission.</p> <p>To demonstrate that the carbon offset credits provided are real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations § 95802(a), UC Santa Cruz shall prepare an annual report documenting the protocol used to verify those credits and submit that report for approval to a CARB-accredited third-party verification entity. If the verification entity finds that any credits purchased did not meet these criteria, UC shall purchase alternative credits and submit a follow-up report to the verification entity for concurrence. All carbon offsets purchased will be reported publicly and tracked through the Climate Registry as required by UC policy.</p> <p>For any remaining emissions not achieved through on-campus reduction efforts, as outlined above, UC Santa Cruz shall ensure that the remaining emissions reductions are taking place and on the trajectory toward meeting the target of reducing annual GHG emissions by at least 6,907 MTCO_{2e} by 2040 and shall conduct an annual review of emissions reductions. To achieve any remaining GHG emissions reductions, voluntary carbon offsets shall be purchased.</p>				
Hazards and Hazardous Materials					
<p>Impact 3.9-2: Result in the Release of Hazardous Materials from a Site of Known or Potential Contamination</p>	<p>Mitigation Measure 3.9-2a: Conduct Preliminary Site Investigation During project planning, the Environmental Health and Safety (EH&S) Department shall be consulted in order to identify if any past contamination, underground storage tanks (USTs), aboveground storage tanks (ASTs), or other contamination could potentially occur in areas to be disturbed for project construction. EH&S will consider the cases on file at the County of Santa Cruz EHS and information on historical uses in the area to be impacted such as old maps and photos. If EH&S determines that there is no or minimal potential for contamination to occur on site, no additional mitigation is necessary. If it is determined that contamination has the potential to exist on a project site, Mitigation Measure 3.9-2b shall be implemented.</p>	<p>Conduct preliminary site assessment.</p>	<p>During project planning.</p>	<p>PPDO and EH&S</p>	<p>Document findings.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>Mitigation Measure 3.9-2b: Conduct Site-Specific Investigation and Prepare Work Plan Where initial investigations indicate the potential for contamination, UC Santa Cruz shall conduct soil sampling within the boundaries of the project site prior to initiation of grading or other groundwork. This investigation will follow the American Society for Testing and Materials standards for preparation of a Phase II Environmental Site Assessment (ESA) and/or other appropriate testing guidelines. If the results indicate that contamination exists at levels above regulatory action standards, then the site will be remediated in accordance with recommendations made by applicable regulatory agencies, including County of Santa Cruz Environmental Health Services (EHS), Regional Water Quality Control Board (RWQCB), and Department of Toxic Substances Control (DTSC). The agencies involved shall depend on the type and extent of contamination.</p> <p>Based on the results and recommendations of the investigation described above, UC Santa Cruz shall prepare a work plan that identifies any necessary remediation activities, including excavation and removal of on-site contaminated soils, and redistribution of clean fill material within the project site. The work plan shall include measures that ensure the safe transport, use, and disposal of contaminated soil removed from the project site.</p>	<p>Conduct survey and document findings. Conduct remediation activities as necessary.</p>	<p>During project siting or planning phase. Remediation prior to ground-disturbing construction.</p>	<p>PPDO and EH&S</p>	<p>Document finding and confirm remediation activities.</p>
	<p>Mitigation Measure 3.9-2c: Prepare and Implement Hazardous Materials Contingency Plan Prior to initiation of grading or other ground disturbance, UC Santa Cruz shall provide a hazardous materials contingency plan to EH&S and County of Santa Cruz EHS, as appropriate. The plan will describe the necessary actions that would be taken if evidence of contaminated soil or groundwater is encountered during construction. The contingency plan shall identify conditions that could indicate potential hazardous materials contamination, including soil discoloration, petroleum or chemical odors, and presence of underground storage tanks or buried building material.</p> <p>If at any time during the course of construction, evidence of soil and/or groundwater contamination with hazardous material is encountered, UC Santa Cruz shall immediately halt construction and contact EH&S and County of Santa Cruz EHS. Work shall not be resumed until the discovery has been assessed/treated appropriately (through such mechanisms as soil or groundwater sampling and remediation if potentially hazardous</p>	<p>Prepare hazardous materials contingency plan.</p> <p>Monitor construction site, perform testing, and consult with EH&S and County of Santa Cruz EHS, as necessary.</p>	<p>During project design before project approval.</p> <p>During earth moving activities.</p>	<p>PPDO and EH&S</p> <p>PPDO and EH&S</p>	<p>Confirm preparation and implementation of contingency plan.</p> <p>Confirm monitoring, resting, and consultation, as necessary.</p>

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	<p>materials are detected above threshold levels) to the satisfaction of County of Santa Cruz EHS, RWQCB, and DTSC (as applicable).</p> <p>The hazardous materials contingency plan, and obligations to abide by and implement the plan, shall be incorporated into the construction and contract specifications of the project.</p>				
	<p>Mitigation Measure 3.9-2d: Require Minimization of Hazards during Demolition</p> <p>Prior to demolition of existing structures, in order to minimize potential for accidental release of hazardous materials during demolition, UC Santa Cruz shall complete the following:</p> <ul style="list-style-type: none"> ▶ Locate and dispose of potentially hazardous materials in compliance with all applicable federal, state, and local laws. This shall include: 1) identify locations that could contain hazardous residues; 2) remove plumbing fixtures known to contain, or potentially containing, hazardous materials; 3) determine the waste classification of the debris; 4) package contaminated items and wastes; and 5) identify disposal site(s) permitted to accept such wastes. ▶ Provide written documentation to the appropriate County department and MBARD that asbestos testing and abatement consistent with MBARD Rule 424, as appropriate, has occurred in compliance with applicable federal, state, and local laws. ▶ Provide written documentation to the appropriate County department and MBARD that lead-based paint testing and abatement, as appropriate, has been completed in accordance with applicable state and local laws and regulations. Abatement shall include the removal of lead contaminated soil (considered soil with lead concentrations greater than 400 parts per million in areas where children are likely to be present). If lead-contaminated soil is to be removed, UC Santa Cruz shall submit a soil management plan to County of Santa Cruz EHS. 	<p>Monitor construction site, perform testing, and consult with County of Santa Cruz EHS and MBARD, as necessary.</p>	<p>Inspect construction site during demolition of existing structures.</p>	<p>PPDO and EH&S</p>	<p>Confirm monitoring, resting, and consultation, as necessary.</p>
<p>Impact 3.9-4: Impair Implementation of, or Physically Interfere with, an Adopted Emergency Response Plan or Emergency Evacuation Plan</p>	<p>Mitigation Measure 3.9-4: Prepare and Implement Site-Specific Construction Traffic Management Plans</p> <p>UC Santa Cruz shall prepare and implement site-specific construction traffic management plans for any construction effort that would require work within existing roadways. To the extent feasible, the campus shall maintain at least one unobstructed lane in both directions on campus</p>	<p>Develop and implement a traffic management plan.</p>	<p>Prior to construction.</p>	<p>PPDO and EH&S</p>	<p>Confirm preparation and implementation of traffic management plan.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>roadways during construction activities. At any time only a single lane is available due to construction-related road closures, the campus shall provide a temporary traffic signal, signal carriers (i.e., flag persons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway, the campus shall provide appropriate signage indicating alternative routes. If simultaneous construction activities occur close to one another, UC Santa Cruz shall require that simultaneous road closures not occur within 1,000 feet of each other. To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, the campus shall inform emergency services, including the UC Santa Cruz Police Department (UCPD) and Santa Cruz Fire Department (SCFD) of the closures and alternative travel routes. During National Weather Service Red Flag Warnings and Fire Weather Watches, the UCPD and SCFD shall be consulted to determine if any changes to road closures are necessary while these fire hazard conditions are in effect.</p>				
Hydrology and Water Quality					
<p>Impact 3.10-5: Impacts to Karst Aquifer Supply, Recharge and Groundwater Quality</p>	<p>Mitigation Measure 3.10-5a: Procedures for Building on Karst Where Groundwater is Encountered and Where Pressure Grouting is Considered For projects involving construction on karst as determined by the geotechnical investigation, if 1) groundwater is encountered beneath the building site, and 2) the proposed building foundation design includes pressure grouting, UC Santa Cruz shall complete a dye tracing study to confirm potential hydrologic connectivity of the building site with springs around the campus or campus wells. If the study confirms the building site to be hydrologically linked to springs and/or wells in the karst system, then alternative building foundation designs will be implemented.</p>	<p>Conduct dye tracing study to confirm potential hydrologic connectivity. If study confirms the building site to be hydrologically linked to springs and/or wells in the karst system, implement alternative building foundation designs.</p>	<p>Prior to design approval.</p>	<p>PPDO</p>	<p>Confirm implementation of dye tracing study and alternation building foundation design, as necessary.</p>
	<p>Mitigation Measure 3.10-5b: On-Going Groundwater Level and Spring Flow Monitoring If the existing well WSW#1 or a new groundwater well is used for extraction, UC Santa Cruz shall perform monitoring of water levels within that well and any other campus wells completed in the karst aquifer on a continuous basis when groundwater pumping occurs. UC Santa Cruz shall also conduct, at a minimum, monthly flow monitoring of those springs in the</p>	<p>Monitor water levels of existing well WSW#1 or a new groundwater well, and any other campus wells completed in the karst aquifer on an annual basis</p>	<p>Prior to and during groundwater extraction.</p>	<p>PPDO</p>	<p>Confirm water level monitoring and document results.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. Monitoring of the springs shall also include an assessment of surface water resources (i.e., habitats, plant species, and wildlife species) for a distance of 500 feet downgradient from the daylighting of connected springs at least 30 days prior to and after groundwater pumping to determine if there are any adverse changes (i.e., reduction in ordinary high water mark, changes in plant or wildlife species assemblages such that a species is no longer present, or reduction in plant cover) in the condition of these resources that may be directly attributed to changes in spring discharge as a result of groundwater pumping.</p> <p>If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding water year type. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, grouped by water year types. As new monitoring data becomes available, UC Santa Cruz will continually update the statistical analysis.</p>	<p>when groundwater pumping occurs.</p> <p>Terminate or reduce use of groundwater if water levels and spring flows indicate a net deficit.</p>	<p>During groundwater extraction.</p>	<p>PPDO</p>	<p>Review and monitor water level results.</p>
Noise					
<p>Impact 3.12-1: Generate Substantial Temporary Construction Noise</p>	<p>Mitigation Measure 3.12-1: Implement Construction Noise Reduction Measures</p> <p>As part of construction of new/renovated facilities associated with 2021 LRDP implementation, UC Santa Cruz shall implement or incorporate the following noise reduction measures into construction specifications for the contractor(s) to implement during project construction:</p> <ul style="list-style-type: none"> ▶ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer 	<p>Incorporate measures in contract specifications.</p>	<p>During construction.</p>	<p>PPDO</p>	<p>Inspect construction site to verify that measures are being implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>recommendations. Equipment engine shrouds shall be closed during equipment operation.</p> <ul style="list-style-type: none"> ▶ Where available and feasible, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 5 A-weighted decibels (dBA) over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels. ▶ All construction equipment and equipment staging areas shall be located as far as feasible from nearby noise-sensitive land uses and, when feasible, staging areas shall be located such that existing or constructed noise attenuating features (e.g., temporary noise wall or blankets) block line-of-sight between affected noise-sensitive land uses and construction staging areas. ▶ Individual operations and techniques shall be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete off-site instead of on-site) where feasible, and shall be consistent with building codes and other applicable laws and regulations. ▶ Stationary noise sources such as generators or pumps shall be located as far away from noise-sensitive uses as feasible. ▶ No less than 1 week prior to the start of construction activities at a particular location, notification shall be provided to nearby off-campus, noise-sensitive land uses (e.g., residential uses, elementary schools) that are located within 690 feet of the construction site and where projected construction noise levels are anticipated to exceed acceptable daytime L_{max} noise standards. ▶ When construction would occur within 140 feet of on-campus housing or 690 feet of off-campus noise-sensitive uses (e.g., residences, elementary schools, churches) and may result in temporary noise levels in excess of established standards at the exterior of the adjacent noise-sensitive structure, temporary noise barriers (e.g., noise-insulating blankets or temporary plywood structures) shall be erected, if deemed to be feasible and effective, between the noise source and sensitive receptor such that construction-related noise levels are reduced to acceptable noise levels at the receptor. 				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▶ Loud construction activity (i.e., construction activity such as jackhammering, concrete sawing, asphalt removal, and large-scale grading operations) shall not be scheduled during the Campus's finals week. ▶ When construction of a project requires material hauling, a haul route plan shall be prepared for the project, for review and approval by UC Santa Cruz, that designates haul routes as far as feasible from sensitive receptors. ▶ The contractor shall designate a disturbance coordinator and post that person's telephone number conspicuously around the construction site, as well as provide it to nearby residences. The disturbance coordinator shall receive all public complaints and be responsible for determining the cause of the complaint and implementing any feasible measures to alleviate the problem. ▶ Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 8:00 a.m. and 10:00 p.m., when feasible. For any construction activity that must extend beyond the daytime hours of 8:00 a.m. and 10:00 p.m. and occurs within 440 feet of an on-campus residential building or 1,225 feet of an off-campus sensitive land use, UC Santa Cruz shall require the use of one or more of the following or equivalent measures to reduce interior noise levels to less than 45 dB L_{eq} at the nearest receptor: <ul style="list-style-type: none"> ▪ Use of noise-reducing enclosures around stationary noise-generating equipment (e.g., concrete mixers, generators, compressors). ▪ Installation of temporary noise curtains installed as close as possible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s). The curtains shall consist of durable, flexible composite material featuring a noise barrier layer bounded to sound-absorptive material on one side. The noise barrier layer shall consist of rugged, impervious, material with a surface weight of at least one pound per square foot. ▪ Retain a qualified noise specialist to develop a noise monitoring plan and conduct noise monitoring to ensure that noise reduction measures are achieved the necessary 				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>reductions such that levels at the receiving land uses do not exceed exterior noise levels of 45 dBA L_{eq} for construction activity occurring during noise-sensitive nighttime hours.</p> <ul style="list-style-type: none"> ▪ If restricting construction activities to daytime hours (8 a.m. to 10 p.m.) is infeasible and the application of all feasible mitigation, as listed above, does not successfully reduce interior noise levels to lower than 45 dB L_{eq} at the nearest residential noise-sensitive receptor, UC Santa Cruz will offer hotel accommodations to residents who would temporarily be exposed to nighttime interior noise levels that exceed the interior noise standard of 45 L_{eq}. Alternative overnight accommodations should be in a location that is not adversely affected by nighttime construction noise. 				
<p>Impact 3.12-2: Generate Substantial Temporary (Construction) Vibration Levels</p>	<p>Mitigation Measure 3.12-2a: Implement Measures to Reduce Ground Vibration</p> <p>For any future construction activity that would involve construction activities within 75 feet of an existing sensitive land use or occupied building, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ Earthmoving and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors (i.e., within 75 feet). The total vibration level produced could be significantly less when each vibration source is operated at separate times. ▶ In the event that simultaneous earthmoving and ground-impacting operations in close proximity to sensitive receptors (i.e., within 75 feet) cannot be avoided, no such construction activities shall be undertaken without prior approval from UC Santa Cruz. Prior to the commencement of such activities, the contractor shall apply for and obtain an exemption from UC Santa Cruz. The application for exemption shall be submitted to UC Santa Cruz and shall include the following information: <ul style="list-style-type: none"> ▪ Explanation as to why operating earthmoving and ground-impacting operations in close proximity to sensitive receptors (i.e., within 75 feet) at separate times is not feasible. ▪ Dates and times that the simultaneous earthmoving and ground-impacting operations construction activities would occur. 	<p>For construction activity with 75 feet of an existing sensitive land use, implement measures as specified.</p>	<p>During construction.</p>	<p>PPDO</p>	<p>Inspect construction site to verify that measures are being implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▪ Distance from sensitive receptors at which simultaneous earthmoving and ground-impacting operations construction activities would occur. ▪ Identify the on- and off-site sensitive receptors and structures that could be exposed to levels of ground vibration that could exceed applicable thresholds and apply Mitigation Measure 3.12-2b if applicable. ▶ Rubber-tired equipment shall be used, where feasible, instead of tracked equipment. ▶ Where there is flexibility in the location of use of heavy-duty construction equipment, the equipment shall be operated as far away (up to 250 feet) from vibration-sensitive sites. 				
	<p>Mitigation Measure 3.12-2b: Develop and Implement a Vibration Control Plan</p> <p>To assess and, when needed, reduce vibration and noise impacts from construction activities, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▶ A vibration control plan shall be developed prior to initiating any construction activities within 50 feet of a sensitive use (75 feet if vibratory equipment is required) and within 125 feet of a structure with laboratory or other similarly sensitive equipment (235 feet if vibratory equipment is required). Applicable elements of the plan shall be implemented before, during, and after construction activities. The plan will include measures sufficient to reduce vibration at sensitive receptors to levels below applicable thresholds (i.e., 0.2 in/sec PPV for building structural damage, 80 VdB for human disturbance and 65 VdB for sensitive equipment). Items that will be addressed in the plan may include, but are not limited to, the following: <ul style="list-style-type: none"> ▪ Pre-construction surveys shall be conducted to identify any pre-existing structural damage to buildings that may be affected by project-generated vibration. ▪ Identification of minimum setback requirements for different types of ground-vibration-producing activities (e.g., use of a vibratory roller) for the purpose of preventing damage to nearby structures and preventing adverse effects on people. Factors to be considered include the nature of the vibration- 	<p>Prepare and implement a vibration control plan.</p>	<p>Before and during construction.</p>	<p>PPDO</p>	<p>Confirm implementation of vibration control plan.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>producing activity, local soil conditions, and the fragility/resiliency of the nearby structures. Initial setback requirements can be reduced if a project- and site-specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage to buildings or structures would occur.</p> <ul style="list-style-type: none"> ▪ Identification of vibration-sensitive equipment and existing vibration control measures for the identified equipment. If, upon evaluation and prior to construction, vibration levels at the nearby equipment would exceed 65 VdB, UC Santa Cruz shall either provide additional vibration dampening (e.g., mounting) for the equipment or relocate the equipment to another suitable location on campus until construction vibration would decrease to below 65 VdB. ▪ Vibration levels shall be monitored and documented at the nearest sensitive land use within the aforementioned distances to document that applicable thresholds are not exceeded. Recorded data shall be submitted on a twice-weekly basis to UC Santa Cruz. If it is found at any time that thresholds are exceeded, construction activities shall cease in that location, and methods shall be implemented to reduce vibration to below applicable thresholds, or an alternative pile installation method shall be used at that location. 				
<p>Impact 3.12-3: Generate Substantial Long-Term Stationary Noise</p>	<p>Mitigation Measure 3.12-3a: Implement Noise Reduction Measures to Reduce Long-Term Noise Impacts from Loading Dock Activity</p> <p>To minimize noise levels generated by loading docks and delivery activity to levels that do not exceed the daytime standard of 70 dB L_{max} or nighttime standard of 65 dB L_{max}, the following measures shall be implemented for construction projects that include loading docks:</p> <ul style="list-style-type: none"> ▶ New loading docks only used during daytime hours (8 a.m. to 10 p.m.) shall be located at least 320 feet from all residential receptors, and new loading docks used during daytime and nighttime hours shall be located at least 560 feet from all residential receptors. If this is not feasible, UC Santa Cruz shall reduce the noise level at all residential receptors to 70 dB L_{max} during daytime hours and 65 dB L_{max} during nighttime hours by incorporating one or more of the following mitigation strategies, 	<p>For construction projects that include loading docks, implement measures as specified.</p>	<p>During construction and project operation.</p>	<p>PPDO</p>	<p>Confirm that measures are being implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>the effectiveness of which shall be determined on a project-level basis by an acoustical professional:</p> <ul style="list-style-type: none"> ▪ Design and build sound barriers near loading docks and delivery areas that block the line of sight between truck activity areas and residential land uses. Sound barriers may consist of a wall, earthen berm, or combination thereof. ▪ Constructing loading dock pits that are below grade relative to the surrounding parking area or placing loading docks on the side of a building that does not directly face noise-sensitive receptors. ▪ Incorporate a setback distance from loading docks to noise-sensitive receptors, and prohibit truck travel and activity within the setback area by posting signs and/or by installing gates that restrict truck access 				
	<p>Mitigation Measure 3.12-3b: Implement Noise Reduction Measures to Reduce Long-Term Noise Impacts from Corporation Yard Activity To minimize noise levels generated by corporation yard activity to levels that do not exceed the daytime standard of 70 dB L_{max} or nighttime standard of 65 dB L_{max}, the following measures shall be implemented for the construction of new corporation yards:</p> <ul style="list-style-type: none"> ▶ New corporation yards only used during daytime hours (8 a.m. to 10 p.m.) shall be located at least 320 feet from all residential receptors, and new corporation yards used during daytime and nighttime hours shall be located at least 560 feet from all residential receptors. If this is not feasible, UC Santa Cruz shall reduce the noise level at all residential receptors to 70 dB L_{max} during daytime hours and 65 dB L_{max} during nighttime hours by incorporating one or more of the following mitigation strategies, the effectiveness of which shall be determined on a project-level basis by an acoustical professional: <ul style="list-style-type: none"> ▪ Design and build sound barriers around corporation yards that block the line of sight between truck activity areas and residential land uses. Sound barriers may consist of a wall, earthen berm, or combination thereof. ▪ Incorporate a setback distance from corporation yards to noise-sensitive receptors, and prohibit travel and activity of trucks or other heavy equipment within the setback area by posting signs and/or by installing gates that restrict truck access. 	<p>For construction projects that include new corporation yards, implement measures as specified.</p>	<p>During construction and project operation.</p>	<p>PPDO</p>	<p>Confirm that measures are being implemented.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Public Services					
<p>Impact 3.14-1: Impacts on Fire Facilities</p>	<p>Mitigation Measure 3.14-1: Require Acquisition of New Fire Equipment and Construction/Expansion of On-Campus Fire Station to Meet Fire Access Requirements During the design and planning of individual on-campus structures under the 2021 LRDP, UC Santa Cruz in coordination with SCFD shall determine if proposed development would exceed the height of existing on-campus response vehicles of the existing fire station. If it is determined that proposed development would exceed height capacity of existing on-campus response vehicles, UC Santa Cruz shall initiate the design and planning of a new on-campus fire station that can accommodate the required response vehicle(s) and adequately serve the development. Prior to operation of the on-campus development that would trigger the need for additional fire protection facilities, UC Santa Cruz shall initiate operation of the new on-campus fire station in cooperation with the City and pursuant to existing agreements related to fire protection service provided by SCFD.</p>	<p>UC Santa Cruz to coordinate with SCFD to determine if design and planning of a new on-campus fire station is needed to support on-campus development.</p>	<p>Design and planning of on-campus development.</p>	<p>PPDO and OES</p>	<p>Confirm coordination and implementation of design and planning of a new on-campus fire station, as needed.</p>
Transportation					
<p>Impact 3.16-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Related to Vehicle Miles Traveled (VMT)</p>	<p>Mitigation Measure 3.16-2: Implement Transportation Demand Management (TDM) Program and Monitoring UC Santa Cruz shall prepare and implement a TDM program as part of the 2021 LRDP that will adaptively manage campus-related VMT. At a minimum, the TDM program shall include the following:</p> <ul style="list-style-type: none"> ▶ performance standards that are deemed sufficient to demonstrate annually that UC Santa Cruz will reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average; ▶ parking management strategies that reduce the per student/faculty/staff parking rates to reduce travel and associated VMT; ▶ campus features and TDM measures that will be used to achieve the performance standard commitments; and ▶ a monitoring and reporting program. <p>UC Santa Cruz shall initiate preparation of the TDM program within three months of adoption of the 2021 LRDP and shall adopt and initiate program implementation within one academic year of LRDP adoption.</p>	<p>Prepare and implement a TDM program, as specified.</p>	<p>Preparation of the TDM program initiated within three months of adoption of the 2021 LRDP; program adopted and initiated within one academic year of LRDP adoption.</p>	<p>PPDO, TAPS and Sustainability Office</p>	<p>Document measures in annual reporting.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>This mitigation measure is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022.</p> <p><u>Performance Standard</u></p> <p>The TDM Program is intended to reduce the total daily VMT per capita to 15 percent below the baseline campus average and the employment VMT per employee to 15 percent below the countywide average. To accurately monitor performance, the TDM Program will develop specific VMT thresholds (i.e., VMT per capita and VMT per employee) and new baseline conditions to measure VMT thresholds against, based on the same methodology and data sources proposed for the monitoring component of the TDM program by which UC Santa Cruz may adaptively manage campus VMT. For example, if 10 percent of UC Santa Cruz employees were to work remotely, the overall target VMT and VMT per employee would be achieved (i.e., a 2-percent reduction in overall VMT). The VMT metrics presented in this chapter were developed using the SCC Travel Model, while the annual monitoring would occur using data collection. Based on current technologies, the campus' VMT performance could be most effectively monitored by using hose counts to measure the number of trips and anonymous cell phone data, which is "big data" that aggregates trip data using cellphones and navigation divides, to determine trip lengths. Since current technologies, including anonymous cell phone data, do not allow the tracking of employment trip lengths separately from the trip lengths generated by other campus uses (i.e., residential trips), the TDM Program shall develop a performance standard for the employment VMT threshold that is a weighted average of VMT generated by campus commuters and other campus users.</p> <p><u>TDM Program Elements</u></p> <p>A reduction in daily trips and VMT could be achieved through a significantly enhanced and robust TDM program. For the campus, the TDM program includes both campus features proposed as part of the 2021 LRDP and additional programmatic TDM elements that would support employment (faculty, staff, and student) trip reductions, as outlined below, such as employee housing, additional transit, and parking management tools. The campus would have the flexibility to</p>				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>manage implementation of TDM measures as long as the campus is meeting the VMT performance standards. If the campus is not meeting its performance standard, it would need to evaluate the effectiveness of TDM program and implement additional TDM elements to achieve the performance standards. Potential TDM measures may include, but are not limited to:</p> <p>Implementation Level 1</p> <ul style="list-style-type: none"> ▶ Work with appropriate agencies to implement an intelligent transportation system (ITS) program for the Campus Transit system to provide real-time vehicle location and time-to-arrival information at major on-campus shuttle bus stops. ▶ Encourage SCMTD to implement ITS program for campus routes to provide real-time vehicle location and time-to-arrival information at major SCMTD bus stops on- and off-campus (<i>project is currently in development with delivery planned for 2021</i>). ▶ Continue to expand Commuter Vanpool program. ▶ Expand Bike Shuttle hours of operations, routes and increase frequency of service, as needed. ▶ Improve transit service between Coastal Science Campus, Westside Research Park, and the main residential campus. ▶ Work with local agencies to provide additional secure bike parking and/or "bike stations" at or near off-campus transit stops. ▶ Where feasible, implement a 4-day/10-hour or 9-day/80-hour work schedule option for staff. ▶ Where feasible, promote increased use of telecommuting options for students, staff, and faculty. ▶ Replace monthly/annual parking fee with "pay at exit" use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel. <p>Implementation Level 2</p> <ul style="list-style-type: none"> ▶ Implement reduced on-campus parking fees for arrivals and departures occurring during off-peak hours, to better manage existing and reduce the need for new parking. 				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<ul style="list-style-type: none"> ▶ Work with local agencies to implement a series of off-campus bike circulation improvements (bike boulevards, secure bike parking at major transit stops, etc.). ▶ Work with appropriate agencies to identify and develop a Westside Santa Cruz multi-modal hub, to connect Westside shuttle service with expanded automobile and bike parking and (ultimately) regional access via the adjoining rail right-of-way. ▶ Work with appropriate agencies to identify and develop remote Park & Ride facilities with transit service. ▶ Explore opportunities to construct new student/staff housing along off-campus transit corridors, including the RTC mass transit rail-trail corridor. <p>Potential VMT Reduction by Program Measure</p> <p>Employee Housing – The 2021 LRDP identifies sites with capacity to house as many as 25 percent of new employees, based on demand associated with the 2021 LRDP. Employee housing would be predominantly located near the main entrance to the campus at Bay and High Streets and at Westside Research Park to make trips to services such as grocery stores and schools as convenient as possible for employees and their families. Inclusion of support uses such as child-care, small park spaces, and community-use rooms located on-campus could also help reduce the number of trips taken by employees. The California Air Pollution Control Officers Association (CAPCOA) conducted a study to quantify greenhouse gas (GHG) mitigation measures, which also assess how certain policies/actions can reduce VMT, and subsequently reduce GHG. Per CAPCOA, land use/location measures could reduce VMT by up to 5 percent for a suburban development.</p> <p>Telecommuting - Continue to allow and encourage employees to telecommute when possible. Specifically, shift work schedules such that travel occurs outside of peak congestion periods so that employees do not drive longer routes to avoid traffic or providing opportunities for employees to work from home one or a few days a week can reduce travel to the campus. While schedule shifts would still result in commute trips to campus, they could encourage use of transit by moving trips to times of day when buses are less crowded and/or allow commuters to travel outside of peak commute periods where people may choose</p>				

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>longer routes to avoid traffic. Telecommuting is an easy and low-cost way to reduce VMT and GHG. Per CAPCOA, alternative work schedules and telecommuting could reduce work VMT by up to 5.5 percent.</p> <p>Additional Transit - Add express service from major regional destinations or provide fair share contribution to regional mass transit improvements. Add select long-distance bus service to/from campus. Per CAPCOA, transit system improvements could reduce VMT by up to 10 percent, which is also consistent with the campus' Sustainability Plan.</p> <p>TDM Program Expansion - Expand TDM programs and prioritize investments in transportation programs before constructing on-campus parking facilities, such as implementing multimodal transit hubs and working with partner agencies to increase transit and active transportation connectivity to the campus. Provide additional subsidies for transit use by commuters. Provide additional subsidized commuter vanpool routes to locations with concentrated employee residences, real-time ride matching, and reserved carpool and vanpool parking spaces. Per CAPCOA, a commute trip reduction program could reduce work VMT anywhere from 1 percent to 21 percent, depending on if it is voluntary or required.</p> <p>Parking Management Tools - Improve parking management and enforcement system. Establish "no net new commuter parking" and other parking management or eligibility policies. Per CAPCOA, parking policy/pricing could reduce VMT by up to 20 percent. Each of the TDM strategies can be combined with others to increase the effectiveness of vehicle trip and VMT reduction; however, the interaction between the various strategies is complex. Generally, with each additional measure implemented the incremental benefit of vehicle trip and VMT reduction may be less than the benefit that measure would have if it was considered on its own.¹ Thus, overall, the TDM measures could reduce VMT by up to an additional 15 percent, given the land use context and anticipated effectiveness of the TDM measures.</p> <p>Annual Monitoring Program Starting in the next full academic year after adoption and initiation of a TDM Program implementation, including establishment of baseline</p>				

¹ For example, a theoretical TDM measure A and B may have an effectiveness of 10 percent each when they are considered on their own. However, if the two measures are combined, the reduction may only be 15 percent and not the 20 percent expected by adding the two measures together.

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>data, UC Santa Cruz shall conduct cordon counts at the two campus entrances for at least two weeks, on the fourth week of fall and spring quarters, and other methods to quantify mode choice and trip length, to determine whether the campus is achieving a 15 percent reduction in the per capita VMT over baseline to a maximum of 7.7 VMT per capita. A big data service could be used, to estimate the VMT generated by the campus during the same academic year as the cordon count data collected or other methods such as a mandatory employee travel survey. As noted earlier, the VMT generated by employees cannot be measured separately, so a ratio will be applied to estimate the VMT generated by employees, if big data is only used.</p> <p>An annual monitoring report shall be developed to describe: (a) specific steps taken to implement the TDM program; (b) results of the annual cordon counts and other data collected, including the methodology used to calculate VMT; (c) findings regarding whether the campus has met the VMT performance standard; and (d) an outline of additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years should the VMT performance standard of at least 15 percent below baseline VMT levels is not reached.</p>				
Utilities and Service Systems					
<p>Impact 3.17-1: Impacts on Water Supply</p>	<p>Mitigation Measure 3.17-1a: Require Implementation of Measures Consistent with City Drought Measures</p> <p>If and when the City of Santa Cruz implements drought emergency management measures, UC Santa Cruz shall implement the following measures for the duration of the drought emergency:</p> <ul style="list-style-type: none"> ▶ Reduce use of potable water for irrigation of campus landscaping, including the Arboretum, in accordance with reductions required by the City for similar users; ▶ Utilize water from the existing supply well in Jordan Gulch. UC Santa Cruz shall implement a program of monitoring flow at downgradient springs during the time when the well is being used; ▶ Require academic/administrative water use on campus be reduced, consistent or in excess of the City's target for business facilities; and ▶ Require residential water use on campus be reduced, consistent or in excess of the City's target for multifamily residential facilities. 	<p>During drought emergency, implement measures as specified.</p>	<p>Duration of drought emergency.</p>	<p>PPDO</p>	<p>Confirm implementation of measures throughout the duration of a drought emergency.</p>

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
Wildfire					
Impact 3.18-1: Compatibility with Adopted Emergency Response and Evacuation Plans	Mitigation Measure 3.9-4: Prepare and Implement Site-Specific Construction Traffic Management Plans (See the mitigation above under Impact 3.9-4: Impair Implementation of, or Physically Interfere with, an Adopted Emergency)	As specified above.	As specified above.	As specified above.	As specified above.
Impact 3.18-2: Wildfire Risk Associated with New Development and Land Use Patterns	<p>Mitigation Measure 3.18-2: Prepare Campus-Wide Vegetation Management Plan</p> <p>Upon approval of the 2021 LRDP and certification of the EIR, UC Santa Cruz shall initiate preparation and, within 2 years, begin implementation of a campus-wide vegetation management plan. The campus-wide vegetation management plan shall identify fire hazard areas 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. Policies and implementation actions that shall be considered as part of the plan will include, but are not limited to:</p> <ul style="list-style-type: none"> ▶ vegetation management techniques for fire hazard mitigation, including thinning, pruning, removing or otherwise altering vegetation to reduce the potential for ignitions and to modify potential fire behavior; different vegetation management techniques shall be identified, depending on vegetation type, location, condition, and configuration; ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the LRDP area; ▶ vegetation management and maintenance standards for dominant vegetation types in the LRDP area, specific recommendations for key wildfire risk areas, and the procedures for identifying and planning annual vegetation treatment operations; ▶ fuel management requirements, including clearing vegetation within 100 feet of structures, removing trees and branches that extend within 100 feet of a chimney/stovetop outlet, clearing 	Prepare and implement a campus-wide vegetation management plan.	Within 2 years of approval of the 2021 LRDP and certification of the EIR.	PPDO and OES	Confirm preparation and implementation of a campus-wide vegetation management plan.

Impact	Mitigation Measure	Mitigation Procedure	Mitigation Timing	Mitigation Responsibility	Monitoring and Reporting Procedure
	<p>roofs of vegetative debris, and maintaining vegetation adjacent to overhanging of a building;</p> <ul style="list-style-type: none"> ▶ best management practices implemented to avoid and/or minimize impacts associated with soil erosion, biological resources, and water quality, including the use of fire resistant/drought tolerant landscaping within 100 feet of new/modified structures within high or very high fire hazard zones; and ▶ building construction requirements for new development located in HFHSZs, including fire- or flame-resistant roofing material, roof vent coverings/screens, exterior siding, skylights, windows, doors, and decks, consistent with California Fire Code Chapter 49. <p>As part of this effort, UC Santa Cruz shall also consider and incorporate actions/strategies included as part of the CAL FIRE California Vegetation Treatment Program.</p>				

4 REVISIONS TO THE DRAFT EIR

This section contains changes to the text of the draft environmental impact report (Draft EIR) in response to certain comments. These changes are generally referenced in the responses to comments in Chapter 2, "Responses to Comments," or are provided to be consistent with changes referenced in Chapter 2 of this Final EIR. The changes are presented in the order in which they appear in the Draft EIR and are identified by Draft EIR page number. Text deletions are shown in ~~strikeout~~ and additions are shown in underline. The changes identified below do not alter the conclusions of the EIR with respect to any of the significant impacts of the project and do not necessitate recirculation of the Draft EIR.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See the Master Response regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

4.1 TABLE OF CONTENTS

References to table numbering with Section 3.16, "Transportation" on page viii have been amended as follows:

Table 3.16-6	2021 LRDP <u>Land Use Summary and Model Inputs</u> Vehicle Trip and Total Vehicle Miles Traveled Summary.....	3.16-33
Table 3.16-7	2021 LRDP Vehicle Trip and SB 743 Vehicle Miles Traveled Summary.....	3.16-33
Table 3.16-8	2021 LRDP Generated Residential and Employment VMT Per Capita.....	3.16- 34

4.2 EXECUTIVE SUMMARY

The seventh bullet on page ES-3 has been amended as follows:

- ▶ Recognize, to the extent feasible, UC Santa Cruz and regional histories within the campus, including protecting tribal cultural resources and maintaining the integrity of existing historic structures and enhancing the Cowell Lime Works Historic District as a campus gateway.

The last paragraph on page ES-4 of the Draft EIR is revised as follows:

State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed in Chapter 6, "Alternatives," the No Project Alternative is environmentally superior for all environmental resource areas. As a result, this EIR must identify an alternative among the other alternatives that is environmentally superior. Based on the environmental analysis contained in this Draft EIR, the environmentally superior alternative would be Alternative 2~~3~~.

Mitigation Measure 3.1-3a, as presented in Table ES-1 on page ES-6 of the Draft EIR is amended to state:

Mitigation Measure 3.1-3a: Require Setback Distance from Empire Grade

UC Santa Cruz shall require that development located north of the Arboretum and Botanic Garden entrance under the 2021 LRDP, which could be seen from Empire Grade, include a minimum setback of 200 feet from Empire Grade. If establishment of a 200-foot buffer is not feasible, a vegetated barrier or screen that prevents a direct line of site between a resource and developed structures shall be provided. Vegetation shall be native to California and selected to match existing vegetation located nearby.

Mitigation Measure 3.1-3b, as presented in Table ES-1 on page ES-7 of the Draft EIR is amended to state:

Mitigation Measure 3.1-3b: Implement Design Measures for Protection of Views Along Empire Grade

Development within 500 feet of Empire Grade and west of the Santa Cruz city limits and the Arboretum and Botanic Garden within the UC Santa Cruz main residential campus shall be subject to review by the Campus Design Advisory Board to ensure that design of new facilities is consistent with or complimentary to other nearby campus development with respect to development scale, massing, and materials. shall be visually unobtrusive and not unduly interfere with existing views. Review of future development by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework and Physical Planning Principles and Guidelines in the 2021 LRDP.

Mitigation Measure 3.3-1, as presented in Table ES-1 on page ES-9 of the Draft EIR is amended to state:

Mitigation Measure 3.3-1: Reduce Construction-Generated Emissions of NO_x

Per contract specification requirements, UC Santa Cruz shall require that the contractor(s) develop and implement a plan demonstrating that the off-road equipment used on-site to construct 2021 LRDP projects would achieve a fleet-wide average 45 percent reduction in NO_x exhaust emissions, compared to uncontrolled aggregate statewide emission rates for similar equipment. One feasible plan to achieve this reduction would include the following:

- ▶ At least 80 percent of diesel-powered off-road equipment operating on the project site for more than two days continuously shall be equipped with engines meeting US EPA emissions standards for Tier 3 engines or equivalent, and use of Tier 4 engines shall be encouraged;
- ▶ Use of renewable diesel or other zero emissions alternative (e.g., electric) construction equipment to the degree available and feasible;
- ▶ Plan construction projects such that multiple project components (i.e., bridge construction or roadway construction) will not occur on the same days as other construction activities; and
- ▶ Alternatively, if UC Santa Cruz can demonstrate through preparation of an air quality assessment report prepared by an air quality specialist that large or contemporaneous 2021 LRDP construction projects would not exceed MBARD thresholds, then the above mitigation requirements may be waived.

Mitigation Measure 3.3-2, as presented in Table ES-1 on page ES-9 of the Draft EIR is amended to state:

Mitigation Measure 3.3-2: Reduce Operational Emissions of ROG and PM₁₀ from All Sources

The majority of ROG emissions are a result of aerosolized and evaporation of consumer products, which include cleaning solutions, personal care products, and pesticides. The calculation of ROG emissions from consumer products was based on the ability to control personal products over the use of consumer products, such as personal care products and household cleaners used off-campus. However, UC Santa Cruz is responsible for facility-related purchases, such as commercial cleaning and sanitizing solutions. Additional measures should also be taken to reduce ROG emissions from other sectors, such as mobile sources, landscaping equipment, and architectural coatings.

As such, UC Santa Cruz shall make every effort to reduce ROG emissions generated under the 2021 LRDP. With respect to the new construction and operations that would occur under the 2021 LRDP, UC Santa Cruz shall implement the following measures for on-campus activities:

- ▶ Use zero or low-VOC consumer products and cleaning supplies that exceed CARB's consumer product VOC standards (as defined in CCR Title 17, Division 3, Chapter 1, Subchapter 8.5, Articles 1 through 5), such as those using electrolyzed water, where available.

- ▶ Use zero-VOC architectural coatings with a VOC content no greater than 5 grams per liter.
- ▶ Increase the level of zero emission landscaping equipment over time, such as electric lawnmowers, leaf blowers, and chainsaws, ~~on campus such that to attain~~ 95-100 percent of zero emission landscaping equipment ~~is used~~ use on campus.
- ▶ Choose zero emission vehicles for all new light-duty fleet purchases.
- ▶ Choose zero or low emission vehicles for all new heavy-duty fleet purchases, where available and feasible.
- ▶ Encourage the use of zero emission vehicles by installing electric vehicle charging stations in parking facilities.
- ▶ Reduce campus vehicle speed limits to the extent feasible and install traffic calming or signal coordination to reduce the intensity of vehicle braking and acceleration.

Mitigation Measure 3.4-1, as presented in Table ES-1 on page ES-11 of the Draft EIR is amended to state:

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally-affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project's area of effects:

- 1) For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project's area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC Santa Cruz and/or archaeologist shall notify consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program ~~the appropriate Native American tribe and extend an invitation for monitoring.~~
- 2) Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to

notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.

- 3) If it is determined that ~~the resource~~ a known archaeological site extends into the project's area of potential effects, UC Santa Cruz shall ensure that the ~~resource site~~ is evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project's area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.
- 4) If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.
- 5) If archaeological material within the project's area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or ~~other means~~ more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).
- 6) If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe's nonprofit organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of

data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.

Mitigation Measure 3.4-4a, as presented in Table ES-1 on page ES-14 of the Draft EIR is amended to state:

Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for historic buildings and structures as early as possible. If the project is located within or adjacent to the Cowell Lime Works Historic District, UC Santa Cruz shall take the following measures into account in project design to preserve the historic visual quality of the historic district:

- ▶ ~~New buildings or structures within 500 feet of the district boundaries shall be subject to design review by the Design Advisory Board, to ensure that design is compatible with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.~~
- ▶ To the greatest extent feasible, a buffer of at least 200 feet shall be maintained between the boundaries of the Cowell Lime Works Historic District and new building development that would be visible against the backdrop of historic buildings from significant campus viewpoints.
- ▶ Any development, including new buildings, structures, access improvements, within the 500-foot buffer or within the district boundaries shall be evaluated by an architectural historian prior to implementation and conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).
- ▶ New buildings or structures within 500 feet of the district boundaries shall additionally be subject to design review by the Design Advisory Board, to ensure that design does not interfere with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.

Mitigation Measure 3.4-4b, as presented in Table ES-1 on page ES-15 of the Draft EIR is amended to state:

Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for historic buildings and structures as early as possible. For projects affecting any building identified as a potential contributor to the potential Campus Core discontiguous historic district, UC Santa Cruz shall implement the following procedures:

- ▶ For all buildings located within the potential Campus Core discontiguous historic district, projects involving interior alterations or routine maintenance work do not need review by an architectural historian.
- ▶ For minor exterior repairs that do not alter the visual appearance of the building-such as caused by water damage-to buildings that could be contributors to the potential Campus Core discontiguous historic district, if the repairs meet the "Secretary of the Interior's Standards for the Treatment of Historic Properties," then review by an architectural historian is not required. Buildings that contribute to the potential Campus Core discontiguous historic district are Classroom Unit 1, Cowell College, Cowell Student Health Center (original construction), Crown College, East Field House, Hahn Student Services, Jack Baskin Engineering Building, Kerr Hall, Kresge College, McHenry Library, Merrill College, Nat Sci 2 Annex, Nat Sci 2 Main Building, Porter College, Stevenson College, Student Music East-KZSC Radio

Station, Theater Arts, Thimann Laboratories, Thimann Lecture Hall, Thimann Receiving Building, and the University House.

- ▶ For larger exterior repairs, building additions, or demolition of buildings that could be contributors to the potential Campus Core discontinuous historic district, UC Santa Cruz shall retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors ~~to the potential historic district~~. If large repairs, alterations, or demolitions are proposed at Cowell, Crown, Merrill, Porter, or Stevenson colleges, those groups of buildings shall be evaluated for their potential to comprise separate, individual sub-districts. (Note: Kresge College is not included in this group because Kresge College has been previously evaluated at a district level; due to lack of integrity, the college is not eligible for listing on the National Register of Historic Places [NRHP] or California Register of Historical Resources [CRHR].)
- ▶ The qualified architectural historian shall record the buildings on the appropriate California Department of Parks and Recreation DPR 523 forms and evaluate the buildings against NRHP and CRHR significance criteria. If the building or group of buildings does not meet the CEQA criteria for a historical resource, no further mitigation is required. If the buildings qualify as a historic resource, the architectural historian and UC Santa Cruz shall consult to consider measures that would enable the project to avoid direct or indirect impacts to the potential Campus Core discontiguous historic district or contributing building.

If the project cannot avoid modifications to the building, UC Santa Cruz shall ensure that documentation and treatment shall be carried out by a qualified architectural historian, as follows:

- a) If the building or structure can be preserved on-site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).
- b) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, UC Santa Cruz shall ensure that a qualified architectural historian thoroughly documents the building and associated landscaping and setting. Documentation shall include still and video photography and a written documentary record of the building to the standards of the Historic American Building Survey (HABS) or Historic American Engineering Record (HAER), including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. A copy of the record shall be deposited in the McHenry Library Special Collections, and with the California Historical Resources Information System. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate.
- c) If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and, when it is physically and financially feasible, it shall be moved and preserved or reused.
- d) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, UC Santa Cruz shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications, where feasible, to the proposed project that would limit the degree of modification or allow the structure to be preserved intact. These could include project redesign, relocation, or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (b).

- ▶ For new infill construction within the potential historic district that does not involve building demolition:
 - a) Infill projects outside Cowell, Crown, Merrill, Porter, or Stevenson colleges would not affect the potential college sub-districts or the potential Campus Core discontinuous historic district, and do not need review by an architectural historian; and
 - b) Infill projects within Cowell, Crown, Merrill, Porter, or Stevenson College will require review by an architectural historian for elements such as form, massing, and scale, to ensure visual compatibility with the college, and the review shall be conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).

Mitigation Measure 3.5-1a, as presented in Table ES-1 on page ES-19 of the Draft EIR is amended to state:

Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey

During the early planning stages of projects under the 2021 LRDP, the following measure shall apply:

- ▶ A data review and biological reconnaissance survey will be conducted within a particular 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. The qualified biologist must be familiar with the life histories and ecology of species in Santa Cruz County and must have experience conducting field surveys of relevant species or resources, including protocol-level surveys for individual species, if applicable. The data reviewed will include the biological resources setting, species tables, and habitat information in this EIR. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDDB, CNPS Inventory of Rare and Endangered Plants of California, consultation with appropriate campus experts (e.g. Campus Natural Reserve Manager) to obtain information on biological resources that may not be captured in other databases, relevant Biogeographic Information and Observation System (BIOS) queries, and relevant general and regional plans. BIOS is a web-based system that enables the management and visualization of biogeographic data collected by CDFW and partner organizations.
- ▶ The qualified biologist will assess the habitat suitability of the project site for all special-status plant and wildlife species as well as sensitive habitats identified as having potential to occur in the LRDP area (refer to Section 3.5.2, "Environmental Setting"), and will identify any wildlife nursery sites (e.g., heron rookeries, bat maternity roosts, monarch butterfly overwintering colonies, deer fawning areas) within the LRDP area and potential ESHAs within project sites that fall within the coastal zone. The qualified biologist will also conduct a preliminary delineation of sensitive habitats (e.g., wetlands, streams, seeps, sensitive natural communities, ESHAs) within the project site. The biologist will provide a report to UC Santa Cruz with evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur within the project site.
- ▶ If the reconnaissance survey identifies no potential for special-status plant, wildlife species, or sensitive habitats to occur, UC Santa Cruz will not be required to apply any additional mitigation measures under Impact 3.5-1 through 3.5-4.
- ▶ If the qualified biologist determines that there is potential for special-status species or sensitive habitats to be present within the project site, the appropriate biological mitigation measures, identified herein shall be implemented.

Mitigation Measure 3.5-1b, as presented in Table ES-1 on page ES-20 of the Draft EIR is amended to state:

Mitigation Measure 3.5-1b: Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for special-status plant species is present within a particular project site, the following measures shall be implemented:

- ▶ Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site, as determined during implementation of Mitigation Measure 3.5-1a, a qualified botanist will conduct protocol-level surveys for special-status plants within the project site following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version). The qualified botanist will: 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the Santa Cruz region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW 2018, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at <http://vegetation.cnps.org/>), and 5) be familiar with federal and state statutes and regulations related to plants and plant collecting.
- ▶ If special-status plants are not found, the botanist will document the findings in a report to UC Santa Cruz, and no further mitigation will be required.
- ▶ If special-status plant species are found, the plant will be avoided completely, if feasible (i.e., project objectives can still be met). This may include establishing a no-disturbance buffer around the plants and demarcation of this buffer by a qualified biologist or botanist using flagging or high-visibility construction fencing. The size of the buffer will be determined by the qualified biologist or botanist and will be large enough to avoid direct or indirect impacts on the plant

Mitigation Measure 3.5-2a, as presented in Table ES-1 on page ES-23 of the Draft EIR is amended to state:

Mitigation Measure 3.5-2a: Conduct Site-Specific Habitat Suitability Analysis for California Red-Legged Frog, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that aquatic or upland habitat determined to be suitable for California red-legged frog migration, dispersal, foraging, or refuge is present within a particular project site (Biosearch Environmental Consulting 2020, Figure 3.5-7), the following measures shall be implemented during the planning stages for each individual project under the 2021 LRDP:

- ▶ A qualified biologist will conduct a site-specific habitat suitability verification analysis to confirm the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in California red-legged frog life history and ecology, 2) be able to correctly identify California red-legged frogs and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW's CNDDDB. The habitat assessment will include, but will not be limited to:
 - Identification or verification of the vegetation communities present in the project site.
 - Consideration of known occurrences within the LRDP area;
 - Description of the project, including proposed project construction activities;
 - Analysis of the type and likelihood of impacts on California red-legged frog as a result of project implementation; and
 - Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of California red-legged frog and habitat.

- ▶ Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration.
- ▶ Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: injury or mortality of California red-legged frog; or disturbance of individuals or adverse effects on California red-legged frog breeding, upland refugia, or dispersal habitat.
 - If a qualified biologist determines that the individual project would have no substantial adverse effect on red-legged frog or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed.
 - For those areas where adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frog cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization for construction-related impacts (e.g., installation of exclusion fencing around the project construction site) and compensatory actions for habitat impacts, including purchase of credits at a conservation bank or creation of additional habitat at a minimum 1:1 mitigation ratio, as well as adaptive management strategies to ensure long-term conservation of mitigation lands. No actions that could adversely affect California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures are implemented.

To the extent the project may result in “take” of the species, UC Santa Cruz ~~may~~ shall pursue incidental take coverage by either pursuing consultation and biological opinion under Section 7 of the federal ESA (where there is some federal nexus) or by developing an HCP, which would require authorization by USFWS under Section 10 of the ESA. Such an HCP could provide long-term conservation and incidental take coverage for species listed under ESA with potential to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Typically, HCPs include the following:

- ▶ Measures that UC Santa Cruz will undertake to monitor, minimize, and mitigate for such impacts, the funding available to implement such measures, and the procedures to deal with unforeseen or extraordinary circumstances.
- ▶ Alternative actions to the taking analyzed by UC Santa Cruz, and the reasons why the alternatives were not adopted.
- ▶ Biological goals and objectives, which would define the expected biological outcome for each species covered by the HCP.
- ▶ Adaptive management, which includes methods for addressing uncertainty and also monitoring and feedback to biological goals and objectives.
- ▶ Monitoring for compliance, effectiveness, and effects.
- ▶ Permit duration which is determined by the time-span of the project and designed to provide the time needed to achieve biological goals and address biological uncertainty.

Mitigation Measure 3.5-2e, as presented in Table ES-1 on page ES-28 of the Draft EIR is amended to state:

Mitigation Measure 3.5-2e: Conduct Protocol-Level Surveys for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for burrowing owl is present within a project site, the following measures shall be implemented prior to and during construction of a particular project under the 2021 LRDP:

- ▶ A qualified biologist will conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of habitat suitable for the species identified during the reconnaissance-level survey (e.g., ruderal

grassland, successional grassland, scrub habitat with sparse shrub cover) on and within 1,500 feet of the project site. Surveys will be conducted before the start of project activities and in accordance with Appendix D of the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFW 2012, or most current version) (CDFW Staff Report).

- ▶ If no occupied burrows are found, the qualified biologist will submit a report documenting the survey methods and results to UC Santa Cruz, and no further mitigation will be required.
- ▶ If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), UC Santa Cruz shall establish and maintain a minimum protection buffer of ~~400~~ 165 feet around the occupied burrow throughout construction. The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan will be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls will not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan will include a compensatory habitat mitigation plan (see below).
- ▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows will not be disturbed and will be provided with a protective buffer at a minimum of ~~400~~ 650 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report.
- ▶ If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, UC Santa Cruz will mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) will be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. UC Santa Cruz will retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
 - Mitigation lands will be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
 - If feasible, mitigation lands will be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
 - If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and will aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a

CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.

- If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan will include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures (e.g., measures required if performance standards and success criteria are not met). Success will be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Mitigation Measure 3.5-2g, as presented in Table ES-1 on page ES-32 of the Draft EIR is amended to state:

Mitigation Measure 3.5-2g: Limit Human Disturbance of Cave Ecosystems

- UC Santa Cruz shall continue to limit visitation of caves on campus and discourage activities by members of the public that could jeopardize the physical integrity, condition, or scientific value of the caves, through exclusion of access to the caves with bat-friendly fencing (i.e., fencing that allows unimpeded ingress and egress by bats), appropriate signage and educational literature, Campus Natural Reserve website information, or other appropriate measures.

Mitigation Measure 3.5-2h, as presented in Table ES-1 on page ES-32 of the Draft EIR is amended to state:

Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that a monarch overwintering colony or suitable overwintering habitat is present within a particular project site, the following measures shall be implemented:

- ▶ 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.
- ▶ Within 14 days before the onset of project activities that include vegetation removal between October 1st and March 31st, a qualified biologist familiar with monarchs and monarch overwintering habitat will conduct focused surveys for monarch colonies within habitat suitable for the species in the project site and will identify any colonies found within the project site.
- ▶ Monarch overwintering colonies that are identified within a project site will be demarcated with flagging or high-visibility construction fencing to prevent removal of the stand of trees containing the overwintering colony and encroachment by heavy machinery, vehicles, or personnel. Monarch overwintering colonies shall be protected throughout the duration of their presence within a project site. Removal of the tree or stand of trees that contains the overwintering colony will not occur until the monarchs have left the area, as determined by a qualified biologist.
- ▶ If modification or removal of a stand that contains an where overwintering monarchs have been identified overwintering colony is required for project implementation, and the project cannot be redesigned to avoid modification or removal of the stand, vegetation management purposes, then UC Santa Cruz will prepare and implement a site-specific plan for the stand with the goal of maintaining habitat function for the monarch overwintering colony, following ~~feasible~~ recommendations from *Protecting California's Butterfly*

Groves Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017). Examples of management strategies that could be considered include:

- remove or trim hazard trees;
- selectively remove or trim of trees to create a heterogeneous habitat that provides access to sunlight and shade for monarchs;
- maintain suitable wind protection in the stand; and
- replace removed trees with native trees in strategic locations to provide additional wind protection.

Mitigation Measure 3.5-2k, as presented in Table ES-1 on page ES-36 of the Draft EIR is amended to state:

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 cinereoargenteus*]). 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.

Mitigation Measure 3.5-5a, as presented in Table ES-1 on page ES-46 of the Draft EIR is amended to state:

Mitigation Measures 3.5-5a: Utilize Wildlife-Friendly Building and Fencing Designs

The following measures shall be implemented during the early planning stages of projects under the 2021 LRDP:

- ▶ Buildings and other permanent structures that would be constructed during implementation of projects under the 2021 LRDP shall be designed to minimize impacts on wildlife, including disruption to wildlife movement, bird strikes, and wildlife entanglement.
 - 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) or other appropriate resources (e.g., International Dark Sky Association). 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.
 - Fencing associated with new development under the 2021 LRDP will utilize wildlife-friendly fencing design to minimize the risk of entanglement or impalement of wildlife. UC Santa Cruz will require the review of fencing design by a qualified biologist prior to installation. The fencing design shall meet, but not be limited to the following standards:
 - Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes).
 - Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass.
 - Allow smaller wildlife to pass under easily without injury or entrapment.

The fifth bullet of Mitigation Measure 3.5-7 on page ES-48 of the Draft EIR is amended to state:

As noted in Mitigation Measures 3.5-2a and 3.5-2i, UC Santa Cruz may elect to pursue a comprehensive HCP, which shall be accomplished either by amending the Ranch View Terrace HCP or by incorporating and replacing the existing Ranch View Terrace HCP.

The third sentence of the impact summary for Impact 3.10-2 on page ES-58 has been amended to state:

Compliance with the CGP requires ~~a) development of a Storm Water Pollution Prevention Plan (SWPPP) for projects disturbing 1 acre or more and, or b) preparation of an Erosion and Sediment Control Plan for projects less than 1 acre in accordance with the Campus Standards Handbook~~ requires preparation of an Erosion Control and Sediment Control Plan for projects less than 1 acre. Compliance with the CGP and the Campus Standards Handbook would and the Storm Water Management Program to minimize erosion and sedimentation during construction.

Mitigation Measure 3.10-5b, as presented in Table ES-1 on page ES-59 of the Draft EIR is amended to state:

Mitigation Measure 3.10-5b: On-Going Groundwater Level and Spring Flow Monitoring

If the existing well WSW#1 or a new groundwater well is used for extraction, UC Santa Cruz shall perform monitoring of water levels within that well and any other campus wells completed in the karst aquifer on a ~~an~~ annual continuous basis when groundwater pumping occurs. UC Santa Cruz shall also conduct, at a minimum, monthly equivalent flow monitoring of those springs in the vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. Monitoring of the springs

shall also include an assessment of surface water resources (i.e., habitats, plant species, and wildlife species) for a distance of 500 feet downgradient from the daylighting of connected springs at least 30 days prior to and after groundwater pumping to determine if there are any adverse changes (i.e., reduction in ordinary high water mark, changes in plant or wildlife species assemblages such that a species is no longer present, or reduction in plant cover) in the condition of these resources that may be directly attributed to changes in spring discharge as a result of groundwater pumping.

If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period ~~that includes both wetter and drier years~~ coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding ~~rainfall season~~ water year type. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, ~~with consideration of associated seasonal rainfall grouped by water year types~~. As new monitoring data becomes available, UC Santa Cruz will continually update the statistical analysis.

The impact summary for Impact 3.13-1, beginning on page ES-66 of the Draft EIR, is amended to remove an extra space as follows:

Implementation of the 2021 LRDP would allow physical development to accommodate projected increases in student enrollment, UC Santa Cruz faculty/staff, non-UC employees, and on-campus faculty/staff families/dependents, up to the levels anticipated when the campus was founded. To account for projected increases in the total on-campus population, the 2021 LRDP would provide additional housing on the main residential campus and potentially at the Westside Research Park. Up to 28,000 students (baseline plus project) would be accommodated by the plan, and this is consistent with regional growth projections. The 2021 LRDP sets aside an adequate amount of land for housing to accommodate 100 percent of the increase in student enrollment above 19,500 and for 25 percent of the increase in the number of employees, based on demand. Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff, and non-UC employees for whom on campus housing would not be accommodated. However, other data, such as affordability, suggest a tighter housing market. Further, due to the recent (summer 2020) loss of homes associated with the CZU Lightning Complex fire, 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.

Mitigation Measure 3.16-2, beginning on page ES-69, has been amended to include the full text of the mitigation measure, as provided in Section 3.16, "Transportation" of the Draft EIR and amended through responses to comments:

Performance Standard

The TDM Program is intended to reduce the total daily VMT per capita to 15 percent below the baseline campus average and the employment VMT per employee to 15 percent below the countywide average. To accurately monitor performance, the TDM Program will develop specific VMT thresholds (i.e., VMT per capita and VMT per employee) and new baseline conditions to measure VMT thresholds against, based on the same methodology and data sources proposed for the monitoring component of the TDM program by which UC Santa Cruz may adaptively manage campus VMT. For example, if 10 percent of UC Santa Cruz employees were to work remotely, the overall target VMT and VMT per employee would be achieved (i.e., a 2-percent reduction in overall VMT). The VMT metrics presented in this chapter were developed using the SCC Travel Model, while the annual monitoring would occur using data collection. Based on current technologies, the campus' VMT performance could be most effectively monitored by using hose counts to measure the number of trips and

anonymous cell phone data, which is “big data” that aggregates trip data using cellphones and navigation divides, to determine trip lengths. Since current technologies, including anonymous cell phone data, do not allow the tracking of employment trip lengths separately from the trip lengths generated by other campus uses (i.e., residential trips), the TDM Program shall develop a performance standard for the employment VMT threshold that is a weighted average of VMT generated by campus commuters and other campus users.

TDM Program Elements

A reduction in daily trips and VMT could be achieved through a significantly enhanced and robust TDM program. For the campus, the TDM program includes both campus features proposed as part of the 2021 LRDP and additional programmatic TDM elements that would support employment (faculty, staff, and student) trip reductions, as outlined below, such as employee housing, additional transit, and parking management tools. The campus would have the flexibility to manage implementation of TDM measures as long as the campus is meeting the VMT performance standards. If the campus is not meeting its performance standard, it would need to evaluate the effectiveness of TDM program and implement additional TDM elements to achieve the performance standards. Potential TDM measures may include, but are not limited to:

Implementation Level 1

- ▶ Work with appropriate agencies to implement an intelligent transportation system (ITS) program for the Campus Transit system to provide real-time vehicle location and time-to-arrival information at major on-campus shuttle bus stops.
- ▶ Encourage SCMTD to implement ITS program for campus routes to provide real-time vehicle location and time-to-arrival information at major SCMTD bus stops on- and off-campus (*project is currently in development with delivery planned for 2021*).
- ▶ Continue to expand Commuter Vanpool program.
- ▶ Expand Bike Shuttle hours of operations, routes and increase frequency of service, as needed.
- ▶ Improve transit service between Coastal Science Campus, Westside Research Park, and the main residential campus.
- ▶ Work with local agencies to provide additional secure bike parking and/or “bike stations” at or near off-campus transit stops.
- ▶ Where feasible, implement a 4-day/10-hour or 9-day/80-hour work schedule option for staff.
- ▶ Where feasible, promote increased use of telecommuting options for students, staff, and faculty.
- ▶ Replace monthly/annual parking fee with “pay at exit” use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.

Implementation Level 2

- ▶ Implement reduced on-campus parking fees for arrivals and departures occurring during off-peak hours, to better manage existing and reduce the need for new parking.
- ▶ Work with local agencies to implement a series of off-campus bike circulation improvements (bike boulevards, secure bike parking at major transit stops, etc.).
- ▶ Work with appropriate agencies to identify and develop a Westside Santa Cruz multi-modal hub, to connect Westside shuttle service with expanded automobile and bike parking and (ultimately) regional access via the adjoining rail right-of-way.
- ▶ Work with appropriate agencies to identify and develop remote Park & Ride facilities with transit service.
- ▶ Explore opportunities to construct new student/staff housing along off-campus transit corridors, including the RTC mass transit rail-trail corridor.

Potential VMT Reduction by Program Measure

Employee Housing – The 2021 LRDP identifies sites with capacity to house as many as 25 percent of new employees, based on demand associated with the 2021 LRDP. Employee housing would be predominantly located near the main entrance to the campus at Bay and High Streets and at Westside Research Park to make trips to services such as grocery stores and schools as convenient as possible for employees and their families. Inclusion of support uses such as child-care, small park spaces, and community-use rooms located on-campus could also help reduce the number of trips taken by employees. The California Air Pollution Control Officers Association (CAPCOA) conducted a study to quantify greenhouse gas (GHG) mitigation measures, which also assess how certain policies/actions can reduce VMT, and subsequently reduce GHG. Per CAPCOA, land use/location measures could reduce VMT by up to 5 percent for a suburban development.

Telecommuting - Continue to allow and encourage employees to telecommute when possible. Specifically, shift work schedules such that travel occurs outside of peak congestion periods so that employees do not drive longer routes to avoid traffic or providing opportunities for employees to work from home one or a few days a week can reduce travel to the campus. While schedule shifts would still result in commute trips to campus, they could encourage use of transit by moving trips to times of day when buses are less crowded and/or allow commuters to travel outside of peak commute periods where people may choose longer routes to avoid traffic. Telecommuting is an easy and low-cost way to reduce VMT and GHG. Per CAPCOA, alternative work schedules and telecommuting could reduce work VMT by up to 5.5 percent.

Additional Transit - Add express service from major regional destinations or provide fair share contribution to regional mass transit improvements. Add select long-distance bus service to/from campus. Per CAPCOA, transit system improvements could reduce VMT by up to 10 percent, which is also consistent with the campus' Sustainability Plan.

TDM Program Expansion - Expand TDM programs and prioritize investments in transportation programs before constructing on-campus parking facilities, such as implementing multimodal transit hubs and working with partner agencies to increase transit and active transportation connectivity to the campus. Provide additional subsidies for transit use by commuters. Provide additional subsidized commuter vanpool routes to locations with concentrated employee residences, real-time ride matching, and reserved carpool and vanpool parking spaces. Per CAPCOA, a commute trip reduction program could reduce work VMT anywhere from 1 percent to 21 percent, depending on if it is voluntary or required.

Parking Management Tools - Improve parking management and enforcement system. Establish "no net new commuter parking" and other parking management or eligibility policies. Per CAPCOA, parking policy/pricing could reduce VMT by up to 20 percent.

Each of the TDM strategies can be combined with others to increase the effectiveness of vehicle trip and VMT reduction; however, the interaction between the various strategies is complex. Generally, with each additional measure implemented the incremental benefit of vehicle trip and VMT reduction may be less than the benefit that measure would have if it was considered on its own.¹ Thus, overall, the TDM measures could reduce VMT by up to an additional 15 percent, given the land use context and anticipated effectiveness of the TDM measures.

Annual Monitoring Program

Starting in the next full academic year after adoption and initiation of a TDM Program implementation, including establishment of baseline data, UC Santa Cruz shall conduct cordon counts at the two campus entrances for at least two weeks, on the fourth week of fall and spring quarters, and other methods to quantify mode choice and trip length, to determine whether the campus is achieving a 15 percent reduction in the per capita VMT over baseline to a maximum of 7.7 VMT per capita. A big data service could be used,

¹ For example, a theoretical TDM measure A and B may have an effectiveness of 10 percent each when they are considered on their own. However, if the two measures are combined, the reduction may only be 15 percent and not the 20 percent expected by adding the two measures together.

to estimate the VMT generated by the campus during the same academic year as the cordon count data collected or other methods such as a mandatory employee travel survey. As noted earlier, the VMT generated by employees cannot be measured separately, so a ratio will be applied to estimate the VMT generated by employees, if big data is only used.

An annual monitoring report shall be developed to describe: (a) specific steps taken to implement the TDM program; (b) results of the annual cordon counts and other data collected, including the methodology used to calculate VMT; (c) findings regarding whether the campus has met the VMT performance standard; and (d) an outline of additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years should the VMT performance standard of at least 15 percent below baseline VMT levels is not reached.

Beginning on page ES-72, the impact summary for Impact 3.18-2 has been amended to correct a type as follows:

Impact 3.18-2: Wildfire Risk Associated with New Development and Land Use Patterns

Implementation of the 2021 LRDP would place new development within the north campus, and along the margins of existing development on the central and lower campus. The UC Santa Cruz EOP outlines evacuation procedures for building emergencies and campus-wide emergencies, and the UC Santa Cruz OES also maintains an ongoing schedule of inspections for all buildings to ensure that fire hazards are mitigated and also conducts plan reviews and inspections of building construction and renovation activities. However, in the absence of an adopted Vegetation Management Plan, the wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant.

The fifth bullet of Mitigation Measure 3.18-2 on page ES-73 has been amended as follows:

- ▶ best management practices implemented to avoid and/or minimize impacts associated with soil erosion, biological resources, and water quality, including the use of fire resistant/drought tolerant landscaping within 100 feet of new/modified structures within high or very high fire hazard zones; and

4.3 CHAPTER 2, PROJECT DESCRIPTION

The fourth bullet on page 2-9 has been amended as follows:

- ▶ Recognize, to the extent feasible, UC Santa Cruz and regional histories within the campus, including protecting tribal cultural resources and maintaining the integrity of existing historic structures and enhancing the Cowell Lime Works Historic District as a campus gateway.

The discussion of the Natural Space land use designation on page 2-19 has been amended to state:

The principal use of the Natural Space designation is to maintain the landscape in its natural state, including the Great Meadow and existing ravines and drainages throughout the campus.

Supporting uses could include carefully sited paths, roads, infrastructure, and unobtrusive research uses which do not impinge on overall character.

Approximately 513 acres are designated Natural Space in the proposed 2021 LRDP, an increase of about 10 acres compared to the 2005 LRDP (where it was designated Protected Landscape). 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. Natural Space will continue to be managed by Grounds. In specified areas of Natural Space used for long term research projects, including sections of the Great Meadow, the area will be managed in consultation with the UCSC Campus Natural Reserve.

The last paragraph describing the Campus Natural Reserve on page 2-19 has been amended as follows:

The Campus Natural Reserve would continue to be managed in consultation with the Campus Natural Reserve Committee ~~and, where there are common borders, the UC Santa Cruz Arboretum.~~ One area of the

Campus Natural Reserve, the Lower Moore Creek area adjacent to the Arboretum, will be jointly managed by the UCSC Campus Natural Reserve and the Arboretum and includes a California regional native plant garden. The Campus Natural Reserve is located primarily in the North Campus and on the west side of the campus.

The following sentence has been added to the second to last paragraph on page 2-25 of the Draft EIR:

In addition, similar pedestrian improvements along Empire Grade may occur in cooperation with the County/City of Santa Cruz and in connection with other improvements to alternative transportation infrastructure.

The last paragraph on page 2-25 of the Draft EIR is revised as follows:

Additional trail improvements could include improved connections ~~ng~~ between the Spring Trail and to Spring Street within the LRDP area. ~~and~~ The Spring Trail also provides pedestrian connection to Highway 9. Trail corridors that provide access to campus research areas could be limited to pedestrians only, such as Red Hill Road gravel fire road in the north campus.

4.4 SECTION 3.1, AESTHETICS

The listing of 2021 LRDP Physical Planning Principles, beginning on page 3.1-36 of the Draft EIR, has been moved to correctly follow the subheading and introductory information, as follows:

2021 LRDP Physical Planning Principles

In addition, the 2021 LRDP Physical Planning Principles, which are described below, articulate the manner in which future development under the 2021 LRDP would be planned, designed, constructed, and maintained.

A. The Campus Land – Respect and Resiliency

1. Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments -- meadow, ecotone (forest edge), and forest – with architecture that is sensitive to the natural setting.
2. Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.
3. Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.
4. Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.
5. Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.

B. Academic Core Infill and Expansion – Growth from Within

1. Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment
2. Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.
3. Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.

4. Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.
5. Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.

C. Campus Life and Housing – The Expanded Ring

1. Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.
2. Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.
3. Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.
4. Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.
5. Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.

D. Integrated Transportation – Walkable Core

1. Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core
2. Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment
3. Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner campus loop and interconnected roadway network for improved access
4. Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.
5. Generate dynamic public gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.

E. Pedestrian Mobility – Web of Pathways

1. Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.
2. Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.
3. Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.
4. Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.
5. Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.

F. Campus and Community – Culture and Connectivity

1. Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.
2. Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.
3. Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.
4. Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.
5. Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.

ISSUES NOT EVALUATED FURTHER

Result in Damage to Scenic Resources within a State Scenic Highway

There are no officially designated State highways in Santa Cruz County. The closest State-designated highway includes segments of California SR-1 located in Monterey County, which is approximately 30 miles south of the main residential campus. Given the distance to the main residential campus, views of the LRDP area are not visible from designated segments of SR-1. Therefore, potential effects of the 2021 LRDP on scenic resources within a State scenic highway are not addressed further.

~~A. The Campus Land – Respect and Resiliency~~

- ~~1. Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments – meadow, ecotone (forest edge), and forest – with architecture that is sensitive to the natural setting.~~
- ~~2. Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.~~
- ~~3. Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.~~
- ~~4. Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.~~
- ~~5. Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.~~

~~B. Academic Core Infill and Expansion – Growth from Within~~

- ~~1. Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment~~
- ~~2. Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.~~

3. ~~Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.~~
4. ~~Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.~~
5. ~~Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.~~

C. ~~Campus Life and Housing — The Expanded Ring~~

1. ~~Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.~~
2. ~~Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.~~
3. ~~Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.~~
4. ~~Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.~~
5. ~~Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.~~

D. ~~Integrated Transportation — Walkable Core~~

1. ~~Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core~~
2. ~~Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment~~
3. ~~Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner-campus loop and interconnected roadway network for improved access~~
4. ~~Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.~~
5. ~~Generate dynamic public-gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.~~

E. ~~Pedestrian Mobility — Web of Pathways~~

1. ~~Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.~~
2. ~~Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.~~
3. ~~Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.~~
4. ~~Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.~~

5. ~~Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.~~

F. ~~Campus and Community—Culture and Connectivity~~

1. ~~Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.~~
2. ~~Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.~~
3. ~~Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.~~
4. ~~Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.~~
5. ~~Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.~~

The sixth and seventh sentences of the first paragraph on page 3.1-44 of the Draft EIR are amended to state:

Land use changes proposed at the Westside Research Park would also occur within a developed area of the city and would be consistent with surrounding uses, which include commercial, industrial, community, and multi-family residential uses. While new development in these areas may change the visual quality, required compliance with UC Santa Cruz design standards (i.e., Physical Design Framework and Campus Standards Handbook) would ~~these changes are more likely to be perceived as an improvement, rather than an adverse impact, by providing for a continued a more congruous visual condition, consistent with existing development, a higher education institution.~~

Page 3.1-42 has been amended as follows:

Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District

(Refer to Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources")

Significance after Mitigation

The Cowell Lime Works Historic District Management Plan is being refined to identify opportunities to further improve the district for use as a campus and community amenity including adaptive reuse and rehabilitation of existing structures that preserves the spatial and historic character relationships in the historic district. Implementation of Mitigation Measures 3.4-4a in Section 3.4, "Archaeological, Historical, and Tribal Cultural Resources," would require UC Santa Cruz to implement specific design considerations and conduct any development within or proximate to the Cowell Lime Work Historic District in a manner compatible with the historic aspect of the historic district until such time as the Cowell Lime Works Historic District Management Plan is adopted. Future projects located ~~adjacent to~~ within the Cowell Lime Works Historic District would be evaluated for consistency with the visual design guidelines included in the Cowell Lime Works Historic District Management Plan. In addition, future development proposed proximate to the historic district would be required to comply with the UC Santa Cruz Design Review Process to ensure that design is ~~consistent with or complementary to~~ and does not interfere with the historic aspect of the historic District and its buildings with respect to scale, massing, architectural style, and materials, such that the rural historic visual character of the district is maintained. As a result, implementation of the 2021 LRDP would not result in damage or substantial adverse changes in the visual quality of the historic district, and impacts would be less than significant.

Page 3.1-44 has been amended as follows:

Mitigation Measure 3.1-3a: Require Setback Distance from Empire Grade

UC Santa Cruz shall require that development located north of the Arboretum and Botanic Garden entrance under the 2021 LRDP, which could be seen from Empire Grade, include a minimum setback of 200 feet from Empire Grade. If establishment of a 200-foot buffer is not feasible, a vegetated barrier or screen that prevents a direct line of site between a resource and developed structures shall be provided. Vegetation shall be native to California and selected to match existing vegetation located nearby.

Mitigation Measure 3.1-3b: Implement Design Measures for Protection of Views Along Empire Grade

Development within 500 feet of Empire Grade and west of the Santa Cruz city limits and the Arboretum and Botanic Garden within the UC Santa Cruz main residential campus shall be subject to review by the Campus Design Advisory Board to ensure that design ~~of new facilities is consistent with or complimentary to other nearby campus development with respect to development scale, massing, and materials.~~ shall be visually unobtrusive and not unduly interfere with existing views. Review of future development by the Campus Design Advisory Board shall occur upon initial selection of sites. Design shall comply with standards set forth in the UC Santa Cruz Campus Standards Handbook and be generally consistent with the Physical Design Framework and Physical Planning Principles and Guidelines in the 2021 LRDP.

4.5 SECTION 3.3, AIR QUALITY

The first bullet on page 3.3-3 of the Draft EIR is amended to state:

- ▶ Part One, "One National Program" (84 FR 51310) revokes a waiver granted by EPA to the State of California under Section 209 of the CCA to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of greenhouse gas (GHG) reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. As of this writing, EMFAC2017 is CARB's most recent version of the EMFAC model series and considers effects of known policy implementation and economic forecasts, such as the implementation of the CAFE standards and Advanced Clean Cars program.

Table 3.3-3 on page 3.3-12 of the Draft EIR is revised as follows:

Table 3.3-3 Ambient Air Quality Standards and Attainment Designations for North Central Coast Air Basin

Pollutant	Averaging Time	California Standards ² Primary ³	California Standards ² Attainment Status ⁴	National Standards ¹ Primary ³	National Standards ¹ Attainment Status ⁶
Ozone	1-hour	0.09 ppm (180 µg/m ³)	NNT	-	U/A
	8-hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)	
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	A	35 ppm (40 mg/m ³)	U/A
	8-hour	9 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	
	8-hour (Lake Tahoe)	6 ppm (7 mg/m ³)		-	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	A	0.053 ppm (100 µg/m ³)	U/A
	1-hour	0.18 ppm (339 µg/m ³)		0.100 ppm	
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	-	A	0.030 ppm (80 µg/m ³)	U/A
	24-hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	
	3-hour	-		0.5 ppm (1300 µg/m ³) ⁵	

Pollutant	Averaging Time	California Standards ² Primary ³	California Standards ² Attainment Status ⁴	National Standards ¹ Primary ³	National Standards ¹ Attainment Status ⁶
	1-hour	0.25 ppm (655 µg/m ³)		0.075 ppm	
Respirable Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	N	–	U
	24-hour	50 µg/m ³		150 µg/m ³	
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	A	12.0 µg/m ³	U/A
	24-hour	–		35 µg/m ³	
Lead ⁷	30-day Average	1.5 µg/m ³	A	–	–
	Calendar Quarter	–		1.5 µg/m ³	U/A
	Rolling 3-Month Avg	–		0.15 µg/m ³	U/A
Sulfates	24-hour	25 µg/m ³	A	No National Standards	
Hydrogen Sulfide	1-hour	0.03 ppm (42 µg/m ³)	U		
Vinyl Chloride ⁷	24-hour	0.01 ppm (26 µg/m ³)	Not Available		
Visibility-Reducing Particle Matter	8-hour	Extinction coefficient of 0.23 per kilometer — visibility of 10 miles or more	U		

Notes: µg/m³ = micrograms per cubic meter; ppm = parts per million; EPA=U.S. Environmental Protection Agency; CAAQS=California Ambient Air Quality Standards; CCAA=California Clean Air Act; CARB=California Air Resources Board

¹ National standards (other than ozone, PM, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. The PM₁₀ 24-hour standard is attained when 99 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. The PM_{2.5} 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the EPA for further clarification and current federal policies.

² California standards for ozone, CO (except in the Lake Tahoe Basin), SO₂ (1- and 24-hour), NO₂, PM, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

³ Concentration expressed first in units in which it was promulgated [i.e., ppm or µg/m³]. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas. Secondary national standards are also available from EPA.

⁴ Unclassified (U): a pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.

Attainment (A): a pollutant is designated attainment if the state standard for that pollutant was not violated at any site in the area during a 3-year period.

Nonattainment (N): a pollutant is designated nonattainment if there was a least one violation of a state standard for that pollutant in the area. Non-attainment designations for ozone are classified as marginal, serious, severe, or extreme depending on the magnitude of the highest 8-Hour ozone design value at a monitoring site in a non-attainment area.

Nonattainment/Transitional (NT): is a subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the standard for that pollutant.

⁵ Secondary Standard

⁶ Nonattainment (N): any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant.

Attainment (A): any area that meets the national primary or secondary ambient air quality standard for the pollutant.

Unclassifiable (U): any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant.

Maintenance (M): any area previously designated nonattainment pursuant to the CAAA of 1990 and subsequently redesignated to attainment subject to the requirement to develop a maintenance plan under Section 175A of the CAA, as amended.

- ⁷ CARB has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2018; EPA 2017; data compiled by Ascent Environmental in 2020.

Mitigation Measure 3.3-1, as presented on page 3.3-23 of the Draft EIR, is clarified to state:

Mitigation Measure 3.3-1: Reduce Construction-Generated Emissions of NO_x

Per contract specification requirements, UC Santa Cruz shall require that the contractor(s) develop and implement a plan demonstrating that the off-road equipment used on-site to construct 2021 LRDP projects would achieve a fleet-wide average 45 percent reduction in NO_x exhaust emissions, compared to uncontrolled aggregate statewide emission rates for similar equipment. One feasible plan to achieve this reduction would include the following:

- ▶ At least 80 percent of diesel-powered off-road equipment operating on the project site for more than two days continuously shall be equipped with engines meeting US EPA emissions standards for Tier 3 engines or equivalent, and use of Tier 4 engines shall be encouraged;
- ▶ Use of renewable diesel or other zero emissions alternative (e.g., electric) construction equipment to the degree available and feasible;
- ▶ Plan construction projects such that multiple project components (i.e., bridge construction or roadway construction) will not occur on the same days ~~as other construction activities;~~ and
- ▶ Alternatively, if UC Santa Cruz can demonstrate through preparation of an air quality assessment report prepared by an air quality specialist that large or contemporaneous 2021 LRDP construction projects would not exceed MBARD thresholds, then the above mitigation requirements may be waived.

Mitigation Measure 3.3-2, as presented on page 3.3-27 of the Draft EIR, is clarified to state:

Mitigation Measure 3.3-2: Reduce Operational Emissions of ROG and PM₁₀ from All Sources

The majority of ROG emissions are a result of aerosolized and evaporation of consumer products, which include cleaning solutions, personal care products, and pesticides. The calculation of ROG emissions from consumer products was based on the ability to control personal products over the use of consumer products, such as personal care products and household cleaners used off-campus. However, UC Santa Cruz is responsible for facility-related purchases, such as commercial cleaning and sanitizing solutions. Additional measures should also be taken to reduce ROG emissions from other sectors, such as mobile sources, landscaping equipment, and architectural coatings.

As such, UC Santa Cruz shall make every effort to reduce ROG emissions generated under the 2021 LRDP. With respect to the new construction and operations that would occur under the 2021 LRDP, UC Santa Cruz shall implement the following measures for on-campus activities:

- ▶ Use zero or low-VOC consumer products and cleaning supplies that exceed CARB's consumer product VOC standards (as defined in CCR Title 17, Division 3, Chapter 1, Subchapter 8.5, Articles 1 through 5), such as those using electrolyzed water, where available.
- ▶ Use zero-VOC architectural coatings with a VOC content no greater than 5 grams per liter.
- ▶ Increase the level of zero emission landscaping equipment over time, such as electric lawnmowers, leaf blowers, and chainsaws, ~~on campus such that~~ to attain 95-100 percent of zero emission landscaping equipment ~~is used~~ use on campus.
- ▶ Choose zero emission vehicles for all new light-duty fleet purchases.

- ▶ Choose zero or low emission vehicles for all new heavy-duty fleet purchases, where available and feasible.
- ▶ Encourage the use of zero emission vehicles by installing electric vehicle charging stations in parking facilities.
- ▶ Reduce campus vehicle speed limits to the extent feasible and install traffic calming or signal coordination to reduce the intensity of vehicle braking and acceleration.

The reference to a transportation mitigation measure on page 3.3-27 of the Draft EIR is corrected to show:

Mitigation Measure 3.16-21: Implement Transportation Demand Management Program and Monitoring

(Refer to Section 3.16, "Transportation")

The last paragraph on page 3.3-29 of the Draft EIR is amended to provide the percentage exceedance of thresholds, as follows:

While such modeling may be warranted when considering ~~extremely large~~ projects that exceed thresholds by multiples, they are of questionable value, and are, in fact, often misleading when considering projects such as the 2021 LRDP, which only exceeds the significance standard by 11 percent ~~a very small margin~~. Further, while dispersion modeling of project-generated PM may be conducted to evaluate resulting ground-level concentrations, localized impacts of directly-emitted PM do not always equate to local PM concentrations due to the transport of emissions. Therefore, it is simply not possible, based on current modeling technologies, to model specific health impacts of this exceedance with a reasonable degree of scientific certainty, and doing so would not provide reliable, credible informational value to decisionmakers or the public.

The first paragraph of Impact 3.3-3, beginning on page 3.3-30 of the Draft EIR, is revised as follows:

Santa Cruz County is in an area of nonattainment-transitional for ozone and non-attainment for PM₁₀ with respect to the CAAQS. Because of this, MBARD is required to develop an air quality plan to achieve and maintain the state ozone standard by the earliest practicable date. As a means of reducing regional ambient ozone concentrations, MBARD sets daily and annual significance thresholds for emissions of ozone precursors ROG and NO_x, as specified in the AQMP.

4.6 SECTION 3.4, ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

The fourth paragraph on page 3.4-12 of the Draft EIR is amended to state:

The remaining five sites are recorded as lithic scatters (scattered chipped stone tool manufacture debris), several with Monterey-banded chert: CA-SCR-94/P-44-00098, CA-SCR-142/P-44-000145, CA-SCR-143/P-44-000146, CA-SCR-180/P-44-000182, and CA-SCR-181/P-44-000183. The last site, CA-SCR-181/P-44-000183, was not relocated during a 2005 archaeological survey. In general, the boundaries of these sites are not well defined, it has been difficult to accurately relocate these sites in subsequent surveys, and it is unclear whether the deposits have subsurface components. These eight sites have been assumed eligible for listing in the CRHR for management and preservation purposes until their significance can be documented through archaeological testing.

The first sentence on page 3.4-14 of the Draft EIR is revised as follows:

As shown in Table 3.4-1, only one Tribe requested consultation with UC Santa Cruz. ~~To date, no specific tribal cultural resources have been identified.~~ The Amah Mutsun Tribal Band has identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources. This includes the three habitation sites (CA-SCR-3/P-44-000011; CA-SCR-160/P-44-000163; and CA-SCR-4/P-44-00012), five lithic

scatter sites (CA-SCR-94/P-44-00098; CA-SCR-142/P-44-000145; CA-SCR-143/P-44-000146; CA-SCR-180/P-44-000182; and CA-SCR-181/P-44-000183).

The second to last paragraph on page 3.4-18 of the Draft EIR is amended to state:

Eight prehistoric archaeological sites have been recorded on the main campus. None has been formally evaluated for listing in the CRHR. Three habitation sites have the potential to yield important information and may be eligible for listing in the CRHR. The remaining five sites are recorded as lithic scatters. These eight sites have been assumed eligible for listing in the CRHR, however for management and preservation purposes until their significance can be documented through archaeological testing.

Mitigation Measure 3.4-1 on pages 3.4-19 and 3.4-20 of the Draft EIR is amended as follows:

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally-affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project's area of effects:

- 1) For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project's area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC Santa Cruz and/or archaeologist shall notify/consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program ~~the appropriate Native American tribe and extend an invitation for monitoring.~~
- 2) Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.
- 3) If it is determined that ~~the resource~~ a known archaeological site extends into the project's area of potential effects, UC Santa Cruz shall ensure that the ~~resource~~ site is evaluated by a qualified

archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project's area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.

- 4) If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.
- 5) If archaeological material within the project's area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or ~~other means~~ more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).
- 6) If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe's nonprofit organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.

Impact 3.4-2, beginning on page 3.4-20 of the Draft EIR is revised as follows:

Impact 3.4-2: Substantial Adverse Change in the Significance of a Tribal Cultural Resource

Future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. ~~Although no specific tribal cultural resources have been identified, there are~~ The eight prehistoric archaeological sites that currently exist on the main residential campus have been identified as tribal cultural resources, and ground-disturbing construction activities could unearth previously unrecorded resources. This impact would be **potentially significant**.

As described previously, UC Santa Cruz sent notification letters to six tribes February 22, 2020 per PRC 21080.3.1 (b)(1). UC Santa Cruz had a verbal communication with Mr. Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band. ~~Chairman Lopez did not identify any specific resources they would consider eligible to be tribal cultural resources but requested consultation with UC Santa Cruz.~~ The Amah Mutsun Tribal Band identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources.

~~Although no tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus or the Westside Research Park,~~ Additionally, the campus is located in a region where significant resources have been documented. The NAHC Sacred Lands database search revealed that Native American cultural sites (i.e., sites that have either not been evaluated or do not meet the definition of a tribal cultural resource under PRC Section 21074) have been previously documented within both the UC Santa Cruz main residential campus and the Westside Research Park site. While none of the envisioned development areas are located on sites of known prehistoric archaeological materials, there remains a potential that unrecorded prehistoric archaeological resources that may meet the definition of tribal cultural resources could be unearthed or otherwise discovered during ground-disturbing construction activities. Therefore, this impact would be **potentially significant**.

Beginning on page 3.4-22, Mitigation Measure 3.4-4a has been clarified as follows:

Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for historic buildings and structures as early as possible. If the project is located within or adjacent to the Cowell Lime Works Historic District, UC Santa Cruz shall take the following measures into account in project design to preserve the historic visual quality of the historic district:

- ~~▶ New buildings or structures within 500 feet of the district boundaries shall be subject to design review by the Design Advisory Board, to ensure that design is compatible with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.~~
- ▶ To the greatest extent feasible, a buffer of at least 200 feet shall be maintained between the boundaries of the Cowell Lime Works Historic District and new building development that would be visible against the backdrop of historic buildings from significant campus viewpoints.
- ▶ Any development, including new buildings, structures, access improvements, within the 500-foot buffer or within the district boundaries shall be evaluated by an architectural historian prior to implementation and conducted in compliance with the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" (Weeks and Grimmer 1995).
- ▶ New buildings or structures within 500 feet of the district boundaries shall additionally be subject to design review by the Design Advisory Board, to ensure that design does not interfere with the historic aspect of

the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.

Mitigation Measure 3.4-4b, on page 3.4-23 of the Draft EIR is amended to state:

Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project's area of effect for historic buildings and structures as early as possible. For projects affecting any building identified as a potential contributor to the potential Campus Core discontiguous historic district, UC Santa Cruz shall implement the following procedures:

- ▶ For all buildings located within the potential Campus Core discontiguous historic district, projects involving interior alterations or routine maintenance work do not need review by an architectural historian.
- ▶ For minor exterior repairs that do not alter the visual appearance of the building—such as caused by water damage—to buildings that could be contributors to the potential Campus Core discontiguous historic district, if the repairs meet the “Secretary of the Interior's Standards for the Treatment of Historic Properties,” then review by an architectural historian is not required. Buildings that contribute to the potential Campus Core discontiguous historic district are Classroom Unit 1, Cowell College, Cowell Student Health Center (original construction), Crown College, East Field House, Hahn Student Services, Jack Baskin Engineering Building, Kerr Hall, Kresge College, McHenry Library, Merrill College, Nat Sci 2 Annex, Nat Sci 2 Main Building, Porter College, Stevenson College, Student Music East-KZSC Radio Station, Theater Arts, Thimann Laboratories, Thimann Lecture Hall, Thimann Receiving Building, and the University House.
- ▶ For larger exterior repairs, building additions, or demolition of buildings that could be contributors to the potential Campus Core discontiguous historic district, UC Santa Cruz shall retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors ~~to the potential historic district~~. If large repairs, alterations, or demolitions are proposed at Cowell, Crown, Merrill, Porter, or Stevenson colleges, those groups of buildings shall be evaluated for their potential to comprise separate, individual sub-districts. (Note: Kresge College is not included in this group because Kresge College has been previously evaluated at a district level; due to lack of integrity, the college is not eligible for listing on the National Register of Historic Places [NRHP] or California Register of Historical Resources [CRHR].)
- ▶ The qualified architectural historian shall record the buildings on the appropriate California Department of Parks and Recreation DPR 523 forms and evaluate the buildings against NRHP and CRHR significance criteria. If the building or group of buildings does not meet the CEQA criteria for a historical resource, no further mitigation is required. If the buildings qualify as a historic resource, the architectural historian and UC Santa Cruz shall consult to consider measures that would enable the project to avoid direct or indirect impacts to the potential Campus Core discontiguous historic district or contributing building.

If the project cannot avoid modifications to the building, UC Santa Cruz shall ensure that documentation and treatment shall be carried out by a qualified architectural historian, as follows:

- a) If the building or structure can be preserved on-site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the “Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995).
- b) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, UC Santa Cruz shall ensure that a qualified architectural historian thoroughly documents the building and associated landscaping and setting. Documentation shall include still and video photography and a written documentary record of the building to the

- standards of the Historic American Building Survey (HABS) or Historic American Engineering Record (HAER), including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. A copy of the record shall be deposited in the McHenry Library Special Collections, and with the California Historical Resources Information System. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate.
- c) If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (b) and, when it is physically and financially feasible, it shall be moved and preserved or reused.
 - d) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, UC Santa Cruz shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications, where feasible, to the proposed project that would limit the degree of modification or allow the structure to be preserved intact. These could include project redesign, relocation, or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (b).
- For new infill construction within the potential historic district that does not involve building demolition:
- a) Infill projects outside Cowell, Crown, Merrill, Porter, or Stevenson colleges would not affect the potential college sub-districts or the potential Campus Core discontinuous historic district, and do not need review by an architectural historian; and
 - b) Infill projects within Cowell, Crown, Merrill, Porter, or Stevenson College will require review by an architectural historian for elements such as form, massing, and scale, to ensure visual compatibility with the college, and the review shall be conducted in compliance with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995).

4.7 SECTION 3.5, BIOLOGICAL RESOURCES

The description of Coastal Prairie provided in Section 3.5.2, “Environmental Setting” on page 3.5-11 of the Draft EIR is amended as follows:

Coastal Prairie

The LRDP area contains approximately 107.9 acres of coastal prairie habitat, which is considered a sensitive natural community (Figure 3.5-2, Table 3.5-1). This habitat is present within portions of north and lower campus. Coastal prairie habitat is similar to other grassland habitat within the LRDP area, but with greater incidence of native grass species, including California oat grass and western panic grass (*Panicum acuminatum*). Coastal prairie habitat also supports a diverse assemblage of native forbs, including coyote thistle (*Eryngium armatum*), wild hyacinth (*Triteleia hyacinthina*), dwarf brodiaea (*Brodiaea terrestris*), and yampah (*Perideridia kelloggii*). Due to the coarse scale of vegetation mapping, some areas of the LRDP area mapped as grassland as shown in Figure 3.5-2, may meet the alliance requirements to be classified as coastal prairie.

Coastal prairie habitat in the southwest corner (west of Empire Grade) of the lower campus portion of the LRDP area and in the Marshall Fields complex in north campus is characterized by Mima mound habitat. Mima mounds are hillocks typically found in grassland habitat, the origin of which has been historically debated. Recent modelling studies support the “fossorial rodent hypothesis,” which suggests that Mima mounds are built by burrowing mammals (e.g., pocket gophers) over time to provide refuge from seasonally saturated soils or that they are the result of a combination of the biotic factors and abiotic factors, such as vegetation/erosion interactions (Cramer and Barger 2014, Gabet et al. 2014).

The last row of Table 3.5-3 on page 3.5-21 of the Draft EIR is revised as follows:

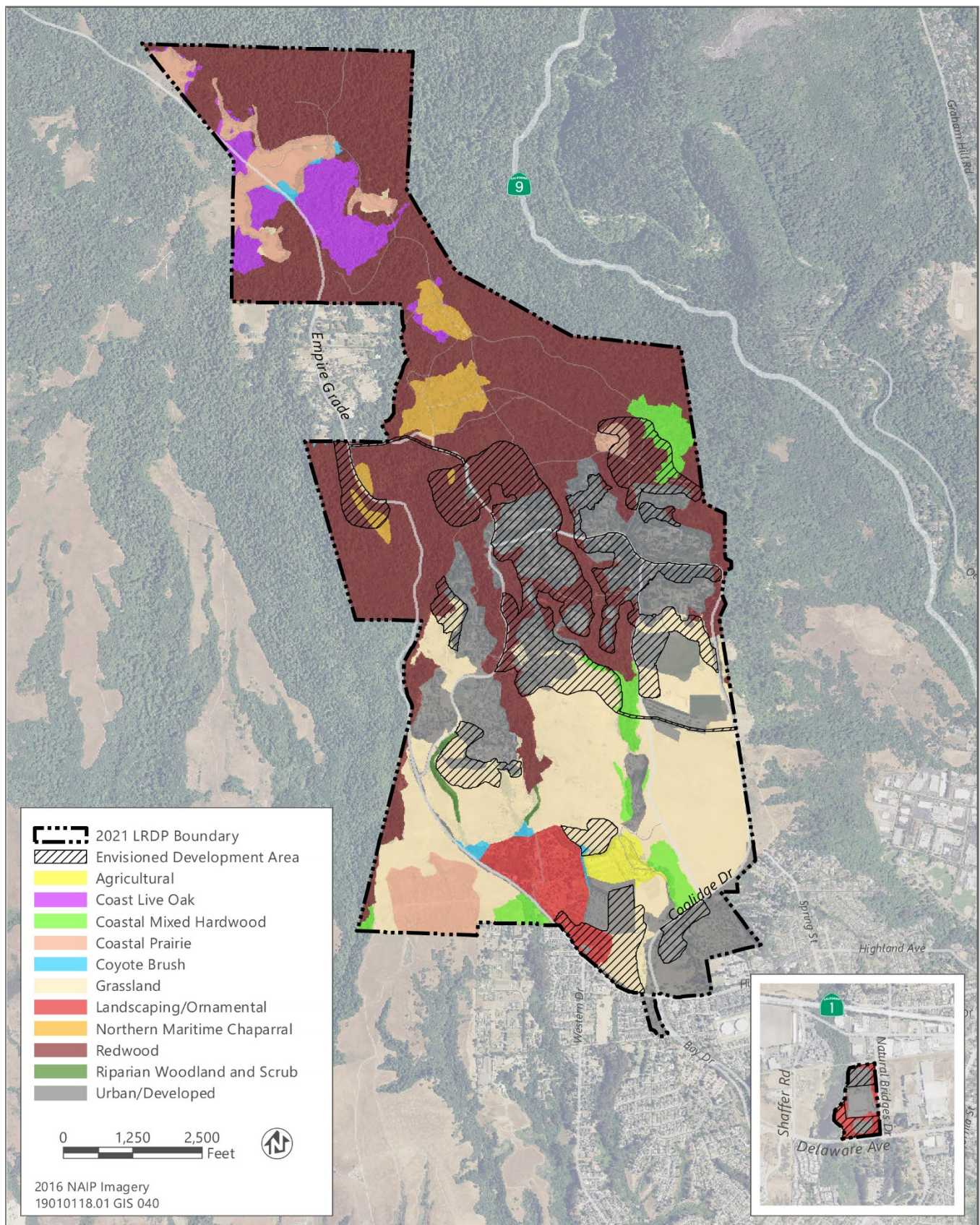
Bank swallow <i>Riparia riparia</i>	-	ST	Riparian scrub, riparian woodland. Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	<i>Not expected to occur.</i> There is one known historic (1950) occurrence of bank swallow approximately 1 mile east of the LRDP area, potentially associated with the San Lorenzo River (CNDDDB 2020). However, bank swallows are considered extirpated from Santa Cruz County (Remsen 1978).
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The first paragraph on page 3.5-35 of the Draft EIR is 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).~~

Figure 3.5-6 on page 3.5-37 of the Draft EIR was amended to remove depiction of a North Loop Road that is not part of the 2021 LRDP.



Source: data downloaded from the Bay Area Open Space Council in 2019; adapted by Ascent Environmental in 2020

[REVISED] Figure 3.5-6 Envisioned Development Areas Overlay on Vegetation Communities in the LRDP Area

Mitigation Measure 3.5-1a, as presented on page 3.5-39 of the Draft EIR is amended to state:

Mitigation Measure 3.5-1a: Conduct Project-Level Biological Reconnaissance Sensitive Species and Habitats Survey

During the early planning stages of projects under the 2021 LRDP, the following measure shall apply:

- ▶ A data review and biological reconnaissance survey will be conducted within a particular 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. The qualified biologist must be familiar with the life histories and ecology of species in Santa Cruz County and must have experience conducting field surveys of relevant species or resources, including protocol-level surveys for individual species, if applicable. The data reviewed will include the biological resources setting, species tables, and habitat information in this EIR. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDDB, CNPS Inventory of Rare and Endangered Plants of California, consultation with appropriate campus experts (e.g. Campus Natural Reserve Manager) to obtain information on biological resources that may not be captured in other databases, relevant Biogeographic Information and Observation System (BIOS) queries, and relevant general and regional plans. BIOS is a web-based system that enables the management and visualization of biogeographic data collected by CDFW and partner organizations.
- ▶ The qualified biologist will assess the habitat suitability of the project site for all special-status plant and wildlife species as well as sensitive habitats identified as having potential to occur in the LRDP area (refer to Section 3.5.2, "Environmental Setting"), and will identify any wildlife nursery sites (e.g., heron rookeries, bat maternity roosts, monarch butterfly overwintering colonies, deer fawning areas) within the LRDP area and potential ESHAs within project sites that fall within the coastal zone. The qualified biologist will also conduct a preliminary delineation of sensitive habitats (e.g., wetlands, streams, seeps, sensitive natural communities, ESHAs) within the project site. The biologist will provide a report to UC Santa Cruz with evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur within the project site.
- ▶ If the reconnaissance survey identifies no potential for special-status plant, wildlife species, or sensitive habitats to occur, UC Santa Cruz will not be required to apply any additional mitigation measures under Impact 3.5-1 through 3.5-4.
- ▶ If the qualified biologist determines that there is potential for special-status species or sensitive habitats to be present within the project site, the appropriate biological mitigation measures, identified herein shall be implemented.

Mitigation Measure 3.5-1b, as presented on page 3.9-40 of the Draft EIR is amended to state:

Mitigation Measure 3.5-1b: Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for special-status plant species is present within a particular project site, the following measures shall be implemented:

- ▶ Prior to implementation of project activities and during the blooming period for the special-status plant species with potential to occur in a particular project site, as determined during implementation of Mitigation Measure 3.5-1a, a qualified botanist will conduct protocol-level surveys for special-status plants within the project site following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version). The qualified botanist will: 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the Santa Cruz region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW 2018, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including

updated natural communities data at <http://vegetation.cnps.org/>), and 5) be familiar with federal and state statutes and regulations related to plants and plant collecting.

- ▶ If special-status plants are not found, the botanist will document the findings in a report to UC Santa Cruz, and no further mitigation will be required.
- ▶ If special-status plant species are found, the plant will be avoided completely, if feasible (i.e., project objectives can still be met). This may include establishing a no-disturbance buffer around the plants and demarcation of this buffer by a qualified biologist or botanist using flagging or high-visibility construction fencing. The size of the buffer will be determined by the qualified biologist or botanist and will be large enough to avoid direct or indirect impacts on the plant

The first paragraph of Impact 3.5-2, beginning on page 3.5-42 of the Draft EIR is revised as follows:

Table 3.5-3 provides a list of the special-status wildlife species that may occur or are known to occur within the LRDP area. Nineteen special-status wildlife species have been previously documented in the LRDP area: California giant salamander (*Dicamptodon ensatus*), California red-legged frog, foothill yellow-legged frog (*Rana boylei*), Santa Cruz black salamander (*Aneides niger*), southwestern pond turtle (*Actinemys pallida*), Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*), burrowing owl (*Athene cunicularia*), olive-sided flycatcher (*Contopus cooperi*), white-tailed kite (*Elanus leucurus*), Dolloff cave spider (*Meta dolloff*), Empire Cave amphipod (*Stygobromus imperialis*), Empire Cave pseudoscorpion (*Fissilicreagris imperialis*), MacKenzie's Cave amphipod (*Stygobromus mackenziei*), monarch butterfly - California overwintering population (*Danaus plexippus* pop. 1), Santa Cruz telemid spider (*Telema* sp.), Ohlone tiger beetle, American badger (*Taxidea taxus*), mountain lion (*Puma concolor*), and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), (Jones, pers. comm., 2020, CNDDDB 2020, UC Santa Cruz 2005a, Santa Cruz Puma Project 2020).

The discussion of California red-legged frog on pages 3.5-43 and 3.5-44 of the Draft EIR has been amended to state:

California Red-Legged Frog

California red-legged frog is listed as threatened under ESA and is a CDFW species of special concern. California red-legged frog occurs along the Coast Ranges from Mendocino County south to Los Angeles County, and in portions of the Sierra Nevada and Cascade Ranges (CDFW 2008). This species is most abundant within the inner Coast Ranges from Point Reyes, Marin County to southern Santa Barbara County, and within eastern Contra Costa and Alameda Counties (Thomson et al. 2016). Habitat suitable for California red-legged frog is typically characterized by aquatic breeding area (e.g., pools within streams and creeks, ponds, marshes, stock ponds) within a matrix of riparian and upland refugia and dispersal habitat (USFWS 2002b). Adult frogs are nearly always associated with permanent bodies of water (Amphibiaweb 2020). During rainy weather, California red-legged frogs may move overland through upland habitat; however, in general, the species is rarely observed far from water (USFWS 2002b).

California red-legged frog is known to occur within numerous locations in the southwestern portion of the LRDP area (e.g., within Moore Creek), and is known to breed in the Arboretum Pond (Biosearch Environmental Consulting 2020, CNDDDB 2020). No other breeding habitat is known within the LRDP area (Biosearch Environmental Consulting 2020). There are several known occurrences of California red-legged frog within 1 mile of the LRDP area, and the nearest breeding pond outside of the LRDP area is in Upper Dairy Gulch at the Wilder Sand Quarry, approximately 1.2 miles southwest of the LRDP area (Biosearch Environmental Consulting 2020).

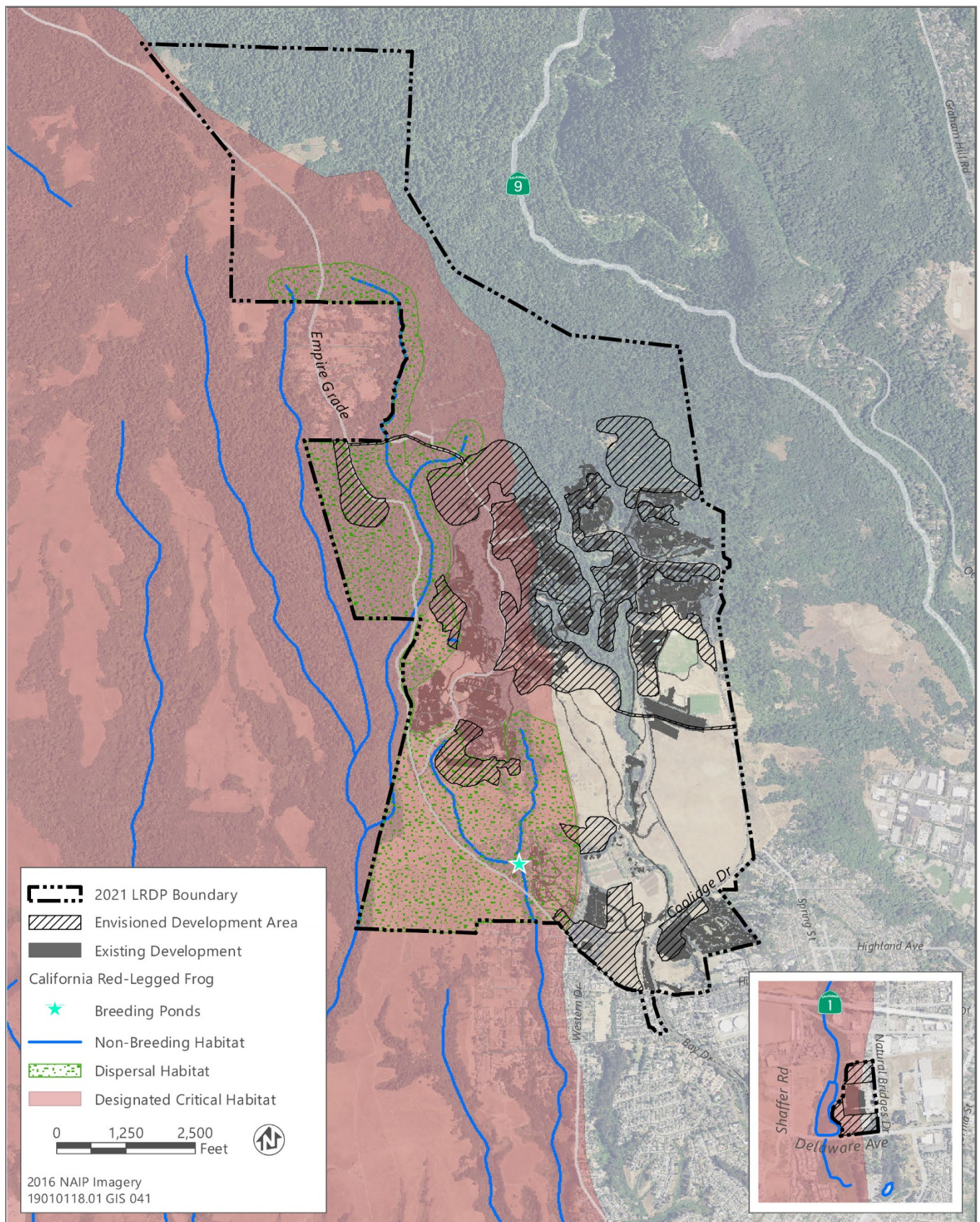
Adult and juvenile California red-legged frogs are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to upland refugia and foraging habitat, or to disperse to new breeding locations. The LRDP area contains upland refugia and dispersal habitat potentially suitable for the species within grasslands, coastal prairie, redwood forest, coastal mixed hardwood, coast oak woodland, northern maritime and shrub, riparian woodland and scrub, and some urban/developed and

landscaped areas that contain ruderal grassland (Biosearch Environmental Consulting 2020). Additionally, the LRDP area contains approximately 970 acres of federally designated critical habitat for California red-legged frog (Figure 3.5-4).

Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the nonbreeding season and typically do not move more than approximately 500 feet into upland refugia habitats (Bulger et al. 2003; Fellers and Kleeman 2007). All known California red-legged frog observations on the UC Santa Cruz campus have been within 300 feet of aquatic habitats (Biosearch Environmental Consulting 2020). However, during migration to other suitable ponds in the region, California red-legged frogs may ~~travel~~ disperse long distances from aquatic habitat (i.e., greater than 1,600 feet) and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). California red-legged frogs breeding within the Arboretum Pond are expected to migrate to aquatic habitat suitable for the species within and outside of the LRDP area because the Arboretum Pond is not perennial (Biosearch Environmental Consulting 2020). California red-legged frog migratory and dispersal movements from the Arboretum Pond to other aquatic habitats are expected to be primarily along Moore Creek both upstream and downstream, and overland to the southwest, west or northwest to aquatic habitats in the Wilder Creek watershed (Biosearch Environmental Consulting 2020, Figure 3.5-7). Movements to the east of the Arboretum pond are not as likely to occur ~~likely would not occur~~ due to the lack of aquatic habitat suitable for California red-legged frog in Jordan Gulch, the City of Santa Cruz, and the lower San Lorenzo River watershed, and the presence of developed areas which would likely impede movement (Biosearch Environmental Consulting 2020, Figure 3.5-7). Additionally, developed areas of the UC Santa Cruz campus contain numerous potential barriers to overland movements (e.g., buildings, retaining walls, decorative walls, parking lots, roads, paths), and while frogs may be able to cross roads, paths, and parking lots, the cumulative barriers and hazards presented by developed areas reduce the likelihood that California red-legged frogs would be present within these areas (Biosearch Environmental Consulting 2020).

Development of new land uses (e.g., buildings, impervious surfaces) under the 2021 LRDP is not planned within the UC Santa Cruz Arboretum and Botanic Garden, or within 500 feet of the Arboretum Pond, so project implementation is not expected to result in loss of breeding habitat for California red-legged frogs or impacts on individual California red-legged frogs while breeding in the Arboretum Pond. However, 2021 LRDP development is planned within grassland, redwood, and northern maritime chaparral habitats north and northwest of the Arboretum Pond near Empire Grade in lower and central campus, in areas that are likely used by California red-legged frogs for upland migration, dispersal, and refuge (Figure 3.5-6, Figure 3.5-7). Implementation of projects under the 2021 LRDP would include ground disturbance, vegetation removal, and land development in several habitats that may provide upland refugia and dispersal habitat suitable for California red-legged frog as described above (Table 3.5-4). These activities could result in loss of or injury to California red-legged frogs if present within upland refugia ~~migration~~ or dispersal habitat within the project site, as well as loss of habitat for the species. This would be a **potentially significant** impact.

Figure 3.5-7 on page 3.5-45 of the Draft EIR was amended to include long-distance dispersal habitat and to remove depiction of a North Loop Road that is not part of the 2021 LRDP.



Source: Data received from Biosearch Environmental Consulting in 2020

[REVISED] Figure 3.5-7 Envisioned Development Areas Overlay of California Red-Legged Frog Potential Sensitive Habitat in the LRDP Area

Mitigation Measure 3.5-2a on pages 3.5-46 and 3.5-47 of the Draft EIR is revised as follows:

Mitigation Measure 3.5-2a: Conduct Site-Specific Habitat Suitability Analysis for California Red-Legged Frog, Obtain Incidental Take Authorization through Consultation with USFWS, Implement Minimization Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that aquatic or upland habitat determined to be suitable for California red-legged frog migration, dispersal, foraging, or refuge is present within a particular project site (~~Biosearch Environmental Consulting 2020, Figure 3.5-7~~), the following measures shall be implemented during the planning stages for each individual project under the 2021 LRDP:

- ▶ A qualified biologist will conduct a site-specific habitat suitability verification analysis to confirm the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in California red-legged frog life history and ecology, 2) be able to correctly identify California red-legged frogs and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW's CNDDDB. The habitat assessment will include, but will not be limited to:
 - Identification or verification of the vegetation communities present in the project site.
 - Consideration of known occurrences within the LRDP area;
 - Description of the project, including proposed project construction activities;
 - Analysis of the type and likelihood of impacts on California red-legged frog as a result of project implementation; and
 - Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of California red-legged frog and habitat.
- ▶ Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration.
- ▶ Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: injury or mortality of California red-legged frog; or disturbance of individuals or adverse effects on California red-legged frog breeding, upland refugia, or dispersal habitat.
 - If a qualified biologist determines that the individual project would have no substantial adverse effect on red-legged frog or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed.
 - For those areas where adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frog cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization for construction-related impacts (e.g., installation of exclusion fencing around the project construction site) and compensatory actions for habitat impacts, including purchase of credits at a conservation bank or creation of additional habitat at a minimum 1:1 mitigation ratio, as well as adaptive management strategies to ensure long-term conservation of mitigation lands. No actions that could adversely affect California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures are implemented.

To the extent the project may result in "take" of the species, UC Santa Cruz ~~may~~ shall pursue incidental take coverage by either pursuing consultation and biological opinion under Section 7 of the federal ESA (where there is some federal nexus) or by developing an HCP, which would require authorization by USFWS under Section 10 of the ESA. Such an HCP could provide long-term conservation and incidental take coverage for species listed under ESA with potential to occur in the LRDP area: California red-legged frog and Ohlone tiger beetle. Typically, HCPs include the following:

- ▶ Measures that UC Santa Cruz will undertake to monitor, minimize, and mitigate for such impacts, the funding available to implement such measures, and the procedures to deal with unforeseen or extraordinary circumstances.
- ▶ Alternative actions to the taking analyzed by UC Santa Cruz, and the reasons why the alternatives were not adopted.
- ▶ Biological goals and objectives, which would define the expected biological outcome for each species covered by the HCP.
- ▶ Adaptive management, which includes methods for addressing uncertainty and also monitoring and feedback to biological goals and objectives.
- ▶ Monitoring for compliance, effectiveness, and effects.
- ▶ Permit duration which is determined by the time-span of the project and designed to provide the time needed to achieve biological goals and address biological uncertainty.

Mitigation Measure 3.5-2e on pages 3.5-51 and 3.5-52 of the Draft EIR is revised as follows:

Mitigation Measure 3.5-2e: Conduct Protocol-Level Surveys for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows

If it is determined through implementation of Mitigation Measure 3.5-1a that habitat suitable for burrowing owl is present within a project site, the following measures shall be implemented prior to and during construction of a particular project under the 2021 LRDP:

- ▶ A qualified biologist will conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of habitat suitable for the species identified during the reconnaissance-level survey (e.g., ruderal grassland, successional grassland, scrub habitat with sparse shrub cover) on and within 1,500 feet of the project site. Surveys will be conducted before the start of project activities and in accordance with Appendix D of the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFW 2012, or most current version) (CDFW Staff Report).
- ▶ If no occupied burrows are found, the qualified biologist will submit a report documenting the survey methods and results to UC Santa Cruz, and no further mitigation will be required.
- ▶ If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), UC Santa Cruz shall establish and maintain a minimum protection buffer of ~~400~~ 165 feet around the occupied burrow throughout construction. The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan will be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls will not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan will include a compensatory habitat mitigation plan (see below).
- ▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows will not be disturbed and will be provided with a protective buffer at a minimum of ~~400~~ 650 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow

can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report.

- ▶ If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, UC Santa Cruz will mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) will be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. UC Santa Cruz will retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
 - Mitigation lands will be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
 - If feasible, mitigation lands will be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
 - If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and will aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.
 - If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan will include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures (e.g., measures required if performance standards and success criteria are not met). Success will be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Mitigation Measure 3.5-2g on page 3.5-55 of the Draft EIR is revised as follows:

Mitigation Measure 3.5-2g: Limit Human Disturbance of Cave Ecosystems

- UC Santa Cruz shall continue to limit visitation of caves on campus and discourage activities by members of the public that could jeopardize the physical integrity, condition, or scientific value of the caves, through exclusion of access to the caves with bat-friendly fencing (i.e., fencing that allows unimpeded ingress and egress by bats), appropriate signage and educational literature, Campus Natural Reserve website information, or other appropriate measures.

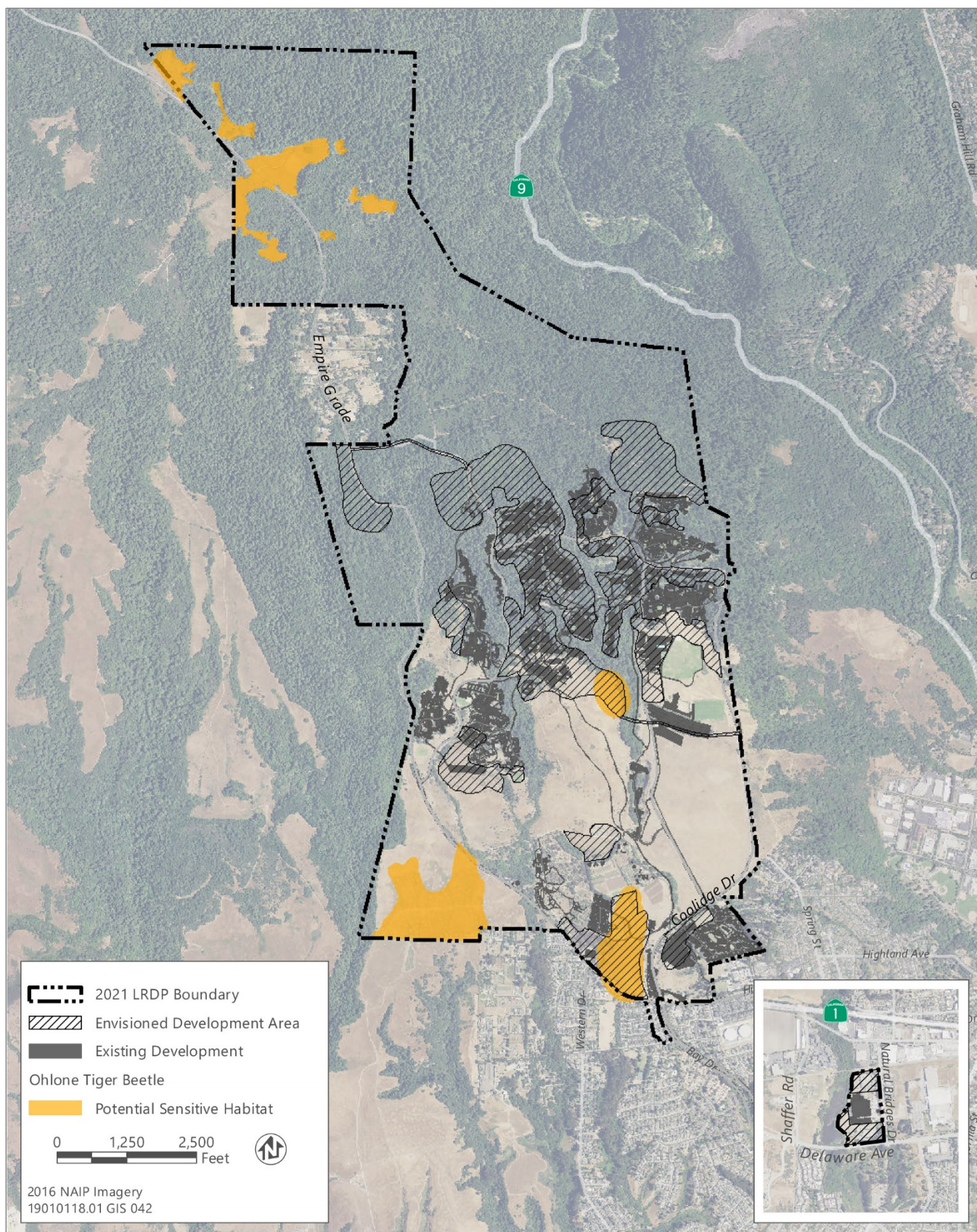
Mitigation Measure 3.5-2h on page 3.5-56 of the Draft EIR is revised as follows:

Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures

If it is determined through implementation of Mitigation Measure 3.5-1a that a monarch overwintering colony or suitable overwintering habitat is present within a particular project site, the following measures shall be implemented:

- ▶ 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.
- ▶ Within 14 days before the onset of project activities that include vegetation removal between October 1st and March 31st, a qualified biologist familiar with monarchs and monarch overwintering habitat will conduct focused surveys for monarch colonies within habitat suitable for the species in the project site and will identify any colonies found within the project site.
- ▶ Monarch overwintering colonies that are identified within a project site will be demarcated with flagging or high-visibility construction fencing to prevent removal of the stand of trees containing the overwintering colony and encroachment by heavy machinery, vehicles, or personnel. Monarch overwintering colonies shall be protected throughout the duration of their presence within a project site. Removal of the tree or stand of trees that contains the overwintering colony will not occur until the monarchs have left the area, as determined by a qualified biologist.
- ▶ If modification or removal of a stand ~~that contains an~~ where overwintering monarchs have been identified overwintering colony is required for project implementation, and the project cannot be redesigned to avoid modification or removal of the stand, ~~vegetation management purposes, then~~ UC Santa Cruz will prepare and implement a site-specific plan for the stand with the goal of maintaining habitat function for the monarch overwintering colony, following ~~feasible~~ recommendations from *Protecting California's Butterfly Groves Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017). Examples of management strategies that could be considered include:
 - remove or trim hazard trees;
 - selectively remove or trim of trees to create a heterogeneous habitat that provides access to sunlight and shade for monarchs;
 - maintain suitable wind protection in the stand; and
 - replace removed trees with native trees in strategic locations to provide additional wind protection.

Figure 3.5-8 on page 3.5-57 of the Draft EIR was amended to remove depiction of a North Loop Road that is not part of the 2021 LRDP.



Source: Data received from Richard A. Arnold, Ph.D. in 2020

[REVISED] Figure 3.5-8 Envisioned Development Areas Overlay of Ohlone Tiger Beetle Potential Sensitive Habitat in the LRDP Area

Mitigation Measure 3.5-2k on page 3.5-61 of the Draft EIR is 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 cinereoargenteus*]). 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.

Mitigation Measure 3.5-5a on page 3.5-72 of the Draft EIR is revised as follows:

Mitigation Measures 3.5-5a: Utilize Wildlife-Friendly Building and Fencing Designs

The following measures shall be implemented during the early planning stages of projects under the 2021 LRDP:

- ▶ Buildings and other permanent structures that would be constructed during implementation of projects under the 2021 LRDP shall be designed to minimize impacts on wildlife, including disruption to wildlife movement, bird strikes, and wildlife entanglement.
 - 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) or other appropriate resources (e.g., International Dark Sky Association). 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.

- Fencing associated with new development under the 2021 LRDP will utilize wildlife-friendly fencing design to minimize the risk of entanglement or impalement of wildlife. UC Santa Cruz will require the review of fencing design by a qualified biologist prior to installation. The fencing design shall meet, but not be limited to the following standards:
 - Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes).
 - Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass.
 - Allow smaller wildlife to pass under easily without injury or entrapment.

The fifth bullet of Mitigation Measure 3.5-7 on page 3.5-74 is revised as follows:

- ▶ As noted in Mitigation Measures 3.5-2a and 3.5-2i, UC Santa Cruz may elect to pursue a comprehensive HCP, which shall be accomplished either by amending the Ranch View Terrace HCP or by incorporating and replacing the existing Ranch View Terrace HCP.

4.8 SECTION 3.6, ENERGY

The final paragraph of Section 3.6.3 on page 3.6-12 of the Draft EIR is revised as follows:

~~The Campus~~ Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES (UC Santa Cruz 2017). UC Santa Cruz is also in the process of installing the aforementioned, on-site (2.1 MW) solar array above the East Remote parking lot. Solar arrays would also be installed on the campus as part of the Student Housing West project to provide some of the electricity needed in the new housing. Though solar facilities may be installed on campus as part of the 2021 LRDP, it is conservatively assumed that those facilities would not be operated as part of the analysis in this section.

Table 3.6-5 on page 3.6-15 of the Draft EIR is revised as follows:

Table 3.6-5 Per-Capita Annual Energy Consumption with 2021 LRDP Implementation Compared to Existing Conditions

Annual Energy Metrics	2019 Existing	2040 Net Increase (with 2021 LRDP)	Percent Change
Building Electricity Use (kWh)	48,479,557	32,282,652	NA 67%
Building Natural Gas Use (therms)	4,954,650	873,967	NA 18%
Transportation Gasoline Use (gal) ¹	2,580,660	980,939	NA 38%
Total MMBTU ²	983,050	320,033	NA 33%
Population	22,344	12,830	NA 57%
kWh per capita	2,170	2,516	16%
therms per capita	222	68	-69%
Gasoline gallons per capita	115	76	-34%
MMBTU per capita	44	25	-43%

Notes: gal = gallons; kWh = kilowatt hours; MMBTU = million British thermal units; NA = not applicable

¹ Includes both fleet and non-fleet mobile fuel use.

² Excludes transportation-related diesel, natural gas, and electricity use.

Source: Data provided by Ascent Environmental, Inc. in 2020

4.9 SECTION 3.8, GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

The discussion of the Association of Monterey Bay Area Governments on page 3.8-12 of the Draft EIR is revised as follows:

Association of Monterey Bay Area Governments

The Association of Monterey Bay Area Governments (AMBAG) serves as the MPO for Monterey, San Benito and Santa Cruz Counties. In accordance with SB 375, AMBAG has prepared a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) that integrates land use and transportation planning at a regional level to achieve GHG emission reduction targets from passenger vehicles. The most recent MTP/SCS is Moving Forward Monterey Bay 2040, which was adopted in June 2018. CARB set a target for the Monterey Bay Area of 5 percent reduction from 2005 per capita GHG emissions for the year ~~2035~~ 2030. The MTP/SCS demonstrates the region's ability to exceed the GHG emission reduction target set forth by CARB through transportation investments, strategic land use development, and performance measures (AMBAG 2018).

4.10 SECTION 3.10, HYDROLOGY AND WATER QUALITY

The first sentence of the fourth paragraph on page 3.10-11 of the Draft EIR is revised as follows:

The head of the Moore Creek East Fork is located just west of University House and drains the central and south portion of campus from Meyer Drive south to the Arboretum Dam, ~~as shown in Figure 3.10-4.~~

The last sentence of the third paragraph on page 3.10-24 has been amended to state:

Aquifer analysis indicated the well is completed in a ~~highly permeable~~ high yielding area of the karst aquifer, with the ability to provide a sustained pumping rate of 100 gpm without dewatering the well, or creating any pumping drawdown at identified spring locations over 2000 feet away (Johnson and Weber & Associates 1989).

The last sentence of the first full paragraph on page 3.10-25 has been amended to state:

The study concluded that WSW#1 is hydraulically connected to major portions of the karst aquifer and ~~that groundwater can be extracted from well WSW#1 without substantially reducing the flow rates of any individual spring in the area~~ therefore, if pumped, is unlikely to substantially affect the discharge of any individual spring or springs.

The first full paragraph on page 3.10-26 of the Draft EIR has been revised as follows:

Thirteen recognized springs, seeps or spring fed streams that are linked to the karst aquifer have been mapped to outcrop on- and off-campus. Monthly to semi-annual monitoring of flows from these surface water locations has been conducted by UC Santa Cruz since 1984; currently, nine are being monitored for flow monthly. In 2011, UC Santa Cruz obtained permission from the City of Santa Cruz Water Department (Water Department) to access and retrofit an existing weir that has been used by the Water Department to measure Bay Street Spring flow rates since 1980. The weir is housed inside a manhole on Water Department property just east of Bay Street, adjacent to, and upstream of the Bay Street Spring monitoring station that had been monitored since 1984. The weir was retrofitted with a stilling well and an electronic pressure transducer was installed and secured to the inside of the stilling well. The transducer is calibrated to record the height of water flowing over the 90 degree V-notch weir once every 12 hours in order to obtain high resolution spring flow monitoring data. A histogram of the continuous monitoring data that has been collected since June 2011 is shown on Figure 3.10-6. The high-resolution spring flow data confirms an almost immediate response to individual precipitation events and a strong seasonal trend of increased flow through the wet season, followed by a slow and steady period of reduced flow through the rest of the year during the drier months to base flow levels. Base flows are generally higher during wetter years and lower during the drier years. Construction related to the Bay Street Reservoir Replacement Project in 2013 (located ~500 feet

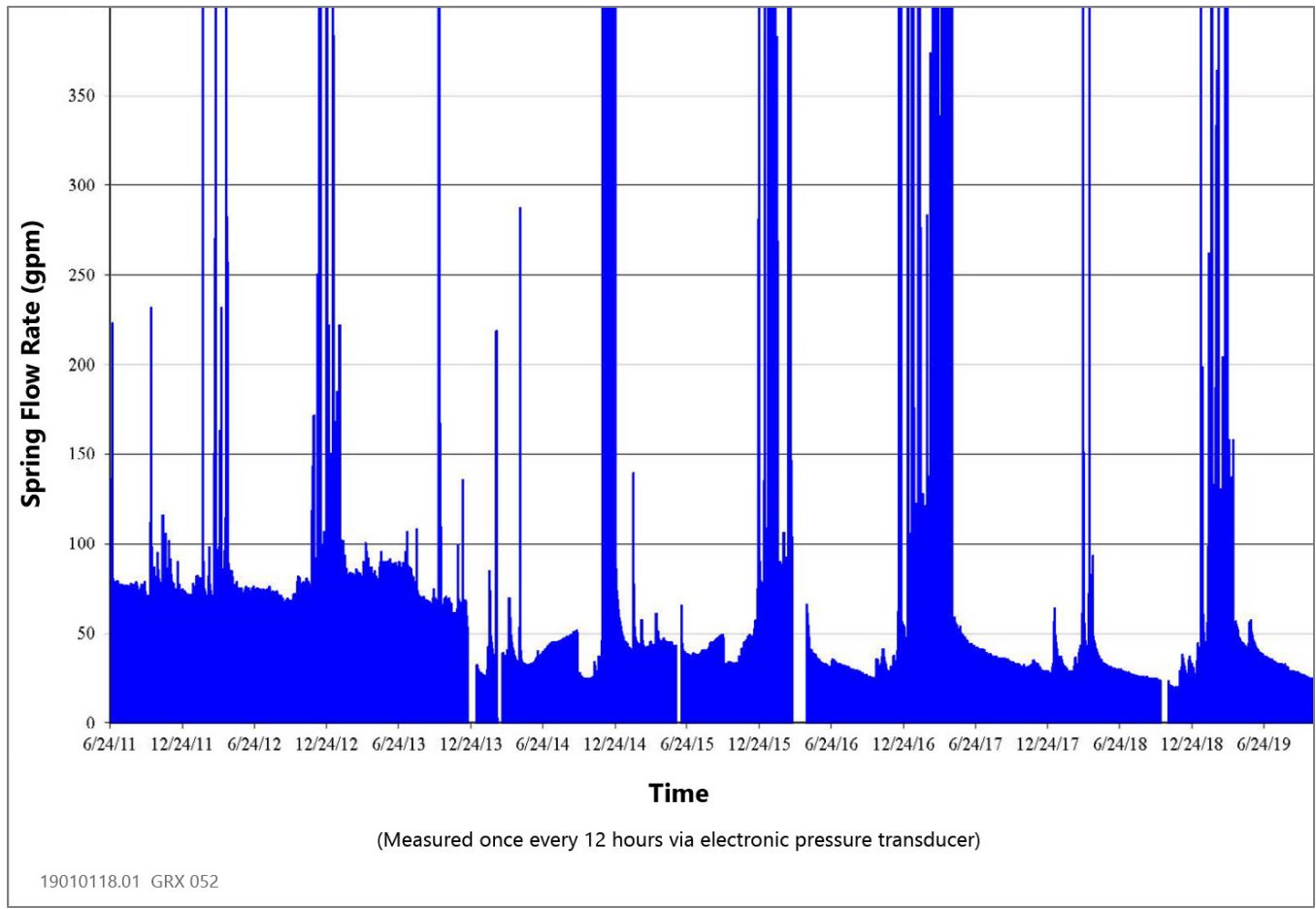
north of the weir manhole) periodically and briefly affected observed spring flow at the weir manhole location due to brief diversions of the sub-drain system that delivers the spring water to this location. Following a mid-December 2013 diversion of the sub-drain system that was conducted in connection with the Bay Street Reservoir Replacement Project flows at the weir manhole dropped by more than half of the historic base flow rate (i.e., from about 65 gpm to less than 30 gpm). This is observed on Figure 3.10-6. It is suspected that when the sub-drain was plugged for downstream retrofitting the backpressure likely ruptured the historic piping resulting in upstream flow loss to the subsurface. All data collected following this incident appears to be erroneous with respect to the long-term record; however, strong seasonal trends are still observed.

In addition, groundwater levels are measured in three wells that are completed in the karst aquifer in lower Jordan Gulch. The monitoring locations are shown on Figure 3.10-5. Because wet season measurements are influenced by the amount and timing of rainfall, there is more variation in wet season measurements. The dry season measurements represent base flow conditions and are therefore more suitable for year-to-year comparisons. The monitoring has indicated that development activities on campus have not created a measurable increase or decrease in flow rates at any of the springs and streams monitored, and have not affected groundwater elevations in on-campus monitoring wells (Weber, Hayes and Associates 2019a). A statistical summary of the monitoring data gathered by UC Santa Cruz since 1984 that is grouped by water year type, including average, maximum, minimum spring flows and standard deviation for spring or spring fed stream discharge data, and water surface elevations for the monitoring wells is presented in Table 3.10-5. Table G1-1 in Appendix G presents a summary of all monitoring data since 1984.

Continuous Water Level Monitoring

In August 2007, UC Santa Cruz installed dedicated electronic pressure transducers in wells WSW#1, MW-1A, and MW-1B, see Figure 3.10-5). The transducers are programmed to record water level data once every 12 hours to obtain high-resolution data of seasonal water level fluctuations in these wells. These transducers continue to record water levels to date. Hydrographs of water level fluctuations from wells WSW#1, MW-1A, and MW-1B along with superimposed monthly precipitation data are shown on Figure 3.10-7. The high-resolution data set confirms a strong seasonal trend of rapid groundwater recharge and water level rise after the start of winter rainfall followed by a slow and steady period of groundwater decline through the rest of the year during the drier months. Water levels in wells WSW#1 and MW-1A fluctuate in tandem, with nearly identical response to aquifer recharge and drainage. Seasonal water level rise observed in these wells since 2007 has ranged from approximately 43 feet during the wettest period monitored (i.e., ~36.5 inches of precipitation between December and March of the 2016-2017 water year) to approximately 2.5 feet during the 2013-2014 water year when only approximately 14 inches of precipitation was recorded for the entire water year. Data collected from well MW-1B indicates a similar recharge pattern as that observed in nearby wells WSW#1 and MW-1A, yet on a much smaller scale and with a time lag (i.e., observed to be on the order of a few days to several weeks). As noted in the Campus Wells Section, MW-1B is evidently completed in a separate hydraulic fracture regime, and shows a distinctly higher water level (i.e., 40 to 50 feet higher), and no pumping influence from pumping in WSW#1 in 1989 or 2007. Groundwater elevations are generally higher during wetter years and lower during the drier years. Most notably, during both wetter and drier years, dry season base water levels observed for wells WSW#1 and MW-1A have only varied by approximately 10 feet, with the base level following the driest years ever recorded in California state history being the lowest observed for the continuous water level monitoring data set. This relatively small fluctuation in base water levels from wetter years to several consecutive years of drought suggests a significant aquifer storage capacity in this area of the karst.

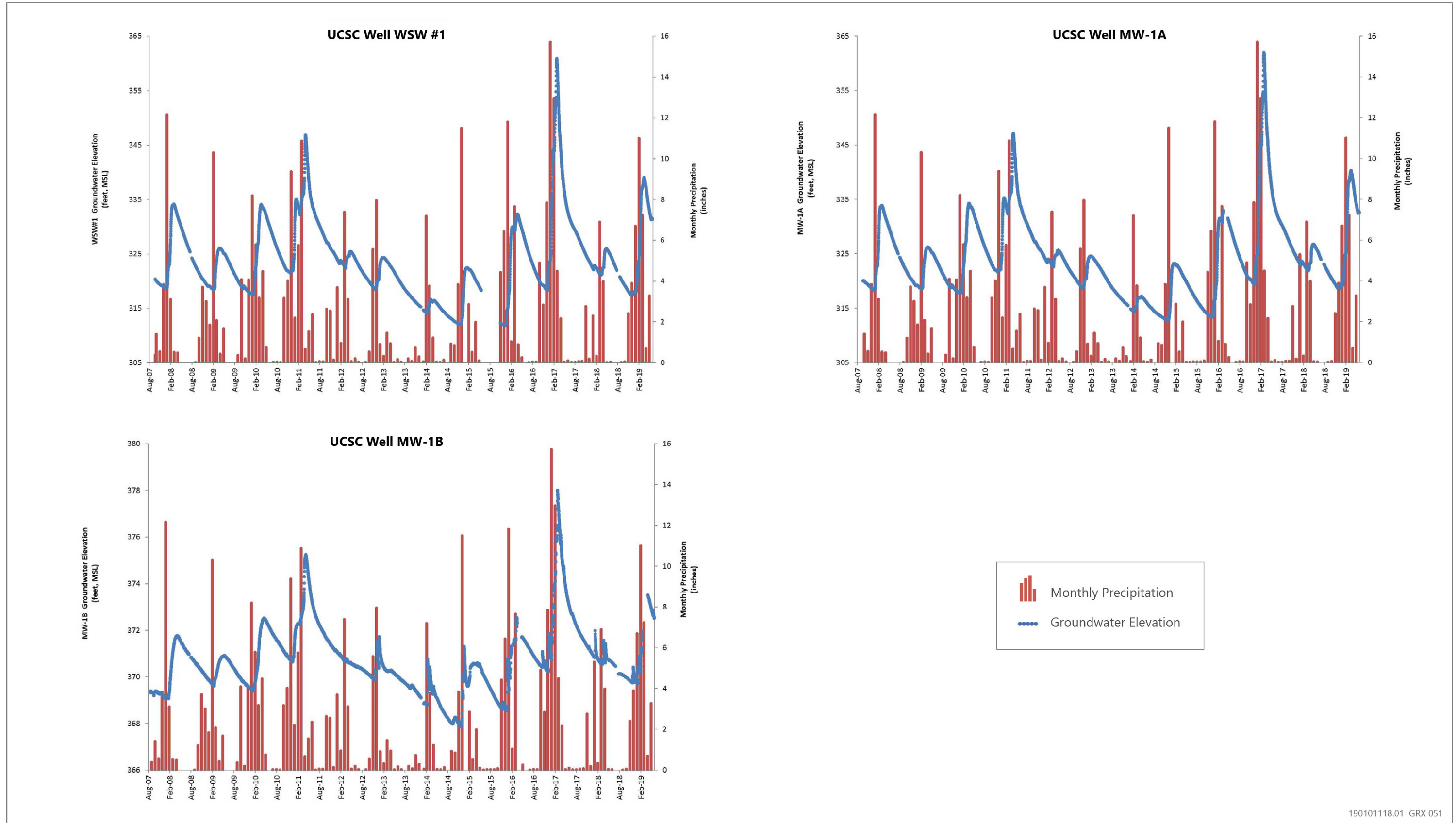
Figures 3.10-6 and 3.10-7 have been added to this section, prior to the presentation of Table 3.10-5 on page 3.10-27 of the Draft EIR.



Source: [Data provided by 2NDNATURE in 2021.](#)

Figure 3.10-6 Bay Street Spring Flow Data

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Source: Data provided by 2NDNATURE in 2021.

Figure 3.10-7 Temporal Water Level Fluctuation and Monthly Precipitation Data for On-Campus Wells

Table 3.10-5 on page 3.10-27 of the Draft EIR has been amended to include additional data regarding spring and stream flow rates.

Table 3.10-5 Statistical Summary of Spring and Stream Flow Rates and Groundwater Elevation

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW-1
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC, ft MSL)	418.69 (TOC, ft MSL)	416.41 (TOC, ft MSL)
Statistical Summary (Per Monitoring Event)															Total Q gpm	Average	Average	Average
Flow Rate	gpm															ft MSL	ft MSL	ft MSL
Average	110.55	66.44	50.57	160.97	23.05	7.75	13.6	221.75	58.29	13.04	46.45	63.26	450.65	4.32	1,290.7	320.85	368.21	326.44
Std Dev (average only)	37.09	86.27	28.68	252.47	22.95	42.07	37.87	108.65	97.61	15.84	173.86	188.75	697.14	6.05		9.18	6.08	8.62
Maximum	230.89	451.14	236.62	1865.512	116	298.3	181.57	719.58	761.5	64.61	1239.94	1357.45	4944.03	29.2	NA	356.23	376.44	369.12
Minimum	21	0	3.6	0	0	0	0	80.27	2.8	1.23	0	1.9	7.73	0	NA	308.13	321.12	311.78
June-October Average	93.71	18.57	36.74	82.22	7.02	0	2.36	201.87	32.24	5.73	3.32	10.57	141.90	1.99	638.29	318.79	368.89	324.44
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	178.31	107.16	81.57	259.65	37.18	12.50	21.93	357.68	94.02	21.04	74.93	102.04	726.91	6.97	2,081.91	NA	NA	NA

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC, ft MSL)	418.69 (TOC, ft MSL)	416.41 (TOC, ft MSL)

Statistical Summary (Per Monitoring Event in Very Dry Years, < 23.5 in/yr precipitation)

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Flow Rate	gpm														Total Q gpm	Ave. ft MSL	Ave. ft MSL	Ave. ft MSL
Average	116.1	25.3	40.9	52.0	1.3	0	0.7	196.4	47.7	10.2	0	10.6	214.6	1.3	716.9	315.6	368.3	314.2
Std Dev (average only)	33.6	27.4	14.5	49.5	0.6	0	0.5	105.7	52.9	8.7	0	8.0	176.4	0.8	NA	5.6	1.1	2.0

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Maximum	147.1	95.7	58.7	158.0	1.9	0	1.0	398.7	152.0	22.1	0	21.9	500.0	2.0	NA	327.0	370.4	316.2
Minimum	21.0	0.0	3.6	0.0	0.8	0	0.0	113.1	10.0	2.2	0	5.0	28.7	0	NA	310.5	367.3	312.1
Dry Season Average (June-Sept.)	104.3	8.8	31.0	26.8	0.8	0	0.5	162.1	17.8	3.1	0	5.0	102.0	1.0	463.1	313.5	367.8	312.1
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	187.2	40.7	65.9	83.9	2.1	0	1.1	316.8	76.9	16.4	0	17.2	346.1	2.0	1156.4	NA	NA	NA
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC, ft MSL)	418.69 (TOC, ft MSL)	416.41 (TOC, ft MSL)

Statistical Summary (Per Monitoring Event in Dry Years, 23.5 - 33.2 in/yr precipitation)

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Flow Rate	gpm														Total Q gpm	Ave. ft MSL	Ave. ft MSL	Ave. ft MSL
Average	117.4	39.6	48.1	80.2	27.0	0	3.4	191.0	24.7	7.8	9.1	6.9	274.5	3.6	833.3	315.6	366.3	324.3
Std Dev (average only)	32.3	39.3	17.2	58.5	18.0	0	5.3	46.3	40.0	8.6	8.5	3.1	417.3	7.7	NA	4.8	8.8	9.0
Maximum	180.0	175.9	108.2	245.8	70.4	0	18.8	390.7	201.0	40.0	23.5	12.6	2617.0	25.0	NA	323.2	370.4	369.1
Minimum	23.0	0.0	12.0	0.0	0.0	0	0.8	114.5	2.8	1.2	1.0	1.9	7.7	0.0	NA	308.1	321.1	313.0
Dry Season Average (June-Sept.)	95.3	7.1	34.5	50.2	11.6	0	0.9	184.5	15.3	6.1	2.6	5.9	93.7	0.2	508.0	315.3	368.3	322.7
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	189.31	63.87	77.61	129.44	43.54	0	5.49	308.05	39.91	12.64	14.65	11.18	442.73	5.74	1344.15	NA	NA	NA
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC, ft MSL)	418.69 (TOC, ft MSL)	416.41 (TOC, ft MSL)

Statistical Summary (Per Monitoring Event in Normal Years, 33.2 - 51.1 in/yr precipitation)

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Flow Rate	gpm														Total Q gpm	Ave. ft MSL	Ave. ft MSL	Ave. ft MSL
Average	112.0	76.0	48.5	170.7	20.0	11.6	11.4	212.9	37.4	8.1	9.9	34.0	438.5	2.7	1193.6	321.7	367.6	328.0
Std Dev (average only)	33.8	80.0	26.1	192.2	34.0	57.3	30.1	93.3	58.3	10.0	24.7	53.9	582.8	1.9	NA	7.4	5.7	7.0
Maximum	192.3	309.5	155.6	1110.6	116.0	298.3	157.9	559.5	329.0	48.7	117.9	175.0	3040.6	7.5	NA	340.5	372.7	339.0
Minimum	36.0	0.0	7.8	0.0	0.0	0.0	0.8	92.1	2.9	1.2	0.0	2.6	21.3	0.0	NA	310.7	336.8	311.8
Dry Season Average (June-Sept.)	88.0	21.9	38.1	120.9	0.0	0.0	3.1	189.4	20.4	4.3	0.9	13.5	186.0	1.5	687.9	320.8	368.9	328.3
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	180.7	122.6	78.2	275.4	32.2	18.7	18.4	343.4	60.4	13.1	16.0	54.8	707.3	4.3	1925.3	NA	NA	NA
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC. ft MSL)	418.69 (TOC. ft MSL)	416.41 (TOC. ft MSL)

Statistical Summary (Per Monitoring Event in Wet Years, 51.1 - 71.0 in/yr precipitation)

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Flow Rate	gpm														Total Q gpm	Ave. ft MSL	Ave. ft MSL	Ave. ft MSL
Average	131.4	190.0	71.8	440.0	--	12.1	40.0	288.4	72.1	25.6	173.3	225.1	1054.8	8.5	2733.1	328.9	371.4	329.3
Std Dev (average only)	47.7	128.0	29.4	294.5	--	34.6	68.6	133.5	61.9	19.4	361.8	388.5	1266.6	6.8	NA	6.6	1.3	8.5
Maximum	230.9	406.8	135.4	971.5	--	115.7	181.6	574.7	233.5	64.6	1239.9	1357.5	4944.0	20.0	NA	340.0	373.1	344.6
Minimum	70.0	16.7	30.0	123.4	--	0.0	1.0	80.3	11.6	5.5	0.0	3.4	132.3	0.5	NA	319.9	369.5	316.4
Dry Season Average (June-Sept.)	94.3	59.8	52.5	159.0	--	0.0	1.5	303.3	38.8	9.9	0.0	27.0	212.8	1.2	960.1	327.2	371.1	327.3

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	212.0	306.5	115.7	709.7	--	19.6	64.5	465.2	116.2	41.3	279.5	363.0	1701.5	13.7	4408.5	NA	NA	NA
Surface Elevation	235 ft MSL	255 ft MSL	255 ft MSL	310 ft MSL	250 ft MSL	200 ft MSL	110 ft MSL	150 ft MSL	435 ft MSL	500 ft MSL	540 ft MSL	330 ft MSL	330 ft MSL	410 ft MSL		424.84 (TOC, ft MSL)	418.69 (TOC, ft MSL)	416.41 (TOC, ft MSL)

Statistical Summary (Per Monitoring Event in Very Wet Years, > 71.0 in/yr precipitation)

Location	Bay Street Spring	West Lake Outlet	Messiah Lutheran Spring	Kalkar Spring Quarry	High-Longview Spring	Wagner Grove Seep	Harvey West Seep	Pogonip Creek System	Pogonip Spring #1	Pogonip Spring #2	Upper Cave Gulch	Lower Cave Gulch	Wilder Creek Spring	Moore Creek Spring		MW-1A	MW-1B	WSW 1
Flow Rate	gpm														Total Q gpm	Ave. ft MSL	Ave. ft MSL	Ave. ft MSL
Average	84.2	197.3	105.2	875.8	--	3.9	9.4	365.3	271.3	30.1	189.6	126.8	992.4	10.6	3262.0		338.3	
Std Dev (average only)	29.5	181.4	78.3	762.7	--	3.9	4.4	187.3	290.1	24.7	189.6	121.0	785.6	11.1	NA		13.0	#DIV/0!
Maximum	116.0	451.1	236.6	1865.5	--	7.8	13.8	646.9	761.5	59.0	379.3	247.8	1991.6	29.2	NA		356.2	
Minimum	36.0	23.1	30.0	111.8	--	0.0	5.0	155.6	24.0	1.2	0.0	5.9	156.7	0.0	NA		324.1	
Dry Season Average (June-Sept.)	36.0	27.7	81.0	155.4	--	0.0	0.0	244.3	203.0	10.6	0.0	0.0	294.8	0.0	1052.8		327.8	326.6
Annual Flow	acre-feet/year														Total Q acre-feet/year	NA	NA	NA
Average	135.9	318.2	169.8	1412.7	--	6.3	15.2	589.2	437.6	48.6	305.9	204.6	1600.8	17.0	5261.6	10523.3	NA	

Notes: gpm = gallons per minute, ft MSL = Feet above Mean Sea Level, TOC = Top of Casing elevation, NA = Not Applicable, Q = Discharge Flow

Source: UC Santa Cruz 2020.

The third sentence of the impact summary on page 3.10-30 for Impact 3.10-2 has been amended to state:

Compliance with the CGP requires ~~a) development of a Storm Water Pollution Prevention Plan (SWPPP) for projects disturbing 1 acre or more and, or b) preparation of an Erosion and Sediment Control Plan for projects less than 1 acre in accordance with the Campus Standards Handbook~~ requires preparation of an Erosion Control and Sediment Control Plan for projects less than 1 acre. Compliance with the CGP and the Campus Standards Handbook would ~~and the Storm Water Management Program~~ to minimize erosion and sedimentation during construction.

The second full paragraph on page 3.10-31 is amended to state:

For projects less than one acre, the Campus Standards Handbook requires preparation of an Erosion Control and Sediment Control Plan, which ensures that, as part of The Construction Site Stormwater Runoff Control program elements that are included in the UC Santa Cruz Storm Water Management Program are designed to ensure that through project specific analysis, appropriate BMPs are incorporated into the project. During construction, campus inspectors routinely inspect the project to confirm compliance with the project plans.

Mitigation Measure 3.10-5b on page 3.10-36 of the Draft EIR is revised as follows:

Mitigation Measure 3.10-5b: On-Going Groundwater Level and Spring Flow Monitoring

If the existing well WSW#1 or a new groundwater well is used for extraction, UC Santa Cruz shall perform monitoring of water levels within that well and any other campus wells completed in the karst aquifer on ~~an annual~~ a continuous basis when groundwater pumping occurs. UC Santa Cruz shall also conduct, at a minimum, monthly-equivalent flow monitoring of those springs in the vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. Monitoring of the springs shall also include an assessment of surface water resources (i.e., habitats, plant species, and wildlife species) for a distance of 500 feet downgradient from the daylighting of connected springs at least 30 days prior to and after groundwater pumping to determine if there are any changes or adverse effects in the condition of these resources that may be attributed to changes in spring discharge as a result of groundwater pumping.

If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period ~~that includes both wetter and drier years~~ coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding ~~rainfall season~~ water year type. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, ~~with consideration of associated seasonal rainfall grouped by water year types.~~ As new monitoring data becomes available, UC Santa Cruz will continually update the statistical analysis.

4.11 SECTION 3.13, POPULATION AND HOUSING

The first paragraph under the subheading "Growth Projections" on page 3.13-8 of the Draft EIR is revised as follows:

Growth Projections

AMBAG produced regional growth projections through 2040 for the entire AMBAG planning area as well as counties and incorporated cities within its jurisdiction. Table 3.13-8 identifies AMBAG's growth projections for the City of Santa Cruz and Santa Cruz County. AMBAG projects that the city's employment growth rate would increase as the population levels rise through 2040. The city is expected to have higher population, housing, and employment percentage growth rates than the county based on AMBAG projections. As shown

in Table 3.13-8, employment, population, and housing within the city are anticipated to increase by approximately 20-30 percent between 2015 and 2040, while countywide (incorporated cities and unincorporated area) is anticipated to increase by approximately 10-20 percent between 2015 and 2040. The rate of growth seen recently in the city and county vary from The AMBAG growth projections. ~~contradict the trends seen recently in both the city and the county.~~ However, as shown in Table 3.13-5, substantial housing growth has been approved and is also newly proposed in the city, which would comport with a reversal of growth rates.

The impact summary for Impact 3.13-1, provided on page 3.13-10 of the Draft EIR, is amended to remove an extra space as follows:

Implementation of the 2021 LRDP would allow physical development to accommodate projected increases in student enrollment, UC Santa Cruz faculty/staff, non-UC employees, and on-campus faculty/staff families/dependents, up to the levels anticipated when the campus was founded. To account for projected increases in the total on-campus population, the 2021 LRDP would provide additional housing on the main residential campus and potentially at the Westside Research Park. Up to 28,000 students (baseline plus project) would be accommodated by the plan, and this is consistent with regional growth projections. The 2021 LRDP sets aside an adequate amount of land for housing to accommodate 100 percent of the increase in student enrollment above 19,500 and for 25 percent of the increase in the number of employees, based on demand. Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff, and non-UC employees for whom on campus housing would not be accommodated. However, other data, such as affordability, suggest a tighter housing market. Further, due to the recent (summer 2020) loss of homes associated with the CZU Lightning Complex fire, 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**.

Table 3.13-11 on page 3.13-12 of the Draft EIR is revised as follows:

Table 3.13-11 Baseline and Projected On-Campus Housing Capacity and Demand

	New Housing Under 2021 LRDP (Compared to 2018–2019)	Projected Housing Demand	Demand Not Provided on Campus	Would All of the Increased Housing Demand Be Accommodated On-Campus?
Student Housing (beds)	8,500 ¹	9,482 students	982 beds	No
Employee Housing(homes)	558	2,550 employees	1,992 residences	No
Totals	9,058	12,032	2,974 12,032	

Source: UC Santa Cruz 2020a

The fourth paragraph on page 3.13-12 is amended to clarify:

The 2021 LRDP would accommodate a projected increase in enrollment of 9,482 students between the 2018-2019 and 2040-2040 academic years. If it is assumed that all new students are also from outside the UC Santa Cruz commute-, this would equate to a demand for 9,482 new beds (one bed per student). The project would add up to 8,500 beds. This would result in a demand for an additional 982 beds that would not be provided on campus.

The second to last paragraph on page 3.13-12 of the Draft EIR is revised as follows:

Moreover, an additional 558 housing units ~~2,550~~ for employees would be provided ~~with housing~~ on campus ~~for 558 in~~ under the 2021 LRDP. Assuming all employees would be new residents, which is an overstatement, this would create a demand for an additional 1,992 residences, assuming each employee lives in their own residence. This is an oversimplification of potential demand, as it would be expected that some employees

already live in the region, some may share residences with others, etc., but it would be speculative to specify more refined estimates of demand for residences over the next 20-year period.

4.12 SECTION 3.14, PUBLIC SERVICES

Impact 3.14-3, beginning on page 3.14-11 of the Draft EIR, is revised as follows:

Impact 3.14-3: Impacts on School Facilities

The increase in campus population, particularly faculty and staff (who may have children) that is expected to occur under the 2021 LRDP could result in increased enrollment at area schools. However, adequate existing capacity coupled with projections of decreased enrollment in SCCS suggests that additional students can be accommodated in existing classrooms. No new facilities would be needed. Therefore, this impact would be **less than significant**.

Under the 2021 LRDP, the number of students and faculty/staff living on campus is anticipated to increase, which could contribute additional primary and secondary students to local school districts. The largest area of potential impact would be the SCCS, because housing would be provided on campus (within the SCCS boundaries) for 558 employees (faculty/staff). While housing would also be provided for students, the number of school-age children associated with enrolled college students is expected to be minimal given their typical age range. However, to be conservative, this Draft EIR assumes that the 140 units dedicated to on-campus student family housing would be occupied by newly enrolled students with children. Based on student generation rates established by SCCS, a new dwelling unit (for faculty/staff and existing student family housing units) would generate 0.273 students for grades K-6, and 0.207 students for grades 7-12 (City of Santa Cruz 2011). As noted above, student enrollment for SCCS schools is anticipated to decrease through the 2024-2025 academic school year.

A total of 558 new dwelling units for faculty and staff housing is expected to generate 153 students in grades K-6 and 116 students in grades 7-12. The existing 140 student family housing units would generate 38 students in grades K-6 and 30 students in grades 7-12. As shown in Table 3.14-1, SCCS schools have a combined available capacity to accommodate 922 students. Even if all children living in on-campus student family housing and ~~of~~ the roughly 1,650 faculty/staff not living on campus lived in the SCCS (resulting in 450 K-6 students and 341 grade 7-12 students), or a total of ~~4,055~~ 1,123 students, they would barely exceed the forecasted capacity of SCCS schools. Realistically, a sufficient percentage of faculty and staff would live outside the SCCS in more dispersed communities, that the capacity of SCCS schools is not expected to be exceeded. Further, SCCS has established procedures for interdistrict transfers to students who would otherwise attend a different district. SCCS existing schools have adequate capacity to serve existing enrollment levels in addition to enrollment generated by the 2021 LRDP. Some percentage of faculty/staff may reside in areas outside the SCCS. Based on the available information noted above, the nearby school districts have available capacity to accept new students and declining enrollment. Given that, only a fraction of the total 1,055 estimated students generated by employees associated with the 2021 LRDP would attend schools in these districts, it is expected that adequate capacity will be available to accommodate these students. Therefore, implementation of the 2021 LRDP would have a **less-than-significant** impacts on schools.

4.13 SECTION 3.15, RECREATION

The last paragraph on page 3.15-11 of the Draft EIR is revised as follows:

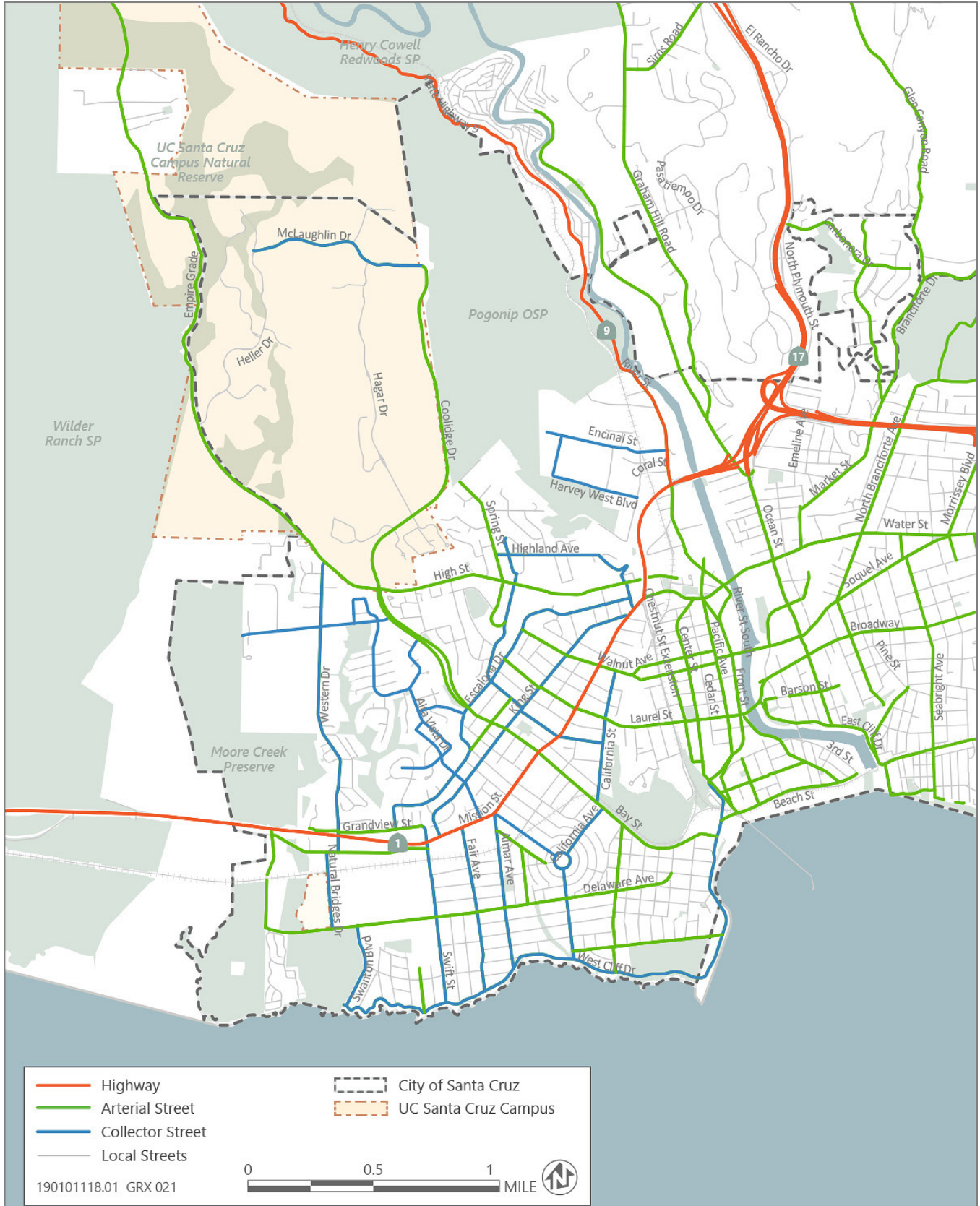
~~As shown on Figure 3.5-1, n~~New unpaved multi-use trail networks include east-west connections from Wilder Ranch State Park to Henry Cowell State Park and Pogonip City Park; and north-south trail networks through Moore Creek Preserve and the Great Meadow, connecting to the east-west trail network in the north campus. Additional trail improvements could include improved connections ng between the Spring Trail and to Spring Street within the LRDP area, ~~and Spring Box Trail to~~ The Spring Trail also provides pedestrian connection to Highway 9. Trail corridors that provide access to research areas would be limited to pedestrians only, such as Red Hill Road gravel fire road in the North Campus.

4.14 SECTION 3.16, TRANSPORTATION

The first paragraph on page 3.16-9 of the Draft EIR is revised as follows:

[...]in 2018. As part of the 2040 MTP/SCS, AMBAG worked closely with stakeholders to develop a new growth forecast and an updated multimodal transportation network with land use patterns and strategies based on reasonably available revenues. AMBAG developed the 2040 MTP/SCS in close coordination with its three regional transportation planning agencies (RTPAs). Each of the three counties in the Monterey Bay Area has a RTPA responsible for countywide transportation planning and implementation. The three RTPAs consist of the Transportation Agency for Monterey County, the Santa Cruz County RTC and the San Benito County Council of Governments. AMBAG also worked in close coordination with the region's transit operators, local jurisdictions, Caltrans, the Monterey Bay Area Air Resources District, state and federal resource agencies, local agency formation commissions and other special purpose public agencies. The regional growth forecast expressed and included as part of the 2040 MTP/SCS identifies a growth in student enrollment by 2040 to between 27,000 and 28,000 FTE (AMBAG 2018). The MTP/SCS also considers the UC Santa Cruz transit service to be a regionally significant local transit service (AMBAG 2018:2-10).

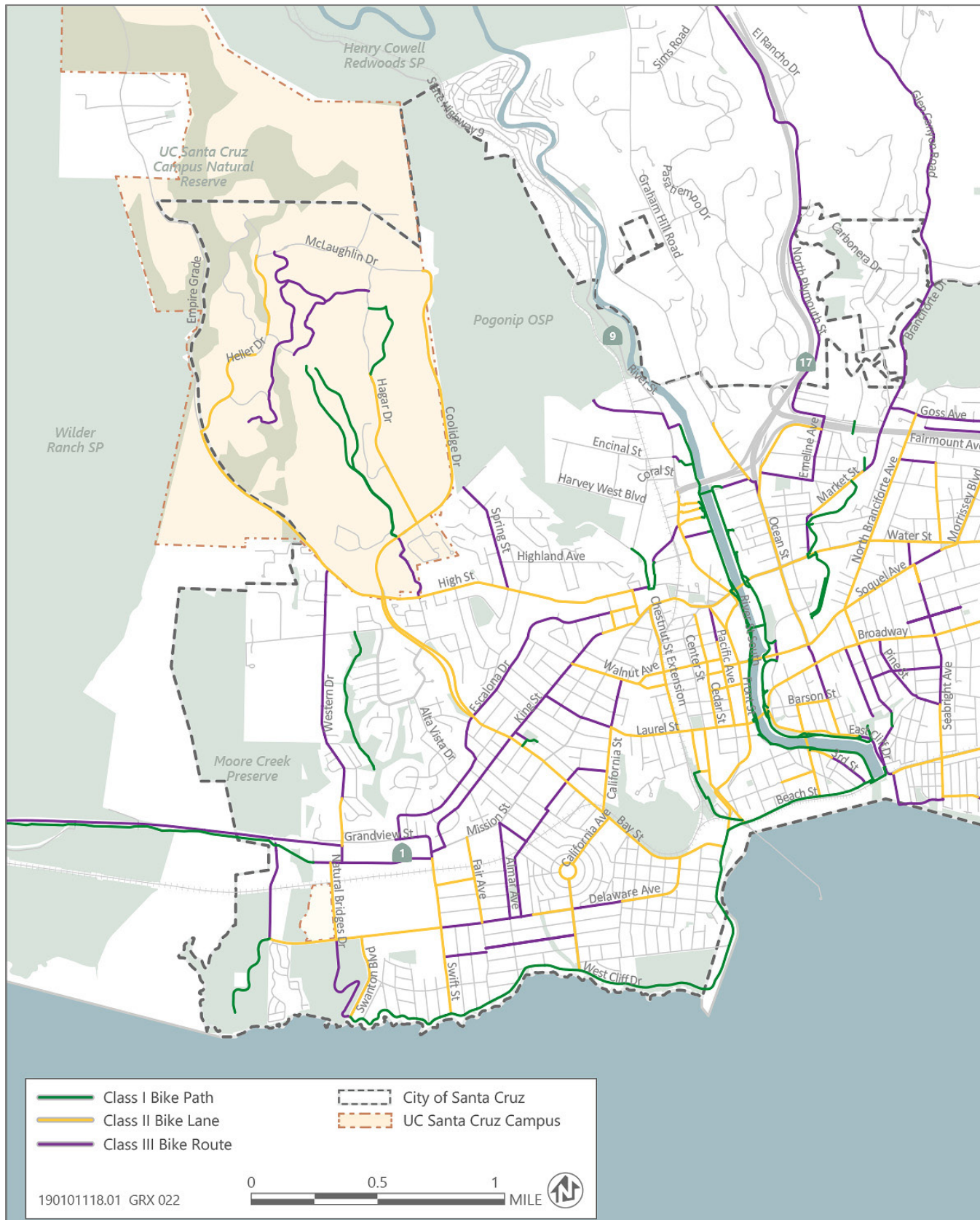
Figure 3.16-1 on page 3.16-10 of the Draft EIR was amended for clarity to remove unauthorized trails and fire roads within the LRDP area.



Source: City of Santa Cruz 2030 General Plan

[REVISED] Figure 3.16-1 Existing Circulation Roadway Network

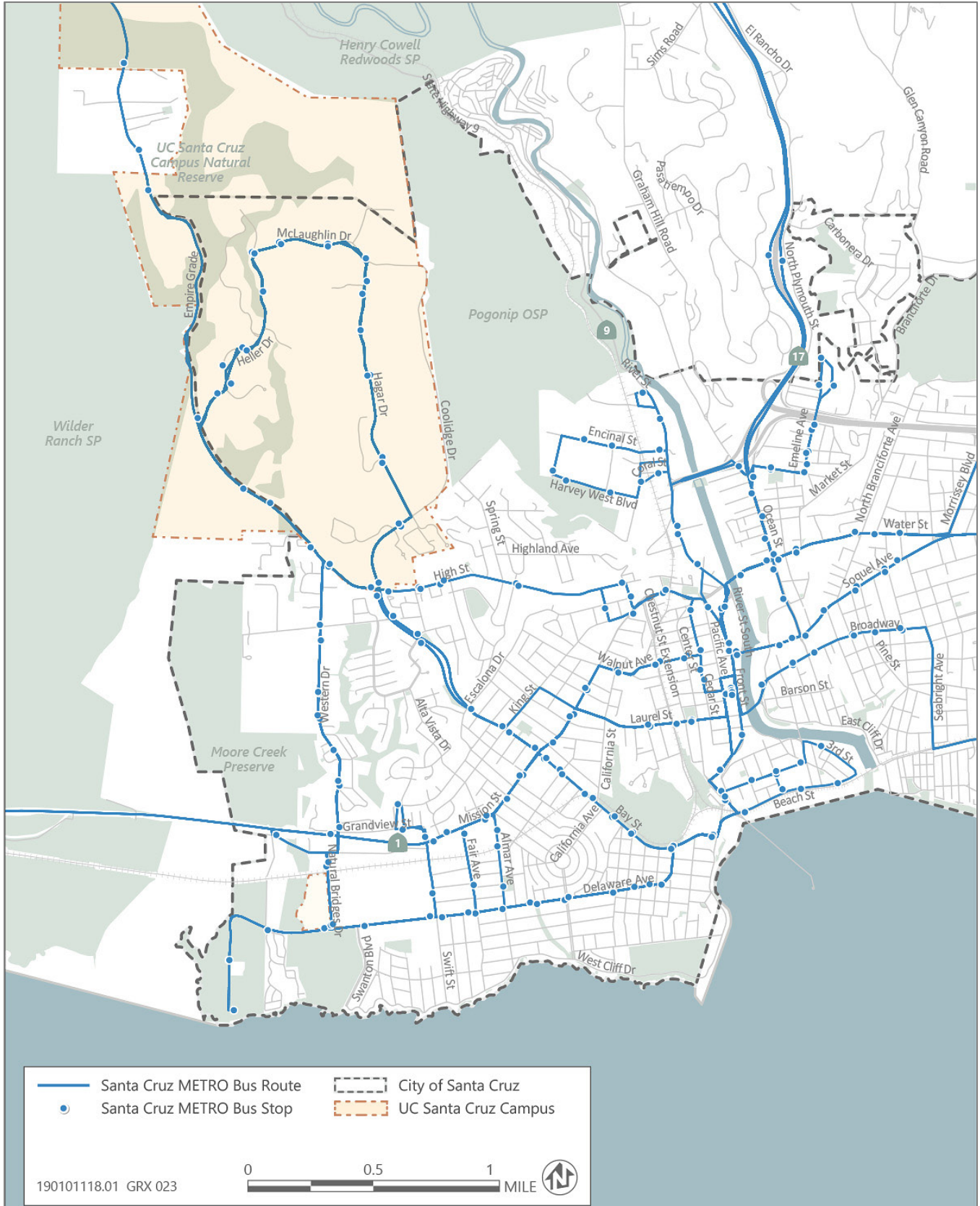
Figure 3.16-2 on page 3.16-14 of the Draft EIR was amended for clarity to remove unauthorized trails and fire roads within the LRDP area.



Source: City of Santa Cruz Active Transportation Plan

[REVISED] Figure 3.16-2 Existing Bicycle Circulation Network

Figure 3.16-3 on page 3.16-17 of the Draft EIR was amended for clarity to remove unauthorized trails and fire roads within the LRDP area.



Source: Santa Cruz METRO

[REVISED] Figure 3.16-3 Existing METRO Transit Routes to UC Santa Cruz (Pre-COVID-19)

The last paragraph on page 3.16-21 of the Draft EIR has been revised as follows:

TAPS plans, manages, maintains, and monitors the campus parking supply, excluding certain residential parking which is managed by Colleges, Housing, and Educational Services (CHES), to ensure existing parking capacity is utilized before additional parking is constructed and to ensure excess parking capacity does not encourage single-occupant vehicle use. Parking capacity is managed in an area-specific manner by parking permit type to maximize utilization and turnover.

Table 3.16-2 on page 3.16-22 of the Draft EIR has been amended to state:

Table 3.16-2 Existing Main Residential Campus and Westside Research Park Parking Supply by Parking Program Category

Parking Program Categories	Parking Capacity
Accessible Disabled	159
Medical	77
Visitor	326
Motorcycle	306
University	99
Reserved	340
Loading	28
Student Commuter	1,399
Faculty/Staff/Grad Commuter	2,284
On Campus Student Housing (managed by CHES)	326
On Campus Employee Housing (managed by CHES)	473
Total (without on campus housing)	5,018
Total (with on campus housing)	5,817

Source: data received from UC Santa Cruz and adapted by Fehr & Peers in 2020.

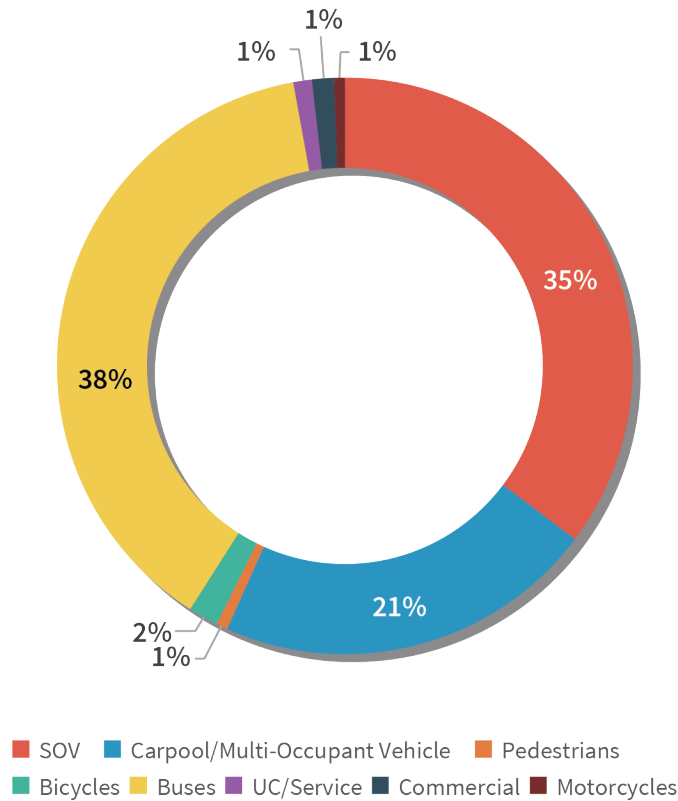
The second and third full paragraphs on page 3.16-23 of the Draft are revised to state:

In addition to the listed improvements, the RTC recently completed the Unified Corridor Investment Study to identify multimodal transportation investments that best utilize SR 1 and the Santa Cruz Branch Rail Line to serve the community’s transportation needs, which would benefit both the main residential campus and Westside Research Park by reducing the VMT for the two areas. The study recommends Bus + Rapid Transit (BRT)/bus on shoulder on Highway 1; mass transit (rail or BRT) on the rail corridor; multi-modal improvements on the Soquel Drive/Freedom Boulevard corridor). RTC is now working on a preferred alternative for the rail corridor as part of a Transit Corridor Alternative Analysis. UC Santa Cruz plans to integrate the planned mass transit and trail facilities into future mixed-used land uses at Westside Research Park.

The following projects have been identified in the City of Santa Cruz’s two-year Capital Improvement Program for the fiscal years 2019-2021 for near-term construction, contingent on receiving approval and funding:

- ▶ Downtown Intersection Improvements – addressing deficiencies at Pacific/Laurel, Front/Laurel, and Front/Soquel;
- ▶ Bay Street/High Street Intersection Improvements – Install protected left-turns on High Street or a roundabout to improve mobility; and,
- ▶ SR 1/SR 9 Intersection Improvements.

The legend of Figure 3.16-6 has been amended to clarify the designation of carpool as carpool/multi-occupant vehicle, as shown below:



Source: UC Santa Cruz Transportation and Parking Services, counts taken in May 2019.

Figure 3.16-6 UC Santa Cruz Spring 2019 Mode Share (by person-trips)

The third full paragraph on page 3.16-25 has been amended to reflect the final amount contributed to Santa Cruz Metropolitan Transit District (SCMTD) as follows:

Since 1972, UC Santa Cruz has maintained a service agreement with SCMTD that provides any registered student access to any regularly scheduled transit route operating within Santa Cruz County without paying a fare. In 1989, this agreement was extended to include any UC Santa Cruz faculty or staff member displaying a UC Santa Cruz Employee Metro Bus Pass. Historically, compensation models have varied, and have included both a per-rider methodology and flat-fee. Currently, SCMTD bills UC Santa Cruz based on a per-trip model, which is scalable based on the level of service purchased per month. UC Santa Cruz routes account for around 50 percent of the total SCMTD ridership countywide, with average daily ridership during the 2018-19 academic year averaging around 10,100 students and 270 faculty and staff. UC Santa Cruz’s payments to the SCMTD for 2019-2020 is around \$34.5 million. The UC Santa Cruz Student Bus Pass Program with SCMTD and the Campus Shuttle Program are funded from a self-assessed quarterly Student Transit Fee (for student ridership billings) and parking revenues/employee bus pass fee (for faculty and staff ridership billings).

The last paragraph on page 3.16-25 has been amended to state:

This program provides a commute alternative for faculty, staff, and students. TAPS operates approximately 14 vanpools originating from surrounding cities and towns, such as Aptos, Campbell, Monterey, San Jose/Bascom, South San Jose, Watsonville, and Castroville, with new routes to Los Gatos, Salinas/Prunedale, San Lorenzo Valley, and Scotts Valley ~~are~~ being developed. Demand is higher than available capacity, as

evidenced by the waitlist. About a dozen parking spaces in heavily utilized parking areas have been reserved for vanpool drivers. As of 2018-2019, about 130 people participate in the UC Santa Cruz Vanpool Program.

The discussion of VMT metrics on pages 3.16-27 and 3.16-28 of the Draft EIR are revised as follows:

VMT Metrics

The OPR *Technical Advisory* sets forth guidance regarding metrics that may be calculated to evaluate VMT impacts from three types of land uses: residential, office, and retail. An institutional land use such as a university campus is not specifically addressed in the advisory. However, for purposes of this EIR, the campus is treated as a mixed-use development with its residential land uses corresponding to the residential land uses addressed in the advisory and its non-residential land uses corresponding to office use in the advisory.

With regard to metrics, the advisory recommends use of a total VMT per capita metric, which is estimated based on the total VMT generated by a project divided by the project's total service population. For VMT purposes, service population is defined as the sum of all residents and employees. Thus, residents who are also workers are counted twice within the service population. For residential land uses, the advisory suggests a metric based on home-based vehicle trips, and for office uses, it suggests a metric based on only home-based work vehicle trips.

This EIR uses all three metrics to evaluate the project impact analysis:

- 1) total project generated VMT per service population,
- 2) home-based project generated VMT per campus resident student, faculty and staff (residential VMT), and
- 3) home-based project generated employment VMT per faculty, and staff (employee VMT).

Commuter students are accounted for in the total per service population VMT.² These metrics are consistent with the OPR Technical Advisory and appropriate for use for the land use mix on the campus, which functions both as a workplace (for commuting faculty, staff and students) and as a residence (for on-campus student and faculty/staff residents).

Impact 3.16-1 on page 3.16-31 of Draft EIR is revised as follows:

While emergency access and evacuation capacity would be improved due to the proposed new entrance on Empire Grade, growth in typical daily vehicular travel demand would not be induced because ~~virtually all typical~~ some of the daily campus traffic ~~must that currently passes~~ through existing intersections to the south of the proposed new access point would use the new northern entrance to access existing and proposed development north of the campus core.

Impact 3.16-2, including Table 3.16-6, on pages 3.16-33 and 3.16-34 of the Draft EIR is revised as follows:

Impact 3.16-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Related to Vehicle Miles Traveled

Implementation of the 2021 LRDP would reduce total campus VMT per capita and residential VMT per campus resident compared to baseline conditions. Residential VMT per campus resident would be below the significance threshold of 15 percent below baseline VMT per campus resident. However, commuter VMT per worker would increase relative to baseline conditions and would not meet the significance threshold of 15 percent below baseline commuter VMT per employee. Therefore, this impact would be **significant**.

Total Campus VMT

Table 3.16-6 below summarizes the baseline and growth assumptions for the analysis scenarios and Table 3.16-7 presents the total daily VMT generated by the UC Santa Cruz main residential campus and Westside Research Park (i.e. "Total Campus" VMT). The total campus VMT per capita was calculated using the total

² Service population correlates to information included in Table 2-1 of Chapter 2, "Project Description," and includes resident and commuter students, resident and commuter faculty/staff, and non-UC employees.

number of people living, working, and attending school at UC Santa Cruz. This includes faculty/staff living on campus, their associated family members (i.e., spouse and child(ren), students living on campus, any associated family members for on-campus student residents, students living off campus, non-UC employees (e.g., vendors), and visitors to campus.

As shown in Table 3.16-6Z, the implementation of the 2021 LRDP would result in a decrease in total campus VMT per capita from 9.1 to 7.9 miles, which represents a 13 percent reduction. The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus. However, the project-generated total campus VMT per capita would marginally exceed the significance threshold of 7.7 miles (15 percent below 9.1 miles or $9.1 \text{ miles} \times (1.0 - 0.15) = 7.7 \text{ miles}$) and the project-generated total campus VMT per capita impact would be significant.

It should be noted that the UC Santa Cruz 2017-2022 Campus Sustainability Plan includes a goal to reduce commute VMT by five percent by 2022. While the results in Table 3.16-6Z do not measure VMT between the years 2017 and 2022, it does indicate that the proposed 2021 LRDP would support the goal.

Table 3.16-6 2021 LRDP Land Use Summary and Model Inputs Vehicle Trip and Total Vehicle Miles Traveled Summary

Land Use/Campus Population	VMT Metric Applied ¹	2019 Baseline	2019 Plus 2021 LRDP
Land Use Summary			
Resident Students	Residential, Total Campus	9,283	17,783
Commuter Students	Total Campus	9,235	8,058
Total Enrollment		18,518	28,000
Resident Faculty and Staff	Residential, Employment, and Total Campus	270	828
Commuter Faculty and Staff	Employment, Total Campus	3,387	5,702
Non-UC Santa Cruz Employees (Commuters)	Employment, Total Campus	640	990
Total Employment		4,297	7,520
Faculty and Staff Housing	Residential, Total Campus	270	828
Non-UC Employee Housing	Residential, Total Campus	386	1,184
Total Faculty and Staff Household Population		656	2,012

¹ VMT metric (residential VMT, employment VMT, or total campus VMT) in which each land use is accounted for.

Table 3.16-7 2021 LRDP Vehicle Trip and SB 743 Vehicle Miles Traveled Summary

SB 743 VMT Estimates/Service Population	Land Use ¹	VMT Metric Applied ²	Calculation	2019 Baseline	2019 Plus 2021 LRDP
Residents (Resident students + Total Faculty and Staff Household Population)	Resident Students + Total Faculty and Staff Household Population	Residential, Total Campus	A	9,939	19,795
Employees (Total Employment)	Total Employment	Employment, Total Campus	B	4,297	7,520
Students	Total Enrollment	Total Campus	C	18,518	28,000
Total Service Population (Residents + Employees + Enrollment/Students)³			D (A + B + C)	32,754	55,315
Total Campus Vehicle Trips (from SCC Travel Model)			E	28,900	44,700
Average Trip Length in miles (from SCC Travel Model)			F	10.3	9.8
Total Campus Vehicle Miles Traveled (VMT) in miles (from SCC Travel Model)^{2B}			G (E x F)	298,000	439,000

Total Campus VMT per Capita in miles*	H (G/D)	9.1	7.9
<u>VMT per Capita Threshold (15 percent below existing)</u>	<u>2019 Baseline H x (1.00-0.15)</u>	<u>7.7 miles</u>	

¹ Land use/campus population inputs from Table 3.16-6.

² VMT metric (residential VMT, employment VMT, or total campus VMT) in which each land use is accounted for.

³ Service population is defined as those populations generating residential and commute activity; thus, Resident students are captured both under "Residents" and "Students," because resident students generate both residential and commute trips.

⁴ Total campus vehicle trips multiplied by average trip length (rounded to nearest thousand).

⁵ Total campus VMT divided by total service population.

References to Table 3.16-7, beginning on page 3.16-34 have been amended to reflect new table numbering, as follows:

Residential VMT

The VMT per capita forecasts from the modified SCC Travel Model for the campus' residential population under the 2021 LRDP are summarized in Table 3.16-~~87~~, below.

Table 3.16-~~87~~ 2021 LRDP Generated Residential and Employment VMT Per Capita

VMT Metric	2019 Countywide Average	15% Below Countywide Average ¹	UC Santa Cruz Campus 2019 plus 2021 LRDP
Residential VMT per Capita	10.4	8.8	5.6
Employment VMT per Capita	10.5	8.9	12.5

Note: 15% below Countywide average is used for impact determination.

Source: Modified SCC Travel Model

As shown in Table 3.16-~~87~~, campus development under the 2021 LRDP would generate 5.6 VMT per resident, which is below the significance threshold of 15 percent below the countywide average for residents (i.e., 8.8 VMT per resident). Thus, the impact related to the residential VMT per capita would be less than significant.

Employment VMT

The employment VMT per capita forecasts from the modified SCC Travel Model for resident and commuter faculty and staff (commuters) upon full implementation of the 2021 LRDP are summarized in Table 3.16-~~87~~, above. As shown in Table 3.16-~~87~~, with the implementation of the 2021 LRDP, faculty, staff and students living off campus would generate 12.5 VMT per worker, which is above the significance threshold of 15 percent below the countywide average for workers (i.e., 8.9 VMT per worker). Therefore, the 2021 LRDP would result in a significant impact related to the employment VMT.

Within Mitigation Measure 3.16-2, the first bullet under the subheading Implementation Level 2 on page 3.16-36 has been moved under the subheading for Implementation Level 1 as follows:

Implementation Level 1

- ▶ Replace monthly/annual parking fee with "pay at exit" use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.

...

Implementation Level 2

- ▶ ~~Replace monthly/annual parking fee with "pay at exit" use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.~~

4.15 CHAPTER 3.17, UTILITIES AND SERVICE SYSTEMS

The fourth paragraph on page 3.17-3 of the Draft EIR is revised as follows:

On December 15, 2014, DWR announced its official “initial prioritization” of the state’s groundwater basins for purposes of complying with the SGMA, and this priority list became effective on January 1, 2015. The Soquel-Valley Groundwater Basin (Basin Number 3-01) was identified by DWR as one of 21 groundwater basins to be reclassified as critically overdrafted. In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016, through a joint powers agreement to oversee management of the basin. is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin.

The fifth paragraph on page 3.17-3 of the Draft EIR is revised as follows:

The City of Santa Cruz receives a minor amount (5 percent) of drinking water from groundwater basins. The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin ~~(which includes the Soquel Valley Groundwater Basin)~~, and the westerly area is within the West Santa Cruz Terrace Basin ~~Santa Margarita Groundwater Basin~~.

The third paragraph on page 3.17-9 of the Draft EIR is revised as follows:

The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. ~~Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency. The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.~~

The fifth paragraph on page 3.17-9 has been amended as follows:

The Santa Margarita GSP, ~~covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz,~~ is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020).

4.16 CHAPTER 3.18, WILDFIRE

The discussion of the UC Santa Cruz Emergency Operations Plan on pages 3.18-5 and 3.18-6 of the Draft EIR is revised as follows:

Emergency Operations Plan

As noted above, UC Santa Cruz adopted its EOP in November 2016. The EOP 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. The UC Santa Cruz EOP adopts the Standardized Emergency Management System (SEMS), an emergency management organizational structure used by emergency response agencies statewide to coordinate response to multi-jurisdictional or multi-agency incidents. By incorporated SEMS, UC Santa Cruz implements the same emergency response organization structure and terminology as other city, county, and state agencies. SEMS incorporates:

- ▶ The Incident Command System (ICS), a field-level emergency response system based on management by objectives;
- ▶ Multi-Agency Coordination, affected agencies working together to coordinate allocations of resources and emergency response activities;

- ▶ Mutual Aid, a system for obtaining additional emergency resources from non-affected jurisdictions;
- ▶ Operational Area Concept, a system for coordinating damage information, resource requests and emergency response; and
- ▶ National Incident Management System (NIMS), a system for coordinating federal resources and response.

The ICS is a foundation part of the SEMS; it provides an organizational structure that can grow rapidly in response to the requirements of an emergency. The structure identifies employee roles, activates certain positions needed to manage a particular incident or level of emergency, promotes unity of command, and establishes a unified command when multiple jurisdictions or agencies have incident response responsibilities. The UC Santa Cruz EOP also outlines evacuation procedures for building emergencies (Stage 1) and campus-wide emergencies (Stage 2). The procedures and actions that students, faculty, and staff should take during an evacuation are communicated by residential staff assigned to a college, building emergency coordinator in academic/administrative buildings, public address announcement from public safety vehicles, and the CruzAlert system. CruzAlert is the UC Santa Cruz emergency notification system used to quickly communicate information to the campus community during emergency situations (UC Santa Cruz 2016).

In May 2019, UC formed the Systemwide Air Quality Protocol Working Group to evaluate operational- and health-related issues and develop recommendations for how UC campuses should respond to various conditions and potential unhealthy air quality due to smoke from wildfire events. The working group compiled an air quality index (AQI) based decision matrix for wildfire smoke events, which was recommended for implementation at all UC campuses. As evidenced by procedures implemented as part of UC Santa Cruz's response to the CZU Lightning Complex fire, UC Santa Cruz implements the decision matrix and stages the level and type of response/requirements, based on AQI values (UC Santa Cruz 2021).

On page 3.18-14, the impact summary for Impact 3.18-2 has been amended as follows to correct a typo:

Impact 3.18-2: Wildfire Risk Associated with New Development and Land Use Patterns

Implementation of the 2021 LRDP would place new development within the north campus, and along the margins of existing development on the central and lower campus. The UC Santa Cruz EOP outlines evacuation procedures for building emergencies and campus-wide emergencies, and the UC Santa Cruz OES also maintains an ongoing schedule of inspections for all buildings to ensure that fire hazards are mitigated and also conducts plan reviews and inspections of building construction and renovation activities. However, in the absence of an adopted Vegetation Management Plan, the wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be **significant**.

On page 3.18-17, Mitigation Measure 3.18-2 has been modified to state:

Mitigation Measure 3.18-2: Prepare Campus-Wide Vegetation Management Plan

Upon approval of the 2021 LRDP and certification of the EIR, UC Santa Cruz shall initiate preparation and, within 2 years, begin implementation of a campus-wide vegetation management plan. The campus-wide vegetation management plan shall identify fire hazard areas 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. Policies and implementation actions that shall be considered as part of the plan will include, but are not limited to:

- ▶ vegetation management techniques for fire hazard mitigation, including thinning, pruning, removing or otherwise altering vegetation to reduce the potential for ignitions and to modify potential fire behavior; different vegetation management techniques shall be identified, depending on vegetation type, location, condition, and configuration;

- ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the LRDP area;
- ▶ vegetation management and maintenance standards for dominant vegetation types in the LRDP area, specific recommendations for key wildfire risk areas, and the procedures for identifying and planning annual vegetation treatment operations;
- ▶ fuel management requirements, including clearing vegetation within 100 feet of structures, removing trees and branches that extend within 100 feet of a chimney/stovetop outlet, clearing roofs of vegetative debris, and maintaining vegetation adjacent to overhanging of a building;
- ▶ best management practices implemented to avoid and/or minimize impacts associated with soil erosion, biological resources, and water quality, including the use of fire resistant/drought tolerant landscaping within 100 feet of new/modified structures within high or very high fire hazard zones; and
- ▶ building construction requirements for new development located in HFHSZs, including fire- or flame-resistant roofing material, roof vent coverings/screens, exterior siding, skylights, windows, doors, and decks, consistent with California Fire Code Chapter 49.

As part of this effort, UC Santa Cruz shall also consider and incorporate actions/strategies included as part of the CAL FIRE California Vegetation Treatment Program.

4.17 CHAPTER 4, CUMULATIVE IMPACTS

Table 4-1 on pages 4-1 and 4-2 of the Draft EIR amended for consistency purposes to state:

Table 4-1 Geographic Scope of Cumulative Impacts

Resource Issue	Geographic Area
Aesthetics	Local (LRDP area and surrounding public viewpoints)
Agriculture and Forestry Resources	Regional (Santa Cruz County)
Air Quality	Regional (North Central Coast Air Basin for pollutant emissions that have regional effects) Local (immediate vicinity for pollutant emissions that are highly localized such as Carbon Monoxide)
Archaeological, Historical, and Tribal Cultural Resources	<u>Historical Resources: Local (LRDP area and City of Santa Cruz)</u> <u>Archaeological and Tribal Cultural Resources: Regional (historic lands of the Uypi people)</u>
Biological Resources	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Energy	Regional (Pacific Gas and Electric Company grid in Santa Cruz County)
Geology and Soils	Local (LRDP area)
Greenhouse Gas Emissions and Climate Change	Global
Hazards and Hazardous Materials	Local (LRDP area)
Hydrology and Water Quality	Regional (Santa Cruz County) and local (LRDP area)
Land Use and Planning	Local (LRDP area and immediately surrounding area)
Noise	Local (immediate project vicinity where project-generated noise could be heard concurrently with noise from other sources)
Population and Housing	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Public Services	Local service areas of service providers
Recreation	Regional (Santa Cruz County) and local (LRDP area)

Resource Issue	Geographic Area
Transportation	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)
Utilities and Service Systems	Local service areas of utility providers
Wildfire	Regional (Santa Cruz County) and local (LRDP area and immediately surrounding area)

The first paragraph under the subheading “Operational Emissions” on page 4-20 of the Draft EIR is revised as follows:

NCCAB is currently designated as a nonattainment-transitional area for ozone and non-attainment for PM₁₀. As noted above, MBARD considers emissions of ROG and NO_x (ozone precursors), and PM₁₀ from an individual project that exceed the applicable mass emissions thresholds to be a substantial contribution to a cumulative impact on regional air quality.

The first paragraph on page 4-23 of the Draft EIR is revised to add the following:

The cumulative context for the cultural resources cumulative analysis considers the broad regional system of which the resources are a part. The cumulative context for archaeological resources, human remains, and tribal cultural resources is the former territory of the Ohlone tribelet, recorded in Mission Santa Cruz records as Uypi. The historic lands of the Uypi people have been affected by development since the arrival of the Portolá expedition in 1769. Division of the land into land grants was soon followed by limestone production and related commercial development through the 1800s. Development of the Uypi lands continued with agricultural growth, residential growth throughout the county and city of Santa Cruz, and the establishment of UC Santa Cruz in 1965. These activities have resulted in an existing significant adverse effect on tribal cultural resources. The cumulative context for historical resources is UC Santa Cruz and the city of Santa Cruz, where common patterns of historic-era settlement have occurred over roughly the past two centuries.

The last paragraph on page 4-23 of the Draft EIR is amended to state:

Future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource. ~~Although no specific tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus or the Westside Research Park, the campus is located in a region where significant resources have been recorded.~~ The Amah Mutsun Tribal Band identified the eight prehistoric archaeological sites on the UC Santa Cruz main residential campus as tribal cultural resources. Compliance with PRC Section 21080.3.2 and Section 21084.3 (a) would ensure that treatment and disposition of the tribal cultural occurs in a manner consistent with the California Native American Heritage Commission guidance. Further, implementation of Mitigation Measure 3.4-2 would require UC Santa Cruz to provide the culturally affiliated tribe the to monitor construction and by requiring appropriate and respectful treatment (i.e., proper care as determined through preparation and implementation of a treatment plan that is approved by the tribe) of artifacts if they are recovered. With compliance with existing regulations and implementation of Mitigation Measure 3.4-2, development under the 2021 LRDP would not contribute to a cumulative loss of tribal cultural resources in the area, and as a result would not be cumulatively considerable.

Section 4.3.5, “Biological Resources” on pages 4-24 and 4-25 of the Draft EIR is revised as follows:

The context for cumulative impacts on biological resources is the LRDP area, the range of affected special-status species and sensitive habitats, as well as adjacent migration and movement corridors (e.g., natural habitat areas surrounding the LRDP area, the Pacific flyway for migratory birds) that are connected to the LRDP area.

Past, present, and future development projects have and likely will result in impacts on special-status plants, special-status wildlife, sensitive natural communities, riparian habitat, state or federally protected wetlands, wildlife movement corridors, and native wildlife nurseries. Most of the projects in Table 4-2 would be discretionary and subject to environmental review under CEQA or otherwise subject to regulations protective

of biological resources (e.g., ESA, CESA, and California Fish and Game Code), and would be required to implement measures to avoid, reduce or compensate for adverse effects on sensitive natural resources. The existing cumulative impacts of these projects, activities, and disruptions to ecosystem and biophysical processes (e.g., climate change, invasive species invasions) on special-status species, sensitive natural communities, riparian habitat, state and federally protected wetlands, and wildlife movement corridors and nursery sites have been substantial, and are considered significant.

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 Lightning 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 Lightning 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 Lightning Complex fire contributed to the existing significant cumulative impacts described above.

As analyzed and described in Section 3.5, "Biological Resources," implementation of projects under the 2021 LRDP would result in several direct and indirect impacts related to the disturbance or loss of special-status plants, special-status wildlife and wildlife habitat, riparian habitat, sensitive natural communities, state or federally protected wetlands, wildlife movement corridors, wildlife nurseries, and conflicts with the provisions of the Ranch View Terrace HCP. Implementation of the 2021 LRDP, in combination with other past, present, and reasonably foreseeable projects that have resulted or would result in similar impacts, would contribute to the significant cumulative effects on these biological resources if left unmitigated.

The third paragraph on page 4-40 of the Draft EIR is revised as follows:

VEHICLE MILES TRAVELED

As noted in Section 3.16, "Transportation," existing region-wide and project-generated VMT estimates were calculated using the SCC Travel Model. The model uses land use data and transportation network inputs, including highway, arterial, and transit systems, across the County to assign trips within the region's transportation network and estimates of daily person trips and associated VMT. The model also estimates the travel that occurs between Santa Cruz County and surrounding counties even though these areas are not included within the model's geographic boundary. The cumulative (year 2040) model also includes land use growth consistent with AMBAG based on adopted growth plans the municipalities within the county that are used to estimate future (i.e., cumulative) transportation conditions.

4.18 CHAPTER 5, OTHER CEQA SECTIONS

The first paragraph on page 5-4 of the Draft EIR was revised as follows:

Forecasts concerning growth in Santa Cruz County provide a wide range of predictions. Per a recent report published by the California Department of Finance (DOF), the county of Santa Cruz (County) is anticipated to experience a minor decrease in population between 2020 and 2040 (117 fewer residents or 0.04 percent compared to DOF's 2020 estimate of 273,999 residents) (DOF 2020), although countywide population would have minor fluctuations during that period, reaching a peak projected population of 276,168 in 2033. Other growth projections identify an increase in countywide population. The Association of Monterey Bay Area Governments (AMBAG) identifies a countywide increase of 25,734 residents or 9 percent over the same period (AMBAG 2018). Per AMBAG's 2018 Regional Growth Forecast, approximately 8,000 of the projected increase in countywide population between 2020 and 2040 is associated with UC Santa Cruz. Based on

projected increases in development within the County, including those listed in Table 4-1 of Chapter 4, "Cumulative Impacts," the AMBAG projections may more accurately reflect growth expectations. Further, the AMBAG projections are used to develop various regional planning documents, including the sustainable community strategy required by SB 375 (Chapter 4.2 of CEQA) to provide for more efficient land use patterns that facilitate a reduction in regional VMT and per capita greenhouse gases over time."

4.19 CHAPTER 6, ALTERNATIVES

The third bullet on page 6-3 has been amended as follows:

- ▶ Recognize, to the extent feasible, UC Santa Cruz and regional histories within the campus, including protecting tribal cultural resources and maintaining the integrity of existing historic structures and enhancing the Cowell Lime Works Historic District as a campus gateway.

The fifth paragraph on page 6-25 has been amended for clarity as follows:

Alternative 4 would provide campus facilities and infrastructure to accommodate projected increases in student enrollment up to a projected 28,000 FTE, consistent with the University of California's forecasted need for additional public university capacity. Development on the main residential campus would be reduced compared to the proposed 2021 LRDP which would maintain existing open space within the LRDP area. Similar to the 2021 LRDP, this alternative would also maintain existing historic structures, and support a more efficient roadway network. Therefore, this alternative would meet some of the project objectives (Project Objectives 4, 5, 7, and 8). However, under this alternative on-campus student housing would only be provided for students enrolled on the main residential campus and Westside Research Park, but not for students~~employees~~ at UC MBEST. Similarly, the alternative provides on-campus housing for about 25 percent of the new employees~~students~~ on the main residential campus and Westside Research Park, but not for employees at UC MBEST. The reduction in on-campus housing opportunities would contribute to off-campus housing demands, although these demands would likely be closer to the UC MBEST campus, but would not fully meet the UC Santa Cruz objective of accommodating 100 percent new student enrollment above 19,500 and up to 25 percent of new faculty/staff (Project Objectives 1 and 6).

4.20 CHAPTER 8, REFERENCES

The reference information related to AMBAG provided at the bottom of page 8-2 is revised as follows:

AMBAG. See Association of Monterey Bay Area Governments.

Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

The following reference has been added to page 8-26 of the Draft EIR:

Sempervirens Fund. 2020 (August). *What Recovery Means for Big Basin and Santa Cruz Redwoods*. Available: <https://sempervirens.org/news/what-recovery-means-for-big-basin-and-santa-cruz-redwoods/>. Accessed April 15, 2021.

The reference information related to AMBAG provided on page 8-29 of the Draft EIR is revised as follows:

AMBAG. See Association Monterey of Bay Area Governments.

Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFa.pdf. Accessed August 25, 2020.

4.21 APPENDICES

4.21.1 Appendix D, Air Quality Modeling

The total trips for the 2019 plus Project scenarios included in the table titled "VMT forecasts from Fehr and Peers" on page 11 has been amended from 44,600 to 44,700 trips.

4.21.2 Appendix G, Hydrologic Conditions Technical Information

Append G has been amended to include a summary of water year rainfall modelling information, conducted for the purposes of supplementing the analysis of the Draft EIR.

4.21.3 Appendix I, VMT Analysis Memorandum

The second paragraph on page 3 has been amended as follows:

Given that the model overestimates campus vehicle trips, the trip generation rates for the campus were adjusted to more consistent with the UCSC tool. It should be noted, that as one of the final validation steps to assess the validity of the adjust trip generation rates, the model outputs with the adjust trip generation rates were compared to the daily vehicle driveway counts discussed on page 5 and illustrated in Table 3.

The first and second paragraph on page 5 have been amended as follows:

As a final step, the vehicle generation and assignment model was validated using observed traffic counts collected around the UCSC campus during Fall 2019. Table 3 shows a comparison of daily vehicle volumes at the two campus driveways after incorporating the trip generation changes described above.

Within the SCC model, the campus is presented by two transportation analysis zones (TAZs), or geographic areas. Due to the limited on-campus zonal detail within the SCC Travel Model, the model assigns most trips to the main entrance at Coolidge Drive/High Street and a smaller fraction to the west entrance. However, the total number of vehicle trips from the model accessing/leaving the campus at the two main entrances is within 10 percent of the observed data and this shows the model is reasonably estimating the daily number of trips generated by the campus. For the purpose of the VMT calculation the total number of trips accessing the campus is more important than which gate they use, since the model link distance within the campus' TAZs is about the same.

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5 REFERENCES

5.1 CHAPTER 1, INTRODUCTION

No references were used in this chapter.

5.2 CHAPTER 2, RESPONSES TO COMMENTS

AEP. See Association of Environmental Professionals.

Association of Environmental Professionals. 2017 (August). *Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implication for CEQA and Climate Actions Plans*. Available: https://califaep.org/docs/Draft_AEP_White_Paper_Lifecycle_CEQA_CAPs_082017.pdf. Accessed May 2021.

CAL FIRE. See California Department of Forestry and Fire Protection.

California Department of Forestry and Fire Protection. 2020. CAL FIRE Stats and Events Available: <https://www.fire.ca.gov/stats-events/>. Accessed: October 15, 2020.

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California Office of Planning and Research. 2018a (December). *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Available: opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed May 14 and 31, 2021.

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California State Water Resources Control Board. 2021. *Groundwater Protection Program FAQs*. Available: https://www.waterboards.ca.gov/water_issues/programs/gmp/faqs.html. Accessed May 29, 2021.

Caltrans. See California Department of Transportation.

City of Santa Cruz. 2011. *General Plan 2030 Draft EIR – Section 4.6, Public Services*. Available: <https://www.cityofsantacruz.com/home/showpublisheddocument/22459/635418232770030000>. Accessed May 21, 2021.

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OPR. See California Office of Planning and Research.

Santa Cruz County. 2021. Park Impact Fees. Available:

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US DOT. See U.S. Department of Transportation.

5.3 CHAPTER 3, MITIGATION MONITORING AND REPORTING PROGRAM

No references were used in this chapter.

5.4 CHAPTER 4, CORRECTIONS AND REVISIONS TO THE DRAFT EIR

No references were used in this chapter.

Appendix A

Comment Letters Received

Federal Comment Letter



Erika Carpenter <escarpen@ucsc.edu>

Letter
F1

[eircomment] USFWS Comments on DEIR for the UCSC LRDP

1 message

'Takano, Leilani' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Thu, Feb 25, 2021 at 6:13 PM

Reply-To: "Takano, Leilani" <leilani_takano@fws.gov>

To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Cc: "Mitcham, Chad J" <chad_mitcham@fws.gov>, "Sinclair, Karen D" <karen_sinclair@fws.gov>

Dear Erika Carpenter,

We have reviewed relevant sections of the Draft Environmental Impact Report (DEIR) for the University of California Santa Cruz (UCSC) 2021 Long Range Development Plan (LRDP) (UCSC 2021). As it is not our primary responsibility to comment on documents prepared pursuant to the California Environmental Quality Act, our comments on the DEIR do not constitute a full review of project impacts. We are providing our comments based upon a review of sections addressing water resources, biological resources, and our concerns for listed species within our jurisdiction related to our mandates under the Endangered Species Act of 1973, as amended (Act).

F1-1

As discussed on a phone call between UCSC and U.S. Fish and Wildlife Service (Service) staff on January 4, 2021, the DEIR inaccurately characterizes the extent of suitable California red-legged frog (*Rana draytonii*) habitat in the LRDP area. Although existing campus infrastructure may reduce the potential for California red-legged frogs to disperse to portions of the campus that are completely isolated, we believe the majority of undeveloped terrestrial habitats within the LRDP area provides suitable upland or dispersal habitat for the California red-legged frog. This belief is due to the existence of a California red-legged frog breeding pond within the LRDP area, the large extent of suitable and unsurveyed habitat north of the LRDP area, and the ability of California red-legged frogs to disperse distances of well over a mile. Based on this information, UCSC should include a California red-legged frog mitigation measure stating that UCSC would coordinate with the Service prior to any development occurring within the LRDP area, so that we may provide technical assistance on measures to minimize any adverse impacts to CRLF and its habitat.

F1-2

We are concerned that implementation of the LRDP could result in substantial effects to aquatic resources that federally listed species are reliant upon. Please refer our 2010 comment letter regarding the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service for the 374-acre portion of the UCSC North Campus (Service 2006) (attached). Concerns discussed in our 2010 comment letter remain relevant to the 2021 LRDP.

F1-3

As discussed between UCSC and Service staff on January 4, 2021, we recommend that UCSC pursue the development and implementation of a campus-wide habitat conservation plan (HCP). This year's release of the 2021 LRDP provides a logical opportunity to begin drafting a campus-wide HCP. A campus-wide HCP would provide an efficient approach to permitting development associated with the 2021 LRDP while taking into account landscape-level needs of the federally listed species that utilize UCSC lands. An HCP provides the most efficient approach to meet both UCSC's and the Service's goals.

F1-4

We appreciate the opportunity to provide comments on the DEIR for the UCSC 2021 LRDP. If you have any questions regarding our comments, please contact Chad Mitcham at chad_mitcham@fws.gov or Karen Sinclair at karen_sinclair@fws.gov.

F1-5

Sincerely,
Leilani

Leilani Takano
Assistant Field Supervisor
U.S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
[2493 Portola Road, Suite B](#)
Ventura, CA 93003

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **USFWS DEIR Comments on UCSC LRDP 2010-TA-0150.pdf**
599K



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
81440-2010-TA-0150

January 19, 2010

Ken Thomas
Principal Planner
City of Santa Cruz
809 Center Street, Room 107
Santa Cruz, California 95060

Subject: Comment Letter for the Notice of Availability of a Draft Environmental Impact Report for the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service, Santa Cruz County, California

Dear Mr. Thomas:

We have reviewed the Draft Environmental Impact Report (DEIR) (City of Santa Cruz 2009) for the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service (project) for the 374-acre portion of the University of California Santa Cruz (UCSC) known as the "North Campus," in Santa Cruz County, California. The City of Santa Cruz (City) submitted an application to the Santa Cruz Local Agency Formation Commission (LAFCO) to amend the City's Sphere of Influence (SOI) to include UCSC's North Campus. UCSC concurrently submitted an application to LAFCO for extraterritorial water and sewer service to be provided by the City. The applications to LAFCO were made by the City and UCSC in accordance with provisions of the "Comprehensive Settlement Agreement" (Agreement) regarding UCSC's 2005 Long Range Development Plan (LRDP). The objective of the project is to implement the City's obligations set forth in the Agreement with regards to provision of water and sewer services to UCSC's North Campus. Pursuant to the Agreement, the City agreed to continue to provide water service to the campus to assist UCSC with achieving its on-campus housing commitment. Furthermore, the City agreed to submit an application to LAFCO to amend its SOI to include most of the North Campus concurrent with UCSC submitting its own application request to LAFCO for provision of extraterritorial water and sewer service to the project area for development of up to 3,175,000 gross square feet of building space in this area as set forth in the 2005 LRDP.

6

The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap,

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capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species. Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways: through interagency consultations for projects with Federal involvement pursuant to section 7 of the Act or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

As it is not our primary responsibility to comment on documents prepared pursuant to the California Environmental Quality Act (CEQA), our comments on the DEIR do not constitute a full review of project impacts. We are providing our comments based upon a review of sections addressing biological resources, project activities that have the potential to affect federally listed species, and our concerns for listed species within our jurisdiction related to our mandates under the Act.

We are concerned that the DEIR does not take into consideration the several federally listed species that are also reliant upon the City's water supply sources and management actions to ensure their continued existence. The federally threatened California red-legged frog (*Rana aurora draytonii*) and its designated critical habitat (71 FR 19243), the threatened Santa Cruz tarplant (*Holocarpha macradenia*) and its designated critical habitat (67 FR 63967), the endangered tidewater goby (*Eucyclogobius newberryi*) and its designated critical habitat (73 FR 5920), and the endangered Ohlone tiger beetle (*Cicindela ohlone*) all occur within either the City's current or proposed SOI or the Service believes has the potential to be affected by the project as a result of water withdrawals.

The Service is concerned that the DEIR discusses the project's potential impacts to water resources throughout the City's current and proposed SOI, yet fails to have any meaningful discussion and analysis of the project's potential impacts to the federally listed species that are also reliant upon these water resources for their survival. These concerns are based on conclusions reached in the DEIR; one of which states "cumulative development and growth in the City's water service area would result in a significant cumulative water impact, as it results in additional demand in a system that does not currently have adequate water supplies to meet existing or future demands during drought conditions or adequate long-term supplies during normal years potentially at some time after the year 2025" (City of Santa Cruz 2009).

The City has four primary water sources which include: North Coast Stream Diversions (25 percent), San Lorenzo River Diversions (47 percent), Loch Lomond Reservoir (24 percent), and the Live Oak Well system (4 percent) (Erler and Kalinowski, Inc. 2009).

North Coast Sources and the California Red-Legged Frog

The North Coast sources consist of surface diversions from three coastal streams and a natural spring located approximately 6 to 8 miles northwest of downtown Santa Cruz. These sources are Liddell Spring, Laguna Creek, Reggiardo Creek and Majors Creek; all of which are located within California red-legged frog designated critical habitat unit SCZ-1 (71 FR 19243). Diversion from these sources is limited primarily by flows (City of Santa Cruz Water Department 2006 in City of Santa Cruz 2009).

The California red-legged frog critical habitat final rule recognizes that “threats that may require special management in this unit (SCZ-1) include water diversions, which could dewater portions of aquatic habitat, and thereby lead to desiccation of egg masses or temporal loss of aquatic habitat.” Considering that the City currently extracts 25 percent of its water from the North Coast sources it remains their responsibility to ensure that their actions are not taking California red-legged frogs that also rely upon these water sources for their continued survival. The Service recommends that the City complete an effects analysis of each of the (above mentioned) affected streams and springs to determine what effects their actions currently have on California red-legged frogs and their habitat in these areas. Furthermore, as the City is now proposing to increase their SOI, the Service recommends that the City also analyze the project’s potential impacts to California red-legged frogs and their habitat in regards to the North Coast sources.

North Campus and the California Red-Legged Frog

California red-legged frogs occur south of the project area on the UCSC campus and are also known to occur 0.4 mile northwest of the project area; locations that are both well within the known dispersal distance of the subspecies. The DEIR estimates that 4.7 acres of wetland habitat currently exists within the project area. This information leads the Service to believe that the project area likely constitutes upland and dispersal habitat for California red-legged frogs, and may also contain appropriate breeding habitat for the subspecies. The DEIR only recognizes and attempts to address impacts to the subspecies within the Moore Creek watershed while anticipating that “the proposed 2005 LRDP would not result in take of threatened or endangered species or their habitat in other areas of the campus.” We are unclear how this conclusion was reached when protocol surveys for the species have not been conducted within the North Campus area. We request that the City or UCSC conduct protocol level surveys for California red-legged frogs within the North Campus area in order to properly plan for future growth at UCSC by taking into consideration the needs of listed species that also utilize these resources.

Live Oak Well System

The City’s Water Supply Assessment (WSA) concludes that water supplies are sufficient to meet the City’s existing and project water demands in a normal year through the year 2030 based on a 0.4 percent annual increase in customer classes (City of Santa Cruz 2009). We note that from 1921 to 2008, the City experienced 28 years (32 percent) of either dry or critically dry years (City of Santa Cruz Water Department 2009). Additionally, during wet or normal years

historical ground water production at the Live Oak Well System provides the City with 91 million gallons per year (mgy) and 119 mgy respectively. However, during dry or critically dry years that production increases to 188 mgy and 260 mgy respectively (Erler and Kalinowski 2009).

Although ground water constitutes only four percent of the City's normal year water supply, it is a critical component for meeting peak season and dry year demands. The City currently produces water through the Live Oak Well System which extracts ground water from one of the water bearing units of the Purisima Formation. Ground water level data collected over the past 15 years indicate that water levels across the Purisima Formation have been lowered by a combination of changes in recharge and the gradual increase in overall ground water production from the aquifer (City of Santa Cruz 2009).

Wetlands are sensitive to the effects of ground water pumping as a result of progressive lowering of the water table and by increased seasonal changes in the altitude of the water table. The persistence of wetness for many wetlands is dependent on a relatively stable influx of ground water throughout changing seasonal and annual climatic cycles. Characterizing ground water discharge to wetlands and its relation to environmental factors, such as moisture content and chemistry in the root zone of wetland plants, is a critical but difficult to characterize aspect of wetlands hydrology (USGS 1999).

As stated previously, the Service is concerned that the DEIR does not take into consideration potential impacts resulting from the project on federally listed species and their habitat throughout the City's SOI, and at water source locations. This concern is highlighted by LRDP Impact HYD-8, contained in Volume II of the DEIR (UCSC 2006) which states that "The City has also evaluated the cumulative impact on the aquifer from withdrawal of ground water and determined that the cumulative impact on ground water storage and saltwater intrusion would be significant."

The primary responsibility of the Service is the conservation of public fish and wildlife resources and their habitats. In order for the Service to determine if the proposed project would impact these species or their habitat we offer the additional following information and recommendations that the Service believes should be thoroughly addressed in the final EIR.

Ohlone Tiger Beetle

The Ohlone tiger beetle is endemic to Santa Cruz County, where it is known only from coastal terraces supporting patches of native grassland habitat. Since the final listing rule in 2001 (63 FR 50340), the known distribution of the Ohlone tiger beetle has decreased from 5 geographic areas with 16 occurrences to 3 geographic areas with 7 occurrences. Three historical occurrences are on property owned by the City, two of which have been determined as potentially extirpated, while six historical occurrences are on property owned by UCSC, three of which have not been detected in 5 or more years. Threats to the Ohlone tiger beetle, including habitat fragmentation and destruction due to urban development, habitat degradation due to

invasion of nonnative plants, potential threats due to collection, pesticides, and recreational use of habitat, and vulnerability to random local extirpations continue to imperil the continued existence of this species. The DEIR recognizes that development under the LRDP could result in a substantial adverse impact on the species as a result from increased bicycle use on trails and obstruction of potential movement corridors. Measures contained in the LRDP are intended to reduce these potential impacts to a less than significant level; however, this can only be determined with appropriate coordination with the Service. We recommend that the City and UCSC take these factors into consideration to ensure direct and indirect impacts to the species and its habitat is avoided.

Santa Cruz Tarplant

The Santa Cruz tarplant and its designated critical habitat occur within the City's SOI. A special management consideration identified in the critical habitat final rule (67 FR 63967) states that the hydrologic regime of the area surrounding Santa Cruz tarplant habitat should be maintained to provide for the seasonally moist soils that the species favors. Increasing or decreasing surface and subsurface water flow to these areas through habitat alteration that either artificially adds or reduces water could decrease the suitability of these areas to support the species.

The Service recognizes the City's previous conservation and management efforts regarding the Santa Cruz tarplant; such as management efforts at the Arana Gulch Open Space Preserve. However, habitat that has been set aside in preserves, conservation easements, and open spaces also suffers secondary impacts such as changes in hydrology. In particular, smaller preserve areas with Santa Cruz tarplant suffer because they are cut off from many ecosystem functions dependent upon soil and hydrologic characteristics that would be present in larger, more contiguous sites. More often, these smaller areas are left as open spaces, but without the benefit of the grassland management needed to sustain them (67 FR 63967). As such, the Service recommends that the City discuss and analyze the project's potential impacts on the Santa Cruz tarplant and its critical habitat.

Tidewater Goby

Historically, concern about ground water in coastal regions has focused on seawater intrusion into coastal aquifers. More recently, ground water has been recognized as a key contributor of nutrients and contaminants to coastal waters. Likewise, plant and wildlife communities adapted to particular environmental conditions in coastal areas can be affected by changes in the flow and quality of ground water discharges to the marine environment (USGS 1999). Tidewater gobies occur in lagoons, estuaries, backwater marshes, and in freshwater streams to brackish habitats. Tidewater goby critical habitat has been designated at 44 units, 3 of which may be affected by the project. These units include: 1) SC-1 (Laguna Creek), a North Coast Diversion source located approximately 7.5 miles west of the City; 2) SC-2 (Baldwin Creek), which is located approximately 6 miles west of the City; and 3) SC-3 (Corcoran Lagoon), which is located adjacent to the east of the City. The species has been also known to occur at several locations within this range including at the San Lorenzo River and Woods Lagoon, both of which are

within the City's SOI. Threats relevant to the project and identified within the critical habitat final rule include: 1) coastal development projects that result in the loss or alteration of coastal wetland habitat; 2) water diversions and alterations of water flows upstream of coastal lagoons that negatively impact the species breeding and foraging activities; and, 3) ground water overdrafting that results in reduction of flows and negatively impacts the species breeding and foraging activities. These threats combined with drought conditions, which is the most significant natural factor adversely affecting the species, have degraded coastal and riparian ecosystems and have created extremely stressful conditions for most aquatic species including the tidewater goby (73 FR 5920). The Service recommends that the City consider these factors and conduct an effects analysis at known tidewater goby occurrence locations that are currently impacted, or will be impacted, by the City's continued water diversions.

Other Considerations

The WSA (Erler and Kalinowski 2009) indicates that in response to the City's existing dry year supply shortfalls the City has been implementing water conservation programs and has initiated studies for the development of a desalination project. The City anticipates being able to reduce the water supply deficit in a worst case scenario, as in the 1976 to 1977 drought event, from over 50 percent at peak times to a maximum of 15 percent. Plans for achieving this 15 percent curtailment are outlined in the City's updated Water Shortage Contingency Plan (WCSP) (City of Santa Cruz Water Department 2009). However, the WCSP identifies several issues regarding implementation of the plan which include: 1) A major capital improvement affecting the City's water supply is the renovation of the Live Oak well system which includes upgrades to wells, treatment plant, and the distribution system to restore production capacity back to its full 2 million gallons per day (mgd) level that was in operation during the 1987 to 1992 drought. This assumes the entire ground water basin is not compromised by continued regional over-pumping of the Purisima aquifer; 2) The City is pursuing an Endangered Species Act section 10 permit (habitat conservation plan). Long-term requirements for in-stream flow releases affecting the City's surface water diversions have yet to be determined. It is expected that the City will lose more water as a result of regulatory actions at the state or Federal level for the protection of listed species; and, 3) The City is also involved in two water rights matters pending before the State Water Resources Control Board that could affect future operations of the Felton Diversion and Loch Lomond Reservoir.

The Service is concerned that despite the acknowledgment that long-term requirements for in-stream flow releases have yet to be determined (in regards to a section 10 permit), the City has proposed to move forward with expanding their water service area. We request that the final EIR include substantive discussion regarding the potential effects of the project in regards to projected in-stream flow release limitations, which should be determined coordination with the Service and the National Marine Fisheries Service.

Summary

The Service is concerned that approval of the project would not only result in impacts to federally listed species occurring within UCSC's North Campus area, but to federally listed species occurring throughout the City's SOI, which are also dependent on the City's water management actions for their survival. This is derived from the fact that ground water and surface water supplies are inexorably linked, and as a result, plant and animal species that are dependent on these water supplies will also continue to be affected by the City's water management decisions. The Service recognizes the City's difficulty in understanding how their water management actions may affect federally listed species occurring in this area; however, irrespective of these difficulties it remains the City's responsibility to ensure their actions do not result in effects to these species.

Thank you for the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report for the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service. If you have any questions, please contact Chad Mitcham of our staff at (805) 644-1766, extension 335.

Sincerely,

A handwritten signature in black ink, appearing to read 'David M. Pereksta', with a long horizontal flourish extending to the right.

David M. Pereksta
Assistant Field Supervisor

REFERENCES

City of Santa Cruz. 2009. Draft Environmental Impact Report for the City of Santa Cruz Sphere of Influence Amendment and Provision of Extraterritorial Water and Sewer Service. Prepared for the City of Santa Cruz. (SCH No. 2008102108).

City of Santa Cruz Water Department. 2009. Water Shortage Contingency Plan.

Erler and Kalinowski, Inc. 2009. City of Santa Cruz Water Supply Assessment, Sphere of Influence Amendment. EKI A90033.00.

University of California Santa Cruz. 2006. University of California, Santa Cruz 2005-2020 Long-Range Development Plan Final Environmental Impact Report. (SCH No. 2005012113).

U.S. Geological Survey. 1999. Sustainability of Ground-Water Resources. U.S. Geological Survey Circular 1186. Denver, Colorado.

CITY OF SANTA CRUZ
Notice of Availability of Draft EIR

Project Location: A portion of the UCSC North Campus that is adjacent to and north of Santa Cruz City limits.

Project Description: The project consists of an amendment to the City of Santa Cruz Sphere of Influence (SOI) to include a 374-acre portion of the UCSC "North Campus" for the purpose of providing extraterritorial water and sewer services to the area. Applications were submitted to the Santa Cruz Local Agency Formation Commission (LAFCO) by the City of Santa Cruz (for the SOI amendment) and by UCSC (for provision of extraterritorial services) in accordance with provisions of the "Comprehensive Settlement Agreement" regarding the University's 2005 Long Range Development Plan EIR. Implementation of the proposed project would adjust the City's probable physical boundaries and service area for water and sewer service to include the project area in which UCSC proposes development as set forth in its adopted 2005 LRDP and in the Comprehensive Settlement Agreement.

Potentially Significant Effects on the Environment: Potentially significant impacts were identified related to water supply availability during dry years, project effects on cumulative water supply during normal and dry years, and indirect project effects on greenhouse gas emissions and global climate change.

Lead Agency: City of Santa Cruz Planning and Community Development Department

Public Review Period: November 19, 2009 through January 19, 2010.

A copy of the Draft EIR may be reviewed or obtained at the Planning Department at the address below, and a copy is available for review at the Downtown Library at 224 Church Street. The Draft EIR can be found online at: www.ci.santa-cruz.ca.us/

City of Santa Cruz Planning and Community Development Dept.
809 Center Street, Room 107
Santa Cruz, CA 95060

Comments on the Draft EIR should be submitted in writing to Ken Thomas at the above address from November 19, 2009 until 5PM on January 19, 2010. Comments may also be emailed to Ken Thomas at kthomas@ci.santa-cruz.ca.us. If you have any questions or comments, please contact Ken Thomas in the Planning Department at (831) 420-5148.

FISH AND WILDLIFE
SERVICE

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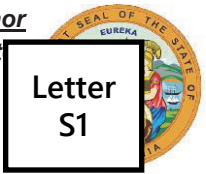
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State Comment Letters



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 1, 2021

Ms. Erika Carpenter
University of California, Santa Cruz
1156 High Street, Barn G
Santa Cruz, CA 95064
eircomment@ucsc.edu

Subject: UC Santa Cruz Long Range Development Plan, Draft Environmental Impact Report, SCH No. 2020029086, City and County of Santa Cruz

Dear Ms. Carpenter:

The California Department of Fish and Wildlife (CDFW) has reviewed the draft Environmental Impact Report (EIR) prepared by the University of California, Santa Cruz for the UC Santa Cruz Long Range Development Plan (Project) located in Santa Cruz County. CDFW is submitting comments on the draft EIR regarding potentially significant impacts to fish and wildlife resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (e.g., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state’s fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

S1-1

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Lake and Streambed Alteration Program

Notification is required, pursuant to CDFW’s LSA Program (Fish and Game Code, section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

S1-1
cont.

PROJECT DESCRIPTION AND LOCATION

The 2021 Long Range Development Plan (LRDP) would serve as the long-term planning document that guides physical campus growth through 2040 on two of the three UC Santa Cruz campus properties located in the City of Santa Cruz: (1) the UC Santa Cruz main residential campus and (2) the Westside Research Park, located at 2300 Delaware Avenue. Together, the main residential campus and Westside Research Park constitute the LRDP area or plan area for the 2021 LRDP. It does not address planning or growth on the third campus property, the Coastal Science Campus, which is governed by a separate Coastal LRDP (State Clearinghouse No. 2001112014). In addition, the LRDP area does not include the Scotts Valley Center, the Silicon Valley remote satellite campus, nor the UC Monterey Bay Education, Science, and Technology Center (MBEST), which was transferred to UC Santa Cruz by the U.S. Army and is located approximately 26 miles south of the main residential campus.

S1-2

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the University of California, Santa Cruz in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct, and indirect impacts on biological resources.

COMMENT 1: Pertains to Section 3.10 Hydrology and Water Quality

Issue: This section addresses impacts that could occur in the immediate LDRP project footprint including overdraft and contamination of karst aquifer system. The karst aquifer underlies multiple local watersheds inclusive of the San Lorenzo River. This section does not address whether contamination or overdraft issues to karst aquifer could transmit outside of the immediate project footprint. The San Lorenzo River is a fully appropriated waterway and listed under Clean Water Act 303(d) list for several contaminants, temperature and sediment.

S1-3

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CDFW is working with the City of Santa Cruz and NOAA Fisheries on a Habitat Conservation Plan authorized under section 10(a)(1)(B) of the Federal Endangered Species Act. If this Habitat Conservation Plan is authorized, the City would agree to provide minimum bypass flows below their water diversions on the San Lorenzo River to protect Central California Coast Coho Salmon and Central California Coast steelhead trout.

Recommendation: CDFW recommends expanding the discussion already provided in Section 3.10 and addressing whether project could transmit hydrologic or water quality impacts to the San Lorenzo River, and if impacts to Coho Salmon and steelhead trout could result. The Project draft EIR should further address whether contaminants stemming from LDRP could enter the karst aquifer and be transmitted to the San Lorenzo River as remerging streamflow. CDFW also recommends the Project draft EIR consider whether drafting of groundwater by UC Santa Cruz from the karst aquifer could potentially impact streamflow in the San Lorenzo River.

S1-3
cont.

COMMENT 2: Pertains to Section 3.17 Utilities and Service Systems

Issue: Pertains specifically to section 3.17-1: Impacts on Water Supply. The draft EIR brings up a serious sustainability issue that the city's water supplies are already inadequate to meet current service demand, and any UC Santa Cruz expansion will result in additional demand and take from the city's water system. There is a discussion of drought and critical dry year shortfalls in this section. This section does not address potential climate change impacts which may further impact city supply. The draft EIR brings up potential water prospecting projects that the city could specifically undertake to increase water supply, and potential environmental impacts, although the description and impacts presented do not appear to be comprehensive. Our agency is concerned that any prospecting for additional water will undoubtedly put strain on additional groundwater or surface water systems, and result in impacts to associated biological communities.

S1-4

COMMENT 3: Mitigation Measure 3.5-2h: Conduct Focused Surveys for Monarch Overwintering Colonies and Implement Avoidance Measures

Issue: The draft EIR identifies that Project tree removal activities could impact monarch butterfly overwintering colonies or suitable overwintering habitat. Mitigation measure 3.5-2h proposes tree removal will be delayed until monarchs have left the areas, as determined by a qualified biologist. In addition, UC Santa Cruz will prepare and implement a site-specific plan for the monarch overwintering colony, following feasible recommendations from *Protecting California's Butterfly Groves Management Guidelines for Monarch Overwintering Habitat* (Xerces 2017). It is unclear from the Project draft EIR which recommendations would be considered feasible. Recommendations include replacing removed trees with native trees in strategic locations to provided additional wind protection.

S1-5

Ms. Erika Carpenter
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CDFW is concerned loss of trees used by Monarchs for overwintering will contribute to extirpation of Western Monarch populations. Tree planting is unlikely to be sufficient to mitigate loss of suitable trees for Monarch overwintering to a less-than-significant level. Loss of mature trees used by monarch butterflies for over-wintering will cause temporal loss of over-wintering habitat until replacement trees grow to a mature size and assumes Monarchs would utilize replacement trees.

Evidence the impact would be significant: The data gathered from the Western Monarch Thanksgiving Count show that western overwintering monarchs are at an all-time critical low level and have significantly declined to approximately two percent of their numbers since 1997 (Xerces Society Western Monarch Thanksgiving Count, 2019). The decrease in Western Monarch butterflies may be due to the loss of overwintering habitat and loss of its host plant (milkweed) (Pelton et al. 2019). According to the Xerces Society, “Western monarchs use the same sites each year, even the same trees, and need intact overwintering habitat, which provides a very specific microclimate and protection from winter storms,” (Xerces Society, 2020).

S1-5
cont.

Recommendations to minimize significant impacts: CDFW recommends the Project be planned to avoid removal of trees used by Western Monarchs for over-wintering.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form, online field survey form, and contact information for CNDDDB staff can be found at the following link: <https://wildlife.ca.gov/data/CNDDDB/submitting-data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

S1-6

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

S1-7

Ms. Erika Carpenter
University of California, Santa Cruz
March 1, 2021
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Thank you for the opportunity to comment on the Project's draft EIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or wesley.stokes@wildlife.ca.gov; or Mr. Craig Weightman, Environmental Program Manager, at craig.weightman@wildlife.ca.gov.

S1-8

Sincerely,

DocuSigned by:

BE74D4C93C604EA...
GREGG ERICKSON
Regional Manager
Bay Delta Region

cc: State Clearinghouse
Sean Cochran, CDFW Region 3 – sean.cochran@wildlife.ca.gov

REFERENCES

- Pelton, E. M., Schultz, C. B., Jepsen, S. J., Black, S. H., and Crone, E. E. (2019). Western Monarch Population Plummet: Status, Probable Causes, and Recommended Conservation Actions. *Frontiers in Ecology and Evolution*. 7:258.
- Xerces Society Western Monarch Thanksgiving Count (2019). Western Monarch Thanksgiving Count Data from 1997–2018. Available online at: www.westernmonarchcount.org
- Xerces Society (2020). <https://xerces.org/press/western-monarch-butterfly-population-still-at-critical-level>. Accessed January 5, 2021.



Erika Carpenter <escarpent

Letter
S2

[eircomment] LRDP EIR Comments-Norris

'Richard Norris' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Sun, Mar 7, 2021 at 2:41 PM

Reply-To: Richard Norris <rnorris@ucsd.edu>

To: eircomment@ucsc.edu, Don Croll <dcroll@ucsc.edu>, Gage Dayton <ghdayton@ucsc.edu>

Dear Erika Carpenter and other members of the Campus Planning Team,

Please find my letter on the proposal to make the UCSC Campus Reserve part of the UC-NRS.

Cheers, Dick

Richard D. Norris

Scripps Institution of Oceanography

University of California San Diego

La Jolla CA 92093-0244

Ph: 858-822-1868

email: rnorris@ucsd.edu

"We are off on the Greatest Adventure of our lives!"

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



UCSC Campus Reserve Norris.doc

85K



RICHARD D. NORRIS
SCRIPPS INSTITUTION OF OCEANOGRAPHY
GEOSCIENCES RESEARCH DIVISION

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0244
Office: 858) 822-1868

March 1, 2021

To: UCSC Campus Planners
Subject: LRDP EIR Comments

I am writing to urge UCSC campus administrators and the UC Regents to permanently protect the UCSC Campus Natural Reserve by adding the reserve to the UC Systemwide Natural Reserve System. The campus reserve is critical to the university’s teaching and research mission, and is a signature element that differentiates UCSC from all the other campuses of UC.

S2-1

Here at UCSD we have found that our most heavily used reserves are those close to campus that can function truly as outdoor laboratories. Research on student engagement shows that field classes have more impact than lecture courses on student decisions to stick with their choices in STEM fields and to feel empowered about their abilities to do inquiry-based research. Our near campus sites are important because they can be accessed in normal class periods and can be reached (in some cases) by walking, requiring no special logistics. Published research has shown that field experiences also create a sense of social place for students in majors like Earth Sciences and Ecology—an important component in UC’s wider emphasis on increasing diversity in STEM.

S2-2

Furthermore, in these liability-driven times, NRS reserves are protected field sites where liability can be controlled. Field sites, particularly those close to campus, are valuable not only for instruction in STEM, but also in many other fields from visual arts to expository writing. UCSC should view the campus reserve as a general campus resource for instruction.

S2-3

All this suggests that UCSD would be wise to make sure that open spaces in the Campus reserve are protected from future development. My campus, UCSD, is more urbanized than the UCSC campus, so we acutely feel the loss of open space for social well-being of students in addition to its loss for teaching and research. UCSS should not go down our path too far before protecting the Campus reserve as completely as possible.

S2-3

I strongly urge Chancellor Larive to take advantage of this opportunity to permanently protect the UCSC Campus Reserve as a component of the UC-Natural Reserve System.

Sincerely,

Sincerely,

Richard D. Norris
Distinguished Professor and Curator
Director, UCSD Natural Reserve System



Erika Carpenter <escarpent

Letter
S3

[eircomment] LRDP EIR Comments

Alex Jones <asjones@ucsc.edu>
To: eircomment@ucsc.edu

Sat, Mar 6, 2021 at 8:00 AM

Dear Erika-


Please accept my (long!) comment letter on the Draft 2021 LRDP and Draft EIR (attached) and please reach out with any questions you may have.

Congratulations on all the hard work on these documents--they are overwhelmingly comprehensive!

Take care,
Alex

--
Alex Jones
Campus Natural Reserve Manager
he/him/his
University of California-Santa Cruz
[UCSC Land Acknowledgement](#)
Nat Sci II 463
831.459.5798 (w)
asjones@ucsc.edu
[website](#)
[facebook](#)
[instagram](#)

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **2021_DraftLRDP_DEIR_comment_Alex Jones.pdf**
94K



Erika Carpenter <escarpen@ucsc.edu>

[eircomment] LRDP EIR Comments

Alex Jones <asjones@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 10:39 PM

Dear Erika-

I made a couple slight revisions to my comment document. Please ignore the submission from Saturday, March 6th at 8 am and please accept this one instead.

Thank you,
Alex

[Quoted text hidden]

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **2021_DraftLRDP_EIR_comment_Alex Jones_revised.pdf**
94K

7 March 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development and Operations
University of California, Santa Cruz
1156 High St.
Santa Cruz, CA 95064

Dear Erika,

I am writing as Manager of the UCSC Campus Natural Reserve (CNR) with comments regarding the UCSC Draft Long Range Development Plan (DLRDP) and Draft Environmental Impact Report (DEIR) for the 2021-2040 Long Range Development Plan (LRDP). I am grateful for the continued opportunity to work with you on this topic and am pleased with the designation of the Campus Natural Reserve lands in the DLRDP and how hard UCSC planners and consultants worked to limit development within previously undeveloped areas. I am writing with the following comments pertaining to potential impacts to the CNR and other campus natural lands, as well as numerous other minor points and suggested edits, for your consideration.

S3-1

Permanent Protection for the Campus Natural Reserve

DLRDP 4.3 p.122-123 & DEIR p. 2-19

I strongly support the expansion of the Campus Natural Reserve and see its proposal as a strong indication of the UCSC planners and consultants support of campus education, research, and stewardship. In addition to the areas noted in the 2021 DLRDP land use designation map, I advocate for the inclusion of the portions of the Great Meadow classified as Natural Space to be reclassified as Campus Natural Reserve. This will allow these areas to explicitly be prioritized for education, unobtrusive research, and careful land stewardship. To ensure the integrity of this education and research resource long-term, I strongly advocate for the permanent protection of the Campus Natural Reserve, via inclusion in the UC Natural Reserve System or by other means. This will allow for long-term investment from faculty researchers and safe investment in programs, and secure access to intact natural lands that help fulfill the university's teaching and research missions. Campus Natural Reserve programs and lands annually support over 3000 students per year on course field trips within over 80 courses provide over 100 students with experiential internships. This is often the first real exposure students have to learning in the outdoors, just steps from traditional classrooms and residence halls. They gain marketable job skills, find direction for their studies, and grow in passion and commitment to being ecologically informed citizens. UCSC is unique among all UC campuses, and arguably universities worldwide, in having such a diversity of habitats on such an inspiring landscape. Permanent protection of the Campus Natural Reserve will allow UCSC to remain a leader in field education and research. In addition, permanent protection will the perpetual protection sensitive cultural/archaeological resources and endangered and other listed species.

S3-2

DEIR Mitigation Measures 3.5-3b7 & 3.5-7

Permanent protection of the Campus Natural Reserve could be one avenue to pursue when seeking to mitigate for unavoidable loss of sensitive natural communities and /or to replace Inclusion Area D and amend the Ranch View Terrace Habitat Conservation Plan to allow for the construction of proposed Employee Housing.

S3-3

Creation of a Comprehensive, Campus-wide Habitat Conservation Plan

DEIR Mitigation Measure 3.5-2a/2i

I strongly support the creation of a comprehensive, campus-wide Habitat Conservation Plan that would prescribe avoidance and minimization measures for impacts to Ohlone tiger beetle and California red-legged frog, monitoring requirements, and biological goals and objectives for the conservation and adaptive management of each species.

S3-4

Protection of rare and endemic wildlife within UCSC's karst system

DLRDP 2.2 p.61

"This condition is variable throughout the campus and is a geological feature unique to the State." There is karst elsewhere in the state, and definitely elsewhere in the world.

S3-5

DLRDP 2.2 p.65 & 4.5 p.150; DEIR Impact 3.10-5

On the issue of potential groundwater extraction from the karst aquifer system in the central and lower portion of campus: The biological component of the karst system below campus has not been studied in detail but very well could include the same (and possibly other) rare, endemic, and special status species found in Empire Cave, including the following aquatic species: Empire Cave amphipod (*Stygobromus imperialis*), Mackenzie's amphipod (*Stygobromus mackenziei*), and rare isopods *Caecidotea* n. sp. and *Calasellus californicus*). This should be studied and evaluated prior to any attempt at pumping groundwater from karst systems on campus and appropriate related mitigation measures should be established to reduce potential impacts on sensitive aquatic karst and cave biota.

S3-6

DEIR Mitigation Measure 3.5-2g

The "fencing" mentioned in this mitigation measure should be a bat-friendly cave gate, which should be implemented as soon as possible to protect the sensitive cave ecosystem from rampant vandalism and disturbance, as well as the safety of students and the general public. The LRDP should identify funding for the construction, installation, and maintenance of this gate. Empire Cave has been identified as the 3rd most biodiverse cave in California, but by far the most impacted (Elliot et al. 2017). A local caver has measured CO2 levels upwards of 4% within the cave, which exceeds safe conditions (M. Davies pers. comm.), and the entrance ladder, combined with the substances people ingest as they party in the cave, presents a clear and present safety issue.

S3-7

Create and fund a natural lands recreation/trail management plan and forest/vegetation management plan.

DLRDP 2.2 p.46

Second paragraph, left column: "fire and maintenance trails"—are you calling these trails and not roads because they are not paved? I would suggest calling them roads.

S3-8

DLRDP 3.2 p.92

Objective 4: I applaud this objective and hope to be an active participant in actualizing it. In order for UCSC to provide meaningful protection for habitats, sensitive species, outdoor classrooms, and field research areas, however, significantly more resources must be allocated to these ends. Providing permanent funding and personnel for stewardship programs and

S3-9

coordination, as well as proactive initiatives related to forest/other vegetation management and recreation management, will facilitate reaching this objective.

S3-9
cont.

DLRDP 4.2 p.112

4. Integrate planning for long-term resilience: As part of this, UCSC should fund development and implementation of a recreation management plan and forest/other vegetation management plan (as in Mitigation Measure 3.18-2 for the latter), including necessary associated permitting that would enable vegetation management work. Without these plans the means to support them, which would also include personnel, UCSC will not be able to adequately steward its lands in the long-term.

S3-10

DLRDP 4.4 p. 138

Bicycle trails second paragraph: yes. UCSC should support this planning process and fund the implementation of a resulting recreation/trail management plan.

S3-11

DEIR Impacts 3.15-1: Impacts on Campus Recreation Facilities

The DEIR states that 1,419 acres of the residential UCSC campus functions as "passive recreational space." This area includes the Campus Natural Reserve and adjacent undeveloped lands, where there is currently a very high level of use of a dense network of unauthorized trails. An increase of the FTE student population to a max of 28,000 would add significantly more outdoor recreation pressure to campus natural lands and increase erosion, impacts to sensitive natural communities (such as coastal prairie and redwood forest), and endangered and special-status species (Ohlone tiger beetle, coastal prairie flora). The DEIR should include mitigation measures to specifically address this issue, including the development of a comprehensive recreation and trail management plan for UCSC's undeveloped lands, as well as funding to ensure its effective implementation. I understand that the new ratio of acreage to persons would still exceed the Quimby Act parkland dedication standards, but the reality is that the land is being significantly degraded in the absence of the long-term funding of recreation and trail management and enforcement. Page 3.15-12 states that "UC Santa Cruz will continue to maintain existing on-campus recreation facilities." Though I'm not excited to say this, we need to define the Upper Campus ad-hoc trail system as a recreation facility, due to its high levels of recreational use, and by doing so we need to follow through with dedicated maintenance through adoption of a funded and sustainable management plan for the area.

S3-12

DEIR Mitigation Measure 3.18-2

A campus-wide Vegetation Management Plan needs to include dedicated funding for continued management activities, as well as the necessary permits to conduct particular kinds of vegetation removal (such as Timberland Conversion Permits for removing certain tree species from northern maritime chaparral, Timber Harvest Plans, and/or a Programmatic Timberland EIR). Without funding for those permits, we will be unable to do certain vegetation management prescribed within a campus-wide Vegetation Management Plan.

S3-13

Long-term management and monitoring for invasive species infestations post-development

DLRDP 4.5 p. 151 and DEIR Mitigation Measure 3.5-1c

The Stormwater management at Emergency Response Center photo-----this area is now revegetated and has been colonized by invasive weeds. Large projects like these not only need invasive species BMP during construction (as outlined in DEIR Mitigation Measure 3.5-1c) but should include funding for longer term vegetation management to ensure we do not continue

S3-14

to allow post-construction landscapes to become invasive weed infestations that can spread to adjacent non-project related lands.

S3-14
cont.

Proper alignment and other issues of proposed roads and trails

DLRDP 4.4 p. 130-131 & DEIR p. 2-23

Proposed roadway: "Northern entrance": As mapped, the proposed roadway leading from the North Perimeter parking lot to Empire Grade is sited south of the existing Fuel Break Rd (western extension) fire road (look at the proposed road with an aerial photo basemap). This would result in a need for serious earthwork and the removal of hundreds of trees. If this road is desired, it should follow the existing fire road alignment just north of the proposed road. It also doesn't precisely follow West Rd (fire road), which it should. Those things said, if this road is built I believe it should be gated and only used for emergency purposes. The road corridor and existing topography would only accommodate one-way traffic in most areas, and making it two-lane would have significant impacts on adjacent slope wetlands, Cave Gulch tributaries and upland habitats supporting California giant salamander (CA Species of Special Concern), redwood forest, and potentially northern maritime chaparral. For these reasons I do not believe this is a viable regular use vehicle corridor.

S3-15

DLRDP 4.4 p.131 & DEIR p. 2-21

East-West Extension of Meyer Drive—The alignment of this road, as mapped, follows along the southern edge of the paved portion of the East Remote parking lot to its terminus at Coolidge Dr. This alignment would pass over or very near a sinkhole and erosion gully. If you were to realign this road to the south you would pass near more karst hazards and also overwintering burrowing owl habitat.

S3-16

DLRDP 4.4 pp.136-137 & DEIR pp. 2-27, 2-28

Proposed Bicycle Route: North connection segment of East-west connections—There are problems with this alignment that would become apparent if it is actually considered. There is severe erosion near the western end of the path, which itself appears to pass through areas of the Seep Zone. If this is built, careful siting to a) use existing paths and fire roads when feasible and b) restore eroded areas and c) design the contour trail in such a way to avoid future erosion issues. Importantly, if this is a paved trail, there will likely be erosion issues associated it. If it is unpaved, UCSC would need to change its current policy that prohibits biking on trails such as these in Upper Campus, as well as establish a sustainable trail and recreation management plan. Having a dirt path in this area while maintaining our current ineffectual policy will only confuse things further.

S3-17

Proposed Bicycle Route: New Connection to Housing in Northeast segment of North-south connections: This route is highly problematic, as it passes through a seasonal wetland at the southern end and along a seasonal creek within the East Fork Upper Jordan Gulch drainage. The slopes are steep in most areas, and a contour trail along the slopes would be challenging in some areas.

S3-18

Mitigations related to impacts to sensitive natural communities

DEIR Mitigation Measure 3.5-3a

The vegetation communities map for the 2021 DLRDP (DEIR p. 3.5-9) includes "grassland" and "coastal prairie" delineations identified during the 2005 LRDP planning process. I understand this was done due to lack of granularity in the more current vegetation data. The grassland vs.

S3-19

coastal prairie differentiation, however, is somewhat arbitrary, as our landscape position points to all of our grassland as being coastal prairie (despite some being heavily invaded by invasive grasses and forbs). As such, any development in habitats currently identified as grassland should include protocol-level vegetation surveys to determine whether or not these areas would qualify as coastal prairie or purple needlegrass grassland, both sensitive natural communities. If so, the third bullet point of Mitigation Measure 3.5-3b should be implemented. This is preferred over the previous two bullet points in MM 3.5-3b since it is very difficult to establish coastal prairie through restoration.

S3-19
cont.

Campus telecommunications improvements

DLRDP 4.5 p.158

The UCSC Upper Campus area has very spotty cell service. When considering expansion of telecommunications services, UCSC should seriously consider broad coverage that would cover all Upper Campus. This is a safety issue for the general public and our UCSC student community.

S3-20

Thresholds for student enrollment related to construction of necessary academic, residential, and other support infrastructure

DLRDP 3.2 p.92 (& 3.3 pp.95-96/3.4 pp.100-105)

Objective 1: During the 2005 LRDP period, the 19,500 FTE student enrollment figure identified in the 2005 LRDP was nearly reached and significantly outpaced the implementation of development identified in the plan that would enable UCSC to deliver on its mission of education and research. As a result, there has been a lack of classroom buildings, dormitory space, and other student resources that has impacted the quality of the UCSC student experience. A lack of funding and other resources has also led to increased impacts on campus natural lands, including the Campus Natural Reserve. Karen Holl, UCSC Professor of Environmental Studies, has proposed creating enrollment thresholds that are tied to specific development implementations and resource allocation, without which no further enrollment can occur. I support this idea and strongly encourage the campus to not grow its enrollment beyond its ability to support it---both with infrastructure and with the funding necessary to support programs that can ensure the sustainability of University support operations and effective land stewardship.

S3-21

Nit-picks

DLRDP 1.0 p.29

Minor correction: Alex Krohn's job title is Assistant Director, Ken Norris Center for Natural History

S3-22

DLRDP DLRDP 2.0 p.36

Aerial photo doesn't include the northern portion of Upper Campus (zooming out would allow for that). It would be useful to include the campus boundary on the image.

S3-23

DLRDP 2.1 p.37

Capitalize "Tribal Band" at end of first paragraph, right column. The Land Acknowledgement is buried in this location and would be better to highlight earlier and larger.

S3-24

DLRDP 2.2 p.45

Figure doesn't include Landels-Hill Big Creek Reserve, though I understand including it would dramatically change the scale of the map.

S3-25

DLRDP 2.2 p.51

Second paragraph, left column: "Campus Natural Reserve" (strike the "s" from Reserves).

S3-26

DLRDP 2.2 p. 53

First line right paragraph: There is a period missing after "(*Festuca perennis*)]"

S3-27

DLRDP 2.2 p.60

Figure 2.16—in the Legend it says "Quartz Diorite (Graphite Rocks)" but I'm pretty sure it should say "Quartz Diorite (Granitic Rocks)"

S3-28

DEIR p. ES-48

5th bullet point---"As noted in Mitigation Measures 3.5-2a and 3.5-2h"—it should say 3.5-2i, not 2h.

S3-29

DEIR p. 3.5-21

Latin name for bank swallow is *Riparia riparia*

S3-30

DEIR p. 3.15-11

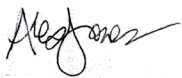
- Last paragraph: "connecting...Spring Box Trail to Highway 9"---those are well off of UCSC property, on Pogonip, are they not?
- Missing a period after "North Campus" in that same paragraph. Sorry, can't help it.

S3-31

Thank you for considering this long list of comments in your review of public comments for the Draft 2021 LRDP and EIR. I am happy to discuss any of these points further if desired.

S3-32

Respectfully,



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Erika Carpenter <escarpenc@ucsc.edu>

Letter
S4

[eircomment] EIR comments

Gage Dayton <ghdayton@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:58 PM

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations

Re: UCSC 2021 Long Range Development Plan and Environmental Impact Report

Dear Erika and UCSC LRDP Planning Team,

Thank you for the opportunity to provide comment and feedback on the DEIR and LRDP. Thank you also for your hard and thoughtful work that went into creating these documents. We greatly appreciate your collaborative approach in discussing ways to ensure we protect and enhance our natural resources and continue to support research and teaching on our natural lands. I feel that the focus of growth in and adjacent to developed areas (while maintaining contiguous open space) is a wise planning strategy. A direct result of your effort and thought that went into considering the importance and location of these natural and cultural “assets” is the increase of an additional approximately 380 acres to the Campus Natural Reserve.

While there will likely be modifications, I think that the plan does a good job of identifying important field teaching and research areas, sensitive species habitats, culturally important sites, and making sure that those areas are not included as developable lands as part of this LRDP. As you are well aware, I feel that it is time we provide permanent protection to these important outdoor research and teaching areas, protected species, and cultural areas. Below I have included some specific questions and comments to the DEIR and LRDP that I hope you will consider while drafting the final documents.

Sincerely,

Gage

S4-1

General comment on how expanded campus population can have significant impacts without triggering mitigation measures.

Expanded campus population without development can have direct impacts on environmental resources via increased use; however, without a development project, mitigation measures are often not required or implemented. An increased campus population has a direct impact on sensitive biological resources through increased use of undeveloped lands (both sanctioned [e.g. hiking and biking on fire roads, increased course and internship use, etc.] and unauthorized [e.g. creation and use of unauthorized trails, fire pits, dumping, etc.]). I think the DEIR should have specific conservation and management strategies/actions that are directly tied to campus population.

S4-2

3.16 Transportation

Figure 3.16-1 shows the vast network of informal and unauthorized trails throughout campus and surrounding areas; however, they are incorrectly identified as local streets. This should be changed to reflect that they are unauthorized trails (or whatever the appropriate title is). The impact of these trails is an example of how growth in campus population, without specific development projects, can have a potentially significant impact on environmental resources. I recognize that there are other groups that are using and creating these trails; however, it is our responsibility to steward and manage these lands.

S4-3

3.17-7 UC Santa Cruz Campus Sustainability Plan

Campus sustainability plan Strategy 1.2 Action 1.2.B and 5.1.B for 2017-2022 specifically mentions creating a campus land use management plan. This plan is critical for a holistic approach to managing campus lands and I am glad to see it included in the DEIR. The plan needs to be campus wide and identify specific actions and methods for achieving them.

S4-4

3.18-9 Vegetation Management

The vegetation management agreement with CalFire is a great example of a collaborative effort to manage campus lands to reduce wildlife risk and protect sensitive resources - this effort should be continued. However, the existing agreement is specific to a relatively small area of the campus (along Empire Grade, upper campus grasslands, and chaparral habitat). The effort should be expanded to consider fire risk and mitigation measures for the entire campus

S4-5

Mitigation measure 3.18-2 calls for the creation of a campus-wide vegetation plan two years post approval of the LRDP, this is an important step and commitment. It will be critical to not only address fire, biological, and ecological impacts of specific plan elements but to also clearly identify when and how it will be implemented.

General comment about Arboretum and Campus Natural Reserve MOU

We are working with the Arboretum on creating an MOU that maintains the Arboretum's longstanding management of the "jointly managed area" that would be designated as CNR in the 2020 LRDP.

S4-6

Inclusionary Parcel D Table 2-3 and Employee Housing in general

Page 2-15 states: “However, a 12.5-acre parcel (Inclusionary Parcel D Preserve or Inclusion Area D) has an employee housing overlay, which would require an amendment to the existing Habitat Conservation Plan (HCP) for Ranch View Terrace if the parcel were to be developed in the future while also maintaining the conservation objectives of the HCP (e.g., no net loss of habitat and potential relocation to more appropriate habitat).” I encourage reaching out to USFWS to discuss this option as are areas on campus where these two species occur that would be of higher conservation value. Placing housing, or other development, adjacent to the campus entrance and protecting higher quality and more intact habitat makes a lot of sense.

S4-7

Section 3.4-1: Tribal and cultural resources

Mitigation measures 3.4.1 (Identify and protect unknown archaeological resources) and 3.4.2 (Protect tribal cultural resources).

S4-8

The preferred method outlined in these mitigation measures, is avoidance and preservation – I agree completely. There are several very important and sacred cultural sites on campus that should be protected in perpetuity – these areas should not be developed and we should commit to permanently protecting them.

3.5 Biological Resources Impact

As with previous planning efforts, specific mitigation measures for impacts to species are project based rather than at a campus wide level. This approach makes it difficult to accurately assess and mitigate for cumulative impacts over time. Furthermore, it is based on development and is thus decoupled with increases in campus population. I feel a more appropriate approach to mitigate impacts to biological resources include:

1) Proactively engaging with resource agencies to explore the feasibility and benefits of an HCP. The DEIR mentions engaging with USFWS to discuss mitigation for specific projects as we have done in the past. This approach continues with the project by project mitigation that we, as a campus, have been following for the past several decades. An alternative approach is to engage in an HCP now that permanently protects resource rich areas of our campus, commits to management and stewardship of those areas (so that we can ensure resources are healthy and present going forward), and presents a more holistic way to managing our campus resources.

S4-9

2) Create a campus habitat and resource management plan that ensures that specific mitigation measures are met and, importantly, that we take a proactive approach in resource management that helps minimize ongoing impacts (e.g. increased trails, camp fires, dumping, etc.) to our natural resources. We can accomplish this in a manner that increases support of our academic and research (e.g. the Coastal Science Campus and Younger Lagoon Reserve model).

Mitigation Measures 3.5-2e

Calls for a Burrowing Owl Mitigation plan. Having a plan in place for this and other species that clearly articulates an approach for monitoring and protecting species would be useful. We should have a Campus Wildlife Management Plan as well as a Vegetation Plan.

S4-10

Section 3.5.2 – Vegetation Communities

As you know, many of the acreages for vegetation communities were calculated at a very coarse scale and are not accurate. I think the 2005 LRDP maps represent a better, but still incomplete, estimate for campus natural lands. Rather than waiting to obtain accurate cover estimates when specific projects are initiated, it will be important that the Campus Habitat Management Plan (described in *Mitigation*

S4-11

measure 3.18-2) include a campus wide effort to assess actual vegetation community composition and coverage. Having an accurate and up-to-date map will enable us to be more proactive in protecting resources and assessing potential project impacts early in the planning process before we are too heavily invested in a particular path.

S4-11
cont.

Permanent protection of the Campus Natural Reserve

Permanent protection of the Campus Natural Reserve would solve a lot of ongoing and future issues related to growth. Importantly, it would also provide permanent protection of research and teaching areas as well as our valued natural and cultural resources. Below are four of the many reasons why this is a good idea and why now is the time to do it.

S4-12

1. It would ensure that our largest facility (our living laboratory and outdoor classroom) is available for research and teaching now and into the future. The Campus Natural Reserve hosts more individual students than any single built facility on our campus. It is used by all of our academic Divisions and over a dozen departments. It supports more undergraduate interns than any other unit on campus. Permanent protection would encourage and facilitate additional investment from faculty and spur additional research and academic use.

2. Campus Natural Reserve areas within the current draft LRDP boundary were in part chosen to protect sensitive biological resources. These sites include specific areas where protected species are known to occur as well as their upland habitat. Engaging with USFWS to create an HCP would ensure future protection and stewardship of these species while providing us with a clearer path forward for development. This approach is, in my opinion, a much more holistic and appropriate path forward as it prevents the need for project-by-project mitigation (which often miss cumulative impacts).

S4-13

3. *“The land on which we gather is the unceded territory of the Awaswas-speaking Uypi Tribe. The Amah Mutsun Tribal Band, comprised of the descendants of indigenous people taken to missions Santa Cruz and San Juan Bautista during Spanish colonization of the Central Coast, is today working hard to restore traditional stewardship practices on these lands and heal from historical trauma.”* Permanent protection of important archaeological and cultural sites and strengthening relations with the Amah Mutusn Tribal Band is simply the right thing to do. Doing so would make additional strides toward achieving the goals articulated in our Land Acknowledgment.

S4-14

4. The LRDP and DEIR recognize the value of open space for passive recreation. These open spaces are important campus and community resources. We are a community that values open space, recreation, and conservation. UCSC natural lands play an important role in all of those areas for the greater community..

S4-15

Permanent protection of the Campus Natural Reserve as a UC Natural Reserve, combined with specific agreements and MOUs with groups and agencies such as USFWS and AMLT, is a mechanism to make this happen. There are other examples of UC Natural Reserves providing these functions and thus HCP and UC Natural Reserve designations are not exclusive of one another. I would greatly appreciate the opportunity to work with you to move this forward.

S4-16

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Erika Carpenter <escarpent

Letter
S5

[eircomment] comments on 2021 LDRP Draft EIR

Bowser, Colin@Coastal <colin.bowser@coastal.ca.gov>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 3:42 PM

Dear Ms. Carpenter,

In response to the University's notice in January of its long-range development plan draft EIR, please accept these related comments from the Coastal Commission's district office in Santa Cruz. If you have any questions about our comments, please contact me via email or by mail. Our office will mail a printed version of this attached letter to your office.

Sincerely,

Colin Bowser

Colin Bowser

coastal planner, Central Coast District

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 **UCSC LDRP DEIR comment letter.pdf**
71K

CALIFORNIA COASTAL COMMISSION

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March 5, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

Subject: Draft Environmental Impact Report for the UC Santa Cruz Long Range Development Plan

Dear Ms. Carpenter:

We received the above referenced Draft Environmental Impact Report (DEIR) for UC Santa Cruz’s 2021 Long-Range Development Plan (LRDP). The LRDP would establish a framework for identifying land uses for academic, administrative, open space, housing, circulation, and other land uses at the Main Campus and at the Westside Research Park to support the University’s academic mission through 2040. Less than five percent of the subject area is in the coastal zone. Pursuant to Section 30605 of the Coastal Act, the standard of review for the coastal zone components of the LRDP is the Chapter 3 policies of the Coastal Act.

S5-1

Thank you for engaging with our office early in the environmental review process; doing so will help identify and address the proposed LRDP’s potential impacts to coastal resources. As a preliminary matter, we continue to strongly support the University’s efforts to protect its coastal resources while focusing on sustainably growing its campus within the community and its unique natural setting. The purpose of this letter is to identify potential Coastal Act consistency issues and propose avoidance and/or mitigation measures to address those issues during the CEQA review process. Our ultimate goal with this approach is to facilitate a streamlined environmental review process, including when the LRDP is submitted to the Commission for review.

Westside Research Park

The DEIR states that over half of the Westside Research Park’s land that is now designated for academic and support uses would be redesignated as mixed-use land for the purpose of building housing and commercial uses for University staff. In doing so, the housing and commercial site would be part of a “commuter mobility hub” and would have a “transit-oriented design.” While future residents of any new housing in the Westside Research Park will use an array of transportation means, including cars, we emphasize the need to plan for car parking onsite for residents and commuting workers at the Research Park.

S5-2

UC Santa Cruz LDRP Draft Environmental Impact Report

The Westside Research Park is located in the vicinity of Delaware Avenue. Delaware Avenue provides public street parking for several nearby outdoor recreation areas, such as Natural Bridges State Beach, the popular coastal bike trail on the City's westside, Antonelli Pond, and the public access trails at the Marine Science Campus. This on-street parking is a critical component in providing public access for visitors to these recreation areas, and such public access is a priority under the Coastal Act. Thus, the Westside Research Park should provide sufficient onsite parking for Westside Research Park residents and commuters to ensure that the public parking along Delaware Avenue remains open and available for general public access use.

S5-2
cont.

Main Campus

Coastal Act Section 30240 requires that environmentally sensitive habitat areas (ESHAs) be protected and that only resource-dependent uses, e.g. trails, are allowed in ESHA. Typically, the Commission has required buffers for development that is adjacent to ESHA. A portion of the new multi-story staff housing complex located on the western side of Empire Grade is located in the coastal zone, as is some of the proposed new natural gas pipeline tentatively planned to be located on the west side of Empire Grade extending from the southwestern part of the lower campus to the west side of the upper campus. A DEIR biological resources report map shows that proposed new housing development would be in an area with habitat suitable for a variety of sensitive species, including protected species such as Ohlone tiger beetles and California red-legged frogs. Per Coastal Act Section 30240, any such development in the coastal zone, i.e. housing and pipeline development, must be located outside of any such ESHA, and appropriate buffers must be required to protect adjacent ESHA.

S5-3

Coastal Act Section 30251 protects important public views, including views of the meadow as seen from a variety of viewpoints in the City and County. The DEIR does not provide information on the proposed housing complex's exact size, location, and other important design and site details. This information is necessary to determine if the LRDP can be found consistent with the view protections required in Coastal Act Section 30251, especially with respect to important coastal views from Empire Grade (which is designated as a scenic road in Santa Cruz County's LCP) and views of the meadow along Empire Grade. Please provide more information on the housing complex's design, planned location, site characteristics such as slope and geotechnical stability, and alternative locations considered in the main campus area for the housing complex.

S5-4

Finally, the DEIR describes that additional freshwater supply for projects envisioned under the LRDP will be provided by new or expanded ground wells that would draw drinking water from the nearby karst aquifer. Please describe how the planned for amount of water withdrawn from the karst aquifer would affect seasonal flows in nearby springs and streams that provide valuable habitat for a range of plant and animal species. In addition, please describe how climate change may affect how the aquifer recharges, especially given the potential for continued droughts over time, and how that will affect the aquifer.

S5-5

Thank you for considering these comments as you refine the DEIR and continue the process of planning for UCSC's careful expansion. Please do not hesitate to contact me

S5-6

UC Santa Cruz LDRP Draft Environmental Impact Report

at the address and phone number above if you would like discuss any of these comments.

| S5-6
| cont.

Sincerely,



Colin Bowser
Coastal Planner
Central Coast District



Erika Carpenter <escarpent

Letter
S6

UC Santa Cruz LRDP Comment Letter

Bjornstad, Christopher@DOT <Christopher.Bjornstad@dot.ca.gov>

Mon, Mar 8, 2021 at 3:00 PM

To: Erika Carpenter <escarpent@ucsc.edu>, "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Cc: Claire Gallogly <cgallogly@cityofsantacruz.com>, Rachel Moriconi <rmoriconi@sccrtc.org>

Good afternoon,

Please see the attached comments for the UC Santa Cruz LRDP DEIR. A hard copy has been sent for your records. Let me know if you have any questions.

Thanks,

Chris Bjornstad

Caltrans, District 5

Associate Transportation Planner

(805) 549-3157



UC Santa Cruz LRDP Comment Letter.pdf
146K

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
www.dot.ca.gov/dist05/



*Making Conservation
a California Way of Life.*

March 8, 2021

SCr/VAR
SCH#2020029086

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

Dear Ms. Carpenter:

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) OF THE UC SANTA CRUZ LONG RANGE DEVELOPMENT PLAN (LRDP), SANTA CRUZ, CA

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the UC Santa Cruz LRDP. The LRDP projects up to 28,000 Full-Time Equivalent (FTE) students and 5,000 FTE faculty, construction of an additional 3.1 million assignable square feet (asf) of academic and support building space, and approximately 2.5 million asf of student and employee housing space by 2040.

S6-1

1. Caltrans supports planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with our State partners and local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

S6-2

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure are supported by Caltrans and are consistent with our mission, vision, and goals. To this point, UC Santa Cruz has an excellent opportunity to increase multi-modal use by improving its internal and external circulation through completion of pedestrian linkages/sidewalks and bicycle infrastructure on and adjacent to the campus.

- Additionally, a great opportunity presents itself for UC Santa Cruz to partner with Santa Cruz Metro Transit District (SCMTD) to improve services to/from and around campus. The proposed LRDP would provide a framework over the next few decades to guide campus development, student growth, and meaningful off-site multimodal improvements to address project specific impacts of the student population. S6-2 cont.
2. We appreciate the vehicle miles traveled (VMT) study developed for the LRDP includes many proposed transportation demand management (TDM) and parking management strategies as mitigation measures. That being said, this programmatic EIR will serve as a foundation for subsequent projects on campus. Caltrans believes the EIR should and can more strongly commit to the TDM mitigation strategy discussed in the transportation section in the EIR. There should be a more robust discussion of which mitigations are realistic, and a timeline for how and when they will be implemented. Additionally, funding sources and partner agencies should be more identified. S6-3
3. The only mitigation measure listed in the transportation section is implementing a TDM program and monitoring the program in order to lower project VMT below the significance threshold of 15% below baseline total VMT. However, the threshold is not guaranteed to be met even with the TDM program. Therefore, additional mitigation measures pertaining to project safety and operational impacts to the State Highway System (SHS) could be required. S6-4
4. Due to the impacts on the SHS from increases in enrollment and employment, Caltrans encourages UC Santa Cruz to contribute to projects listed in the Santa Cruz County Regional Transportation Plan (RTP). Funding local transportation projects can assist in mitigating the increased operational and safety impacts to the SHS due to the significant VMT added from the LRDP. S6-5
5. Please consider contributing funding to projects that will lead to fewer impacts along State Route (SR) 1 intersections based upon local concerns at the DEIR Scoping Sessions. The intersections with known operational issues were located at Bay Street, High Street, and Western Drive. Examples from the RTP designed to reduce congestion on SR 1 include Bus Rapid Transit and the Hwy 1 – West Area Alternative Access project. S6-6
6. Additionally, please contemplate contributing to RTP local bicycle, pedestrian, and transit projects as a part of the UC Santa Cruz TDM strategy to lower VMT by providing transportation alternatives. Many additional opportunities exist to further supplement the LRDP Project Characteristic of S6-7

enhancing alternative transportation opportunities and increasing connectivity within the campus and to the city. Project examples in the RTP include the Bikes on Buses Expansion project and the Bike Parking Subsidy Program.

S6-7
cont.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or email christopher.bjornstad@dot.ca.gov.

S6-8

Sincerely,



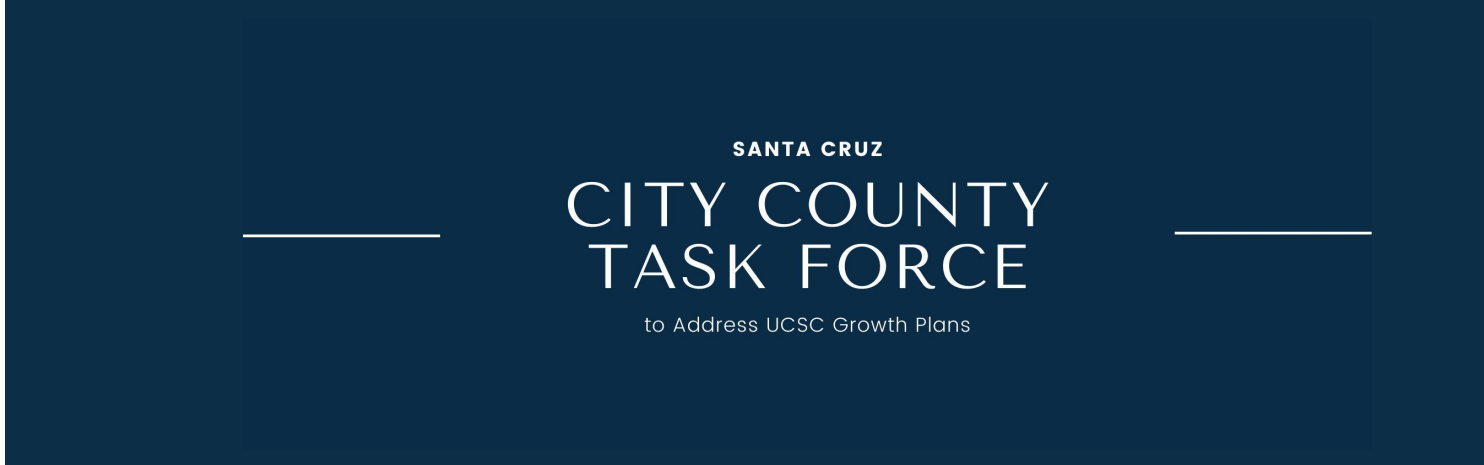
Chris Bjornstad
Associate Transportation Planner
District 5 Development Review

Cc: Rachel Moriconi, SCCRTC
Claire Gallogly, City of Santa Cruz

Local Comment Letters

From: "Santa Cruz Task Force on UCSC Growth Plans" <info@actonucscgrowth.org>
To: eircomment@ucsc.edu
Date: 1/11/2021 10:28:43 AM
Subject: [eircomment] The Draft Environmental Impact Report Has Been Released!

Letter
L1



NOW IS THE TIME TO ACT

*THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) &
DRAFT LONG RANGE DEVELOPMENT PLAN HAVE BEEN RELEASED*

View The Documents

View the [Draft Long Range Development Plan](#) and Draft Environmental Impact Report ([Volume 1](#) & [Volume 2](#)). Explore the UCSC LRDP website [here](#).

Get Involved

These documents are long (2,000+ pages), filled with legal-jargon, and make references many many documents. We know that even for those incredibly dedicated and passionate about responsible UC growth, the task of reading through and proposing comments & alternatives can be intimidating. **Join your neighbors and peers in a topic-specific DEIR working group that will do that work collaboratively to evaluate the adequacy of the University's plans and provide written responses to the University.**

L1-1


View the sections that will be covered by the university and sign up for a working-group [here](#). (Note: your email will only be recorded if you choose to sign up for a working-group.)



...and more!

Sign-up soon as groups will be planning their initial meeting shortly.

L1-1
cont.

 Upcoming Events

February 2021: Draft EIR Public Hearings

FEB 3	5-7PM Information for Zoom Meetings will be posted by February 1
FEB 4	5-7PM Information for Zoom Meetings will be posted by February 1

Mark Your Calendar

February 3rd @ 5:00pm (zoom link TBD)

February 4th @ 5:00pm (zoom link TBD)

Under the 2020-40 LRDP the University will continue to grow faster than the City and the impacts of this growth will overwhelm the City's housing, streets, and infrastructure.

As UCSC prepares the 2020-2040 Long Range Development Plan (LRDP), Santa Cruz cannot afford for history to repeat itself. Given the dueling and serious crises facing our community, we demand that UCSC enters a **legally-enforceable agreement** to:

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;
2. house any additional students, faculty, and staff on campus, and;
3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing [Measure U](#))

L1-1
cont.

WHAT INFO MUST UCSC INCLUDE IN THE LRDP EIR?

- A PROJECT DESCRIPTION
- AN ENVIRONMENTAL SETTING DESCRIPTION
- AN OUTLINE OF THE SIGNIFICANT ENVIRONMENTAL EFFECTS
- DESCRIBE THE UNAVOIDABLE SIGNIFICANT ADVERSE EFFECTS
 - THE GROWTH-INDUCING IMPACTS
 - THE CUMULATIVE IMPACTS
- MITIGATION MEASURES
- ALTERNATIVES
- THE FINAL EIR CONTAINS RESPONSE TO PUBLIC COMMENTS

TIPS FOR YOUR EIR COMMENTS

- EFFECTIVE COMMENTS ARE SUBSTANTIVE:
 - **THEY ADDRESS SPECIFIC IMPACTS**, POINT OUT ERRORS, INCONSISTENCIES, OMISSIONS OF DATA OR ANALYSES, CONCLUSIONS NOT BASED ON EVIDENCE, OR FAILURES TO PROVIDE DISCUSSION REQUIRED BY CEQA
- COMMENTS SHOULD BE BACKED BY FACTUAL SUPPORT OR PERSONAL EXPERIENCE
- UCSC MUST RESPOND ADEQUATELY TO SUBSTANTIVE COMMENTS PRIOR TO CERTIFICATION OF THE EIR

**UCSC must
respond to
substantive
comments>
before the EIR
is certified.**

FAILURE TO DO SO PROVIDES BASIS FOR LEGAL
CHALLENGE.

**SHARE
YOUR
COMMENTS
&
CONCERNS
WITH US.**

EMAIL US AT INFO@ACTONUCSCGROWTH.ORG WITH
HOW UCSC GROWTH WILL IMPACT YOU.

L1-1
cont.

Content: Disclaimer: This information is intended to serve as a guide and is not intended to be legal advice. Please seek professional help from a lawyer if you have legal questions or concerns.



You can reach us via email at info@actonucscgrowth.org

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Want to view this email in your browser?
Visit this [link](#)

www.actonucscgrowth.org

From: "Santa Cruz Task Force on UCSC Growth Plans" <info@actonucscgrowth.org>
To: eircomment@ucsc.edu
Date: 1/14/2021 1:30:36 PM
Subject: [eircomment] Quick Tips to Make Your EIR Comments More Effective

Letter
L2

SANTA CRUZ
CITY COUNTY
TASK FORCE
to Address UCSC Growth Plans

TIPS TO MAKE YOUR COMMENTS ON THE EIR MORE EFFECTIVE

Get Prepared

- Read the EIR ([volume 1](#) & [volume 2](#)) - or just read strategically those subsections related to your interests/concerns;
- If you can, search online for articles, studies, reports, and even contact organizations that support or have expertise in subjects relating to your initial concerns;
- Look at the [Executive Summary's](#) impact table for environmental categories discussed;
- Outline/organize your letter (introduction, comments, conclusion, address, title of project, and attachments);
- Visit affected locations or use Google Maps to view the proposed project sites. Even if you know the area, refresh your memory;
- Decide on the main comment(s) or theme to express in your letter;
- **Questions to consider while reading:**
 - Does the EIR ask the right questions?
 - Does it provide enough information to describe the likely impacts of a project?
 - Is the EIR identifying and analyzing the feasible alternatives?

L2-1

Write Your Comments

- Objectively evaluate the project, present your comments in a neutral tone, and be VERY specific. **Generalities can be dismissed with generalities.**
- Separate your concerns into clearly identifiable paragraphs or headings and keep a tight focus on each separate issue. Don't mix topics.
- Avoid saying "I support the UCSC growth, but..." – **just list your concerns, or your letter may be classified as a letter of support.**
- Consider ways to avoid impacts or enforceable ways to reduce the severity of impacts.
- Quantify your objections whenever possible
 - If a potential significant impact has not been adequately identified; **or**
 - If no mitigation has been proposed for a potentially significant impact; **or**
 - If the mitigation proposed doesn't appear to be sufficient or appropriate, **then:**
 - Identify the specific impact in question;
 - Explain why you believe the impact would occur;
 - Explain why you believe the effect would be significant; and, if applicable;
 - Explain what additional feasible mitigation measure(s) or changes in proposed mitigations or to the project you would recommend.
 - Explain why you would recommend any changes and support your recommendations with evidence.
- Whenever possible, present facts or expert opinions. If not, provide personal experience or your personal observations. **Don't just complain.**
- Focus on correcting their discrepancies, lapses in logic, lack of evidence, old data, etc
- Include suggestions for making the Draft EIR better or offer specific alternatives and describe how your comments meet the requirements of the project and [CEQA](#). **Your goal should be to write something that causes them to respond in a future document based on the evidence you have given.**
- Point out any inconsistencies in the document or the data. Point out outdated information or errors in logic. Focus on the sufficiency of the EIR in identifying and analyzing the possible impacts of the project on the environment and feasible alternatives.
- State your comment(s) with specifics and include attachments. Ask substantive questions.

L2-1
cont.

Send Them In!

Deadline: 5:00 pm on Monday, March 8th, 2021
Email your comments to eircomment@ucsc.edu

- **Send your comments in as early as possible**, so UCSC has time to consider your concerns.
- Address your comments to:

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

- Mention your expertise/experience briefly and **include a return address**
- If you are submitting on behalf of an organization, include the name of a contact person who would be available for questions or consultation along with your comments.
- Write a comment that includes a valid name and address. Submit it before the deadline. **Keep a copy of your comments.**
- If you would like, send a copy to the City-County Task Force via email at info@actonucscgrowth.org.

L2-1
cont.

Content: Disclaimer: This information is intended to serve as a guide and is not intended to be legal advice. Please seek professional help from a lawyer if you have legal questions or concerns.

Sources: 1) [Quick Tips for Effective EIR Comments](#), 2) [How to Effectively Participate in the Environmental Review Process By Chatten-Brown & Carstens, Santa Monica, CA Website](#)

The image shows a snippet of a calendar titled "Upcoming Events". The main heading is "February 2021: Draft EIR Public Hearings". There are two entries for February 3rd and 4th, both from 5-7PM. Each entry states: "Information for Zoom Meetings will be posted by February 1".

Month	Day	Time	Event
FEB	3	5-7PM	Information for Zoom Meetings will be posted by February 1
FEB	4	5-7PM	Information for Zoom Meetings will be posted by February 1

Attend The Public Meetings

February 3rd @ 5:00pm (zoom link TBD)
February 4th @ 5:00pm (zoom link TBD)

What We Want

As UCSC prepares the 2020-2040 Long Range Development Plan (LRDP), Santa Cruz cannot afford for history to repeat itself. Given the dueling and serious crises facing our community, we demand that UCSC enters a **legally-enforceable agreement** to:

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;
2. house any additional students, faculty, and staff on campus, and;
3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing [Measure U](#))

L2-1
cont.



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Want to view this email in your browser?
Visit this [link](#)

www.actonucscgrowth.org



February 3, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, California 95064

RE: Draft Environmental Impact Report for the Proposed UC Santa Cruz Long Range Development Plan

Dear Ms. Carpenter:

Thank you for this opportunity to comment on the Draft Environmental Impact Report (“EIR”) for the University’s Long Range Development Plan (“LRDP”), which is expected to replace the current version that was established back in 2005. The proposed 2021 LRDP envisions adding 8,500 student housing beds, up to 550 employee housing units, and approximately 3.1 million assignable square feet of academic and administrative building space. These developments are scheduled to be built within the campus area. However, it appears that five development projects are located outside the City of Santa Cruz’s jurisdictional and sphere boundaries (refer to attached **Vicinity Map**). These boundaries are designated by the Local Agency Formation Commission of Santa Cruz County (“LAFCO”). Pursuant to State law, development of currently unincorporated territory would be subject to LAFCO’s approval for the delivery of municipal services, such as water, at a future date.

L3-1

Under the California Environmental Quality Act (“CEQA”), LAFCO is a Responsible Agency for this proposal, and will have regulatory authority towards future applications involving boundary changes for the delivery of municipal services. It is in this role that LAFCO is commenting on the Draft EIR.

Comments on Scope of the Draft Environmental Impact Report:

1. Conformance to State LAFCO Law and Locally Adopted LAFCO Policies

(Please provide an analysis in the Draft EIR)

LAFCO’s statutory authority is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). Among LAFCO’s purposes are: discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances (Government Code Section 56301). The Cortese-Knox-Hertzberg Act identifies factors that must be considered, and determinations that must be made, as part of LAFCO’s review of boundary changes requesting the delivery of municipal services.

L3-2

These state law provisions provide the statutory basis for LAFCO’s locally adopted Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization (“LAFCO Policies”) which guide LAFCO’s review and consideration of requests for annexation and other boundary changes. The full text of the LAFCO Policies is available on LAFCO’s web site: <https://www.santacruzlafco.org/policies-rules/>.

If the LRDP is approved, LAFCO will likely be requested to consider the approval of one or more applications requesting the delivery of municipal services for any of the five development projects located within unincorporated territory, in accordance with the Cortese-Knox-Hertzberg Act and local LAFCO policies. As a CEQA Responsible Agency, LAFCO would like to use the University’s environmental document to fulfill CEQA clearance for such applications, and to support the evaluation of the proposal’s consistency with the applicable LAFCO laws and policies, including the “LAFCO Water Policies” and “Standards for Evaluating Proposals.” Such policies are included in this letter (refer to **Attachment 2**).

L3-2
cont.

LAFCO requests that the Draft EIR evaluate the service provisions of all municipal services, specifically those development areas within unincorporated county land. The Draft EIR should also include an analysis of the LRDP’s conformance to the full range of LAFCO’s adopted policies and related state laws, to the extent such analysis is possible based on information currently available about future development in unincorporated territory.

A more detailed, site-specific, and updated analysis to LAFCO laws and policies should also be anticipated as a required part of subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO. Addition of this information in current and future CEQA documents will help ensure that the Commission will have adequate information to act in its role as a CEQA Responsible Agency when future boundary changes for areas within the LRDP are submitted to LAFCO.

L3-3

2. Consideration of Governance Options

(Please evaluate the proposed governance options)

Generally, LAFCOs were created to identify the most logical service providers for municipal services, including but not limited to water, sewer, fire, road maintenance, etc. Such determinations can be accomplished through various changes of organizations such as annexations, consolidations, and approvals of extraterritorial service agreements. These governance options allow cities, special districts, and county governments to provide municipal services to landowners throughout the county.

L3-4

While the majority of the developments in the LRDP are already in the City of Santa Cruz, there are five development projects that are not. In order to comply with state law and local policies, LAFCO has identified four governance options for consideration by UCSC (refer to **Table A** on page 3).

Table A: List of Potential Governance Options

Options	Things to Consider	Benefits
<p>1) Focus on developments within the city limits of Santa Cruz</p>	<p>Based on the 2021 LRDP, developments within the campus will be located in both the City of Santa Cruz and unincorporated county territory.</p> <p>State law requires UCSC to receive LAFCO approval in order to receive municipal services, such as water, from for areas outside City limits.</p>	<p>Under this scenario, UCSC will not need LAFCO approval if their proposed developments are all within City limits.</p>
<p>2) Consider an extraterritorial service agreement with the City of Santa Cruz</p>	<p>Based on the 2021 LRDP, there are 5 development areas that are located outside the City’s jurisdictional and sphere boundaries. Such discrepancy would require LAFCO approval.</p>	<p>Under this scenario, UCSC can request an extraterritorial service agreement from LAFCO if it meets the statutory criteria outlined in GCS 56133 and the Commission’s adopted policies. If so, this would allow the City to provide services, such as water, to the 5 areas without amending its City limits.</p>
<p>3) Consider annexation of the 5 areas into the City of Santa Cruz</p>	<p>Based on the 2021 LRDP, there are 5 development areas that include construction of new buildings and roadways, which are located outside the City of Santa Cruz.</p>	<p>Under this scenario, UCSC can request annexation of the 5 development areas to the City of Santa Cruz. This would allow UCSC to complete its LRDP within the City without building in two different jurisdictions.</p>
<p>4) Consider annexation of the remaining campus area outside the City of Santa Cruz</p>	<p>Based on the 2021 LRDP, the main campus includes approximately 2,000 acres. 1,059.60 acres are within the City of Santa Cruz, and the remaining 979.96 acres are located in unincorporated county territory.</p>	<p>Under this scenario, UCSC can request annexation of the campus not in the City of Santa Cruz. This will allow the City to provide municipal services for any future developments to the entire campus without additional LAFCO approval.</p>

L3-4
cont.

3. Conformance to the County Urban Services Line (USL)

(Please address the LRDP's consistency with the USL)

Please include in the Draft EIR an analysis of the LRDP's consistency with the established USL, which does not appear to be discussed in the Draft EIR. The County of Santa Cruz's ("County") General Plan require the County to preserve a distinction between urban and rural areas, to encourage the location of new development in urban areas, and to protect agricultural land and natural resources in rural areas. These policies are supported by the establishment of a rural services line ("RSL") and the USL to define areas which are or have the potential to be urban and areas which are and should remain rural. The establishment of distinct urban boundaries serves the following purposes:

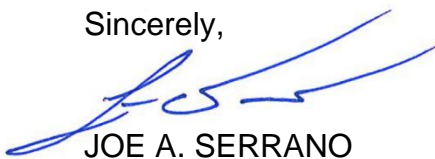
- a) To administer separate urban and rural growth rates and the allocation of residential building permits;
- b) To encourage residential development to locate in urban areas and to discourage division of land in rural areas;
- c) To develop and apply different policies governing urban and rural development;
- d) To provide a basis for a County's Capital Improvements Program;
- e) To coordinate planning for the public services among the County, cities, special districts, and the LAFCO;
- f) To ensure that urban development proceeds at a pace consistent with the provision of urban public services; and
- g) To limit the extension of urban services to those areas within the rural services line in the Coastal Zone.

L3-5

Implementation of the LRDP may require revisions to the established USL. Because such revisions would likely involve the potential for future sphere amendments or other boundary changes, and would directly pertain to LAFCO's legislative purposes, LAFCO would like to have a role in any future modifications to the established USL.

Thank you again for this opportunity to comment on this important document. Please continue to keep us informed throughout your process. I would be happy to meet with you and your staff for more detailed discussions.

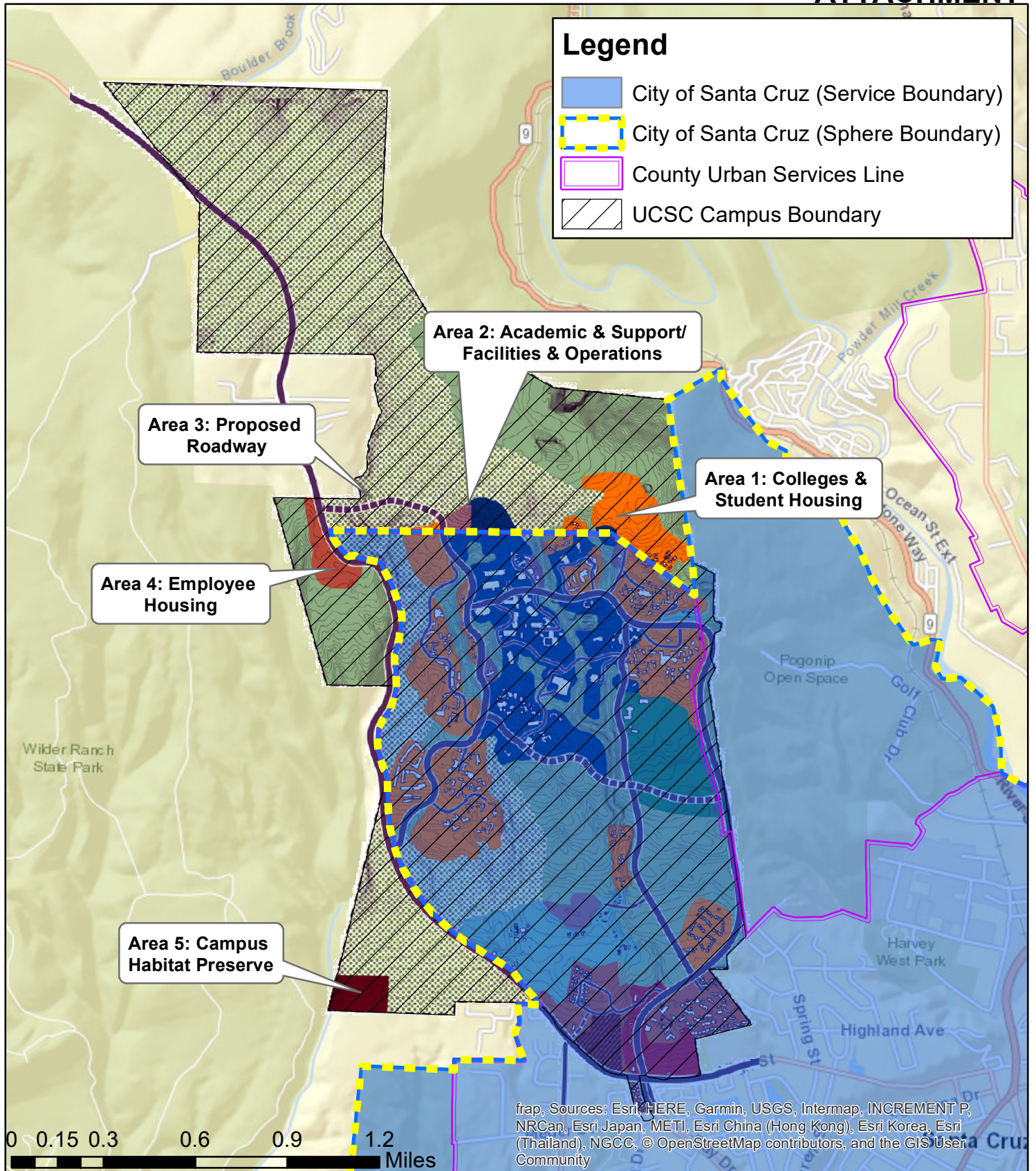
Sincerely,



JOE A. SERRANO
Executive Officer

Attachments:

- 1) Vicinity Map
- 2) Commission Policies (Water and Proposals)



UCSC Campus Boundary in relations to the City of Santa Cruz's Service and Sphere Boundaries

Vicinity Map created on January 11, 2021



LOCAL AGENCY FORMATION COMMISSION OF SANTA CRUZ COUNTY

WATER POLICY

Adopted on March 17, 1964 (Resolution No. 14)

Previous Revision on February 2, 2010 (Resolution No. 2011-1)

Last Revision on November 4, 2020 (Resolution No. 2020-33)

1. OVERVIEW

Government Code Section 56300 requires each Local Agency Formation Commission to establish written policies and to exercise its powers in a manner pursuant to the Cortese-Knox-Hertzberg Local Government Act of 2000 and consistent with the written policies of each Commission. In 1964, the Commission adopted the first water policy to align the limited water supply with existing service providers and smart growth as population continues to increase in Santa Cruz County. The purpose of this policy is to clarify LAFCO's role when considering boundary changes involving cities and special districts.

2. SPHERES OF INFLUENCE

LAFCO recognizes that the water resources of Santa Cruz County are limited, and the Commission's objective is to ensure that its decisions relating to water do not lead to adverse impacts on the natural resources of Santa Cruz County. In reviewing sphere adoptions and amendments, LAFCO will be guided by the potential impacts of the proposal on water resources and will consider the efforts of the water agencies and land use agencies to maintain stream and river flows, promote high water quality of surface waters and groundwater, and reduce groundwater overdraft.

To assist in the review of sphere boundaries and other LAFCO reports, the Commission will utilize the following data sources to maintain an ongoing data base of the supply, demand, and related water data of the local water agencies subject to LAFCO's boundary regulation:

- a) The Public Water System Annual Reports filed by each public water agency with the State Water Resources Control Board;
- b) The Urban Water Management Plans prepared by water suppliers with 3000 or more customers as required by the California Water Code Sections 10610 et.seq; and
- c) The annual Water Resources Report prepared for consideration by the Santa Cruz County Board of Supervisors.

3. BOUNDARY CHANGES

In any proposal requiring water service, the Commission requires that the affected agency identified as the potential water provider to demonstrate the availability of an adequate, reliable and sustainable supply of water. The following factors may be considered:

- a) In cases where a basin is overdrafted or existing services are not sustainable, a boundary change proposal may be approved if there will be a net decrease in impacts on water resources;
- b) In cases where a phased development is proposed, the agency should demonstrate that adequate service capacity will be provided as needed for each phase;
- c) In cases where a proposed new service area will be served by an onsite water source, the proponent should demonstrate its adequacy (Government Code Section 56668[k]); and
- d) In cases where the proposal's new water demand on the agency does not exceed the typical amount of water used by a single-family dwelling in the agency's service area, the Commission will not require that an "adequate, reliable, and sustainable" supply be demonstrated if the agency has a water conservation program and the program will be implemented as part of any new water service.

4. SERVICE REQUEST

Proposals requesting water service from a city of special district will need to provide proof of lack of services to existing urban land uses, a building permit application, allocation for a single-family dwelling, or for a larger project by: (1) a tentative or final land use entitlement (tentative subdivision map use permit, etc.) conditioned on obtaining water service and (2) a growth rate and pattern that the subject area will be developed within 5 years.

The Commission will only approve boundary change applications when the Commission determines that it is unlikely that water resources will be degraded. The Commission will review each application to assure that, by implementing project-specific mitigations, participating in agency water conservation programs, or both if applicable, the project will not adversely affect sustainable yields in groundwater basins, flows in rivers and streams, water quality in surface water bodies and groundwater basins, and endangered species.

5. EXTRATERRITORIAL SERVICE AGREEMENTS

When the Commission authorizes the emergency provision of water services via extraterritorial service outside an agency's boundaries, and annexation is practical, the Commission will require annexation to be completed within two years.

6. CONNECTION MORATORIUM

It is the general policy of the Commission to disapprove annexations to water and sewer agencies (including cities that provide either service) while there is a connection moratorium or other similar service limitation involving the subject water or sewer service. The Commission will consider exceptions to this general policy on a case-by-case basis. The Commission may approve an annexation that meets one or more of the following criteria:

- a) To replace a private water source that has failed, such as a well that has gone dry, new service connections shall not be sized to accommodate more intensive development;
- b) To replace a septic system that has failed, new service connections shall not be sized to accommodate more intensive development;
- c) To implement a transfer of service between two existing agencies such transfer shall be in a manner that is consistent with the adopted Spheres of Influence of those agencies; and
- d) To change a boundary, in a manner consistent with an adopted Sphere of Influence, an agency boundary shall not divide a property that could only be conveyed under a single deed.

Between January 1, 1986 and the time the service limitation is totally lifted, the Commission shall limit the annexations so that the number of cumulative connections made under the above exemption criteria do not exceed 1% of the total agency's flow (as expressed in equivalent single family dwelling units) in service on January 1, 1986. In this case, an additional criteria not subject to the 1% cumulative impact limitation would be to provide facilities or funding that will allow the agency to lift its service limitation.

7. PUBLIC PARTICIPATION

Water resources and supplies are critical issues for many sphere of influence and application decisions made by LAFCO. Public information and participation are important component in the decisions made by the Commission, the land use agencies, and the water agencies. To promote public education, at least every two years, the Local Agency Formation Commission will sponsor, or co-sponsor with the Regional Water Management Foundation, the County of Santa Cruz, and local water agencies, a public forum that provides the public with an overview of the state of the water supplies in Santa Cruz County.

It is preferable that the residents who use water also participate in the governance of the system that provides the water. Therefore, in making decisions on spheres of influence and boundary changes, the Commission will favor water supply entities for which the users of the system participate in the governance of the system.



LOCAL AGENCY FORMATION COMMISSION OF SANTA CRUZ COUNTY

PROPOSAL EVALUATION POLICY

Adopted on September 21, 1966 (Resolution No. 97)

Previous Revision on February 2, 2011 (Resolution No. 2011-1)

Last Revision on August 5, 2020 (Resolution No. 2020-19)

1. OVERVIEW

Pursuant to Government Code Section 56375, Santa Cruz LAFCO has established standards for the evaluation of proposals. The Commission uses these standards when reviewing and acting upon proposals for annexations and other boundary changes.

2. CONSISTENCY WITH SPHERE OF INFLUENCE

All changes of organization shall be consistent with adopted spheres of influence of affected agencies.

2.1 Sphere Consistency

Consistency shall be determined by a LAFCO finding of consistency with the sphere of influence maps and policies adopted by LAFCO for the affected agencies.

3. INITIAL PROPOSAL EVALUATION

Any proposal involving annexations, incorporations, and formations shall not be approved unless it demonstrates a need for the additional services to be provided to the area; while all proposals involving detachments, disincorporations, and dissolutions shall not be approved unless the proponent demonstrates that the subject services are not needed or can be provided as well by another agency or private organization.

3.1 Rezoning & General Plan Updates

For proposals concerning cities, need shall be established by (a) an adopted rezoning, consistent with the city general plan, that shows current or future development at a density that will require urban services such as sanitary sewer and water, and (b) a city growth rate and pattern that the subject area will be developed within 5 years.

The Commission shall require rezoning for all city annexations so that the potential effects of the proposals can be evaluated by the Commission and known to the affected citizens.

3.2 Existing Land Use Designations

For proposals concerning the extension of other services by annexation, incorporation, or district formation, need shall be established by the applicable general plan land use designations and the service levels specified for the subject area in the applicable general plan.

Generally, LAFCO will presume to favor a city's general plan inside the sphere of influence adopted for the city by LAFCO, and the county's general plan elsewhere. It is the proponent's responsibility to prove any exception by referring to the policies of the Local Government Reorganization Act.

3.3 Divestiture of Services

For proposals involving the discontinuation of services, lack of need shall be established by (a) no serious effects on the current users of the service due to discontinuation, and (b) no projected serious effects on the uses that can be expected to occur in the next 5 years based upon the applicable general plan and projected growth rates and patterns.

3.4 Population Analysis

In reviewing proposals, LAFCO shall consider: (1) the "population" in the proposal area to be the population recorded in the last biennial or special census unless the proponent or affected agency can present updated or more detailed information which LAFCO determines to be more accurate, (2) the "population density" to be the population divided by the acreage, and (3) the "per capita assessed valuation" to be the full cash value of all the property in a proposal area (as set by the last secured property tax roll) divided by the population.

3.5 Overlapping Plans

In cases of overlapping plans, LAFCO shall make a determination of which general plan best carries out the policies of the Local Government Reorganization Act.

3.6 In-Fill Development

In order to avoid further urban sprawl, LAFCO shall encourage in-fill development in urban areas and annexations of areas inside the city sphere of influence.

3.7 Provision of Services

In order for LAFCO to approve a change of organization, the proponent shall demonstrate that the subject services can be provided in a timely manner and at a reasonable cost.

3.8 Proposals exceeding 50 acres

For proposals involving the extension of general municipal services to proposal areas greater than 50 acres, the proponent shall either: (a) plan staged growth beginning closest to an existing urban area, or (b) demonstrate why such a plan does not promote urban sprawl and an inefficient pattern of services.

4. AFFECTED AGENCIES AND BOUNDARIES

Proposals, where feasible, should minimize the number of local agencies and promote the use of multi-purpose agencies.

4.1 Ranking Different Boundary Changes

New or consolidated service shall be provided by one of the following agencies in the descending order of preference:

- a) Annexation to an existing city;
- b) Annexation to an existing district of which the Board of Supervisors is the governing body;
- c) Annexation to an existing multi-purpose district;
- d) Annexation to another existing district;
- e) Formation of a new county service area;
- f) Incorporation of a new city;
- g) Formation of a new multi-purpose district; or
- h) Formation of a new single-purpose district.

4.2 Consolidation Proposals

The Commission will promote and approve district consolidations, where feasible.

4.3 Logical Boundaries

LAFCO shall promote more logical agency boundaries.

4.4 Political Boundaries

To the greatest possible extent, boundaries shall follow existing political boundaries, natural features (such as ridges and watercourses), and constructed features (such as railroad tracks).

4.5 Roads and Streets (Right-of-Way)

Boundary lines shall be located so that entire rights-of-way are placed within the same jurisdiction as the properties fronting on the road.

4.6 Community Boundaries

Boundaries should avoid dividing an existing identifiable community, commercial district, or other area having social or economic homogeneity. Where such divisions are proposed, the proponents shall justify exceptions to this standard.

4.7 Parcel Boundaries

The creation of boundaries that divide assessment parcels shall be avoided whenever possible. If the proposed boundary divides assessment parcels, the proponents must justify to the Commission the necessity for such division. If the Commission approves the proposal, the Commission may condition the approval upon obtaining a boundary adjustment or lot split from a city or county.

4.8 Prevention of “Islands”

Boundaries should not be drawn so as to create an island or strip either within the proposed territory or immediately adjacent to it. Where such an island or strip is proposed, the proponent must justify reasons for nonconformance with this standard.

4.9 Prevention of Irregular Boundaries

Where feasible, city and related district boundary changes should occur concurrently to avoid an irregular pattern of boundaries.

4.10 Social & Economic Interests

The Commission shall consider the effects of a proposed action on adjacent areas, mutual social and economic interests, and on local governmental structure.

4.11 Metes & Bounds

A map of any proposed boundary change shall show the present and proposed boundaries of all affected agencies in the vicinity of the proposal site. The Commission shall assure that any approved boundary changes are definite and certain. The Commission may approve a proposal conditioned on the proponent preparing a new boundary map and description.

4.12 Timely LAFCO Actions

LAFCO will review each proposal and take actions needed to encourage timely annexations to discourage agencies from extending services by agreement without annexing to the agency.

4.13 Financially Desirable Areas

The sole inclusion of financially desirable areas in a jurisdiction shall be avoided. The Commission shall amend or reject any proposal that, in its estimation, appears to select principally revenue-producing properties for inclusion in a jurisdiction.

4.14 City Jobs & Housing

For city annexation proposals, if the city has more jobs than places for workers to live (jobs to employed residents ratio greater than 1.00) then a proposal which will directly result in urban development including new permanent employment may only be approved if sufficient land is designated for residential uses in the city's general plan to create a jobs/ housing balance.

The Commission will consider and may grant waivers to this standard in cases where all of the following situations exist:

- a) The territory being annexed is an island of incorporated territory and consistent with the definition of "island" in Government Code Section 56375;
- b) The proposal is consistent with the spheres of influence of all affected agencies; and
- c) The proposal has been initiated by resolution of the city which includes the subject property in its adopted sphere of influence.

5. AGRICULTURAL LANDS

Urban growth shall be guided away from prime agricultural lands, unless such action would not promote planned, orderly, efficient development of an area.

5.1 Smart Growth

A change of organization is considered to promote the planned, orderly, and efficient development of an area when:

- a) It is consistent with the spheres of influence boundaries and policies adopted by LAFCO for the affected agencies; and
- b) It conforms to all other policies and standards contained herein.

5.2 Infill Development

LAFCO shall encourage the urbanization of vacant lands and non-prime agricultural lands within an agency's jurisdiction and within an agency's sphere of influence before the urbanization of lands outside the jurisdiction and outside the sphere of influence, and shall encourage detachments of prime agricultural lands and other open space lands from cities, water districts, and sewer districts if consistent with the affected agency's adopted sphere of influence.

5.3 Ranking Urban Development on Open Spaces and/or Farmlands

The priorities for urbanization are:

- a) open-space lands within existing boundaries;
- b) open-space lands within an adopted sphere of influence;
- c) prime agricultural lands within existing boundaries; and
- d) prime agricultural lands within an adopted sphere of influence.

5.4 Urbanization of Prime Agricultural Lands

Proposals involving urbanization of prime agricultural lands within adopted spheres of influence shall not be approved, unless it can be demonstrated that: (a) there is insufficient land in the market area for the type of land use proposed, and (b) there is no vacant land in the subject jurisdiction available for that type of use.

6. WATER AND SEWER RESOURCES

LAFCO recognizes that the water resources of Santa Cruz County are limited, and the Commission's objective is to ensure that its decisions relating to water do not lead to adverse impacts on the natural resources of Santa Cruz County. In reviewing boundary change applications, LAFCO shall be guided by the potential impacts of the proposal on water resources and will consider the efforts of the water agencies and land use agencies to maintain stream and river flows, promote high water quality of surface waters and groundwater, and reduce groundwater overdraft.

6.1 Supply of Water

In any proposal requiring water service, the Commission requires that the agency that will provide the water will need to demonstrate the availability of an adequate, reliable and sustainable supply of water.

- a) In cases where a basin is overdrafted or existing services are not sustainable, a boundary change proposal may be approved if there will be a net decrease in impacts on water resources;
- b) In cases where a phased development is proposed, the agency should demonstrate that adequate service capacity will be provided as needed for each phase;
- c) In cases where a proposed new service area will be served by an onsite water source, the proponent should demonstrate its adequacy (Government Code Section 56668(k)); and

- d) In cases where the proposal's new water demand on the agency does not exceed the typical amount of water used by a single-family dwelling in the agency's service area, the Commission will not require that an "adequate, reliable, and sustainable" supply be demonstrated if the agency has a water conservation program and the program will be implemented as part of any new water service.

6.2 Service Limitations

It is the general policy of the Commission to disapprove annexations to water and sewer agencies (including cities that provide either service) while there is a connection moratorium or other similar service limitation involving the subject water or sewer service. The Commission will consider exceptions to this general policy on a case-by-case basis. The Commission may approve an annexation that meets one or more of the following criteria:

- a) To replace a private water source that has failed, such as a well that has gone dry. New service connections shall not be sized to accommodate more intensive development;
- b) To replace a septic system that has failed. New service connections shall not be sized to accommodate more intensive development;
- c) To implement a transfer of service between two existing agencies in a manner that is consistent with the adopted Spheres of Influence of those agencies; and/or
- d) To change a boundary, in a manner consistent with an adopted Sphere of Influence, so that an agency boundary does not divide a property that could only be conveyed under a single deed.

Between January 1, 1986, and the time the service limitation is totally lifted, the Commission shall limit the annexations so that the number of cumulative connections made under the above exemption criteria do not exceed 1% of the total agency's flow (as expressed in equivalent single family dwelling units) in service on January 1, 1986.

An additional criterion, not subject to the 1% cumulative impact limitation, is as follows:

- e) To provide facilities or funding that will allow the agency to lift its service limitation.

6.3 Urban Land uses

For proposals concerning water and sewer district annexations, the need shall be established by lack of services to existing urban land uses, or a building permit application or the allocation for a single-family dwelling or, for a larger project, by: (a) a tentative or final land use entitlement (tentative subdivision map use permit, etc.) conditioned on obtaining water or sewer service, and (b) a growth rate and pattern that the subject area will be developed within 5 years.

6.4 Commission Approval

The Commission will only approve boundary change applications when the Commission determines that it is unlikely that water resources will be degraded. The Commission will review each application to assure that, by implementing project-specific mitigations, participating in agency water conservation programs, or both if applicable, the project will not adversely affect sustainable yields in groundwater basins, flows in rivers and streams, water quality in surface water bodies and groundwater basins, and endangered species.

6.5 Multiple Service Providers

When more than one agency could serve an area, the agencies' services capabilities, costs for providing services, and the desires of the affected community will be key factors in determining a sphere of influence.



County of Santa Cruz

Letter
L4

BOARD OF SUPERVISORS

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February 12, 2021

Chancellor Cynthia Larive and UCSC Campus Planners
Kerr Hall, University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064
via email: chancellor@ucsc.edu

RE: UC Reserve Designation as Part of the LRDP EIR Process

Dear Chancellor Larive and Campus Planner Carpenter:

I am writing today to encourage UC Santa Cruz to consider designating the UCSC Campus Natural Reserve as a permanent addition to the UC Natural Reserve System during the current Campus LRDP process.

As you know, UCSC and the Santa Cruz community have a long history of working together to benefit both the wider Santa Cruz community as well as the students and staff on campus. Since the establishment of the University, the UCSC campus has provided a wide array of recreation and learning opportunities for our community, particularly our K-12 students. Our community benefits from the outdoor recreation opportunities the Reserve provides; our experiences over the past year with COVID isolation have only further highlighted the need for access to nature and open spaces to maintain our community well-being. Additionally, the UCSC Campus Reserve plays a valuable role in protecting threatened wildlife and ecosystems while at the same time educating the public about their importance.

While I understand that the LRDP process intends to extend the current campus reserve designation, incorporating UCSC's Natural Reserve into the UC Natural Reserve System would assure that the Reserve's positive contributions extend far into the future, and will benefit the campus and the community for years to come.

Thank you for your consideration of this request.

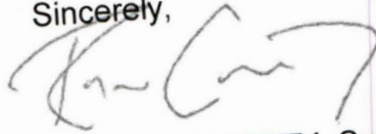
RECEIVED

FEB 23 2021

Chancellor's Immediate Office

L4-1

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Coonerty". The signature is written in a cursive style with a large, sweeping initial "R".

RYAN COONERTY, Supervisor
Third District

COUNTY OF SANTA CRUZ
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FEB 23 2021

Chancellor's Immediate Office

Chancellor Cynthia Larive
Kerr Hall, University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

185 AMQJNMP 95064





Erika Carpenter <escarpent@ucsc.edu>

Letter
L5

[eircomment] AMBAG's Comments on the Draft 2021 LRDP EIR

Heather Adamson <hadamson@ambag.org>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>
Cc: Heather Adamson <hadamson@ambag.org>

Thu, Feb 18, 2021 at 12:20 PM

Erica-

Attached are AMBAG's comments on the draft 2021 LRDP EIR. Please let me know if you have any questions.

Thanks,
Heather

Heather Adamson, AICP

Director of Planning

AMBAG

(831) 264-5086

hadamson@ambag.org

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC_2021LRDP_DEIR_AMBAG Comments_February 2021_final.pdf**
268K



February 18, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

RE: Comments on UCSC’s Draft Environmental Impact Report for the 2021 Long Range Development Plan (State Clearinghouse # 2020029086)

Dear Ms. Carpenter,

Thank you for the opportunity to review UCSC’s Draft Environmental Impact Report (DEIR) for the 2021 Long Range Development Plan. The following comments are offered for your consideration.

L5-1

In Chapter 3.8 (Greenhouse Gas Emissions and Climate Change), Chapter 3.13 (Population and Housing), Chapter 3.16 (Transportation), Chapter 4 (Cumulative Impacts), and Chapter 8 (References), AMBAG requests the following revisions:

Chapter 3.8 (Greenhouse Gas Emissions and Climate Change)

- On page 3.8-12, revise the paragraph to read: “The Association of Monterey Bay Area Governments (AMBAG) serves as the MPO for Monterey, San Benito and Santa Cruz Counties. In accordance with SB 375, AMBAG prepares has prepared a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) that integrates land use and transportation planning at a regional level to achieve GHG emission reduction targets from passenger vehicles. The most recent MTP/SCS is Moving Forward Monterey Bay 2040, which was adopted in June 2018. CARB set a target for the Monterey Bay Area of 5 percent reduction from 2005 per capita GHG emissions for the year 2035 ~~2030~~. The 2040 MTP/SCS demonstrates the region’s ability to exceed the GHG emission reduction target set forth by CARB through transportation investments, strategic land use development, and performance measures (AMBAG 2018).”

L5-2

Chapter 3.13 (Population and Housing)

- On page 3.13-8: the DEIR states that "AMBAG produced regional growth projections through 2040 for the entire AMBAG planning area as well as counties and incorporated cities within its jurisdiction. Table 3.13-8 identifies AMBAG’s growth projections for the City of Santa Cruz and Santa Cruz County. AMBAG projects that the city’s employment

L5-3

growth rate would increase as the population levels rise through 2040. The city is expected to have higher population, housing, and employment percentage growth rates than the county based on AMBAG projections. As shown in Table 3.13-8, employment, population, and housing within the city are anticipated to increase by approximately 20-30 percent between 2015 and 2040, while countywide (incorporated cities and unincorporated area) is anticipated to increase by approximately 10-20 percent between 2015 and 2040. **The AMBAG growth projections contradict the trends seen recently in both the city and the county.** However, as shown in Table 3.13-5, substantial housing growth has been approved and is also newly proposed in the city, which would comport with a reversal of growth rates.”

L5-3
cont.

AMBAG requests that the sentence “The AMBAG growth projections contradict the trends seen recently in both the city and the county.” be removed. This statement is untrue. AMBAG’s growth projections are updated every four years and are prepared with considerable input from local jurisdictions. The recent trends that the DEIR refers to is the one year estimates from 2019 and 2020 do not reflect a long term trend. AMBAG’s projections track to the long term trends seen over the past 20-30 years as shown in Tables 3.13-1 and 3.13.8.

Chapter 3.16 (Transportation)

- On page 3.16-9, revise the sentence to read: “The 2040 MTP/SCS ~~MPT/SCS~~ also considers the UC Santa Cruz transit service to be a regionally significant local transit service (AMBAG 2018:2-10).”

L5-4

Chapter 4 (Cumulative Impacts)

- On page 4-40, revise the sentence to read: "The cumulative (year 2040) model also includes land use growth consistent with AMBAG based on adopted ~~growth~~ plans the municipalities within the county that are used to estimate future (i.e., cumulative) transportation conditions."
- On page 4-40, revise the sentence to read: "Further, the AMBAG projections are used to develop various regional planning documents, including the sustainable community strategy required by SB 375 (Chapter 4.2 of CEQA) to provide for more efficient land use patterns that facilitate a reduction in ~~regional VMT and~~ per capita greenhouse gases over time."

L5-5

L5-6

Chapter 8 (References)

- On page 8-2 in Section 3.3. “Air Quality,” please revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments.

L5-7

- Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFA.pdf. Accessed August 25, 2020. L5-7
cont.

- On page 8-29 in Chapter 5 “Other CEQA Sections,” revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments. L5-8
 - Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFA.pdf. Accessed August 25, 2020.

- On page 8-29 in Chapter 6 “Alternatives,” revise the references to read:
 - AMBAG. See Association of Monterey Bay Area Governments. L5-9
 - Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020-01/08-AMBAG_MTP-SCS_AppendixA_PDFA.pdf. Accessed August 25, 2020.

Sincerely,

Heather Adamson
 Director of Planning



Erika Carpenter <escarpent@ucsc.edu>

Letter
L6

[eircomment] LRDP EIR Comments

Ginger Dykaar <gdykaar@sccrtc.org>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Wed, Mar 3, 2021 at 10:52 AM

Dear Ms. Carpenter,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the UC Santa Cruz 2021 Long Range Development Plan (LRDP). Comments from the Santa Cruz County Regional Transportation Commission are attached. Please let me know that these comments have been received.

Best,

Ginger Dykaar

.....



Ginger Dykaar, Senior Transportation Planner

Santa Cruz County Regional Transportation Commission

1523 Pacific Avenue | Santa Cruz, CA 95060



Direct 831.460.3213 | Main Office 831.460.3200

Watsonville Satellite Office 831.768.3205

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eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **DEIR_UCSC_LRDP-SCCRTC comments-20210303.pdf**
282K



March 3, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, California 95064

RE: Draft Environmental Impact Report (DEIR) for the UC Santa Cruz 2021 Long Range Development Plan (LRDP)

Dear Ms. Carpenter,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the UC Santa Cruz 2021 Long Range Development Plan (LRDP) which plans for future development within the UCSC Main Residential Campus and the Westside Research Park. The Santa Cruz County Regional Transportation Commission (RTC) serves as the Regional Transportation Planning Agency (RTPA) for Santa Cruz County. With a planned increase by 2040 in student enrollment of over 8,000 students and an increase in faculty and staff employment of approximately 2200, it is critical that land use and transportation decisions are consistent with environmental stewardship and long term sustainability. The LRDP supports many of the Santa Cruz County 2040 Regional Transportation Plan Goals and Policies as outlined below.

L6-1

RTC submits the following comments regarding the LRDP:

- RTC supports the LRDP strategy to provide housing for 100% of the additional FTE students. This is consistent with RTC's RTP Objective under Goal 1 to *"Improve people's ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers"* and RTP policy 1.5 *"Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations."*
- RTC supports the LRDP strategy to increase on-campus housing opportunities for faculty and staff at both the main campus and the Westside Research Park for up to 25% of the increase in faculty and staff. This is consistent with RTC's RTP Objective under Goal 1 to *"Improve people's ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers"* and RTP Policy 1.5 *"Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations."*

L6-2

- RTC supports the LRDP strategy to provide compact, in-fill and clustered development of academic, administrative, and support facilities in the academic core and student housing around the periphery but close to academic core to provide convenient access and promote pedestrian circulation. This is consistent with RTP Policy 1.5 *“Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations.”*
- RTC Supports the LRDP strategy to develop an improved, more efficient roadway network and to support transit inner campus roadway loop for more efficient transit. RTC staff requests consideration of a transit, bike and pedestrian only infrastructure on the Meyer Drive Extension so as not to increase roadway capacity for automobiles except during emergencies. This is consistent with RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*, Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks,”* and Policy 2.3 *“Emergency Services: Support projects that provide access to emergency services.”*
- RTC supports the LRDP strategy to promote Transportation Demand Management (TDM) practices to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTP Policy 1.1, *“Expand demand management programs that decrease the number of vehicle miles traveled and result in mode shift.”*
- RTC supports the LRDP strategy to provide infrastructure to optimize trip- and vehicle-miles-traveled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTC Objective under Goal 1, *“Reduce smog-forming pollutants and greenhouse gas emissions”*; RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*; Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks”*; and Objective under Goal 2-*“Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit.”*
- RTC supports bicycle and pedestrian infrastructure design that provides for safe travel and reduces the potential for conflict between bicyclists, pedestrians and vehicles. This is consistent with RTP Policy 2.4, *“Reduce the potential for conflict between bicyclists, pedestrians and vehicles”*.
- RTC supports the LRDP strategy to create parking/mobility hubs at peripheral locations with no net new commuter parking for a seamless transfer from one mode to another, promote a walkable campus, enhance alternative transportation opportunities, and increase connectivity within the campus and to the city. This is consistent with RTC Objective under Goal 1, *“Reduce smog-forming pollutants and greenhouse gas emissions”*; RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*; Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks”*; and Objective under Goal 2-*“Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit.”*

L6-2
cont.

- RTC supports the LRDP strategy to develop adequate transportation infrastructure to allow for quick response to emergencies including wildfires, mud slides and earthquakes. This is consistent with RTP Policy 2.3 *“Emergency Services: Support projects that provide access to emergency services.”* L6-2 cont.
- Page 3.16-33. The RTC does not support the fact that the LRDP is expected to have a significant impact related to vehicle miles traveled but given all the efforts that UCSC is doing to provide other options for travel, provide for housing on campus and travel demand management, it is unclear why there is a significant impact. A number of questions are provided below to suggest ways to provide more clarity in how the VMT analysis was determined. L6-3
- Chapter 3.8 - The RTC appreciates the work of UCSC in the LRDP to aim for a GHG reduction of 60% below the 1990 emissions by 2040 consistent with state targets and to mitigate for any impacts in order to reach this goal. L6-4
- Page 3.8-22 – Please provide the VMT assumptions that were used to determine the various CO2e amounts in the scope 3 table on page 3.8-22. Consider referring to the location in App D where this information is provided in detail. L6-5

RTC staff requests that the EIR provide more clarification on the following components of the DEIR LRDP;

- Page 4-20 states that Santa Cruz County is in an area of nonattainment for ozone. It is RTC staff’s understanding based on the CARB website that Santa Cruz County is in an area of nonattainment-transitional and is being proposed for attainment under the state area designations to be approved in February, 2021. If this designation is revised, consider revising in the report. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations> L6-6
- Page 4-41, Table 4-4 states that the “service population” is 469,000 for cumulative conditions (2040) and 482,000 for Cumulative Conditions with LRDP. Please clarify how this service population is determined in order to understand how the VMT per capita is calculated. This amount seems too high to be total residents plus employees commuting from other counties plus UCSC student population. See also App I, page 7 table of “capita” equal to 403,000 for existing (countywide population, jobs, UCSC enrollment). Should these numbers be consistent? L6-7
- Page 3.16-28 Table 3.16-4 states that the Total Campus VMT threshold is 7.7 VMT/capita. Please provide more detail for how this VMT/capita was determined. L6-8
- Page 3.16-27, when discussing VMT, please clarify whether it is total or VMT/capita. L6-9
- Page 3.16-23, Planned Regional Transportation Improvements – Please consider adding the Highway 1 projects that are underway. See SCCRTC website for details <https://sccrtc.org/projects/streets-highways/hwy1corridor/> L6-10
- Page 3.16-29 – If the 2.01 trips per commuter includes just the on/off campus auto trips – are any additional trips that commuter students (and staff) are making included in the L6-11

changes in overall VMT for the county? If more people are living in county than would otherwise be the case due to LRDP, how is this additional VMT from more people being considered? Are the number of resident student trips all auto trips that a person makes to all destinations off campus since they live on campus? Please include more clarity in report.

L6-11
cont.

- Page 3.16-34, Table 3.16-6 – The service population seems like it is double counting the people living on campus – should it be 35.5k with LRDP? Please provide more details in this table so the VMT/capita can be readily calculated.
- Table 3.16-7 – Please provide more details on how the campus numbers for VMT/capita were determined?
- Page 3.16-23 – Please revise to Bus on shoulder in place of Bus Rapid Transit
- Where in the document does it show the overall increase in total VMT in the county due to the increase in students, staff and faculty as planned in the 2021 LRDP?
- Appendix I, page 7, Table 6 - Please explain how the increase in VMT (existing plus project and cumulative plus project) was calculated. Is this 90,000 and 80,000 miles difference consistent with the VMT numbers calculated in Table 3.16-6? The difference in Table 3.16-6 shows 141,000 miles more with LRDP in 2019 for the total campus VMT.
- Is the mode share split with the LRDP similar to what is shown for existing in Figure 3.16-6 on page 3.16-24 provided in the document?

L6-12

L6-13

L6-14

L6-15

L6-16

L6-17

Thank you for considering comments from the RTC on the DEIR for the 2021 UCSC LRDP. If you have any questions about these comments, please contact Ginger Dykaar of my staff at gdykaar@sccrtc.org.

Sincerely,



Guy Preston
Executive Director



Erika Carpenter <escarpenc@ucsc.edu>



[eircomment] EIR Comment Submission - Morgan Bostic, Advocate for the Santa Cruz City-County Task Force on UCSC Growth Plans

Morgan Bostic <morgan.bostic@actonucscgrowth.org>
To: eircomment@ucsc.edu

Fri, Mar 5, 2021 at 12:58 PM

Dear Erika Carpenter,

I hope this email finds you in good health.

Attached are my comments on the 2021 - 2040 LRDP EIR. Due to the size of the document, please respond with a confirmation of receipt and an indication that you have been able to successfully open it. Thank you!

Warmly,
Morgan Bostic

--
Morgan Bostic
Advocate
Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans
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 **Bostic, Morgan - Comments on the 2021 LRDP Draft EIR.pdf**
534K

Erika Carpenter
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Physical Planning, Development, and Operations
University of California, Santa Cruz 1156 High Street
Santa Cruz, CA 95064
Email: eircomment@ucsc.edu

RE: COMMENTS ON UCSC 2021 LRDP DRAFT EIR

Dear Erika Carpenter:

Thank you for the opportunity to comment on the 2021 Draft Long Range Development Plan’s (LRDP) Draft Environmental Impact Report (DEIR).

Unfortunately, while the DEIR contains useful and relevant analysis regarding the potentially significant impacts of the LRDP, it is not adequate under the California Environmental Quality Act (CEQA) and requires extensive revision and recirculation in order to meet its requirements. As is documented below, in numerous cases the potentially significant impacts are understated, inadequate mitigation measures are proposed, feasible mitigation measures and alternatives are missing, and important, available data and evidence are not provided.

L7-1

Among the many DEIR inadequacies, at least three are critical:

1. The DEIR’s entire analysis of potentially significant impacts is based on the LRDP achieving its objective of housing 100% of the new student enrollment and up to 25% of new faculty and staff on campus. Yet, there is no evidence provided to justify this assumption and, further, the mitigation measures proposed for reducing its impacts to a less than significant level are inadequate under CEQA’s requirements for such measures. As recommended below, these mitigation measures must be revised to require, as a feasible mitigation measure, the University to provide the planned on-campus housing and to tie the provision of this housing to enrollment increases.

L7-2

2. The analysis of the potentially significant impacts of development in the north campus subarea is deeply flawed. The LRDP proposes to locate housing for 3,700 of the 8,500 additional students (43%) as well as 200,000 assignable square feet (asf) (8%) of additional academic support facilities in a State designated high-risk fire hazard area with no new road access provided (page 3.17-30-32). Yet, the DEIR finds that neither the campus Emergency Operations Plan, nor the Campus Evacuation Plan need to be revised in response to this proposal. Further, the potential impact for wildfires is found, without supporting evidence, to be less than significant. The DEIR asserts that simply adopting a vegetation management plan would reduce the potentially significant impact to less than significant. Finally, while the DEIR does consider the potential impacts of not locating development in this area, this option is not considered as a potentially feasible alternative.

L7-3

3. While the DEIR recognizes six direct impacts and many cumulative impacts of the LRDP as significant and unavoidable, it inadequately fails to identify 21 others that should have been included.

L7-4

Executive Summary

- ES-1 – The DEIR states that the 2021 LRDP “embraces a compact academic core with housing around the periphery.” The is incorrect and misleading. The 2021 LRDP proposes significant development, including academic facilities, in the north campus area outside the core The Final EIR needs to correct this misinformation especially since many readers may only read the Executive Summary. | L7-5

- ES-2 – The DEIR indicates that the LRDP “plans to accommodate” 100% of the new enrollment of about 9,500 students and up to 25% of the additional 2,200 FTE faculty and staff. There is no mention of the need to tie this housing commitment to enrollment growth in order to mitigate the potentially significant impacts of this growth. | L7-6

- The DEIR repeats the LRDP objectives of for housing students, faculty, and staff with no enforceable language or connection to enrollment growth. | L7-7

- The last sentence of page ES-4 identifies Alternative 3 as the environmentally superior alternative. Yet the second paragraph on page ES-5 states that Alternative 2 “would result in greater impact reductions and is thus considered superior to Alternative 3. These contradictory statements are confusing to the public and need to be corrected. | L7-8

Introduction

- 1-1 – The LRDP is defined in State law as a “plan,” not a guide, that is subject to CEQA: “a “physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education.” The DEIR needs to clarify that the LRDP is legally binding document and any proposed increases to enrollment levels or significant policy amendments that could impact the environment are subject to review under CEQA prior to approval by the Regents. | L7-9

- 1-2 – The DEIR is inadequate for not including the Santa Cruz Local Agency Formation Commission (LAFCO) as a State responsible agency, since it must approve the extension of water and sewer services beyond the City boundaries, which includes the north campus subarea. Its role is considered in the Utilities and Service Systems chapter but should be described here. | L7-10

- 1-3 – The LRDP proposes to “accommodate,” not house, 100% of the new students and up to 25% of the new FTE employees by designating land on the Land Use Map where that amount of housing could be built. Simply identifying areas on a map where housing would be allowed is not a meaningful commitment to providing this housing. | L7-11

- The DEIR recognizes that its LRDP has the same requirements as a city or County general plan – i.e., it is legally binding: “Much like a city or county general plan, the 2021 LRDP does not mandate growth or the provision of new facilities.” While adopting the LRDP is not a “commitment” to any specific project, its adoption allows for any development consistent with it. The EIR should clarify the LRDP’s legal status. | L7-12

- 1-5 – UCSC’s 10-year Capital Financial Plan should explicitly identify the infrastructure needed at different enrollment thresholds to support the additional growth, and enrollment should not increase beyond these thresholds without the necessary infrastructure. The LRDP is inadequate by not considering the need and potentially significant impacts of proposed infrastructure at different enrollment levels. | L7-13

- 1-7 – CSA – “The Comprehensive Settlement Agreement (CSA) also required UC Santa Cruz to apply to the Santa Cruz County Local Area Formation Commission (LAFCO) for water and sewer services for the north campus subarea, which UC Santa Cruz did in 2008, ...”. This requirement needs further | L7-14

discussion in the DEIR and, also, indicates the DEIR's inadequacy for not identifying LAFCO as a responsible state agency.

L7-14
cont.

Project Description

- 2-1 – The DEIR states that the LRDP “provides for” 8,500 student housing beds and approximately 550 employee housing units. While the plan identifies where those resources could be developed, there is no inclusion of a meaningful commitment to provide this housing.

L7-15

- 2-4 – The DEIR indicates that 53% of the campus' 2,000 acres are in the City of Santa Cruz. The DEIR should specify that 940 acres are not within the City and, under state law, development outside the City is subject to regulation by LAFCO.

L7-16

- The north campus subarea is characterized as follows: “extends from the developed central campus subarea to the northern property line;” “The north campus subarea is largely undeveloped at this time except for recreational trails, unpaved service roads, and infrastructure related to water storage. This subarea is characterized by a mix of evergreen forests and some grasslands and includes the sites of long-term outdoor research projects.” The DEIR should specify in the Project Description the amount of development proposed for this subarea – housing for 3,700 students and 200,000 asf of support facilities.

L7-17

- 2-8 – While the Community Advisory Group (CAG) is mentioned, its adopted Guiding Principles are not. Since they directly relate to potentially significant impacts of the LRDP, they should be listed in the DEIR.

L7-18

- The DEIR identifies the LRDP objective of “housing 100 percent of the additional FTE students” above 19,500 is stated. The DEIR should explain that nothing in CEQA or other state laws requires the University to meet this objective.

L7-19

- 2-9 – The DEIR states: “However, the 2021 LRDP does not commit UC Santa Cruz to any specific enrollment level, campus population, or development.” “UC Santa Cruz plans to provide on-campus housing for 100 percent of the increase in student enrollment beyond 19,500 FTE students and up to 25 percent of the additional anticipated 2,200 FTE faculty/staff members.” These statements are further evidence that, while the DEIR analysis of impacts assumes that the housing objectives will be met, the DEIR is clear that the University is not required to meet them. Without this commitment, the DEIR must analyze the potential impacts of the LRDP assuming that no on-campus housing will be provided.

L7-20

- 2-10 – The net new campus population is projected to be 12,830 compared to the existing population of 22,344 (a 57% increase to 35,230 people). The Santa Cruz City population in 2019 was 64,522. The campus population, then represented about 35%. The AMBAG projections show a total City population of about 79,000 in 2040. Based on this estimate, the campus population will be about 45% of the City's. The DEIR should provide these figures as they provide evidence of the University's impact on the surrounding community.

L7-21

- “An increase of about 9,482 students over the 2018-2019 baseline equates to an average addition of 431 students each year.” This projection of annual student enrollment provides the basis for the DEIR to include a feasible mitigation measure that would tie the provision of on-campus housing to these growth increases. No annual increase in needed faculty and staff housing is projected but should be provided.

L7-22

- 2-11 – Table 2-2 of the DEIR shows the amount of assignable square feet (asf) for existing and new academic, support, and residential space. However, this is significantly less than the gross square feet (gsf) which “reflects the sum of all building space with a building.” This distinction is important because,

L7-23

while the total asf of existing and new buildings would be about 9.4 million, the gsf would be 14.1 million (a 50% increase).

To understand the number of acres the new buildings would require, the gsf numbers need to be used. Therefore, the approximately 3.1 million asf of new academic and support space would total about 4. million gsf. The new housing space required would be about 3.8 million. The total new building space needed would be about 8.4 million gsf. The EIR needs to provide these gsf projections in order carry out adequate impact analysis and adequately inform the public of the total extent of construction of the proposed project.

L7-23
cont.

Moreover, the DEIR doesn't consistently use the gsf space requirements in later sections when analyzing potentially significant LRDP development impacts. Not using gsf may significantly understates LRDP impacts.

- The DEIR states: "As currently envisioned, development under the 2021 LRDP would occur primarily within the central and lower campus subareas, as shown in Figure 2-4." This isn't clear in the Figure because it doesn't define the north campus subarea, though it does show significant colleges and academic space there. The DEIR should state here the number of acres in each subarea. The Figure should also include the City of Santa Cruz boundary.

L7-24

- 2-13 – The LRDP designates the total space for Academic and Support Space as approximately 170 acres and for Residential Space as approximately 359 acres. The number of acres for new construction do not seem to be provided as are not given and it isn't clear whether these projections are for buildings only. The EIR should clarify this.

L7-25

- 2-15 – Land use designations in acreage:

Land Use Designations	Acreage Under the 2005 LRDP, as Amended1	2021 LRDP Acreage	Net Change
Academic Land Use Designation			
Academic & Support (Academic Core in the 2005 LRDP)	132	163	31 (23.5%)
Residential Land Use Designations			
Colleges and Student Housing	245	277	32 (13.1%)
Employee Housing	75	823	7 (9.3%)

L7-26

- The 8,500 new student housing beds, then, would average about 266 beds per acre.

L7-27

- Given that the new student housing (8,500 beds) will approximately double the number of beds on campus now of 9,283 (about a 91% increase) and the new beds will be constructed on about 13% of the area of the current housing, it's clear that the new housing will need to be much taller than the existing housing. Page 2-18 states that they the housing will be in buildings will be between 4 and 8 stories. This seems to contradict the statement on page 3.1-40 that "new buildings would range from two to four stories in height." The EIR needs to ensure that the height limits indicated in the Project Description are analyzed accurately throughout the document and this discrepancy should be clarified in the EIR.

L7-28

- 2-16 – The EIR needs to indicate the number of new academic developments in each of the subareas to document that new development will occur "primarily" in the central campus.

L7-29

- 2-17 – The DEIR states that the new colleges will be on the periphery of the academic core with one in the northeast corner and one in the northwest corner. It is unclear how many acres in the north campus subarea will be developed for these colleges and this should be provided. L7-30

- 2-21 – The DEIR indicates that 11 acres of mixed use are designated in the Westside Research Park that could include housing, academic and support facilities. How can a meaningful impact analysis be conducted without a more precise designation of the uses that would be allowed there? L7-31

Aesthetics

- 3.1-2 – Cowell Lime Works District - The DEIR states that “[f]uture projects located adjacent to the historic district would be evaluated for consistency with the management plan.” However, this plan is currently under revision. Therefore, the public is unable to know exactly what the criteria is that future projects outlined in this document will be evaluated to be consistent with, and therefore are unable to evaluate their adequacy to mitigate the impact. L7-32

- 3.1-3 – Physical Design Framework – The DEIR states that the purpose of the design guidelines is to ensure designs are “true to the vision” of UCSC, ~~but no requirement to follow~~. However, there is no requirement included that would make guidelines binding. L7-33

-3.1-4 - Meadow Areas – The DEIR includes the Physical Design Framework which provides: ‘‘Preserve the integrity of meadows by maintaining a clear meadow boundary. Site development so as not to encroach on the meadow open space.’’ The EIR should clarify the legal status of this Framework. If the University proposed to develop in the meadow area, would an amendment of the LRDP be required? This is necessary in the EIR in order for it to contain an accurate identification of potentially significant impacts. L7-34

- Forests – “Build no taller than the surrounding tree canopy.” Does this mean that any proposed development that would violate this policy would be prohibited under the LRDP? Again, this is necessary to adequately analyze potentially significant impacts. In addition, given that some of the campus redwood trees are as tall as 380 feet, the EIR should include mitigations specifying a maximum height limit and/or mitigations should this limit be exceeded. L7-35

- 3.1-36ff – Under the heading “Issues Not Evaluated Further” the DEIR includes a series of campus development policies. There is no heading to this list and it is unclear why they are located there and their relation to the aesthetic analysis. This needs to be clarified. L7-36

- 3.1-38ff – Impacts and Mitigation – Impact 3.1-1 - On a Scenic Vista – The DEIR determines that the impact here will be less than significant because development will be adjacent to existing development and will follow design guidelines. This analysis of the impact on scenic vistas is misleading and inadequate for the following reasons: L7-37

- The photos don’t identify the height of the proposed development and the draft LRDP proposes residential buildings **generally** 4-6 stories tall (although the Project Description indicates they can go as high as 8 stories – page 2-18) and the height of the buildings in the simulations isn’t stated.
- The draft LRDP does not limit building height for most new developments or how much development will occur in the areas proposed for development. Therefore, it’s impossible to determine what the impact of the Plan will be on scenic resources.

Unless the EIR simulations assume the maximum development and tallest structures allowed at each site in a scenic vista, the impact should be considered **significant and unavoidable**.

- 3.1-3 – The DEIR insufficiently evaluates the project’s potential to degrade existing visual character or quality in a non-urbanized area by only considering the impact of the 2021 LRDP from roadways and not from all publicly accessible vantage points. There is no analysis or evaluation of the impact of the 2021 LRDP on visual resources or existing visual character or quality of public views of the site from publicly accessible vantage points from paved and unpaved trails and fire roads. These are valuable community assets, publicly accessible, and routinely trafficked by pedestrians, cyclists, and equestrians. These trails can be referenced from figure 3.15.1-1, bike trails can be referenced in figure 4.12 of the LRDP. Aesthetic impacts from these public locations need to be evaluated in the EIR.

Additionally, more detailed information can be found on these upper campus trail map¹. Therefore, without this analysis and proposed mitigation(s), this section of the EIR is inadequate and an updated version should be recirculated that includes a detailed analysis of the visual impacts of the 2021 LRDP on the existing visual character or quality of public views of the site from publicly accessible trails, fire-roads, and all other publicly accessible space and vantage points. Because the trails are specifically used for pedestrians, cyclists, and equestrians to access undisturbed natural space, the impact on these cherished visual resources on the existing visual character or quality of public views of the site could not be mitigated by adherence to planning documents that guide development in urbanized areas. UCSC must propose feasible mitigations to prevent the degradation of visual resources in North Campus. If none are available, this impact should be changed to **significant and unavoidable**.

- 3.1-43ff – Impact 3.1-3 – Degrade Existing Visual Character or Quality – The DEIR states: “land use changes would **generally** be visually consistent with existing development under the 2021 LRDP. However, development is also planned for more remote areas of the campus, including areas proximate to Empire Grade to the west of the Santa Cruz city limits.” The DEIR is inadequate in the vagueness of its analysis. To what extent would the proposed land use changes be consistent with existing on-campus development?

- “The area in the northern portion of campus is valued for its scenic quality because the visual landscape and attractiveness of redwood trees and forest within the foreground along Empire Grade. Therefore, it is possible that the introduction of new buildings and structures could damage the scenic value of the redwood forested area.” The DEIR should clarify here that there is no height limit in this subarea as stated later that “To the north within forested areas, buildings may be as tall as six or more floors, as dictated by their programs.” The EIR must analyze the potential impacts of tall building on the visual character of the area.

--3.1-3 - Despite the numerous impacts regarding development in north campus, such as, “The northeast portion of the main residential campus contains redwood forests that are valued for their scenic nature. Additionally, the existing redwood trees in this area provides a visual continuity of forested area and a natural screening feature for future development. New development that extends beyond the height of existing redwood trees or otherwise alters the scenic nature within the forested area, including publicly accessible vantage points along Empire Grade north of the city limits, could damage or degrade the visual character and quality of the area,” there are no mitigation measures proposed that address these identified impacts. With 43% of the additional housing proposed in North Campus, there will be significant population changes to a previously unpopulated area. This will inevitably impact the visual resource of North Campus, which was previously an un-urbanized, and (relative to the proposed population growth) unpopulated area. With significant development as well as construction, this will inevitably impact the scenic quality of the space and therefore must be mitigated to a less than significant level. If no feasible mitigations are possible, this impact should be changed to **significant and unavoidable**.

¹ <https://ucscampusreserve.ucsc.edu/documents/ucsc-upper-campus-map>,
<https://ucscampusreserve.ucsc.edu/documents/cnr-sector-map-pdf>

L7-38

L7-39

L7-40

L7-41

- 3.1-3 - There is no evidence provided to support the statement made on page 3.1-44 that, “While new development in these areas may change the visual quality, these changes are more likely to be perceived as an improvement, rather than an adverse impact, by providing a more congruous visual condition, consistent with a higher-education institution.” In fact, there are numerous examples of significant public opposition to the development of the north campus and for the preservation of that area for its scenic value and biotic importance. It is unclear how this conclusion is determined and either information should be provided to substantiate this claim or it should be removed from the final EIR.

L7-42

- 3.1-44 – The DEIR states: “As described in Chapter 2, “Project Description, “future buildings for academic and support under the 2021 LRDP would generally be similar to those already existing in the academic core, ranging in height between four and six stories.” This statement essentially provides no maximum height to development and contradicts the 8-story height limit on page 2-18). The DEIR needs to clarify the maximum heights used in determining the impact level here and provide evidence to support this finding.

L7-43

- The DEIR states: “However, development activities within areas of campus that are highly regarded for their scenic and visual qualities could degrade or damage the character or quality of surrounding uses and landscapes. The northeast portion of the main residential campus contains redwood forests that are valued for their scenic nature. Additionally, the existing redwood trees in this area provides a visual continuity of forested area and a natural screening feature for future development. New development that extends beyond the height of existing redwood trees or otherwise alters the scenic nature within the forested area, including publicly accessible vantage points along Empire Grade north of the city limits, could damage or degrade the visual character and quality of the area. As a result, this impact would be potentially significant.” The DEIR is correct in its finding that development under the LRDP could significantly degrade the visual character of the campus.

L7-44

- 3.1.45 – Mitigation Measure 3.1-3 – Protection of View within Scenic Areas – While the impact analysis largely focuses on potential impacts on the north campus, the mitigation measure only refers to viewsheds in central and south campus subareas, not the north campus subarea. This is inadequate and needs to be corrected in the EIR.

L7-45

- Significance after Mitigation – The DEIR finds that “Implementation of Mitigation Measures 3.1-3a, 3.1-3b, and 3.1-3c would reduce impacts to less than significant by requiring building limitations and development requirements as well as distancing and screening requirements, that would provide for development that is consistent with and complementary of the landscaped and existing built conditions, thereby minimizing adverse effects on existing visual character of the LRDP area. Additionally, implementation of these mitigation measures would ensure cohesive development and consistency with the natural landscapes present within these areas of campus. In addition, future projects would be required to undergo review by the Campus Design Advisory Board and incorporate design recommendations as part of the development project.”

L7-46

- The Campus Design Advisory Board is referenced four times in various mitigation measures in this section. According to documents released in a CPRA request labeled [Herken 04/02/2018 CPRA Request](#), the Board was unanimously, “...opposed to the selection of [the] site for the FSH (Family Student Housing) development. They questioned what alternative sites had been evaluated and expressed concerns that the low-density program, located at such an iconic gateway intersection, undermines the careful approach and purposefulness of campus planning, and were alarmed by the potentially inhospitable interruption to the visual character of the open meadow in that specific location.” Despite the objections, the FSH project was approved and has been included in this EIR as already existing and assumed development. Therefore, it can be concluded that the Campus Design Advisory Board does not

L7-47

have the authority to change specific project details or require changes to projects. Without performance standards strengthening the role of the Campus Advisory Board's ability to 1) enforce design standards, 2) reject project proposals that don't meet the various campus planning documents, and 3) enforce compliance with the above mitigations that rely on their "review", the determination of this impact being brought to a less-than-significant impact just by their review is inadequate.

L7-47
cont.

- The mitigation measures are also inadequate because they do not specifically correspond to the impact on the scenic visual quality of development in the north campus subarea. The DEIR provides no mitigations for the potentially significant impacts of converting a currently scenic area into academic, support and residential development with buildings potentially over six stories and with no height limits.

L7-48

- The analysis of this impact is reminiscent of bait and switch tactics. The analysis of the draft LRDP's impact on visual character and quality adequately focuses on the north campus subarea and its important scenic character and quality are recognized. However, the mitigations ignore the potentially significant impacts of development in this subarea, except for the area adjacent to Empire Grade, and focus on the visual quality in the lower campus. The EIR must provide mitigation measures for the aesthetic impacts of development in the north campus subarea and determine the subsequent impact level with the imposition of these mitigations. The impact after mitigation should be **significant and unavoidable** without these revisions.

L7-49

Agriculture and Forestry Resources

- 3.2-11 – Impact 3.2-2 – Loss of Forest Land – The DEIR indicates 64 acres of forest land would be lost in the north campus subarea, which contains 750 acres (8%) (page 3.2-7). One of the significance criteria quoted on page 3.2-9 states that a significant impact would: "result in the loss of forest land or conversion of forest land to a non-forest use." The significance criterion, therefore, contains a zero threshold for the amount of forest land that would need to be lost in order for the impact to be considered significant. The loss of 123 acres of forest land (over 10% of the existing forest land), with 64 acres lost to new development in the north campus subarea should be considered a **significant and unavoidable** impact despite the fact that CalFire timber harvesting requirements must be met.

L7-50

- The FEIR should analyze the potential loss of forest land that could result from the increased risk of wildfire that will result from the 2021 LRDP and outline mitigation measures that replicate lost forest resources should an event occur.

L7-51

Air Quality

- 3.3-17 – The DEIR states: "Based on the overall building program, as shown in Chapter 2, "Project Description," annual and maximum daily construction emissions are based on the combined results of CalEEMod and RCEM runs for the construction of approximately 312,700 assignable square feet (asf) (approximately 481,100 gross square feet [gsf]) of various land uses per year (not including parking lots), amortized over 18 years to estimate average annual construction activity, associated annual emissions, and maximum daily emissions that may occur within a year of construction."

L7-52

- 3.3-22 – Impact 3.3-1 – Construction-Generated Emissions – The DEIR's summary description of the quantitative analysis performed to estimate emissions includes roadway and bridge construction. However, no information is presented regarding how these would increase total emissions. The EIR should include a table with the assumptions used to estimate construction emissions from the various sources. Table 3.3-4 on page 3.3-19 should provide this information.

L7-53

- The DEIR states: "This average sf value was estimated based on 18 years of construction, from 2022 to 2040, assuming that construction activities would be relatively similar from year to year." This statement

L7-54

essentially assumes that housing and academic construction will occur in sync with enrollment since the LRDP assumes student enrollment will increase at the same annual level. However, there is no binding commitment in either the LRDP or the DEIR that ties enrollment growth to the construction activity, either for housing or other infrastructure. Without this commitment, the annual assumptions for construction emissions represent a best-case analysis and understate potentially the higher levels of emissions if construction is not tied to enrollment. The EIR should be corrected to either include a mitigation measure tying enrollment to development or provide a worst-case analysis.

L7-54
cont.

- Mitigation Measure 3.3-2 The DEIR states: “UC Santa Cruz has little direct control over fugitive PM emissions from roadway dust nor the use of zero-emissions vehicles from non-university mobile sources. Further PM reductions would require mitigation of these sources of PM10 emissions. Therefore, this impact would be significant and unavoidable”. Further, the DEIR states, “Table 3.3-9 shows the modeled emissions after mitigation, quantifying all proposed measures within Mitigation Measure 3.3-2 that are under UC Santa Cruz’s direct control.” However, the DEIR does not consider on-campus policy changes that would reduce these occurrences substantially, such as traffic reduction efforts that, for instance, could prohibit all future UCSC students, faculty, and staff from having vehicles on-campus or limiting on-campus vehicles to only those that are zero-emissions. The FEIR should include analysis of the PM10 emissions after on-campus policy changes are considered and should include potentially feasible mitigations.

L7-55

- Mitigation Measure 3.3-2 The DEIR is misleading when it states: “While such modeling may be warranted when considering extremely large projects that exceed thresholds by multiples, they are of questionable value, and are, in fact, often misleading when considering projects such as the 2021 LRDP, which exceed the significance standard by a very small margin.” The 2021 LRDP will exceed MBARD’s threshold by 11%. CEQA does not require the evaluation of the 2021 LRDP in relation to other projects, just in relation to the applicable air quality standards. Therefore, the contrast between UCSC and “extremely large projects” is irrelevant and should not be included in the FEIR.

L7-56

Archeology, Historical, and Tribal

- 3.4 – 23 – Mitigation Measure 3.4-4a: Cowell Lime Works – The mitigation measure component to require at least a 200-foot buffer between the Historic District and new buildings “to the greatest extent feasible,” is inadequate. The EIR needs to include performance standards for determining feasibility.

L7-57

Biological Resources

3.5-3 – Coastal Zone – The DEIR states: “Portions of the LRDP area, including the Westside Research Park and the area west of Empire Grade within the Main Residential Campus, fall within the coastal zone. As described in Section 3.11, “Land Use and Planning,” although campus lands are not included in any Local Coastal Program (LCP), UC Santa Cruz must comply independently with the requirements of the CCA.” The statement that campus lands are not included in any LCP is incorrect. The area west of Empire Grade is within the County’s approved LCP.

L7-58

- 3.5-4 – Ranch View Terrace HCP – The EIR should identify Inclusion Area A as located in the Coastal Zone.

L7-59

- 3.5-4ff – Santa Cruz County General Plan – The DEIR is seriously inadequate in not identifying all the County General Plan policies cited as also being Local Coastal Program policies as well. This error is compounded when the DEIR states that the University “is not bound” by the County’s LCP. Once the Coastal Commission approves a jurisdiction’s LCP, its policies must be followed for any State agency

L7-60

development with the jurisdiction’s Coastal Zone boundary. The EIR must clarify the role of the County’s General Plan/Local Coastal Program policies for the portion of the campus west of Empire Grade.	L7-60 cont.
- 3.5-11 – The DEIR finds that Dwarf redwoods “may warrant additional consideration” due to their potential rarity. How many acres of Dwarf Redwoods are located on campus?	L7-61
- 3.5-31 – Critical Habitat – The first paragraph on this page of the DEIR is unclear. On the one hand, it indicates that the University is not required to consult with USFWS as part of the implementation in critical habitats. However, it also states that the USFWS must consult with itself before approving an HCP or incidental take permit. Would the University need an HCP or take permit for construction in critical habitats? If so, how would it acquire these without consulting with the USFWS? The role of the USFWS needs to be clarified.	L7-62
- 3.5-32 – Redwood Forest Sensitive Community – The DEIR indicates that much of the 860.4 acres of redwood forest would not meet the qualifications of the redwood forest sensitive natural community. The portion of the redwood forest that does qualify should be mapped.	L7-63
- 3.5-37 – Figure 3.5-6 – Development Areas Overlay Vegetation Communities. From the figure, it appears as if a new road is proposed connecting the two areas proposed for development in the north campus subarea. Is this a proposal in the LRDP?	L7-64
- 3.5-40ff – Mitigation for Special Status Plants – The mitigation measure in the DEIR only requires replacement of lost vegetation on a 1 for 1 basis. Given the sensitivity of these species, elimination of their natural habitat should require replacement at least on a 2 for 1 basis in order for the mitigation to be adequate. Requiring a 2 for 1 replacement of vegetation in critical habitat is a common and feasible option.	L7-65
- 3.5-42 – Significance after Mitigation – While the mitigation measure requires meaningful actions to replace sensitive vegetation removed from LRDP development sites, there is no evidence that such actions will be successful. Therefore, it isn’t possible to adequately determine that the impacts will be less than significant. In fact, given the failure to transplant sensitive species in other projects, there can be no assurance of successful replacement. Given this uncertainty of success and the lack of substantial evidence, the potential impact should be significant and unavoidable .	L7-66
- 3.5-46 – Red-legged Frog – The DEIR is unclear regarding the requirements under the federal Endangered Species Act if an LRDP might “take” red-legged frogs or reduce their habitat. The DEIR indicates that the University “may” pursue incidental take coverage by getting a biological opinion or a Habitat Conservation Plan. Is the University required to do one or the other, or may it do neither? The USFWS role needs to be clarified.	L7-67
- The DEIR determined that the significance of potential impacts on red-legged frogs after mitigation is less than significant. This is inadequate. While USFWS may give the University permission to take red-legged frogs and/or their habitat when LRDP development results in unavoidable impacts, that doesn’t mean, under CEQA, that the impact is less than significant. Moreover, there are no performance standards to ensure that the potentially significant will be reduced to a less than significant level. Therefore, the potential impacts to the species would be significant and unavoidable .	L7-68
- 3.5-52 – Mitigation Measure 3.5-2e – Burrowing Owls – While the DEIR requires off-site mitigation to include “measures of success,” there are no requirements imposed should the measures not be successful. Simply measuring whether a mitigation achieves its objective does not sufficiently reduce the impact to a	L7-69

less than significant level. Moreover, these measures of success are not specifically identified so it is impossible for the public to evaluate their potential to succeed. Absent measurable performance standards the potential impact should be determined as **significant and unavoidable**.

L7-69
cont.

- 3.5-3 – The DEIR states: “This impact evaluation is based on review of existing databases that address biological resources in the vicinity of the LRDP area, aerial photographs, and reports regarding biological resource surveys in the LRDP area, as described above.” Additionally, the DEIR states, “Due to the programmatic nature of this impact evaluation and the fact that focused surveys of future development sites under the 2021 LRDP would be required to verify habitat conditions in subsequent years during implementation of the 2021 LRDP, the envisioned impact acreages for each vegetation community are used as a proxy to assess potential impacts on wildlife and plant species associated with these communities.” The DEIR should identify which projects will be required to have additional analysis and which will be tiered to the 2021 LRDP EIR.

L7-70

- 3.5-56ff – Ohlone Tiger Beetle - The DEIR considers the potential impact of development on Ohlone Tiger Beetle habitat and seems to require acceptance of USFWS mitigation measures. Mitigation Measure 3.5-2i is inadequate because there is no evidence that the USFWS measures, the biological goals and objectives, adaptive management, or monitoring will reduce the impact to a less than significant level. The impact determination should be **significant and unavoidable**.

L7-71

- 3.5-67 – Sensitive Communities Mitigation Measure 3.5-3b – While the DEIR includes specific success criteria for the mitigation measure, it doesn’t discuss the consequences if these criteria not being met. This should be included.

L7-72

- 3.5-68 – Significance after Mitigation – The finding of a less than significant level is not supported by substantial evidence that the impacts would be reduced to a less than significant level despite the implementation of the mitigation measures. Therefore, the impact after mitigation should be determined as **significant and unavoidable**.

L7-73

- 3.5-70ff – Impact 3.5-5 – Wildlife Movement Corridors – The DEIR focuses on **construction** related impacts on wildlife movement corridors and nursery habitat and the proposed mitigations only respond to these potential impacts.

L7-74

- While the DEIR does mention the danger of fencing on wildlife, it does not consider the reduction of wildlife movement corridors by the permanent development in the north campus subarea where the total subarea was identified as part of a larger wildlife movement area (page 3.5-33). Not only will the new buildings reduce the wildlife corridor but the influx of students, faculty and staff will have impacts on movement of wildlife currently using the area. Particularly, with regards to Mountain Lions, recent [UCSC studies](#) have proven that mountain lions will abandon killed prey upon hearing human voices. An adequate EIR analysis must consider the potential impacts of the new structures and their population within the wildlife movement corridor.

L7-75

- Destruction of nesting habitat will have a devastating effect on birds when they return to destroyed nesting sites during the next breeding season. It is essential to permanently protect already existing habitat for special status bird species, as well as common birds. Because the nests of small birds are difficult to find, habitat suitable for these species within the LRDP should be protected. Habitat is crucial not only for nesting but also for foraging (ex. Black Swift may forage within the LRDP area).

L7-76

- In general, the impacts and proposed mitigations described in the LRDP do not take into account the overall destruction of habitat for all species in the described area. Construction activities and the resulting

L7-77

permanent changes to the landscape will affect all natural areas and wildlife therein, not just species of special interest. Additional analysis of these issues should be provided in the EIR. | L7-77 cont.

- 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. Additional analysis of these issues should be provided in the EIR. | L7-78

Energy

- 3.6-12 – This following sentence in the DEIR is unclear and needs to be revised: “The Campus Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES.” | L7-79

- 3.6-12ff – Impact 3.6-1 – Unnecessary, Inefficient, and Wasteful Energy Use – The DEIR’s determination that the energy impact of the proposed LRDP would be less than significant is inadequate. This finding is based on the fact that development will conform to Title 24 standards and UC energy policy, and that, in most cases, per capita energy use will decline. However, the increased impact on the environment is not only dependent on per capita use but on the total increase in energy demand. The FEIR must include analysis of the total increase in energy demand and analyze its significance under CEQA significance criteria. | L7-80

- As shown in Table 3.6-5, on page 3.6-15, net increase in energy use will be about 67% (the per capita increase will be 16%). The net increase in natural gas use will be about 18%, the net increase in transportation use will be 38%, and the total MMBTU net increase will be about 33%. | L7-81

- The DEIR provides no evidence that these increases are necessary and efficient. For example, Executive Order N-79-20 set a statewide goal of 100% zero emission car and truck vehicles by 2035 yet the UC Sustainable Practices Policy, which is used to justify the DEIR’s determination, only requires that 50% of the campus’ light duty vehicles be either zero emission or hybrid by 2025. | L7-82

- Moreover, the DEIR doesn’t discuss the relationship of the increase in MMBTUs of about 38% to the AB 32 and AB 197 provisions authorizing the California Air Resources Board to achieve a reduction of greenhouse gas emissions by at least 40% below 1990 levels by 2030 (page 3.6-4). | L7-83

- In addition, unlike mitigations included in an EIR, there is ~~are~~ no indication that UC policies are legally binding. The EIR should analyze and disclose what would happen if UCSC is unsuccessful in fully implementing these policies. To ensure full implementation and reduce potential energy impacts these policies, unless legally binding, should be added as mitigation measures. | L7-84

- Finally, there is no evidence in the DEIR for determining that simply applying current UC policies is sufficient to help meet State energy goals and to not represent an inefficient use of energy over the term of the LRDP. The impact determination should be **significant and unavoidable**. | L7-85

- 3.6-16 – Impact 3.6-2 – Conflict with Policies – The determination that there is no inconsistency with applicable policies is not supported by substantial evidence (see comments on Impact 3.6-1). For example, clearly, implementation of the LRDP as proposed will not meet the goal of 100% zero emission vehicles by 2035. The impact determination here should be **significant and unavoidable**. | L7-86

Geology and Soils

- 3.7-27 – Impact 3.7-5 – Karst Topography Risk - The DEIR determines that the potential impact will be less than significant because each LRDP project will be subject to a structural analysis and will comply with the CBC and UC policies. However, as a programmatic EIR, the DEIR should consider the potential impacts of the LRDP overall.

L7-87

- In the discussion of Karst Hazard on pages 3.7-17 and 18, the DEIR notes: “One of the principal problems of developing areas underlain by karst is the extreme irregularity of the karst features, and consequently the lack of predictability of subsurface conditions. Because of this unpredictability, some level of risk is inherent in developing in karst regions, as **no amount of site investigation can reveal every detail of the subsurface.**”

L7-88

In addition, Figure 3.7-8 (page 3.7-20) identifies and rates karst hazard areas on campus. The EIR should include a map that overlays the proposed development areas on the karst hazard areas to determine the risk level for new development areas and, given the environmental damage that could be caused by subsidence, development in high-risk areas should be recognized as a potentially significant impact with mitigation proposed, including avoidance. Without this, the impact should be considered **significant and unavoidable.**

Greenhouse Gas Emissions

- 3.8-17 – The DEIR states: “the 2021 LRDP would have a less-than-significant impact if, despite LRDP growth and development, UC Santa Cruz’s 2030 emissions total (including existing and 2021 LRDP sources) are at least 40 percent below 1990 emissions and UC Santa Cruz’s total 2040 emissions are at least 60 percent below 1990 emissions;”

L7-89

- 3.8-24 – Impact 3.8-1 – Greenhouse Gas Generation - Though this evidence may be in the appendix, the EIR itself should identify the level of reductions due to implementation of the UC policies and from the purchase of carbon credits. It also should discuss why carbon credits aren’t proposed to fully meet the Initiative targets. In addition, the EIR should evaluate the impacts if implementation of the UC policies is not mandatory.

L7-90

- 3.8-25 – Mitigation Measure 3.8-1 – Reduce Annual Emissions- Since increased annual emissions are not tied to increases in enrollment growth and the provision of the supporting infrastructure, imposing mitigations that might not be implemented until the end of the LRDP period in order to meet the required targets is not sufficient. The EIR needs to directly compare the implementation of the mitigation measures to increases in enrollment levels in order to ensure that the targets are met on an ongoing basis. In other words, the mitigation measures in the EIR need to include a timeline for when each must be implemented.

L7-91

- 3.8-25 – Significance after Mitigation – While the DEIR does provide meaningful and enforceable mitigations, it doesn’t provide evidence documenting the reduction in emissions from them. The statement that the mitigations would reduce emission by 6,907 MTCO₂e is conclusory and not adequate under CEQA. Without this evidence, the impact should be considered **significant and unavoidable.**

L7-92

3.8-26 – Impact 3.8-2 – Conflict with Policies - The DEIR determined that because the 2021 LRDP would achieve the targets in the various plans and policies, the impact would be less than significant. However, this is based on the implementation of the mitigation measures specified under Impact 3.8-1 and this should be specified.

L7-93

-When considering reductions to wildfire hazards, UCSC proposes the method of prescribed burns to decrease the wildfire risk of the project. The emissions from these burns, as well as the impact on GHG emissions from the reduction in plant life, should be analyzed, disclosed, and mitigated.

L7-94

- Recent legislation has requested the California Air Resources Board to carry out an independent review of the forestry offset programs that are offered through the CA Carbon Offset Program. 36 forestry projects account for 80% of total offset credits issued by the California Air Resources Board. A UC Berkeley study found that, “82% of these credits likely do not represent true emissions reductions due to the protocol’s use of lenient leakage accounting methods”. California assumes a 20% leakage rate. In a policy brief, UC Berkeley Professor Barbara Haya refers to two studies that found leakage rates can reach as much as 80%. “Using an unsupported low-rate results in over-crediting,” Haya writes. Haya states that, “most forest offset projects begin in greenhouse gas debt; project landowners generate offset credits that allow emitters in California to emit more than the state’s emissions cap today, in exchange for promises that their lands will continue to increase their storage of carbon over 100 years”. But to address climate breakdown, emissions need to be reduced now, not at some hoped for point several decades in the future.”² The DEIR should specify which CARB offsets will be purchased to achieve emission targets, and, if they are forest offsets- should incorporate the findings of these studies in order to determine the amount that will need to be purchased to reduce the impact to a less than significant level. If this cannot be done, the impact should be **significant and unavoidable**, despite the offset purchase.

L7-95

Hazards and Hazardous Materials

- 3.9-13 – The DEIR indicates that UCSC is “in the process of updating the DTSC’s records to reflect existing conditions at Westside Research Park.”

L7-96

- 3.9.- 21 – Impact 3.9.2 – Release from Known Site - Since the Westside Research Park required cleanup in the past, the EIR should include a mitigation measure requiring the campus to complete the DTSC filing within a specified time period.

L7-97

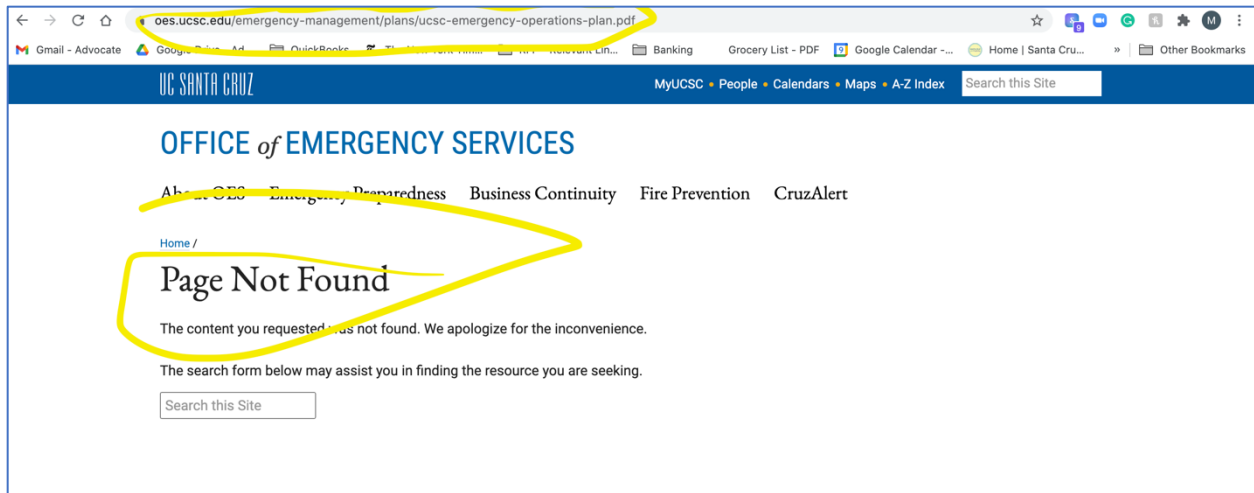
- 3.9-25 – Impact 3.9-4 – Implementation of an Emergency Evacuation Plan - The DEIR only considers short-term, construction related potentially significant impacts of implementation of the draft LRDP on emergency plans. This is inadequate. The draft LRDP proposes at least one new road in the north campus subarea as well as colleges and academic support facilities. Since these developments will occur in a state designated high hazard wildfire area, UCSC’s Emergency Response Plan and Emergency Evacuation Plan need to be revised to reflect the proposed development in this subarea. Simply requiring, as mitigation, site specific but unspecified, traffic management plans is inadequate. A comprehensive review and revision of the plans to reflect the new development is necessary. Without this mitigation, the impact determination after mitigation should be **significant and unavoidable**.

L7-98

3.9-25- The DEIR states: “The UC Santa Cruz EOP outlines evacuation procedures for building emergencies (stage 1) and for campus-wide emergencies (stage 2).” However, the DEIR does not allow review of these procedures. Contrary to CEQA requirements that material cited in an EIR be available for public review, the document cited in the appendix is not accessible by the link provided. See screenshot image taken on 1-19-2021 below:

L7-99

² <https://redd-monitor.org/2019/05/09/californias-lenient-leakage-accounting-means-that-emissions-reductions-from-forest-offsets-may-never-happen/>



L7-99
cont.

Because of the importance of the provisions in the EOP, it was possible outside of the DEIR to track it down. The EOP (found by google search and linked [here](#)) does not include any details for procedures during an emergency. It includes management structures and identifies authority during an emergency only. Further, every “Annex” in the plan is currently under revision and no details are provided. The EIR must identify necessary revisions in the EIOP in response to LRDP development and should include the policies for campus-wide evacuation.

Hydrology and Water Quality

- 3.10-11 – Moore Creek Watershed – The DEIR refers to the Arboretum Dam as shown on Figure 3.10-1. An east dam, West Dam, and Arboretum pond are also identified. However, the Figure didn’t seem to include the location of these facilities. Please clarify.

L7-100

- The DEIR indicates that the Arboretum Pond was used as a water source by the City until 1948. If it still exists, could it be used to provide non-potable water for the campus?

L7-101

- 3.10-33 – Impact 3.10-5 – Impacts on Karst Aquifer -The DEIR lists reasons why development under the draft LRDP could cause potentially significant impacts to the karst aquifer. However, it determines that these impacts would be less than significant in the north and central campus subareas due to existing Post-Construction Requirements. However, no evidence is provided documenting that these requirements successfully achieve their objectives. In fact, the DEIR indicates that UCSC is “considering” better evaluating the effects of these requirements. Given existing uncertainty regarding the effectiveness of the current requirements, a mitigation measure should be added to require the evaluation of the current requirements with performance standards mandating that, if necessary, additional actions be taken to ensure that the standards are met. Without this mitigation, the impact significance should be considered **significant and unavoidable**.

L7-102

- 3.10-36 – Mitigation Measure 3.10-5b – Groundwater Monitoring - The mitigation measure requires the reduction or termination of groundwater extraction if there is a “substantial” decrease in average base flows. This is inadequate. Without a quantitative definition of “substantial,” it will be impossible to determine when the implementation of this mitigation measure would be required. Without providing this definition, the determination of significance after mitigation should be **significant and unavoidable**.

L7-103

- The DEIR states that UCSC will compare flows to historic spring discharge to determine impact. This is inadequate. Flow variation is significant, and therefore UCSC cannot guarantee that the metric used to determine impact significance is sufficient and captures all impacts. L7-104

Land Use and Planning

- 3.11-1 – Coastal Act – The DEIR states: “As UC Santa Cruz is a state agency, campus lands are not included in either of these general plans or LCPs. Nevertheless, UC Santa Cruz must comply independently with the requirements of the Coastal Act.” The EIR needs to clarify the relationship of the LRDP to the Santa Cruz County LCP. The County’s General Plan/LCP Land Use Map includes the Campus lands west of Empire Grade. Generally, once the Coastal Commission approves the LCP for a local jurisdiction these policies are applied to all future applications, including those of state agencies. Is consistency of the LRDP with the County’s adopted LCP required or do only Coastal Act policies apply? L7-105

- 3.11-2 – The EIR should make clear that the County of Santa Cruz General Plan is also its Coastal Commission approved LCP. L7-106

- 3.11-8 – Impact 3.11-1 – Conflict with Plans, Policies or Zoning - - The DEIR’s determination that the draft LRDP would not be in conflict with any local zoning is incorrect and inadequate. L7-107

- 3.11-11 – The DEIR states that the University, as a state entity, is not subject to municipal regulation. However, it is subject to state agency regulation, which the DEIR ignores. State law requires approval by the Local Agency Formation Commission (LAFCO) before the City of Santa Cruz may provide extraterritorial water and/or sewer outside of its boundaries. The draft LRDP proposal to develop in the north campus subarea without LAFCO approval is in conflict with State law and policy. L7-108

- This section of the EIR must be revised to recognize this conflict with local and state requirements. Moreover, this conflict represents a potentially significant environmental impact, and a mitigation measure should be included requiring the University to receive LAFCO approval prior to expanding outside the City’s boundaries in the north campus subarea. Without these revisions the impact should be determined to be **significant and unavoidable**. L7-109

Noise

- 3.12-4 – The DEIR states: “Equivalent Continuous Sound Level (Leq): Leq represents an average of the sound energy occurring over a specified period. In effect, Leq is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period.” L7-110

- 3.12-17 – Thresholds of Significance – The on-campus construction noise thresholds proposed in the DEIR are the following: L7-111

- “Daytime (8 a.m. to 10 p.m.) construction noise levels at or above 80 dB Leq at the on-campus noise-sensitive uses (e.g., student or employee housing).
- Nighttime (10 p.m. to 8 a.m.) construction noise levels at or above 70 dB Leq at on-campus noise-sensitive uses (e.g., student or employee housing).”

- These thresholds seem unreasonable in noise-sensitive areas where students are in class or residing. The EIR needs to provide evidence supporting these thresholds? Table 3.12-1 on page 3.12-2 provide examples of noise levels at these decibels:

<ul style="list-style-type: none"> • “Diesel truck at 50 feet at 50 miles per hour — 80dB — Food blender at 3 feet, Garbage disposal at 3 feet • Noisy urban area, daytime, Gas lawn mower at 100 feet — 70dB — Vacuum cleaner at 10 feet, Normal speech at 3 feet” 	 L7-111 cont.
<p>- The determination that only average noise above these thresholds would constitute a significant noise impact near student housing and classrooms does not seem reasonable. They should each be lowered by at least 10 decibels.</p>	
<p>- 3.12-18ff – Impact 3.12-1 – Construction Noise – The DEIR finds that the impacts of construction noise will be significant and proposes a variety of mitigation measures. Despite the implementation of all the proposed measures, the impact is determined to be significant and unavoidable. However, the mitigation measures are not adequate.</p>	 L7-112
<p>- 3.12-21 – Barriers are proposed under specific conditions “if deemed to be feasible and effective.” This measure is too vague to be adequate. Feasibility needs to be defined in terms of the potential reduction in decibel levels.</p>	 L7-113
<p>- In addition, no rationale is provided for allowing “daytime” construction to continue until 10:00 p.m. Most local jurisdictions limit construction activities to no later than 8:00 p.m. No evidence is included in the DEIR justifying daytime construction to 10:00 p.m. or nighttime construction at all. An additional mitigation should be imposed prohibiting daytime or nighttime construction after 8:00 p.m. at least within 440 feet of a sensitive receptor.</p>	 L7-114
<p>-3.12-22 – Significance after mitigation – The DEIR states: “Additionally, short-term lodging would be offered to residents if they would be temporarily exposed to nighttime interior noise levels that exceed the interior noise standard of 45.” The EIR should provide a full analysis of the impact of this mitigation measure that includes, but is not limited to, the impact on available short term housing options, the impact on student education, VMT, campus emissions, etc. Should students choose not to accept the offer of off-campus accommodation, the EIR should fully analyze the impact of exposure to significant noise on their ability to sleep (and the associated health impacts), study and succeed academically, long-term hearing impacts, etc.</p>	 L7-115
<p>- 3.12-22 – Significance after Mitigation – The DEIR states that the proposed mitigation measure “would limit the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur.” This is a misleading statement as nothing in the mitigation measure prevents construction from occurring 24 hours a day. Construction is only limited between 8:00 a.m. and 10:00 p.m. “when feasible.” (page 3.12-21) The mitigation measures in the DEIR need to be revised and strengthened in order to meet CEQA’s requirements.</p>	 L7-116
<p>- 3.12-22 – Impact 3.12-2 – Construction Vibration – Again, the mitigation measure is inadequate. The operation of “construction activities that may require the use of vibration-generating equipment” should be limited to hours of 8:00 a.m. to 8:00 p.m. in addition to the other measures.</p>	 L7-117
<p>-The DEIR should fully analyze the impact of excessive noise on animal species, including but not limited to their migration patterns.</p>	 L7-118

Population and Housing

<p>- 3.13-3 – The DEIR recognizes the City of Santa Cruz code section prohibiting the expansion of water and services beyond its boundaries without the approval of LAFCO. However, this was not identified on page 3.6-16</p>	 L7-119
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(Impact 3.6-2 – Conflict with Policies) as a significant inconsistency with a local policy, notwithstanding the contracts signed by the City in the 1960s to provide these services.

L7-119
cont.

- Measure U – The DEIR’s summary of the policies is so incomplete as to make it inadequate as a public information document. Measure U was not only approved by almost 77% of the City electorate but some of the policies directly relate to Objectives included in the Draft LRDP. The following Measure U policies should be included in the EIR and should be included in every section for which they are relevant, not only the population and housing section:

- “a. There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP.
- b. If there is additional enrollment growth at UCSC, UCSC should house the net new growth of students, faculty and staff on campus.
- c. If there is additional enrollment growth, it will only occur when the on-campus and off-campus infrastructure (including on-campus housing) required to support the growth is provided prior to or concurrent with the growth.
- d. The University will legally bind itself to tie the provision of infrastructure to enrollment growth.
- e. A Capital Improvement Program identifying on-campus and off-campus infrastructure needs (including on-campus housing), funding and sources needed to carry out the proposed LRDP, shall be prepared concurrently with the LRDP.”

L7-120

- 3-13-4 – Regional population growth – The DEIR includes population figures for the Santa Cruz County and its jurisdictions between 1990 and 2020 but doesn’t provide similar figures for UCSC growth. This should be included in the EIR as they would a useful comparison when analyzing growth proposed under the draft LRDP.

L7-121

- 3.13-5 – The DEIR recognizes that the extremely tight housing market in Santa Cruz County with available housing vacancy rate of about 1.9%. It also identifies UCSC one of the three major economic drivers “behind the tight housing market.” It summarizes that due to the summer wildfires and despite remote teaching at UCSC “a general housing shortage still exists.”

L7-122

- 3.13-8 – Growth projections – The DEIR includes AMBAG population growth projections for the City of Santa Cruz and estimates a change from 2015 to 2040 of 29%. For a meaningful analysis of the impacts of proposed UCSC growth on the City, the DEIR should compare UCSC’s growth with the City’s over a similar time period. Based on the AMBAG estimates, the City’s growth between 2020 and 2040 will be about 20%. The EIR needs provide a direct comparison of this growth with that proposed under the LRDP to adequately analyze the Plan’s significant impacts on Santa Cruz.

L7-123

- 3.13-9 – Issues Not Evaluated Further – The DEIR argues that implementation of the LRDP would not “displace substantial numbers of existing people.” However, the DEIR only considers the potential displacement from on-campus students. This is inadequate because the DEIR does not consider the possible displacement of people living in the City of Santa Cruz resulting from enrollment growth should the University not meet the LRDP’s housing objectives.

L7-124

- While an “Objective” of the draft LRDP is to house 100% of the new students and up to 25% of new faculty and staff on campus there is no binding requirement to make this happen. Moreover, there is no requirement that enrollment growth be tied to housing increases. Without mitigation measures requiring the proposed housing additions to occur in sync with enrollment growth, the determination that the draft LRDP will not displace people is unsupported by evidence and inadequate.

L7-125

- 3.13-10ff – Impact 3.13-1 – Directly or Indirectly Induce Substantial Unplanned Population Growth and Housing Demand – On page 3.13-12 – Regarding the impact of the draft LRDP on off-campus housing demand,

L7-126

the DEIR states: “Combined with the projected student demand identified above, the 2021 LRDP may result in an off-campus housing demand for 2,190 residential units within Santa Cruz County.” The DEIR doesn’t make clear that this impact assumes that 100% of the new students and up to 25% of the new faculty and staff will live on campus on the land “set aside” for housing. Again, given that there is no assurance such housing will be provided, the EIR needs to analyze the off-campus impacts should this objective not be met.

L7-126
cont.

- The DEIR assumes that 100% of new students and up to 25% of new faculty and staff will be housed on campus by simply stating: “The 2021 LRDP **sets aside** an adequate amount of land for housing to accommodate 100 percent of the increase in student enrollment above 19,500 and for 25 percent of the increase in the number of employees, based on demand.” Again, setting aside land for the development of housing is not adequate justification under CEQA for not considering the impacts of the LRDP should the housing not be provided.

L7-127

- 3.13-14 – Mitigation Measures – The DEIR states as a mitigation measure: “UC Santa Cruz **is planning** to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP,” and “UC Santa Cruz **anticipates** that it will be able to provide housing to all students projected under the LRDP and the impact associated with student housing demand is expected to be less-than-significant.” These are not adequate mitigation measures under CEQA because they do not change the project to reduce the potential impacts to a less than significant level (see Section 15370 of the CEQA Guidelines where mitigation is defined). And, in past LRDPs (the 1988 LRDP, for example) that contained significant on-campus housing goals without adequate mitigation measures, these goals were not realized.

L7-128

In order to meet CEQA requirements for an adequate mitigation measure, the mitigation measure should read: “UC Santa Cruz shall provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP and shall provide housing to all students projected under the LRDP.”

- The DEIR also recognizes (page 3-10) that enrollment growth will occur over time but doesn’t analyze the potential impacts of not directly relating the production of the on-campus housing to enrollment growth. It merely states: “On-campus student enrollment is projected to increase by an additional 9,482 FTE students by 2040–2041, which would equate to an average annual increase of 431 additional students (assuming student enrollment growth occurred linearly; in actuality annual enrollment growth (could fluctuate from year to year).”

Without a requirement that ties enrollment growth to the provision of on-campus housing, the proposed mitigation measure would not be adequate to reduce the potential impact to a less than significant level. Even with the mitigation measure proposed above, significant off-campus housing demand beyond what the DEIR anticipates would occur if there were long delays between enrollment growth and the provision of housing to serve it.

L7-129

Therefore, the following mitigation measure should be added in order to reduce the potential impact of the proposed on-campus enrollment growth to a less than significant level: On-campus student housing beds and employee housing units shall be available within four years of enrollment growth in excess of 19,500 students.

There is substantial evidence that these proposed mitigation measures are feasible as based on the fact that the University has successfully complied with essentially the same conditions under the 2005 LRDP’s Comprehensive Settlement Agreement (Section 2).

- If the EIR does not include these (bolded) mitigation measures, the FEIR must include a detailed analysis of the impact that insufficient housing will have on students, including, but not limited to economic and financial

L7-130

impacts, health (physical and mental) and sanitary impacts, traffic and VMT impacts, etc on additional populations, students, and the environment.

L7-130
cont.

- The chapter on Population and Housing is inadequate because it does not analyze the induced off-campus impacts of the draft LRDP. The increase in campus population of over 12,000 people will, as documented in the Growth Inducing section of the DEIR, have a multiplier effect on jobs, population growth and housing off-campus. The University functions as a basic industry and, as stated earlier in the DEIR, is an important economic driver in the community. The financial impact of spending in the community by new students, faculty and staff will be significant. It will generate new jobs, population growth and housing demand in the community. These will create potentially significant environmental impacts that must be analyzed in the EIR. Additionally, according to the Systemwide Economic and Social Impact Analysis (2021) commissioned by the University of California, “every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs”. The EIR needs to take into account the job generating impact of adding new staff at UCSC and the effect on the housing market.

L7-131

Without this analysis, the DEIR is inadequate.

Public Services

- 3.14 – The DEIR analysis of the potential impact of the LRDP on public services assumes that the on-campus housing commitments will be met. This further supports the importance of the proposed revised mitigation measures in the Population and Housing chapter for the EIR to be adequate.

L7-132

-3.14-2- Impacts on Police Facilities – The DEIR states, “...implementation of the 2021 LRDP could result in the need for additional sworn officers, dispatchers, and support staff...” To address this, the DEIR states, “Funding and planning for additional staff members is carried out through UC Santa Cruz capital planning process... Capital planning is a continuous and iterative process that evaluates capital needs identified and assess alternatives to meet such needs in the context of anticipated capital resources.” However, according to UCSC PD Chief Nadar Oweis’ comments in a 2016 City on a Hill Press article, “Six hundred fifty [extra] people on this campus is a lot of people. With the additional bodies on campus, UCSC PD has taken measures to maintain its presence, including having two extra officers earning overtime on Friday, Saturday and Sunday nights. I wish we had an opportunity to hire more officers,” said Oweis. “But I haven’t been given any more money in my budget to hire [them].” This article shows that with additional students present, UCSC has not always increased police presence on campus. But “the campus has also seen an increase in parking citations, thefts, roommate disputes and traffic incidents including hit and runs, said Oweis”. Given the history of inadequate funding, the EIR should include a detailed analysis of the impacts on students and their property should UCSC not allocate funding for additional police officers, as they have not in the past. Since there is substantial evidence that the proposed enrollment increases will generate the need to provide additional police services, the EIR should include a mitigation tying enrollment growth to increases in additional police personnel and all relevant public services.

L7-133

- 3.14-10 – Mitigation Measure 3.14-1 – Require new fire equipment and construction to meet fire access requirements - This is an example of an adequate mitigation measure. The “shall” initiate operation of a new campus fire station if demand warrants it.

L7-134

- 3.14-11ff – Impact 3.14.3 – Impacts on School Facilities – The DEIR is inadequate in the analysis of the draft LRDP’s potential impact on school facilities because it only considers the potential impact from faculty and staff school age children. Since many UCSC students also have school age children the potential impact from school age children of the 8,500 additional students living on campus needs to be analyzed.

L7-135

- The DEIR is inadequate in its analysis of public service impacts of the LRDP by ignoring a potentially significant impact of the LRDP to public services. As a public agency, the academic and support services it provides its students are public services. Moreover, UCSC students are also members of the public. To the extent, then, that the University in implementing the LRDP provides the physical infrastructure to support increased enrollment, it is providing public services.

The DEIR analyzes the potentially significant impacts on the environment of providing this infrastructure necessary to implement the LRDP but does not consider the environmental impacts if the proposed facilities are not provided. The lack of this infrastructure would reduce the direct environmental impacts of the LRDP but it would cause indirect environmental impacts directly related to social and economic impacts for the newly enrolled students. There is a direct nexus between the lack of infrastructure and these social and economic impacts, and they need to be considered in the EIR and, if potentially significant, mitigated.

L7-136

The 2005-2020 LRDP has constructed less than 7% of the physical infrastructure included in the Plan. As a consequence, there are overcrowded classrooms, inadequate faculty to student ratios, and insufficient staff support. This has caused significant mental health problems for students as well as negatively impacted their economic opportunities. Unless the 2021 LRDP provides the infrastructure included in the Plan, these social and economic impacts will be even more significant.

The EIR needs to analyze these potential impacts and, if it determines that they are potentially significant, propose feasible mitigation measures to reduce them. One such measure would tie enrollment growth to the provision of the infrastructure needed to support it. The language could be similar to the mitigation measures proposed in the Population and Housing chapter.

Recreation

- 3.15-12 – Impact 3.15-2 – Impacts on Off-Campus Recreation Facilities - The DEIR analysis of the potential impact of the LRDP on recreation assumes that the on-campus housing commitments will be met. This further supports the importance of the revised mitigation measures in the Population and Housing chapter for the EIR to be adequate. The DEIR estimates that 982 students will seek housing off-campus. If the “planned” on-campus housing is not provided, the off-campus demand on recreational facilities would increase by thousands of students.

L7-137

- According to the DEIR – “... in recognition of the need for distributed recreational facilities to support increased housing throughout the campus, recreation and athletics facilities have also been included as a supporting use in the Colleges and Student Housing land use designation.” Without the inclusion of specific quantity of additional facilities that will serve additional students, it is impossible to evaluate the adequacy of the additional recreational facilities to serve proposed enrollment growth. All proposed recreation facilities should be specified in the EIR. Without the inclusion of these changes, members of the public are unable to evaluate the adequacy of the recreation infrastructure to support additional students.

L7-138

- According to the DEIR – “Although on-campus recreation facilities are heavily utilized, substantial deterioration of those facilities is not apparent.” The FEIR should include evidence of this claim, or, if no evidence is available,

L7-139

it should be removed. Contrary evidence to this statement is provided in a 2016 City on a Hill Press Article³ that says, “Finding money for all necessary maintenance is an issue.”

L7-139
cont.

-3.15-12 - The DEIR states, “The construction of new facilities would occur when warranted by increased demand and when financially feasible.” According to a City on a Hill Press Article, “A lot of our buildings need some really serious repairs,” said Colin Allison (OPERS facilities and operations supervisor). Additionally, the article states, “Even with the Measure 64 and 65, student fees that passed last spring in the campus elections, the sheer amount of people seeking to use Office of Physical Education, Recreation and Sports (OPERS) facilities and services still poses a challenge — and expansion is not in the immediate future.”⁴ The DEIR should reevaluate the impact of additional enrollment on existing recreation resources in consideration of this evidence.

L7-140

- Moreover, the DEIR inadequately determines, with no substantial evidence, that the imposition of the payment of in-lieu fees on off-campus new development sufficiently “addresses” the potential impacts.

There are two inadequacies with the DEIR analysis. First, students living off-campus in the locally tight housing market could simply crowd into existing units and thus, not generate increased park fees. More important, though, the DEIR does not consider whether existing fees are sufficient to provide the increased facilities needed to adequately meet the increased demand. No evidence is provided justifying the conclusion that in-lieu park fees will be sufficient to develop the additional facilities needed. There is not even an analysis of what additional facilities would be required. The EIR needs to provide a specific analysis of the recreational facilities required to meet additional off-campus demand resulting from LRDP growth and whether the fees generated from housing developments to serve this demand will be sufficient. Without these revisions the impact would be **significant and unavoidable**.

L7-141

Transportation

- 3.16-30 – Impact 3.16-1 – Conflict with Plan - The DEIR determined that the impact would be less than significant based on the inclusion in draft LRDP of a number of road construction projects – the extension of Meyer Drive, the north entrance at Empire Grade, and the Western Drive Extension. This is inadequate because there is no requirement that these projects will be implemented. In fact, both the Meyer Drive extension and the northern entrance are included in the 2005 LRDP and have not reduced the impacts anticipated in that Plan.

The construction of these projects must be tied to enrollment growth and timelines provided for their completion. Absent these assurances, the EIR must analyze the potential transportation impacts under the assumption that they will not be provided. In addition, the DEIR analysis assumes that on-campus housing will be provided. Without the proposed additional mitigation measures to ensure the provision of this housing, the EIR must analyze the potential transportation impacts assuming that this housing will not be provided.

L7-142

Without these assurances, the draft LRDP would not be consistent with the local general plans and the impact would be **significant and unavoidable**.

To justify a determination that the impact will be less than significant, the following feasible mitigation measure should be added: **The road construction projects proposed in the LRDP shall be provided in advance of or concurrent with the increased growth they are designed to support.**

- 3.16-33 – Impact 3.16-2 – Conflict related to Vehicle Miles Traveled - The VMT analysis in the DEIR is based on the assumption that the on-campus housing proposed in the draft LRDP will be provided. The DEIR, thereby,

L7-143

³ <https://www.cityonahillpress.com/2016/10/21/the-overcrowding-problem/>

⁴ <https://www.cityonahillpress.com/2016/10/21/the-overcrowding-problem/>

finds that the residential VMT will be below the significance threshold. However, without the recommended mitigation measures to require the provision of the proposed on-campus housing, the DEIR is inadequate because there is no evidence that the proposed housing will be realized.

L7-143
cont.

- As stated in the DEIR “The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus.” The DEIR doesn’t calculate the VMT assuming the proposed housing is not built on-campus, but it is clear, that the VMT would greatly exceed the threshold of significance.

L7-144

Without the recommended on-campus mitigation measures, there is no evidence that the performance standard of reducing the VMT below the threshold of significance can be met, even with the array of proposed mitigation measures, and the impact will be **significant and unavoidable**.

- 3.16-38 – Significance after Mitigation – The DEIR is also inadequate because it does not analyze the potential VMT increase due to off-campus induced growth based on the economic multiplier effect.

L7-145

- 3.16-38ff – Impact 3.16-4 – Inadequate Emergency Access - The DEIR is inadequate in its treatment of this impact because it does not analyze the potential need for emergency access to serve the significant new development in the north campus subarea. The LRDP proposes new colleges and academic support facilities in this high hazard wildfire area but the DEIR does not mention the potential impacts on the provision of emergency access as a result of this development and provides no substantial evidence that emergency access will be adequate. The potential impact may be significant and, absent the required analysis and consideration of mitigation measures, the impact should be considered **significant and unavoidable**.

L7-146

Utilities and Service Systems

- 3.17-5 – Santa Cruz Water Service Agreements - The DEIR discussion of the water services agreements with the City of Santa Cruz is misleading, incomplete, and inadequate. This analysis fails to serve as an adequate public information document.

L7-147

- For example, the DEIR is misleading when it states: “The City has not confirmed its obligations and has taken the position that it is only required to provide water to areas of the campus within the service boundary unless otherwise approved under state and local law.” This is misleading because the City is prohibited under State law from providing water and service outside its boundaries without the approval of the Local Agency Formation Commission (LAFCO).

L7-148

- The DEIR provides no information on the State law requirements that are under dispute. The University may not believe it is subject to the state law requirements but CEQA requires that the public be informed regarding the relevant provisions of state law.

L7-149

- In addition, the DEIR neglects to mention or consider the Comprehensive Settlement Agreement provisions, adopted as part of approval of the 2005-2020 LRDP, that required the University to apply to LAFCO for the extraterritorial water and sewer services. Nor does the DEIR indicate that the University may be in violation of this Agreement by not fulfilling its obligations under its provisions. While the University did initially apply for the extraterritorial service, it never completed the process in good faith and allowed the application to languish at LAFCO for over ten years before LAFCO terminated it for lack of action. Without inclusion of this information in the EIR, the document is inadequate in its description of this issue.

L7-150

- 3.17- 12 – According to the DEIR the City’s water demand in 2035 will exceed the water supply in 2035 by 40 million gallons a year (mg/y) assuming a UCSC demand of 308 mg/y. On page 3.17-15, the DEIR indicates that in

L7-151

2018, the per capita water usage was 8,904.88 gallons per year for a total of 167.1 mgd, a slight per capita increase over 2017. On page 3.17-16, the DEIR indicates that the campus policy is to reduce water consumption 20% by 2020 and 36% by 2025 over the earlier average of 13,924 gallons per capita. This translates into a per capita of 11,139.8 gallons per capita in 2020 and 8,911.36 by 2025. If the campus consumption stays at the 2018 rate or decreases further, it will meet the 2025 goal.

L7-151
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- 3.17-19ff – Projected Water Demand - There appears to be an inconsistency in the demand figures in the DEIR that needs to be clarified. The total campus demand in 2018 (calendar year) is stated as 167.1 mgd. However, the table on page 3.17-21 showing 2017/18 demand lists the total as 154.5 mgd.

L7-152

- In addition, the basis for the Projected 2040 Annual Demand on campus of 289.1 mgd is unclear. From page 2-10 the total campus population in 2040 under the LRDP is projected to be 35,174. Assuming the campus continues the per capita demand achieved in 2018 of 8,904.88 gallons per year this demand would be about 313 mgd, which is about 24 mgd more than projected. This totals a net increase in annual demand of 158.6 mgd. The DEIR provides no evidence supporting the 289.1 mgd estimate. The figures in the DEIR either need to be justified or revised as the difference of about 8% is not inconsequential.

L7-153

- 3.17-22 – Impact 3.17-1 – Impacts on Water Supply - 3.17-23 Sufficiency of Supply – The DEIR uses its unsupported projection of increased water demand under the LRDP of 137.5 mgd in its analysis of the sufficiency of the City’s water supply.

L7-154

- 3.17-23 – Table 3.17-10 – City projected supply and demand – The DEIR indicates that even in normal years in the City systems’ 2035 demand will exceed supply by 40 mgd. If this deficit carries over until 2040 and the UCSC demand is 24 mgd greater than stated in the DEIR, the water supply deficit in normal years will be about 64 mgd or 60% greater than projected. Again, the DEIR needs to provide evidence to support its analysis.

L7-155

- 3.17-24 – The DEIR asserts that the 2021 LRDP water demand would be less than the UCSC projected demand in the UWMP. Without documentation, this finding isn’t supported by the evidence. The UWMP projects a UCSC water demand of 308 mgd by 2035. The analysis above, using 2018 per capita demand figures, indicates that the total demand in 2040 would be 313 mgd not counting the Coastal Marine Campus. UCSC demand, therefore, may exceed the City’s UWMP projection. The impact of LRDP growth on the City’s water supply may be more significant than indicated in the DEIR and, if true, the DEIR should reflect this.

L7-156

- The DEIR discusses the “dispute” with the City of Santa Cruz regarding provision of water and sewer service in the north campus subarea without discussing the State law requirements on the City to receive LAFCO approval in order to provide this service. Since the DEIR recognizes a “remote” possibility that the City will have to follow state law, it indicates that a number of alternatives will be analyzed, including the option of “curtailing” proposed LRDP development. Given the importance of the state law requirements, this DEIR decision is prudent.

L7-157

-The DEIR should include a full analysis of the impact of exposure to drought conditions, water scarcity, and rationing, including but not limited to health impacts, recreational risks, infectious disease, diseases transmitted to animals, food and nutrition, economic impacts, air quality, and hygiene⁵, etc., on the additional students, faculty, staff, and the entire population that exist within the City’s municipal services district.

L7-158

⁵ Information taken from: <https://www.cdc.gov/ncch/drought/implications.htm>

- 3.17-25ff – Alternative Water Supplies – The analysis of alternative water supplies is inadequate because it doesn’t quantitative projections of the amount of water each of the options would supply and how these would impact future demand. For example, the discussion of the water recycling doesn’t make clear that the project with the greatest potential to increase supply, which is under development by the Soquel Creek County Water District, would not directly increase the water supply to City customers.

L7-159
- Also, while conservation has played the major role in reducing the threat of droughts to City water customers, it is questionable how much additional reduction in demand is possible through conservation.

L7-160
- 3.17-30 – The DEIR states that “Because many (alternatives) of them are common supplemental supply sources (such as recycled water and more conservation), there is a reasonably high probability that the City will be able to successfully supplement its water sources.” The DEIR provides no quantitative evidence to justify this conclusion. And, given that, as stated above, neither recycling at this time or conservation in the future are likely to prove adequate. The EIR needs to provide data to support its determination.

L7-161
- 3.17-30 – The draft LRDP and the Project Description chapter of the DEIR state repeatedly that development under the 2021 LRDP will occur “primarily” in the central campus subarea. Here, finally, the DEIR provides the data related to this: “Approximately **43 percent of housing and 8 percent of academic and support space** under the 2021 LRDP is estimated to be located outside the service boundary.” (i.e., the north campus subarea). This mean that 3,655 student beds are proposed in the north campus subarea. With 43% of the housing beds planned in the north campus subarea, it is incorrect and inadequate for the DEIR to assert that the central campus subarea will be the primary location of increased UCSC growth. This misstatement needs to be corrected.

L7-162
- The DEIR considers groundwater as one alternative to supply water for development in the north campus subarea. The DEIR reviews a number of potential impacts of such a project but does not make clear that this analysis is presented on a programmatic level. No detailed project is described or potentially significant impacts on the hydrology of downstream springs identified. The EIR should clarify that any proposal to develop this alternative would not only be subject to “additional study” but to full environmental review.

L7-163
- 3.17-32 – Air Quality with no north campus development – The DEIR states: “Thus, construction-related air quality impacts would be reduced compared to those under the 2021 LRDP.” Despite this finding the DEIR concludes that the impact will be “similar” to the draft LRDP. Why isn’t it “Less impact”?

L7-164
- 3.17-33ff – Population and Housing with no north campus development – The DEIR assumes that, although enrollment will be reduced, 100% of the additional students will be housed on campus and, thus, the impact will be less than significant. However, this will only be the case with the mitigation measures stating that the on-campus housing **shall** be provided and that it **shall** be tied to increases in enrollment.

L7-165
- 3.17-34 – Transportation with no north campus development – The campus enrollment level would decline from 28,000 students by 3,700 to 24,300 students (over 13%) with a concomitant reduction in faculty and staff, as well as in induced growth. These reductions would all lead to decreases in VMT and it, therefore, incorrect for the DEIR to find that the impact would be “similar.” The evidence indicates that the impact will be less.

L7-166
- 3.17-35 – Mitigation Measure 3.17-1b – Water Conservation - While the mitigation measure requires an audit that will include “top priority” measures for implementation within five years, there is no

L7-167

requirement to implement these recommendations, only that “measures determined in cooperation with the City” be implemented. The EIR needs to explain why the mitigation measure shouldn’t require that the top priority conservation measures identified by the audit be implemented. As written, the mitigation measure is unclear regarding whether the cooperation with the City will lead to the implementation of the top priority conservation measures or simply that they be “addressed.” The performance standards for this deferred mitigation are inadequate and need to be revised.

L7-167
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- The potential impacts of not developing in the north campus subarea compared to the development under the draft LRDP is quite useful. This analysis should also be included in the Alternatives chapter as an additional feasible alternative to the draft LRDP. Though the analysis in the DEIR understates the number of impact areas where not developing in the north campus subarea would reduce the impacts, it determined that impacts overall would be less than if the area was developed as proposed.

L7-168

Wildfire

- The determination that Wildfire impacts with no development in the north campus subarea will be similar to those with development in that subarea is incorrect and inadequate. 3,700 student beds are proposed in the north campus subarea which is part of a high hazard fire danger area. Eliminating development in the area that is most subject wildfire would clearly reduce the potential wildfire impacts of the LRDP. While the implementation of wildfire risk reduction and evacuation procedures would reduce the potential impact of wildfires somewhat, there is no evidence provided that this reduction would be similar to that of not building in this high hazard danger area.

L7-169

- The 2021 LRDP EIR estimates that approximately 43% of the additional housing and 8% of the additional academic and support infrastructure will be located in a CALFire designated HFHSZ. This increases the risk of fire ignition, and, as a result, raises the risk of exposing residents, employees, and visitors to catastrophic wildfires.⁶ The FEIR must include a detailed analysis that quantifies the most serious health, air quality, greenhouse gas emission consequences of exposure of additional students, faculty, staff, and the entire population of the region to increased risk of wildfire.

L7-170

- 3.18-6 – Regional Setting – Since the LRDP proposes significant development in the north campus subarea, which is located in the unincorporated area of Santa Cruz County, the EIR must include consideration of the provisions of the County’s Local Hazard Mitigation Plan.

L7-171

- 3.18-7 – Human Influence on Wildfire – The DEIR provides a strong rationale for avoiding development in areas prone to wildfire. It recognizes “increased development in the WUI” (Wildland Urban Interface) can influence wildfire.” In addition, the DEIR notes that humans are responsible for starting an estimated 95% of wildfires and, “Consequently, areas near human development generate fires at a more frequent rate than very remote or urban areas.” Also, the DEIR provides evidence that climate change has significantly increased the risk of wildfires.

L7-172

3-18-8 – The DEIR identifies the following approaches for reducing wildfire risk: “some combination of hazardous fuel reduction projects, fire prevention planning, and fire prevention education.” However, the DEIR analysis is inadequate because it doesn’t consider an avoidance approach of not building in areas with a high risk of wildfires. Particularly, since the north campus subarea is located in such an area, the DEIR must consider the potential impacts of avoidance along with the others. The 2020 Lightning Complex fires were an example of the limitations of these other strategies. In addition, the proposed

⁶ [AG’s Office Motion and comments](#) (above)

approaches are inadequately vague and non-specific so it is impossible to evaluate the extent to which they would reduce the wildfire risk.

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3-18-9 – The DEIR in its description of wildfire risks on campus states: “the northern portion of the campus is largely rated high wildfire severity” and Figure 3.18-1 shows the entire north campus subarea which is proposed to house 3,700 students as well as academic facilities is located in the High Fire Hazard Severity Zone.

- 3.18-13 – Impact 3.18-1 – Compatibility with Emergency Response and Evacuation Plans
- The DEIR’s analysis of the potential compatibility the LRDP on UCSC’s emergency plans focuses solely on short term construction and states: “there are no elements in the 2021 LRDP that would interfere with the emergency response and evacuation procedures set forth in the EOP (Emergency Operations Plan).” This finding is inadequate.

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- Implementation of the LRDP will result in between 4,000 and 5,000 people, with 3,700 residents, occupying the High Fire Hazard Severity Zone in the north campus subarea. Unlike the 2005-2020 LRDP that proposed a loop road to serve proposed development in this area, the 2021 LRDP includes no additional new road access to the area. Moreover, the new roads proposed in the LRDP do not directly serve this area. If the adopted EOP and Emergency Evacuation Plan don’t specifically consider the need to respond to the increased fire danger to the occupants of this area, they must be revised and the LRDP is incompatible with them.

L7-174

- 3.18-14 – Mitigation Measures - The DEIR only proposes a traffic management plan to reduce the short-term impacts. Unless the two plans include adequate consideration of the LRDP’s proposed development in the north campus subarea, the potential impact would be **significant and unavoidable**. Moreover, they would need to be revised even if, as mitigations, the revised plans would not reduce the risk to a less than significant level.

L7-175

- 3-18-14 – Impact 3.18-2 – Wildfire Risk of New Development

- The DEIR finds that: “However, in the absence of an adopted Vegetation Management Plan, the wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant.” This determination is partially incorrect, incomplete, and inadequate.

- Proposed development in the north campus subarea would not be “in close proximity to an HFHSZ,” it would be located primarily within an HFHSZ.
- No evidence is presented to document that adoption of the Vegetation Management Plan by itself would adequately reduce the wildfire risk in the subarea.
- The DEIR fails to recognize that locating the development proposed in the LRDP in an HFHSZ by itself significantly increases wildfire risk.
- As documented in the DEIR: “the prevailing trend in California indicates an increase in the severity and frequency of wildfires over time as a result of climate change, modified vegetation regimes, and increasing human influence. Such trends are expected to continue and will pose an increasing threat to wildland areas... regardless of the actions that UC Santa Cruz takes in terms of the adoption and implementation of the 2021 LRDP.” These trends need to be recognized and included as important contributors causes of significant impacts of new development in the north campus subarea.

L7-176

- While the DEIR recognizes that all the increased development proposed by the LRDP would increase the risk of wildfire, it doesn’t differentiate the degree of risk in the different risk zones or the implications

for public safety or wildfire danger of differences in these risks. This analysis should be included in the DEIR for it to be adequate.

L7-176
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- 3.18-16 – The DEIR argues that with the implementation of vegetation management measures in the north campus area “would likely result in reduced wildfire risk on the newly developed land.” However, no evidence is presented to support this “likely” conclusion.

L7-177

- Moreover, the DEIR recognizes that “However, urban encroachment, especially in the northern portion of the campus, could lead to exposure of new development to increased wildfire risks.” This conclusion is disingenuous at best. How could housing 3,700 students and constructing academic facilities in a High Fire Hazard Severity Zone not result in an increased wildfire risk?

L7-178

-According to the 2021 LRDP Draft EIR: “The increase in the campus population associated with the implementation of the 2021 LRDP, and the development of buildings to accommodate population growth, by the sheer probability of adding more people to the area, would increase the risk of wildfire on or near the main residential campus and Westside Research Park. Human-caused wildfires tend to be generated by activities such as debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson.” Accordingly, from a wildfire analysis perspective, it is critical to analyze whether the Project itself—in its location and with its land uses, density, topography, etc.—increases the risk of wildfire ignition and spread. The EIR recognizes that “[T]he wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant”.

However, the proposed mitigation measure does not include the necessary mechanisms that would reduce the risk of wildfire **caused** by the Project. The DEIR’s reliance on a Vegetation Management Plan does not fill this deficit. It provides a range of wildfire prevention and response strategies (or, mitigation measures) focused on reducing wildfire impacts **on** the Project. But this again skips the central requirement of CEQA— to analyze, disclose, and propose feasible mitigations of the **2021 LRDP’s impact** on wildfire risk.

L7-179

- 3.18-17 – Mitigation Measure 3.18-2 – Vegetation Plan

- The DEIR requires that a campus-wide vegetation plan be adopted that meets the requirements of State law within two years. The DEIR asserts that adoption of the plan the wildfire risk will be less than significant. However, no evidence is provided to document that such a plan would reduce the risk, especially in the north campus subarea, to a less than significant level and the performance standards for the Plan are inadequately vague. To what extent have such plans worked elsewhere? What is the factual basis for the conclusion reached? Without this documentation the potential impact should be considered to be **significant and unavoidable**.

Moreover, the DEIR is inadequate because it does not consider a potentially feasible mitigation measure of not developing in the High Fire Hazard Severity Zone in the north campus subarea. The Utilities and Service Systems chapter analyzed this option and found that in most environmental impact areas not building in the north campus subarea would reduce the impacts. It is likely that a more detailed analysis will show that, even with a vegetation management plan the wildfire risk to development in the north campus subarea will be significant. Not developing in that area clearly would reduce this risk to a less than significant level.

L7-180

Cumulative Effects Analysis

- 4-40 – Transportation – Vehicle Miles Traveled – The analysis here is a clear example of the importance of the proposed mitigation measures in the Population and Housing chapter that would effectuate the LRDP commitment to house 100% of the additional enrollment on campus and tying this increased growth to the provision of housing. As documented in Table 4-4, Cumulative VMT in 2040 is projected to be 12.3 VMT per capita. Cumulative conditions with the 2021 LRDP will be 12.1 VMT per capita. This reduction in VMT from the LRDP results from the campus successfully meeting its housing commitment. Without the proposed mitigation measures the cumulative impact here and in other environmental areas would be **significant and unavoidable**.

L7-181

Other CEQA Sections

- 5-1 – Significant and Unavoidable Impacts – the list of impacts in this section is incomplete. The comments contained in this letter provide substantial evidence documenting the need to include an increased number of significant and unavoidable impacts that will result from the implementation of the LRDP.

L7-182

- 5-4ff – Growth Inducing Impacts – The DEIR recognizes that the campus growth proposed under the LRDP will induce economic and population growth off-campus and employs job multiplier, based on a 2019 UCSC study, of 1.23 to project that the 2021 LRDP could result in the indirect increase of an additional 3,568 job in the region (mostly in the City of Santa Cruz but also in the rest of Santa Cruz County).

L7-183

- The DEIR finds that “the environmental impacts of that growth are not reasonably foreseeable and will be addressed in future environmental review under CEQA.” This is not correct or adequate. It is reasonably foreseeable for the DEIR to provide estimates of increased population growth and housing demand based on the projected induced growth in employment. In fact, the EIR analyzing the impacts of the 2005-2020 LRDP carried out such an analysis.

While the Growth Inducing Impacts section of the DEIR may not be the most appropriate place to analyze these potential impacts of this employment growth, CEQA requires that these indirect impacts be considered. The appropriate chapter to analyze these indirect impacts is in the Population and Housing chapter and it is not speculative to estimate the likely increase in population and housing demand resulting from this increase.

L7-184

- There is substantial evidence in this DEIR that the 2021 LRDP is indirectly likely to result in an increase of 3,568 new jobs in the County. These jobs will create additional housing demand, which should be analyzed in the Population and Housing Chapter. The EIR will be inadequate without such an analysis.

Alternatives

- 6-1 – The DEIR quotes the CEQA Guidelines requirements for the analysis of alternatives, which includes: “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain **most of the basic objectives** of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives do not need to meet all the basic objectives.

L7-185

- A related CEQA Guidelines provision includes: “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of

the project objectives or would be more costly.” This provision is particularly important in considering the comments below.

L7-185
cont.

- 6-2 – 6.5.2 - Alternative 2: Reduced UCSC Enrollment

- 5-13 - This alternative would reduce enrollment under the 2021 LRDP to 26,400 students with the same land use plan as proposed. The DEIR asserts that “this alternative would not provide the full additional capacity for 28,000 students, which is based on the state’s 2040 college enrollment projections; therefore, Alternative 2 would only partially meet Project Objective 1 which involves the accommodation of projected increases in student enrollment through 2040 based on statewide public educational needs.”

L7-186

The DEIR provides no evidence to support the statement that enrollment growth to 28,000 students is based on the state’s 2040 college enrollment projections. None of the references listed in the DEIR seem to relate to this statement. Moreover, if the objective of meeting the referenced state projected need, the DEIR should have included the 28,000 number in the objective language.

Finally, there is no evidence in the DEIR documenting that the LRDP could not meet state’s projected enrollment levels in 2040 with a lower enrollment at the UCSC campus. It is not accurate or adequate, therefore, for the DEIR to assert that a lower student enrollment would only partially meet Objective 1.

L7-187

- 6-17ff – 6.5.3 Alternative 3: Reduced Development Footprint - While this alternative would eliminate development in the north campus, it would not fully reduce the enrollment proposed to be served by development in that subarea and as in Alternative 2 enrollment would total 26,400 students.

L7-188

- 6-19 – Ability to Meet Project Objectives – As with Alternative 2, the DEIR finds that the alternative would meet most of the project objectives but would not serve the project state projected enrollment needs and, thereby, would not meet objective 1. The objections to this determination are the same as listed above for Alternative 2.

- In addition, the DEIR finds that Alternative 3 would not meet Objective 3 which is to provide 2 additional college pairs.

L7-189

- The DEIR determined that many of the impacts of this alternative would be similar to those resulting from the proposed project, some would be less, and one would be greater as a result of locating more development on the central campus.

L7-190

- 6-33 – Comparison of Alternatives – The DEIR is inadequate in its comparison of alternatives. The CEQA Guidelines require that the alternatives to the proposed project meet most of the basic objectives and **substantially** reduce the significant environmental impacts of the project. The DEIR in comparing the alternatives merely states whether the impacts are lesser, similar or greater than the project. The EIR needs to indicate which impacts the alternatives would reduce substantially.

L7-191

While the DEIR mentions, on page 6-34, that the impacts of Alternative 2 would be less than those in the 2021 LRDP, “it would not altogether avoid the significant and unavoidable with respect to” a number of impact areas. This is unclear and inadequate. To what extent would significant and unavoidable impacts be reduced to a less than significant level, even if they were not totally avoided.

L7-192

The EIR should contain a chart comparing the alternatives that includes impacts after mitigation for each environmental factor.

L7-193

- Additional Feasible Alternative - The DEIR is also deficient in its consideration of alternatives because it does not include the alternative discussed in Utilities and Service Systems chapter that is similar to Alternative 3 by not developing in the north campus subarea but eliminates the enrollment growth that would be served in that subarea. This is a potentially feasible alternative and should be evaluated.

Under this alternative, total enrollment growth would be reduced by 3,700 students for a total enrollment of 24,300 students rather than 26,400. By not forcing additional growth in the central campus subarea, as would occur under Alternative 3, the impact to the Historic District would be the same as with the 2021 LRDP. Further, the impacts in all the environmental areas would be similar or less than the 2021 LRDP and all the other alternatives except the No Project Alternative. While it might not meet Objective 1, CEQA only requires that an alternative meet “most” of the objectives and, also, as mentioned above, the DEIR provides no evidence that reduced enrollment at the UCSC campus wouldn’t meet state projections for enrollment growth. This alternative would also not meet Objective 3 to provide two sets of new colleges, but this objective is based on the assumption that enrollment would reach 28,000 students. With reduced enrollment, there may not be the same need for the additional college.

It clearly would be the environmentally superior alternative and as a reasonable alternative with substantially fewer impacts, it should be included in the EIR.

In conclusion, while the DEIR includes a great deal of important and relevant regarding the LRDP, as documented in this letter it is currently inadequate in meeting CEQA’s requirements.

Thank you for your consideration.

Morgan Bostic

*Advocate, Santa Cruz City-County Task Force on UCSC Growth Plans
101 Cooper Street, Santa Cruz, CA 95060
morgan.bostic@actonucscgrowth.org*

L7-194

L7-195



Erika Carpenter <escarpent

Letter
L8

[eircomment] UCSC Long Range Development Plan EIR

Christine Duymich <cduymich@mbard.org>

Mon, Mar 8, 2021 at 5:21 PM

To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Cc: Cindy Searson <CSearson@mbard.org>, David Frisbey <DFrisbey@mbard.org>, Richard Stedman <Rstedman@mbard.org>, Shawn Boyle <SBoyle@mbard.org>

Hello Ms. Carpenter,

Attached please find the comment letter from the Monterey Bay Air Resources District pertaining to the UCSC Long Range Development Plan Draft EIR. Thank you for allowing the Monterey Bay Air Resources District the opportunity to review and comment on this Draft EIR.

Should you have any questions, please contact me at (831) 647-6411 or cduymich@mbard.org.

Respectfully,

Christine Duymich, Air Quality Planner II



24580 Silver Cloud Court

Monterey, CA 93940

Office: 831-647-9411; Direct: (831) 718-8027

www.mbard.org

eircomment mailing listeircomment@ucsc.edu<https://lists.ucsc.edu/mailman/listinfo/eircomment>

March 8, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

Email: eircomment@ucsc.edu

SUBJECT: UC Santa Cruz 2021 Long Range Development Plan (LRDP) Draft Environmental Impact Report (DEIR)

Hello Ms. Carpenter,

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the UC Santa Cruz 2021 LRDP DEIR. The Air District has reviewed the document and has the following comments:

L8-1

AIR QUALITY/GHG

- **Mitigation Measure 3.3-1:** The Air District appreciates UC Santa Cruz's plan Vehicle Miles Traveled (VMT) reduction measures to maximize emission reductions and for congestion management.
The Air District highly supports UC Santa Cruz 2021 LRDP making the project plan area a more bike- and ped-friendly community and encourages UC Santa Cruz's exploration of and eBike fleet for faculty and staff use as well as a possible campus/regional bikeshare program.
In an effort to further reduce emissions, the Air District would like to suggest inclusion of roundabouts at intersections or if signaling intersections is selected, then the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design should be employed. *Local annual funding opportunities from the Air District are available for ATCS and roundabout design and construction projects. Please contact Alan Romero, aromero@mbard.org, for more information.*
- **PM 10 and NOx Construction – Related Emissions:** (Sections 3.3 and 3.8)
As both construction and operational PM 10 and NOx emissions exceed MBARD's CEQA thresholds and since mitigation measures cannot reduce emissions below significance thresholds, we request that UC Santa Cruz coordinate with the Air District to develop off-site mitigation measures. Please contact David Frisbey at the Air District office at (831) 647-9411 or dfrisbey@mbard.org.

L8-2

L8-3

- **Mitigation Measure 3.8-1 and 2:** The Air District supports incorporating increasing electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, the Air District suggests including publicly available dual port Level 2 & DC fast-charge charging stations throughout the project area. *Local annual funding opportunities from the Air District are available for EV charging infrastructure. Please contact Alan Romero, aromero@mbard.org, for more information.*

L8-4

- **Construction Equipment:**

The Air District is pleased with UC Santa Cruz’s employment of Tier 3 construction equipment and renewable diesel. To further reduce GHG emissions the Air District would like to encourage the use of Tier 4 construction equipment in addition or in place of the Tier 3 construction equipment.

L8-5

TRANSPORTATION:

- **2021 LRDP Goals and Objectives:** The Air District supports UC Santa Cruz’s objective of promoting Transportation Demand Management (TDM) and providing infrastructure to optimize trip and vehicle miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.

L8-6

PERMITS:

- **Demolition, Grading and Trenching Activities:**

If any asbestos piping or asbestos material is uncovered as part of the earth moving, trenching or during any part of the project, Air District rules may apply. Notification to the Air District is required at least ten days prior to renovation or demolition activities. In addition to the 10-day waiting period if any construction work involves renovation or demolition of a structure as well as removal/replacement of a subsurface pipe, the Air District recommends that the building materials/pipe be thoroughly inspected for asbestos prior to any construction/demolition activity.

Air District Rule 424 National Emissions Standards for Hazardous Air Pollutants can be found online at: <https://www.arb.ca.gov/drdb/mbu/cur.htm>.

Please contact Shawn Boyle or Cindy Searson at (831) 647-9411 for more information regarding these rules.

L8-7

- **Portable Equipment:**

The Air District permits to operate, or statewide portable equipment registration, may be required for portable and/or auxiliary equipment such as engine generator sets and compressors. Please make sure to contact the Air District’s Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for any portable equipment planned to be utilized for this project.

L8-8

- **Tree Removal:**

Please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Equipment Registration is necessary for the woodchipper being utilized for this project.

L8-9

The Air District appreciates the level of detail and analysis provided in the Draft EIR. Should you have any questions, please contact me at (831) 647-9411 or cduymich@mbard.org.

Best Regards,



Christine Duymich
Air Quality Planner II

cc: David Frisbey
Shawn Boyle
Cindy Searson



Erika Carpenter <escarpent@ucsc.edu>



[eircomment] LRDP EIR Comments - City of Santa Cruz

Matthew VanHua <mvanhua@cityofsantacruz.com>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 4:41 PM

Dear UCSC LRDP team,

Attached is the LRDP Draft EIR comment letter from the City of Santa Cruz along with one attachment referenced in the comment letter.

Best regards,

Matt

Matthew VanHua, AICP

Principal Planner – Advance Planning

Planning and Community Development Department

[809 Center Street, Room 206 | Santa Cruz, CA 95060](#)

Main: 831-420-5110 | Direct: 831-420-5216



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2 attachments

LRPD DEIR Comment Letter - City of Santa Cruz.pdf

ZONING / PERMIT PROCESSING
831/420-5100 • FAX 831/420-5434
COMPREHENSIVE PLANNING
831/420-5180 • FAX 831/420-5101



INSPECTION SERVICES
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PLANNING ADMINISTRATION
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PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
809 Center Street • Room 206 • Santa Cruz, CA 95060 • www.cityofsantacruz.com
Lee Butler, Director

March 8, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

Subject: LRDP NOP Comments

Dear Ms. Carpenter,

The City of Santa Cruz (City) continues to value the partnership it has with the University of California, Santa Cruz (UCSC) and the many amenities, opportunities, and benefits that UCSC itself and the larger UCSC community bring to the City. As UCSC considers expansion, the City appreciates the opportunity to offer feedback on how said expansion may impact the City, its residents, and its visitors. The City has reviewed the information provided in the UCSC Long Range Development Plan (LRDP) Draft Environmental Impact Report (EIR) and provides comments as follows.

L9-1

General Comments.

The timing of proposed mitigations is imperative to minimize negative impacts of future development. Prior to increasing student enrollment and additional faculty/staff, the EIR should clearly note that the necessary transportation and housing mitigations, along with other infrastructure needs, will be in place prior to said increases, not afterwards, so that negative impacts to the environment, the City, and City residents are minimized. For instance, increasing the number of students, faculty, and staff without a coinciding increase in on-campus housing capacity would have different impacts than those studied under this Draft EIR. While the project anticipates providing housing for 100% of its FTE students over 19,500 and up to 25% of its additional 2200 staff and faculty, UCSC does not control where anyone chooses to reside. The DEIR has not studied the impacts under a scenario where less than 100% of new enrollment lives on campus or a significantly smaller portion than 25% of faculty and staff choosing to live off-campus. Additionally, while increases in FTE students, faculty, and staff are analyzed, the number of part time students, faculty, and staff and their impact is unknown. Additional scenarios addressing these issues should be studied. Given this need for further analysis, this Draft EIR should further analyze the impacts of the LRDP on such environmental areas as Air Quality, Hydrology and Water Quality, Population and Housing, Public Services, Recreation, Transportation, and Utilities and Service Systems.

L9-2

L9-3

Impact-Specific Comments. The following comments relate to the proposed impact analysis sections.

I L9-4

3.1 Aesthetics

The City's General Plan states that "views toward Monterrey Bay and the Pacific Ocean provide orientation and strong sense of identity" and that coastal terraces such as the ones home to UCSC "afford panoramic views of the city and Monterrey Bay". A view looking south from approximately Viewpoint Location #6 is noted in the City's LCP document (see Attachment 1) as a Scenic View location and should be analyzed further in the EIR to ensure any impacts to this view are considered.

L9-5

3.3 Air Quality

As noted above in the general comments, the impacts related to different percentages of students, faculty, and staff living off-campus have not been fully analyzed. If student enrollment increases precede increases in on-campus housing capacity, there would be further impacts also not analyzed in this Draft EIR. Additionally, the amount of new housing, if any, built at the Westside Research Park is unknown and that may also affect the air quality analysis as this is in a separate location from the rest of the main campus studied in the Draft EIR. It would be ideal to maximize employment on this site and house only individuals employed on this site and the Marine Lab campus.

L9-6

L9-7

One specific comment relates to Mitigation Measure 3.3-2 and electric vehicle (EV) charging. The Plan's impact on air quality is significant so the Plan should commit to a specific amount of EV charging stations constructed at parking lots and should build all new parking spaces as EV charger-ready. These actions would better support electric vehicles and cleaner air.

L9-8

3.5 Biological Resources

The Plan includes 119.1 acres of Redwoods within the possible development zone which is a high number. There is substantial acreage for other sensitive areas as well. With potentially significant impacts with respect to biological resources, including many sensitive habitats, what analysis was done to minimize development in biologically sensitive areas and maximize development in areas that do not carry the same potential for significant impacts on sensitive habitat?

L9-9

While the report states that the probability of impacting Burrowing Owls is low, the mitigations are not sufficient to adequately address potential impacts. Namely, one mitigation measure calls for providing a 100-foot buffer between active Burrowing Owl sites and development, and that distance is typically larger to ensure that impacts are mitigated. Biologists typically require significantly larger buffers, around 500 feet, so the EIR should increase this buffer to a larger distance in the unlikely event that active Burrowing Owl sites are identified near construction.

L9-10

Mitigation Measure 3.5-3b in the Draft EIR states that the mitigation would result in no net loss of habitat function and the City agrees that compensatory practices resulting in no net loss of habitat function is a vital mitigation measure. However, one possible mitigation option under 3.5-3b is to preserve existing sensitive natural communities of equal or better value through a conservation easement at a sufficient ratio to offset the loss of habitat function. Further analysis should be included

L9-11

on this mitigation option. Does it relate to both plant and animal life? If so, an environmental easement may work better for some species more than others. An additional mitigation could also include providing funds to non-profit organizations whose work can also directly compensate for habitat loss and impacts.

L9-11
cont.

3.10 Hydrology and Water Quality

While the DEIR provides a fairly detailed discussion of historic karst geologic and hydrogeologic issues, it is relatively silent on recent developments in natural resource protection planning related to karst. Since the previous environmental review process related to the UCSC LRDP, the San Lorenzo River has been listed for temperature impairment under the Clean Water Act, the City has become obligated to provide additional instream flow for the protection of special-status species, and development of County of Santa Cruz Karst Protection Zone policies has begun.

L9-12

Specifically, the following issues should be further evaluated in the Final EIR:

Relationship of the area proposed for potential groundwater development to the regional karst aquifer dynamics warrants more discussion in Chapter 3.10 of the DEIR. The DEIR states: “the assignment of surface water runoff to a particular watershed is based on topographic features of the main residential campus; however, flows captured by the natural subsurface karst aquifer drainage system or by the UC Santa Cruz storm water drainage system may be transferred from one watershed to another in some cases.” This is a very important and valid point that understandably exacerbates the evaluation of impacts of the proposed project. On a related note, there have been several significant rainfall years (1998, 2017) and surface runoff from the University has likely changed dramatically since the hydrogeologic investigation in 1989. There is the potential that subsurface flow dynamics have also changed since that time. Furthermore, it also appears that the historic hydrogeologic studies did not identify all karst features in the vicinity; therefore, the evaluation of karst-related impacts is incomplete. For example, seeps at the headwaters of Redwood Creek – a significant lower San Lorenzo River tributary – do not appear to be identified. Finally, there were field and mapping studies performed in order to support recent County of Santa Cruz karst protection efforts that may provide additional background on hydrogeologic dynamics in the region (Nolan 2016). Reference to them in Chapter 3.10 should be included, if only for completeness’ sake.

L9-13

- Water pollution impacts related to stormwater discharge into the karst aquifer and receiving waters’ water quality and increased stormwater discharge effects on karst aquifer morphology and flow paths warrant further evaluation in Chapter 3.10. The DEIR clearly states that “New development under the 2021 LRDP could potentially cause new runoff to be diverted to sinkholes.” Discharge of any additional runoff could be considered significant in the context of karst protection – especially since some new development is proposed for the area immediately upgradient of the Pogonip Springs. While the DEIR focuses on erosion, additional flow into sinkholes can cause significant changes to flow patterns underground. Communication with surface flow to the karst aquifer is very similar to a surface water system – whereby polluted runoff is effectively directly discharged to receiving waters. Given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts – specifically with regard to the lower San Lorenzo River and its associated beneficial uses – needs further evaluation.

L9-14

- County of Santa Cruz Karst Protection Zone policies warrant exploration in Chapter 3.11. These policies – while in their infancy – have recently begun to be implemented in the County code and should be evaluated for relevance to the project. For more information please see the following link:
http://santacruzcountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst
- Potential use of karst-derived groundwater warrants exploration in Chapter 3.11. As the DEIR correctly states repeatedly, karst groundwater often flows through solution channels. Given the stark differences in production potential of the various wells (as reported in the DEIR and also as anecdotally accounted by Dr. Gerald Weber), it is quite likely that monitoring wells identified for groundwater extraction potential on the campus are located within these solution channels. Given that California Water Law requires valid water rights in order to put water that flows through confined channels into beneficial use, the status of the San Lorenzo River and tributaries as a fully-appropriated system (with regard to water rights), and the potential impacts on other, senior water rights holders in areas affected by reduction in flow from the karst aquifer underlying the University (such as the City of Santa Cruz), evaluation of the University’s water rights obligations seems appropriate.
- Groundwater extraction impacts on lower San Lorenzo River biotic resources warrants further evaluation in Chapter 3.5. Dry season and dry year hydrology, as well as dry season water temperatures in the lower river can be limiting to special-status species such as coho salmon and steelhead trout. Again, given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts – specifically with regard to the lower San Lorenzo River instream flows and temperature dynamics – needs further evaluation.
- Impacts on the City of Santa Cruz water system related to potential reduction in karst springs discharge to the lower San Lorenzo River also seems warranted in Chapter 3.17. Again, the San Lorenzo River is a fully-appropriated stream (with regard to water rights) during the dry season. Reduction in flow from Pogonip and Redwood Creeks (as well as smaller karst-derived tributary flows to the lower San Lorenzo River) could have negative effects on the City’s ability to divert at our primary diversion at Tait Street (also known as the Tait Diversion or Crossing Street Diversion). While it may be that the proposed use of groundwater on campus is ultimately determined to have negligible effects on San Lorenzo River flows and water quality, it is not clear from the existing analysis that is so.

L9-15

L9-16

L9-17

L9-18

Statistical Approach to Water Years

Much of the DEIR’s statistical analysis related to groundwater and surface water monitoring is based on averaging water monitoring data across all years and calculating standard deviations around these comprehensive averages. While averaging available data is useful for comparing annual data to a standard (e.g. rainfall, groundwater levels, stream flow), it is not a good measure of how highly variable systems operate.

L9-19

Historically, rainfall in California is highly variable from year to year. In the 124 years that the State has collected rainfall data, only two of those years have exhibited “average” rainfall. California precipitation tends to fluctuate between wet water years that recharge groundwater and dry water years where little or no groundwater recharge occurs. Further, climate science research from UC Berkley Lab (and elsewhere) indicates that California’s already variable rainfall patterns are likely to become even more variable in the future.

We recommend the DEIR's analysis of existing groundwater and surface water monitoring data include additional analysis that is grouped and analyzed by water year (wet, normal, dry and very dry). This additional analysis will provide a more nuanced range of groundwater levels and insight into their interrelationship with surface water by water year types. This more nuanced analysis will provide greater insight into the extremes for rainfall and runoff, greater insight into the management of groundwater levels, and how the management of groundwater pumping changes surface water flows and the habitats that depend on interconnected springs and streams.

L9-19
cont.

We also recommend the DEIR's proposed mitigation measures for groundwater pumping monitoring be revised to rely on these recommended water year calculations. Specifically, we request that any potential groundwater pumping strategy and mitigation monitoring be based on analysis of available historic data by water year type as it corresponds to the current water year (e.g. wet water year pumping is compared to wet water year statistical averages). This will ensure that the analysis of potential groundwater pumping in wet years fits within the standard deviations for wet water years, rather than the artificially low average that incorporates wet and dry years. This will also allow additional pumping in dry water years based on the mean average and standard deviations for dry water years. This revised pumping and mitigation monitoring strategy would be less likely to impact surface water flows beyond what is experienced during natural climate processes. The goal being to ensure that the proposed project incorporates groundwater and surface water monitoring protocols as mitigations that are protective of the natural systems that rely on groundwater, including areas with interconnected surface waters located within the City.

L9-20

Impact 3.10-3 Alteration of Drainage Patterns and Increased Runoff

The DEIR provides average rainfall data on p. 3.10-9 but does not include an appendix to support this rainfall analysis. As discussed above, rainfall in California is highly variable and planning for runoff in an average year is different than planning for runoff in a wet year. While flooding is not expected in this area of the City, the DEIR should include its rainfall analysis including the statistical approach used to analyze this rainfall data. More detailed information is needed for wet years to determine more if there is adequate stormwater retention and storm drain capacity to handle wet year flows, especially since climate change is projected to lead to more rainfall variability and more severe storms.

L9-21

Impact 3.10-4 Flood-Related Impacts

The DEIR identifies karst geology on the central and lower campus and states that the natural karst sinkholes and swallow holes convey surface flows to off-campus springs. The analysis of potential flooding on campus relies on these natural features to address potential flood impacts and on state required rainfall retention related to new construction to limit runoff. The DEIR also relies on drainage improvements made since above normal rainfall events in 2003 & 2004 to divert storm flows away from certain sinkholes and swallow holes where flooding had occurred on campus during those 2003/2004 storm events.

L9-22

The DEIR states that additional LRDP related construction on campus will lead to additional storm related runoff. The DEIR goes on to state that, "...regulatory compliance and programmatic elements in place for new development in the LRDP area are designed to reduce runoff, peak flows and impacts to water quality and, therefore, implementation of the 2021 LRDP would result in a less-than-significant impact."

UCSC is located on a hill within the City of Santa Cruz and is tied into City provided wastewater and stormwater infrastructure. The 40 to 50 sinkholes and swallow holes are also connected to springs and

seep fed streams located off campus within the City and unincorporated County. While the DEIR discusses potential impacts on campus, it does not provide information on increased runoff that would flow into the City as surface runoff, into its wastewater or stormwater infrastructure, or to the interconnected springs and streams.

L9-22
cont.

The DEIR should be revised to include runoff projections for storms from wet water years that would allow the City to evaluate the potential impacts in the City from additional runoff related to the proposed project's potential impact on City infrastructure.

Karst Aquifer Management

The DEIR should recommend mitigations that increase the knowledge needed to properly manage any potential groundwater pumping in this karst aquifer: (1) the DEIR should recommend mitigations that will expand understanding of the interrelationship between groundwater and surface springs that would inform and improve resource management, (2) the DEIR should evaluate biological resources that depend on the interconnected springs/streams supported by groundwater and potentially impacted by groundwater pumping both on and off campus, and (3) the DEIR should recommend a process to develop groundwater sustainability standards that are protective of surface water resources. This process should include the City of Santa Cruz and the County of Santa Cruz, where interconnected springs/streams are located. The process should also identify any relevant resource agencies and other partner agencies involved in protecting the identified biological resources.

L9-23

Groundwater Mitigation Measures

Based on the complex geology involved in karst aquifers, the DEIR recommends groundwater and spring monitoring that is inadequate to protect groundwater and surface water resources from potential groundwater extraction related to the proposed project. The DEIR recommends annual groundwater monitoring of the production well only when groundwater is actually being produced.

In karst systems, continuous monitoring is often used to understand water levels, static reserves, and groundwater recharge. If water is extracted from the karst aquifer, the DEIR monitoring program should include continuous monitoring to confirm that any water extracted from the karst aquifer during the dry season (static reserves) is regularly replenished during periods of aquifer recharge. This continuous monitoring is necessary to adequately understand the karst aquifer, groundwater pumping's effects on static water levels, the sustainability of the karst system to recharge naturally during sustained and/or periodic groundwater withdrawals in order to protect this groundwater resource from depletion. It would also provide information that could be useful to develop the karst aquifer as a storage reserve when excess water is available.

L9-24

The DEIR should be revised to include continuous groundwater monitoring that is reviewed at least quarterly to increase understanding of the complex karst aquifer system as it responds to potential groundwater pumping and recharge in both wet and dry years.

Spring Monitoring and Interconnected Streams

The DEIR should be clarified to discuss the type and location of ongoing surface water monitoring proposed, should include data collection that address both water quality and water quantity at these interconnected springs. This mitigation monitoring should include biological assessment of the habitat values supported by groundwater at interconnected springs and streams located both on campus and off campus. These mitigations should be based upon statistical information developed based on the separate analysis of data from wet water years and dry water years, as discussed above. This is

L9-25

especially important because the biggest shortfalls are likely to occur during single and multi-year droughts.

L9-25
cont.

Significance Criteria for Groundwater and Surface Water Depletions

The DEIR's identified significance thresholds for the depletion of groundwater and interconnected surface water states: "If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period that includes both wetter and drier years coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding rainfall season. The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, with consideration of associated seasonal rainfall." (*emphasis added*).

L9-26

The Sustainable Groundwater Management Act (SGMA) provides a comparable legal framework to analyze significance criteria related to groundwater pumping and surface water impacts, which addresses both groundwater and surface water sustainability planning. The SGMA allows for the local identification of significance criteria when defining what is sustainable to protect an identified resource. However, these locally defined significance criteria must actually be protective of the resource(s) in question.

The significance criteria for groundwater and surface water depletions should be linked to the protected resources. For groundwater, water levels are linked to the resources supported, this could be local well users to ensure that their well continue to produce after the university begins pumping the aquifer. For surface water it is related to the human and biological systems that use the water.

The DEIR should be revised to propose mitigations that will both identify existing water uses and users and develop significance criteria that protects those uses.

The Biological Resources section of the DEIR provides no information on the plants and animals supported by interconnected springs off campus, in the City and County areas, that could be impacted by on campus groundwater production. Biological mitigations recommend "Project-Level Biological Reconnaissance for Sensitive Species and Habitats Surveys" to understand and protect the sensitive species potentially impacted by the proposed project.

L9-27

These types of biological surveys should also be included at section 3.10-5b as mitigation to evaluate surface water resources and protect the habitats and species that rely on these interconnected springs. This additional detail is needed to determine if the significance criteria outlined in the DEIR is likely to be protective of the resources in question. This is especially important considering that groundwater extraction is most likely during single and multi-year droughts when surface water resources are least available to natural systems.

3.13 Population and Housing

Additional information regarding the University’s commitment to providing housing for faculty and staff is needed. The Draft states that 100% of new students enrolled beyond 19,500 and up to 25% of the 2,220 full time equivalent faculty/staff members will be housed on-campus. Despite the Draft EIR studying these percentages of groups being housed on-campus, it fails to adequately evaluate the impacts of all new students, faculty, and staff being housed off-campus. UCSC does not currently have mandatory on-campus residence requirements, so students, faculty, and staff can live wherever they like despite the analyzed percentages. When students, faculty, and staff are not housed on-campus, they create more impacts in the City on such things as transportation, housing demand/cost, water use, etc. In order to adequately assess the impacts of the project, the percentage of students, faculty, and staff living on-campus will need to be clearly established, such as through on-campus living mandates, or alternative percentages of on-campus residents should be analyzed, which would likely result in new or different impacts.

L9-28

The Draft EIR also does not propose tying the development and provision of on-campus housing to increases in students, faculty, and staff. There could be a large gap (possibly many years) between student, faculty, and staff growth and on-campus housing development, and neither the EIR nor the LRDP mandates that housing be built and occupied prior to enrollment growth. This scenario would create impacts to the City of Santa Cruz that have not been analyzed or mitigated. UCSC should commit to providing a specific amount of on-campus housing prior to expansions of students, faculty, and staff members, as this will allow for a more accurate assessment of the project’s impacts.

L9-29

The Draft EIR states that proposed and entitled housing development in the City’s pipeline adequately mitigates for the housing demand created by students, faculty, and staff that choose to live off-campus. Some housing developments have been approved for years, but have not been constructed (e.g., the 32-unit, mixed use project at the southeast corner of Soquel and Hageman Avenues was approved four years ago but has not yet pursued building permits). The construction of most projects is out of the City’s control and cannot be guaranteed. While significant percentages of new units produced in the City are affordable (due in large part to City inclusionary requirements coupled with the City’s support for 100% affordable projects), students are not as likely to live in new, market-rate housing due to cost. While some filtering can occur as newly constructed housing becomes available, this process can take years and relies on continuous production of housing both within the City and regionally, something that cannot be guaranteed, so more affordable housing may not be readily available to meet the needs of student growth just because new housing development is in the pipeline. This scenario could place further demand on housing in the City, particularly on the limited supply of affordable housing. An ongoing contribution to the City’s Affordable Housing Trust Fund should be provided to offset the increased housing demand from students, faculty, and staff in the City, particularly to offset the demands for affordable housing stock in the City.

L9-30

The Draft EIR presents conflicting viewpoints on vacancy. Given that the City of Santa Cruz is the closest city to UCSC, using the County-wide 2020 Department of Finance (DOF) vacancy rate of 7.8% does not accurately reflect the housing pressure on the City itself (a lower rate of 5.6% in the same study). That study also does not take into account the loss of approximately 1,000 units in the County due to the CZU Fire Complex. Additionally, HUD data from 2019 is also referenced and shows a vacancy rate of 1.9% in the County. The report states that based on a number of factors including vacation home counting, the DOF vacancy rate is possibly not accurate and that the vacancy rate is likely lower. The current American Community Survey (ACS) data estimates a County of Santa Cruz rental vacancy rate of 2.0% and a

L9-31

homeowner vacancy rate of 0.4%, similarly low as the HUD data provided. The HUD and ACS data shows an extremely low housing vacancy situation that could be given more weight than the DOF vacancy rate in the Draft EIR analysis. The Draft EIR uses the higher DOF vacancy rate to support its position that there is a less than significant impact on off-campus housing when there is lower vacancy data from two other sources. Increases in student, faculty, and staff populations coupled with a low vacancy rate places further pressure on housing, especially when housing that might be available for students may not be affordable. These potential housing shortages could force students to live further from campus, increasing impacts to transportation and air quality. Housing shortages could be further compounded if UCSC does not tie on-campus housing to its enrollment growth, because if it the two are not linked, there could be years where there is no on-campus housing available for new students, despite additional enrollment and associated demand for housing. This would create additional growth pressure in the City.

L9-31
cont.

The increase in students, faculty, and staff will create increased demand for housing off-campus. Most of that demand will fall on nearby cities, especially Santa Cruz. While this demand for housing may generate a housing market response and the construction of new housing, as mentioned above, there will likely be times when housing development and demand are not in sync. These will be times of far greater demand and pressure on the Santa Cruz housing market. This could have impacts on existing residents due to rent increases to meet the increased demand. Rent increases or even the construction of new housing could also cause displacement. These impacts should be addressed in the Draft EIR.

The exact location of the new housing is unknown, so it is difficult to assess specific impacts. For instance, housing located at the Westside Research Park could have different impacts to transportation and parks than housing located on the main campus. Studies also show that employment and housing in closer proximity generates less travel demand. Further, jobs in proximity to transit support transit ridership more so than housing in proximity to transit, due in part to the “last mile quandary,” which speaks to people being able to drive to a transit starting point but having more challenges in navigating the transit-station-to-destination end point. Given the Regional Transportation Commission’s recent vote to support rail transit along the rail corridor and the adjacency of the Westside Research Park to said rail line, the City encourages UCSC to maximize employment opportunities on the Westside Research Park as a means to promote future transit use. If housing is considered at that location in addition to the employment uses, then the occupants should be limited to employees and students who work at or study at the Westside Research Park and the nearby marine lab as a means to maximize active transportation options (biking, walking, etc.) for those residents. Similarly, the provision of faculty and staff housing on-campus that houses greater than 25% of the new faculty and staff growth could result in fewer negative environmental effects experienced by the City and its residents, and the EIR should consider a project or alternative that provides on-campus housing for a higher percentage of its workforce.

L9-32

The types of housing to be developed for students, faculty, and staff are not outlined in the Draft EIR either. Mixed-use housing with additional amenities on the ground will likely reduce trips and overall impacts. Even horizontal mixed-use development would allow for an increased relationship between where students, faculty, and staff may live and work. This could be especially true for the Westside Research Park area which is more isolated from many campus amenities. The EIR should clearly specify the details of the potential residential uses, how/by whom they will be used, and the resulting environmental impacts.

L9-33

The Draft EIR speaks to analysis of full time equivalent (FTE) students and FTE faculty/staff and a definition of FTE is provided in Footnote 1. However, it is not clear how this definition considers students, faculty, staff who are not full time. Students, faculty, and staff working part time are more likely to live off-campus which may create greater impacts. For instance, two students that are half-time and commuting into the main campus may have generate greater impacts to traffic, air quality, etc. than one student living on campus even though they are both considered 1 FTE. The EIR should clearly identify how impacts from all new students, faculty, and staff are assessed. If the FTE analysis does not address this discrepancy in potential impacts, an alternative measure should seek to quantify the increase in impacts under such a scenario and include an evaluation of the impacts in the EIR.

L9-34

3.14 Public Services

As discussed in the Housing and Population section, the Draft EIR should further analyze potential impacts caused by off-campus population increases by students, faculty, and staff of UCSC. While housing may be provided for 100% of new student enrollment over 19,500, it does not address alternatives where fewer than 100% of new students live on campus, as is likely, especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students.

For instance, the Draft EIR only addresses potential impacts to emergency services due to the increase in the number of vehicles on-campus while there could be further impacts off-campus as well. With an increase in campus population and concurrent increase in traffic congestion, emergency vehicle access could be affected and an increase in response times could result. To mitigate this impact, the Public Services section of the EIR should address the following access and response needs:

- All traffic signals installed on campus shall be outfitted with a Santa Cruz City Fire Department compatible Opticom Emergency Vehicle Traffic Pre-Emption (Opticom) system. This applies to future signals as well as the existing traffic signals already in use on campus.
- Bicycle/pedestrian paths should be wide enough and strong enough to support emergency vehicles. Currently there are a number of paths that do not support Emergency Vehicle Access (EVA), which significantly delays emergency response.
- Provide for EVA to all new and renovated buildings. Allow adequate approach and egress routes as determined by the Fire Marshal.
- Ensure elevators installed in new and renovated buildings are large enough to accommodate a medical gurney in the flat/level position along with the emergency response personnel.
- Turnouts, turn pockets, cut outs, lane widths, number of lanes, islands, and lane separators should all be evaluated in terms of emergency vehicle requirements.
- Address the impact of radio coverage and discuss the need for in-building radio and cellular communications for emergency response.

L9-35

The existing on-campus fire station has reached end-of-life for functionality and will not accommodate additional staffing or equipment. The City does not own the station, nor has a new fire station site been identified on campus. The construction of a new fire station should be tied to specific development and the EIR should address the criteria that will be used for the discussion of mitigating the impacts of development.

3.15 Recreation

In addition to world-class education, students, faculty, and staff are drawn to UCSC because of its access to world-class recreation activities. Hiking, beaches, and countless open spaces are located near the university and many of these facilities are maintained by the City. Whether students, faculty, and staff live on campus or not, an increase in these populations will result in an increase in City park usage. This increase in park usage will have deleterious effects on the park system if this impact is not properly mitigated.

The Draft EIR states that there is a less than significant impact to recreation and that UCSC has no obligation to mitigate any impacts as they would be paid through off-campus development fees. This is not a satisfactory analysis of the impacts. For one, any students living on-campus are still highly likely to use City-maintained parks, especially trails located near campus and beaches, so simply providing additional recreation space on-campus does not mitigate this off-campus impact to City recreation facilities. Additionally, students living off-campus are more likely to establish themselves in crowded living situations beyond the original intent of the housing unit (for instance, two or three individuals to a bedroom). The effect is two-fold: 1) a crowded living situation increases the need for one to seek open space, and 2) any park impact fee derived from off-campus development fails to mitigate for a higher density of people living in a unit than originally intended. The increase in campus population will impact the City park system beyond what the Draft EIR has analyzed and therefore, a more complete analysis in the EIR is required.

L9-36

Given the importance of properly maintaining parks for UCSC students, faculty, and staff, as well as residents of the City of Santa Cruz, the City has determined that a City park impact fee on new residential development should be required. Funds from this impact fee would be used for a City parks system that serves all residents of the area, including students who live both on- and off-campus.

UCSC should evaluate how an impact fee could be incorporated into student fees or some other manner to support the maintenance of existing parks and services. Students currently pay a recreation fee as part of their tuition. This support on-campus recreational amenities, facilities, and programming (via OPERS or now called Athletics and Recreation). The City would like the opportunity work with UCSC on a Joint Powers Authority (JPA) or similar mechanism that would clearly define the UCSC scope of recreation facilities and services and define the City's scope. Students currently pay fees to UCSC but use City amenities, perhaps even more than those on campus. Impact fees could help development of new park assets potentially needed for increased park demand. Currently, the real need is funding to maintain the existing park system, which will be used more with an increase in UCSC students, faculty, and staff, so a parks impact fee to the City represents a reasonable mitigation request. Below are some ways this fee could be instituted:

L9-37

- University of California allows individual campuses to establish unique compulsory fees per the following policy: [PACAOs-80: Compulsory Campus-Based Student Fees \(ucop.edu\)](#). There is a set process similar to a public ballot measure, but within the UCSC system only.
- It is common for universities in California and other states to incorporate a fee for a specific purpose (e.g., building a new rec center or for athletics, etc.). Perhaps it could be deemed an "environmental preservation fee" as part of tuition fees.
- The National Recreation and Parks Association (NRPA) sets standards for Parks and Recreation services: [nrpa-agency-performance-review.pdf](#). If UCSC or the University of California system has parks and recreation standards, a nexus between the population increases and park and

recreation service could be more easily determined. The City has parks and recreation service standards that will be affected as the result of increased population and use of City parks.

L9-37
cont.

3.16 Transportation

A key transportation goal (M2) in the City’s General Plan is to provide... “A safe, sustainable, efficient, adaptive, and accessible transportation system”. The increase in student, faculty, and staff populations will have impacts on transportation, in a broader environmental sense and on the City’s ability to achieve and maintain that goal.

L9-38

While SB 743 eliminates Level of Service (LOS) as a CEQA impact, the City still maintains some LOS policies in order to maintain a safe and efficient transportation system. UCSC should coordinate with the City to determine critical intersections impacted by the LRDP and analyze LOS impacts at those critical intersections in addition to the Vehicle Miles Traveled (VMT) analysis. The previous LRDP included mitigation measures in this same way to provide traffic impact fees to the City and institute a monitoring program and should continue to do so.

As mentioned in other sections, the impacts of different proportions of increased student population living off-campus has not been adequately analyzed especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students. The Draft EIR states that providing housing for all new students on campus would reduce traffic concerns. However, the transportation analysis provided indicates that the trip generation rate for resident students is higher than that of commuter students. This is in conflict with the comments made that providing housing for all new students would reduce traffic concerns. The analysis also identified a significant impact in the VMT analysis per worker with TSM mitigation as proposed in response. While the University has done a good job to date implementing strategies to reduce trips, the City believes these measures may have reached their maximum potential. Please provide additional analysis to support the TSM measures as a satisfactory mitigation response.

L9-39

The expansion of students, faculty and staff, as well as facilities, special events (open lectures, sporting events, etc.), and new classes may attract more individuals who enroll/participate in continuing education, who visit those living on campus, who attend the special events, or who otherwise are drawn to the campus as a result of its expansion. The methodology utilized in the EIR should analyze not only the impacts of additional students, faculty, and staff but should also analyze any impacts (e.g., vehicle trips) associated with the above-described potential additional usage.

L9-40

The transportation analysis does not fully consider areas outside of the main campus such as Westside Research Park. In focusing only on the main campus, system-wide travel associated with UCSC growth is not described. It is also not clear whether the employment numbers used in the analysis apply only to the campus or if they reflect the total UCSC employment which is disaggregated to various areas in the County such as at the Research Park, Coastal Science center, and Scotts Valley offices. This shift in employment location has been a major reason why the traffic volumes at the main entrances to the University have been reduced over the years. If the actual employee volume on the main campus is in fact less, then the trip generation rate used for employees would be higher and affect the subsequent analysis.

L9-41

The City has had previous concerns with the trip generation rates established by the University. The transportation analysis in the Draft EIR refers to a 2017 Tool developed by UCSC which established trip generation rates. This tool is not included in the appendices, so the City is unable to review these trip generation rates and determined if they are improved over ones previously used. This information should be included in the EIR. Additionally, a signal is proposed for the intersection of Western Drive and High Street and there is no analysis provided to warrant such a proposal. Please provide this in the EIR.

L9-42

Finally, the City would like more analysis on whether the LRDP growth in transit demands conflicts with Metro Plans. A near 50% increase in transit demand to the main campus will significantly affect Metro service and coordination is needed to ensure service levels meet the increased demand. The LRDP proposes identification of new trail connections south of the main residential campus to provide access to Westside Research Park and Coastal Science Campus as a proposed improvement and those are not identified in the Draft EIR.

L9-43

3.17 Utilities and Service Systems

Water Supply Impacts

We understand the conclusion of a significant and unavoidable impact to water supply because, although there is adequate water supply from the City's existing water sources in normal water years, during single and multiple dry water year conditions, there is a potential gap between demand and available supply, which would require the City to secure new water sources. As you are aware, the City is planning for new sources of water and is currently implementing the Water Supply Augmentation Plan that was developed by the Water Supply Advisory Committee. It is important to understand that the City's need to secure new sources of water is not dependent on growth of the UCSC campus or future projected demand increases. Even if demand were not forecast to increase, new sources of water are needed to address existing potential shortages during dry years. Furthermore, demand associated with this project, or additional growth in local demand, is not a significant factor in sizing of such future projects because sizing of these projects is being primarily driven by climate change and associated uncertainty surrounding future hydrological conditions.

L9-44

Additionally, the City is in the process of preparing the 2020 Urban Water Management Plan which will incorporate demand projections from the 2021 LRDP into overall projected City demands. It is noted that the UCSC demand forecast in the 2021 LRDP is significantly lower than that projected in the 2005 LRDP which was used as the basis of the 2015 Urban Water Management Plan. We appreciate the commitment that University leadership has made to ongoing water conservation, including working with the City water department to develop an engineering analysis to further reduce water demand. We recommend an ongoing and collaborative effort between the City and UCSC to identify the most efficient ways to use, reuse, recycle, and store water so that the proposed project is as water efficient as possible.

L9-45

Water Supply Constraints

The section referring to the "The Water Rights Conformance Project for Water Rights and Entitlements", should reference the Santa Cruz Water Rights Project. An Initial Study and Notice of Preparation for the Santa Cruz Water Rights Project were released in 2018, and a Draft EIR is expected to be circulated for public review in spring 2021. The scope of this project extends beyond direct diversion for the City's Felton and Newell Creek water rights. Because the City's water rights were granted more than 50 years

L9-46

ago, they are out-of-date with current needs and lack flexibility that would ensure the Water Department can provide supply reliability, protect fish populations, and partner with neighboring water agencies to improve regional water supply reliability.

L9-46
cont.

Water Supply Augmentation Plan

The City continues to pursue and make progress on the implementation of the Water Supply Augmentation Plan developed by the Water Supply Advisory Committee. A report detailing progress on implementation of the Water Supply Augmentation Plan is presented quarterly to the City Water Commission, with the most recent quarterly report presented at the Water Commission meeting January 4, 2021. The report can be found beginning on page 15 of the PDF here:

[https://ecm.cityofsantacruz.com/OnBaseAgendaOnline/Documents/Downloadfile/Water Commission 1607 Agenda Packet 1 4 2021 7 00 00 PM.pdf?documentType=5&meetingId=1607&isAttachment=True](https://ecm.cityofsantacruz.com/OnBaseAgendaOnline/Documents/Downloadfile/Water_Commission_1607_Agenda_Packet_1_4_2021_7_00_00_PM.pdf?documentType=5&meetingId=1607&isAttachment=True).

L9-47

Water Shortage Contingency Plan

Please note that the City adopted an Updated Interim Water Shortage Contingency Plan in February 2021, replacing the 2009 Water shortage Contingency Plan referenced in the Draft EIR. The Plan is available here on the City's website here:

<https://www.cityofsantacruz.com/home/showpublisheddocument?id=83118>.

L9-48

Mitigation Measure 3.17-1a: Require Implementation of Measures Consistent with City Drought Measures

The DEIR recommends water conservation and reuse measures to reduce project impacts relate to its demand for potable water from the City of Santa Cruz. However, the DEIR links these proposed mitigation measures to a time, "If and when the City of Santa Cruz implements drought emergency management measures..."

Mitigation Measure 3.17-1a should be revised to tie water conservation, reuse, and recycling measures to project design and implementation, not the City's implementation of water emergency management measures. Water conservation and water recycling measures are best implemented when incorporated into the facility design stage, when it is easiest to provide water efficient fixtures, sustainable/native landscape materials, and separate pipes to carry potable and recycled water.

L9-49

Mitigation Measure 3.17-1a should also be revised to provide more detail regarding monitoring and reporting related to development and use of on campus groundwater. Use of the existing groundwater supply well in Jordan Gulch, if undertaken, should comply with the recommendations for biological monitoring at interconnected springs both on and off campus, and groundwater/surface water monitoring protocols discussed at Mitigation Measure 3.10-5b above.

Please see the following comments on the Water Supply Assessment

The DEIR includes a Water Supply Assessment (WSA) to stand in for the WSA that the City would ordinarily be required to prepare as the public water system that will supply [at least a portion of] the proposed project. (Wat. Code § 10910(a)-(c).) WSA's are required under state law for a variety of development projects that are likely to increase water demand on the public water system serving the project (Wat. Code § 10912(a)). WSA's are required to assess the projects water demand, available water supplies, and if water is not available for the project, the cost to obtain and develop the additional supplies required to serve the proposed project.

L9-50

Because a portion of the UCSC campus where development is proposed is outside the City's existing water service boundary, it is not clear that the WSA was prepared following the law. Under state law, when a proposed project is outside the boundaries of a water service agency the WSA must be prepared after consultation with the Local Agency Formation Commission, and any public water system adjacent to the proposed project site. (Wat. Code § 10910(b).)

The DEIR should be revised to indicate whether and how UCSC consulted with the City, other neighboring water agencies, and the Local Agency Formation Commission in relation to the preparation of its WSA as required when an entity other than the water service provider prepares the WSA for an area outside the boundaries of an existing water system.

This concludes the comments from the City of Santa Cruz. We look forward to working with you to resolve the points contained herein. Feel free to reach out to us should you have any questions.

Sincerely,

Lee Butler
Director of Planning & Community Development

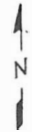
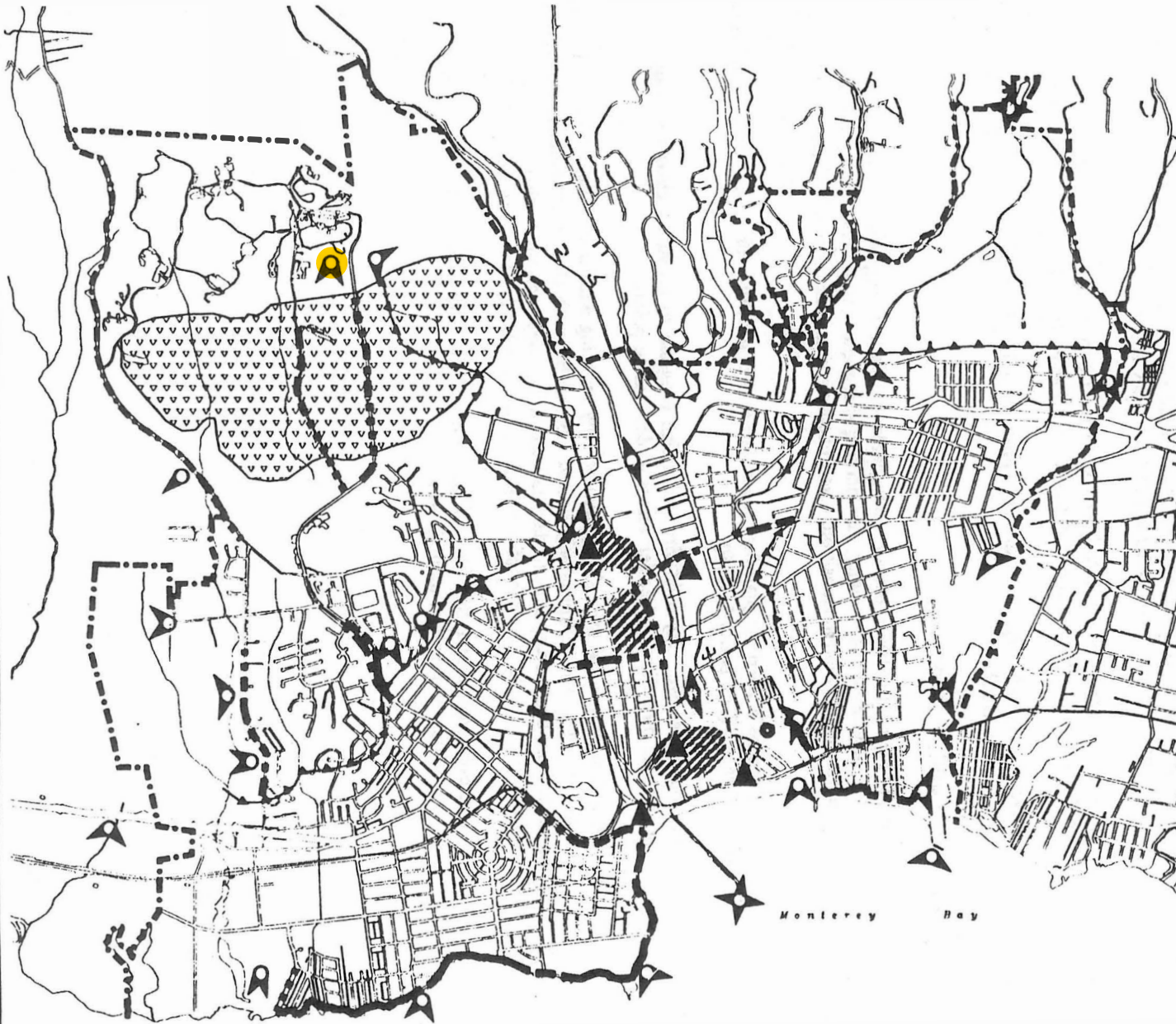
Attachments:

Attachment 1 – City of Santa Cruz LCP Map CD-3: Scenic Views

L9-50
cont.



MAP CD-3: SCENIC VIEWS
The City of Santa Cruz, California



LEGEND

SCENIC VALUES:



VIEWPOINTS AND PANORAMAS



VISUALLY DISTINCTIVE
STRUCTURES



SCENIC DRIVES



URBAN SKYLINE

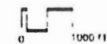


RIDGE SKYLINE



FOOTHILL SKYLINE

SOURCE: City of Santa Cruz
Planning Department, 1992



FILE: C:\ERRY\MAPS\GPNCD\SCEN-FIG
REVISED: 10/27/1992



Erika Carpenter <escarpent@ucsc.edu>

Letter
L10

[eircomment] LRDP EIR Comments

Pete Rasmussen <PRasmussen@scmtd.com>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 4:07 PM

Please find the attached LRDP EIR comments from Santa Cruz METRO.

Sincerely,

Pete Rasmussen

Transportation Planner



Santa Cruz Metropolitan Transit District (Santa Cruz METRO)

prasmussen@scmtd.com | 831.420.2585

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **SC METRO Comments for UCSC LRDP EIR 03-08-21.pdf**
75K



Santa Cruz METRO UCSC 2021 LRDP EIR Comments:

Thank you for the opportunity to provide comments on the draft UCSC 2021 Long Range Development Plan and draft EIR.

The Santa Cruz Metropolitan Transit District (METRO) has had a long-standing partnership with the University, providing transit service to students, staff, and faculty to and from campus funded primarily by the student transportation fee. METRO transit service is one of the primary tools employed to reduce vehicle trips to and around campus, which is vitally important for preservation of the environment and for limiting traffic congestion in and around a campus that has severely limited access routes.

L10-1

Historically, METRO has increased service to UCSC as enrollment has grown so that the University can continue to limit on-campus parking and limit automobile trips.

However, if the University were to increase enrollment by an approximately 50% from 18,518 to 28,000 FTE students (and associated growth in staff, faculty and student families) by 2040, this would present formidable budgetary and operational hurdles to METRO to scale up service in proportion to UCSC growth.

L10-2

Funding for Operations and Capital Expenditures

The University pays METRO monthly fees based either on the number of passenger trips provided to students/staff/faculty or on the number of vehicle trips to campus (the calculation method has varied over time), but METRO still bears a significant share of the operations and maintenance cost for these trips (subsidy). As an agency that receives a portion of its funding from Federal sources, METRO must comply with the Federal Transit Administration's regulations regarding Title VI of the Civil Rights Act. Title VI requires that transit agencies provide equitable service across the service area, not just to one area or community, so as UCSC grows, the University will need to contribute a greater share of the cost of providing service to the campus so that METRO can continue to provide service equitably to the County as a whole.

L10-3

Furthermore, METRO alone has borne the cost of acquisition of buses, other than a short-term articulated bus lease funded by UCSC as a test. As Federal government assistance for bus purchases has dwindled, and as the State of California Air Resources Board (CARB) has instituted requirements for a transition to zero-emissions buses, the cost of acquiring buses has become a major financial hurdle to transit agencies. Zero-emissions buses cost over \$1 million each – 55% more expensive than the compressed natural gas buses that are the majority of the METRO fleet, and nearly four times as expensive as the diesel buses that were standard 15-20 years ago.

*Santa Cruz Metropolitan
Transit District*



As student enrollment increases, there will be a need to increase the use of 60-foot articulated buses. This, however, presents a substantial space challenge at the Judy K. Souza Operations Facility (i.e. bus yard), as the yard is currently at capacity with only four articulated buses in the fleet. An expansion of the bus yard, or acquisition of off-site parking may be needed to increase the articulated bus fleet, and there is no funding currently available for that need. Similarly, the maintenance facility will require an expansion if there is a significant expansion of the articulated bus fleet.

How will the University increase its contribution to METRO to cover operating costs and capital expenditures necessary to increase the UCSC service to meet projected growth in demand from the projected campus growth?

L10-3
cont.

UCSC funds METRO service primarily through the Transportation Fee self-assessed by students, but the 2019 increase in the fee sunsets in 2030. How would the University handle the growth in trips if future referenda fail, and UCSC was not able to continue to fund METRO service at a level commensurate with student population growth?

Mitigations

The following mitigations are proposed:

- All growth beyond the academic year 2018-2019 baseline of 18,518 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to cover 100% of the annual operating cost of the additional METRO revenue service hours needed to respond to said growth.
- All growth beyond the academic year 2019-2020 baseline of 19,500 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to purchase METRO buses for METRO use, as needed to respond to the additional revenue service hours needed beyond the 2018-2019 academic year baseline (last full year prior to COVID-19 service reductions).
- Pursuant to California Air Resources Board regulations requiring METRO to have a 100% zero-emissions bus fleet by no later than 2040, in the event that in-route zero-emissions bus infrastructure (e.g. electric charging) is needed in order to serve UCSC, UCSC will provide a suitable site and charging infrastructure on its property.
- Construction of an on-campus transit center/layover facility (consider the East Remote Lot for a potential location), including restrooms for bus operators, to provide operational flexibility for METRO to better serve the campus.
- Extension of Meyer Drive with a transit-only lane to create an “outer loop” that METRO could utilize instead of the current longer, heavily congested Hagar Drive/McLaughlin Drive/Heller Drive loop. From there, students could either walk or bike to destinations, or ride a TAPS shuttle. This outer loop would shorten each campus trip, thereby reducing operating cost.
- Expansion of on-campus bus stops to accommodate increased use of articulated buses

L10-4

*Santa Cruz Metropolitan
Transit District*



- Dedicated HOV or transit-only lanes and/or queue jumps at select locations on and around campus
- Transit-signal priority on campus and along campus gateways such as Bay Ave
- Pedestrian channelization, traffic signals, and pedestrian overcrossings, to reduce delays to transit caused by unmanaged pedestrian crossings
- Reduce vehicle trips and vehicle delay on campus by permitting work-from-home for those staff roles for which it is feasible.

L10-4
cont.

Previous LRDPs have proposed mitigations such as increasing on-campus student housing, but the University has fallen short of delivering the promised housing, causing more and more students to find off-campus housing and commute to campus, creating stress of the transportation system of the campus and the Westside of Santa Cruz. For this LRDP, increases in student population need to be contingent on completing of proposed mitigations, rather than proceeding with growth and having to live with the consequences.

L10-5

Thank you in advance for review and consideration of these comments.

Pete Rasmussen
Transportation Planner
prasmussen@scmtd.com
831-420-2585



Erika Carpenter <escarpent@ucsc.edu>



[eircomment] Bostic, Morgan- Additional EIR Comment (3)

Morgan Bostic <morgan.bostic@actonucscgrowth.org>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:00 PM

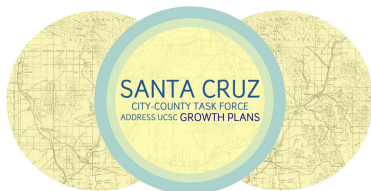
Dear Erika,

Please see the attached document for my **additional** comments on the 2021 LRDP EIR.

Thank you!

Warmly,
Morgan

--
Morgan Bostic
Advocate
Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans
She | Her
UCSC Class of '18



eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **Bostic, Morgan - 2021 LRDP EIR Comment (3).pdf**
93K

EIR Air Quality Comment - North Campus

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on air quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

L11-1

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus' air quality.

L11-2

According to the California Air Resources Board, "Extreme fires are a growing threat to public health and safety, to homes, to air quality and climate goals, and to our forests. California is seeing fires that burn larger and hotter on average than ever before... Smoke from extreme fires can occur with little warning, and travel long distances and into urban areas many miles from the flames, negatively impacting public health and degrading quality of life."

Additionally, "Air pollution from fine particles, known as PM2.5s, was already known to take four months off the lifespan of the average American." However, "After California's residents endured a month of orange-brown air filled with dangerous tiny particles, another set of Stanford researchers tracked dramatic increases in hospitalizations for conditions including strokes, heart attacks, and asthma. Bibek Paudel, a postdoctoral researcher at Stanford's asthma clinic, found that hospitalizations for strokes and related conditions increased by 60% in the five weeks after fires caused by lightning strikes began sending smoke around northern California last August. The number of pregnancies lost also doubled in the weeks after the fires – a startling finding that the researchers are still interpreting. Paudel also found significant increases in heart attacks and youth hospitalization for respiratory illness. "I don't think that people are aware of the long-term health effects of wildfire smoke," said Mary Prunicki, the director of research for Stanford's Sean N Parker Center for Allergy & Asthma Research."

L11-3

Specifically, "[W]hen air pollution of tiny particles called PM 2.5 — for particulate matter 2.5 microns or smaller, so small that 30 of them can line up along the width of a human hair — increased modestly, the number of people admitted to hospitals for respiratory ailments like asthma increased by 1% on average. But when PM 2.5 levels from wildfire smoke went up by the same amount, or 10 micrograms per cubic meter, there was a 10% increase in those hospital admissions.

EIR Air Quality Comment - North Campus

The tiny particles can penetrate deep into people’s lungs, enter the bloodstream and increase the risk of heart attacks, strokes and other serious health issues.”

L11-3
cont.

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that wildfires have substantial public health and air quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

All information for this section is taken from the 2021 LRDP EIR and

<https://ww2.arb.ca.gov/our-work/programs/wildfires>,

<https://www.theguardian.com/world/2021/jan/19/wildfires-air-pollution-western-us#:~:text=Scientists%20from%20Stanford%20University%20and,gains%20in%20cutting%20air%20pollution.&text=Air%20pollution%20from%20fine%20particles%2C%20known%20as%20PM2>,

<https://www.santacruzsentinel.com/2021/03/06/wildfire-smoke-up-to-10-times-more-harmful-than-other-air-pollution-new-study-finds/>

L11-4



Erika Carpenter <escarpent@ucsc.edu>

Letter
L12

[eircomment] LRDP EIR Comments

Stephanie Hansen <Stephanie.Hansen@santacruzcounty.us>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 2:19 PM

Good afternoon,

Attached please find comments from the County of Santa Cruz on the Draft Environmental Impact Report regarding the UC Santa Cruz Long Range Development Plan.

Please feel free to reach out if you have any questions.

Sincerely,

Stephanie Hansen, AICP

Principal Planner

Sustainability and Special Projects

Santa Cruz County Planning Department

[701 Ocean Street, 4th Floor](#)

[Santa Cruz, CA 95060](#)

[\(831\) 454-3112](#)

stephanie.hansen@santacruzcounty.us

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

SCCO Comments on LRDP DEIR (3-8-21).pdf
252K



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123

KATHLEEN MOLLOY, PLANNING DIRECTOR

March 8, 2021

Ms. Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
UC Santa Cruz of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

Dear Ms. Carpenter:

The County of Santa Cruz appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the UC Santa Cruz of California, Santa Cruz's (UC Santa Cruz's) Long Range Development Plan (LRDP). Please consider and address the following comments in the Final EIR:

L12-1

Archaeological, Historical, and Tribal Cultural Resources (EIR Section 3.4)

1. Mitigation Measures to identify and Protect Unknown Archaeological Resources—These measures should include the requirement that a qualified archaeologist be present on site to monitor ground-disturbing activities in areas where an archaeological site has been identified.
2. Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District—This measure should be amended to include the requirement that an architectural historian review any proposed alterations to existing buildings within the historic district for compliance with the Secretary of the Interior Standards. A qualified professional review any significance alterations to the landscape for potential impacts to the historic district.
3. Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District
 - a. Since the existing survey was prepared in 2005, it is recommended any building that is more than 50 years of age, is located within the within the boundaries of the potential district, and is proposed to be altered or demolished, be evaluated by a qualified architectural historian to determine if it meets criteria for a contributing building. If found to be a contributing building, then the mitigation measures provided would also apply to this building.
 - b. In addition, it is recommended that significant alterations to the landscape and landscape features be evaluated to determine if these alterations would affect the significance of the potential historic district. If found to affect the significance of the district, then appropriate mitigation features should be considered such as modifications to the proposed design to reduce the impacts to a less than significant level.

L12-2

L12-3

L12-4

L12-5

Hydrology and Water Quality (EIR Section 3.10)

- 4. Impact 3.10-5: Impacts to Karst Aquifer Supply, Recharge and Groundwater Quality—Surface water runoff that is infiltrated into the ground typically goes through both physical and biological treatments in the vadose zone which diminishes risks of contaminating groundwater with pollutants. The karst features that dominate the campus topography lack much of this natural filtration, and therefore typical stormwater management activities may be insufficient to ensure the minimization of pollution into the water systems. Due to the nature of the karst topography of the campus, it is vital that any changes in surface runoff quantity of quality be fully evaluated and mitigated.

The County Board of Supervisors has emphasized the importance of karst protection and has required that karst protection zone standards be considered. More details can be found at: http://santacruzcountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst

The EIR does not provide sufficient analysis of which new measures to address impacts of new development particularly on water quality will be implemented and where. It states “UC Santa Cruz is also engaging in planning that would be implemented to provide a comprehensive, integrated, and consistent approach to maintain the health and functionality of the existing karst system. This planning would also take into consideration development envisioned under the 2021 LRDP, current water infrastructure planning, campus projects currently under development, and UC Santa Cruz’s goals and aspirations for watershed health, water sustainability and resilience to further ensure that net deficits or increases to the karst aquifer would not occur. As a result, impacts would be less than significant.” This explanation is not sufficient to assess impacts. Further analysis in Section 3.10 is recommended.

While UC Santa Cruz is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by the University we hope that UC Santa Cruz will embrace the County’s concerns for protection of karst systems on campus for the benefit of downstream users of that water.

L12-6

Land Use and Planning (EIR Section 3.11)

- 5. The County of Santa Cruz is currently preparing its Sustainability Policy and Regulatory Update, a substantial revision to its 1994 General Plan and County Code to encourage more sustainable and compact urban development within its Urban Services Line and to plan for growth in the unincorporated County. The Sustainability Policy and Regulatory Update is based primarily on the Sustainable Santa Cruz County Plan, a conceptual planning study approved by the Board of Supervisors in 2014. Changes are proposed to all the General Plan policies listed in section 3.11.1 of the LRDP EIR. Public drafts of the revised General Plan, County Code, and associated EIR are in progress but are not yet available. The County understands that UC Santa Cruz is not subject to municipal regulations of surrounding local governments. Nevertheless, it is suggested that the EIR should recognize Santa Cruz County’s upcoming regulatory changes as part of the regulatory setting discussed in section 3.11.1 of the LRDP EIR. Additional information on this project can be found at: <https://www.sccoplanning.com/sustainabilityupdate>.

L12-7

Population and Housing (EIR Section 3.13)

6. The EIR anticipates growth from 18,500 students and 2,800 faculty and staff (2018-2019 academic year) to 28,000 students and 5,000 faculty and staff by the 2040- 2041 academic year. Student growth would be accommodated on-campus with the Student Housing West, Kresge Housing, and Crown College Major Maintenance Projects, as well as future housing development indicated in the LRDP. Employee growth would be partially accommodated with housing at the University's Westside Research Park and in the lower campus portion of the main campus in a location that is currently part of the Ranch View Terrace Habitat Conservation Plan (HCP) area.

The EIR states that although the overall housing vacancy rate of 7.8% indicates some availability in the housing market, other indicators point to a market that is, in reality, quite constrained. Vacancies may represent housing that is not available for sale or rent due to housing that is in disrepair or in use as vacation homes, and the vacancy rate in the rental market is much lower than the for-sale rate, at just 1.9%. The EIR notes that this already tight housing market has tightened further due to the pandemic as well as the CZU Lightning Complex fire. As a result, the EIR identifies a potentially significant impact on population and housing.

Santa Cruz County is in agreement regarding the tight market and the potentially significant impact on housing availability and affordability from increased demand from UC Santa Cruz students or employees. Both the supply and affordability of housing continues to be a problem, the extent and severity of which are far greater than they were in 2005. In fact, EIR section 3.13.2 should take note of additional factors related to the tight market, such as homelessness and overcrowding of housing units. Section 3.13.2 should also take note that the Association of Monterey Bay Area Governments is preparing for an updated Regional Housing Needs Allocation (RHNA), and it is anticipated that housing production requirements could be increased as much as 1.5 to 3 times the current allocation, with new restrictions on the types of sites that may be counted toward fulfilling RHNA requirements. EIR section 3.13.2 should acknowledge these anticipated near-future housing requirements faced by local jurisdictions. Housing projects that are currently planned and recently completed in the City of Santa Cruz, Santa Cruz County, and other local jurisdictions will not serve to meet the updated RHNA allocation requirement.

The County is not in agreement with the statement in EIR section 3.13.3 that the potential LRDP impact on population and housing is unavoidable and there is no feasible mitigation for this impact. The LRDP proposes to provide housing for only 558 of the 2,550 additional employees anticipated over the next 20 years, creating a demand for up to 1,992 off-campus residences. Mitigation measures for this impact should be included and could include options such as:

- Identify additional locations for employee housing could be considered on UC Santa Cruz property, including locations outside of the HCP area or other environmentally protected areas that face fewer hurdles to development.
- Plan for higher density housing to accommodate more employees where housing is already planned on the UC Santa Cruz main campus or at the Westside Research Park property.

L12-8

L12-9

- Assess housing development potential on other UC Santa Cruz-owned parcels. If no other University parcels are viable for housing development, purchase additional land for production of multifamily employee housing project(s).
- Pay a negotiated mitigation fee to Santa Cruz County and/or other local jurisdictions based on the anticipated local demand for 1,992 housing units.
- Given market uncertainty over the next 20 years, consider a phased approach whereby every five years, a housing market study and coordination with local jurisdictions is conducted to determine the maximum number of employees without on-campus housing for the next five-year period that would be less than significant or could be mitigated with payment of mitigation fees.

L12-9
cont.

7. Minor text edit suggestions:

- Table 3.13-11 (Baseline and Projected On-Campus Housing Capacity and Demand): The total “Demand Not Provided on Campus” appears to be a typo. This number should be the sum of 982 student beds and 1,992 employee residences.
- Page 3.13-12, “Additional Housing Demand” third paragraph states “an additional 2,550 employees would be provided with housing on campus.” This statement is incorrect.
- Page 3.13-12, “Additional Housing Demand” fourth paragraph states: “This could create additional demand for housing in the community, including the City of Santa Cruz.” Suggest changing the end of this sentence to state “City of Santa Cruz, Santa Cruz County, and other neighboring jurisdictions.”

L12-10

L12-11

L12-12

Transportation (EIR Section 3.16)

8. Figure 3.16-6 and the text above it classify Uber/Lyft or transportation network companies (TNCs) in the same mode share category as carpools. Additionally, the LRDP section “Transportation Demand Management” references them as a trip and a strategy to reduce vehicle miles traveled (VMT). Yet TNC vehicles create additional trips as they pick up passengers between rides. Classifying a TNC as a carpool does not fit the purpose of a carpool, particularly if there is one rider in the TNC as one person is arriving to campus in a vehicle with an Uber/Lyft driver who then leaves the campus. The purpose of a carpool is to eliminate trips: when a single person uses a TNC without other users they would have generated less VMT by driving alone from their starting point. Are all TNCs arriving to campus carrying more than one passenger? How are TNC trips between passengers account for? Please clarify what assumptions were made for TNC trips for the VMT analysis. If they were counted as carpools this would result in an understatement of VMT attributable to TNCs.

L12-13

9. The CAPCOA guidance cited for percent reductions throughout the transportation section of the EIR also contains a global maximum VMT reduction of 15% (or 20% with neighborhood electric vehicles) due to transportation measures for suburban areas, which is inclusive of land use/location factors. Transportation Demand Management (TDM) program expansion is cited as a mitigation measure, along with proximity of housing, telecommuting, parking management and transit funding. The EIR notes a 15% reduction of VMT due to these measures, but UC Santa Cruz has a robust TDM program, high parking prices, and a high frequency of transit service.

L12-14

Additionally, the proximity of housing is a component of the project and therefore should already be accounted for in the calculation of project VMT: it cannot be counted again as a mitigation. This claim of a 15% reduction does not consider the fact that the UC Santa Cruz is already employing many of these measures, in effect taking credit for measures already in place or exceeding the maximum reduction that CAPCOA documentation observes in these suburban land use contexts. Additionally, a 15% reduction to the per capita employee VMT of 12.5 would not meet the stated threshold 8.9 miles per employee. If the reduction of 15% when applied to total VMT results in less than or equal to 8.9 miles per employee, then the calculation demonstrating such a reduction to total employee VMT divided by the number of employees should be shown, and this reduction should be attributable to mitigation measures not already in use by UC Santa Cruz, or the EIR should provide evidence that UC Santa Cruz can exceed the typical global maximum cited by CAPCOA.

L12-15

10. As mitigation monitoring occurs, the monitoring program should include a mechanism to guarantee that UC Santa Cruz does not shift vehicle trips to other University-owned properties that are not included in this LRDP, such as the Scotts Valley campus or the Coastal Science Campus, effectively increasing VMT on County and City roadways.

L12-16

11. Currently, people often drive to the city or close to UC Santa Cruz and take shuttles or transit to get onto campus to avoid parking pricing, which does not achieve the purpose of truly decreasing trips or VMT, but does reduce trips as counted by tubes. Will the cellphone or “big data” collected by UC Santa Cruz be able to do a complete accounting of trip length to account for people who park off campus to avoid a “no net new commuter parking” policy? Instead of completely eliminating parking, the University should consider remote lots with shuttles that could also serve as park and rides off campus at locations that are conveniently accessed off of highways.

L12-17

Utility and Service Systems (EIR Section 3.17)

12. On page 3.17-3, the EIR states: “In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin.” This information is out of date. The Soquel-Aptos Groundwater Management Committee was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016. The MGA is the Groundwater Sustainability Agency designated to oversee management of the renamed Santa Cruz Mid-County Groundwater Basin. The MGA was created under a Joint Powers Agreement.

L12-18

13. On page 3.17-3, the EIR states: “The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin (which includes the Soquel-Valley Groundwater Basin), and the westerly area is within the Santa Margarita Groundwater Basin.” This information is incorrect and out of date. The Santa Margarita Groundwater Sustainability Plan does not cover any part of the City of Santa Cruz or the UC Santa Cruz campus. The City does own assets within the Basin,

L12-19

including part of Loch Lomond and the Felton Lift Station. The author likely is confusing the Santa Margarita Basin with the West Santa Cruz Terrace Basin, which includes part of the city and the campus. West Santa Cruz Terrace is not required to write a Groundwater Sustainability Plan. The Soquel-Valley Groundwater Basin no longer exists; it was superseded by the Santa Cruz Mid-County Groundwater Basin.

L12-19
cont.

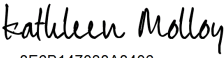
14. On page 3.17-9, the EIR states: “The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.” The groundwater agencies do not serve the city. This should say: “The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.”

L12-20

15. On Page 3.17-9, the EIR states: “The Santa Margarita GSP, covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz, is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020).” As previously mentioned, the Santa Margarita Basin does not include any part of the City of Santa Cruz or UC Santa Cruz.

L12-21

Sincerely,

DocuSigned by:

8E6B147038A8406...
Kathleen Molloy
Planning Director
Santa Cruz County

Cc: Carlos Palacios, County Administrative Officer



Erika Carpenter <escarpent@ucsc.edu>

Letter L13

[eircomment] Bostic, Morgan - EIR Comment Submission

Morgan Bostic <morgan.bostic@actonucscgrowth.org>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:54 PM

Dear Erika,

Please see the attached document for my **additional** comments on the 2021 LRDP EIR.

Thank you!

Warmly,
Morgan

--
Morgan Bostic
Advocate
Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans
She | Her
UCSC Class of '18



eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

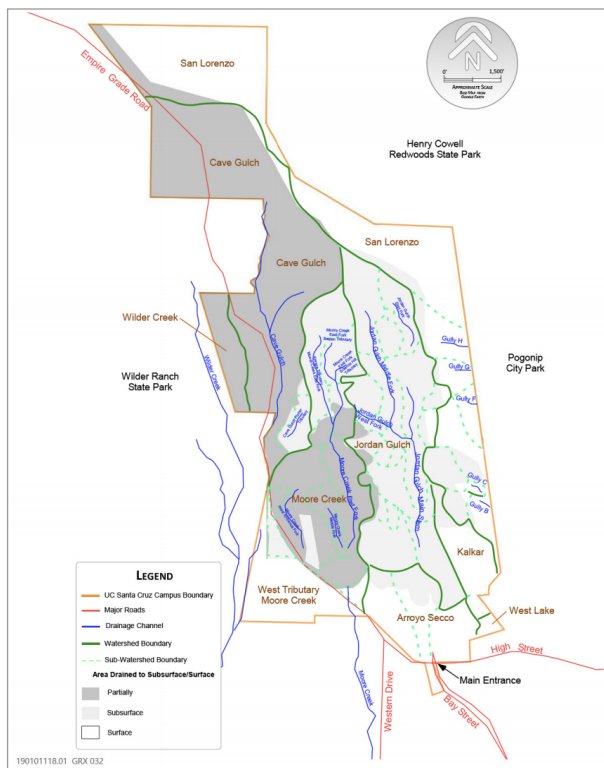
 **Bostic, Morgan - Comment on the 2021 LRDP EIR (2).pdf**
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EIR Water Quality Comment - North Campus

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on water quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus' water resources, particularly the San Lorenzo Valley Watershed.

L13-1



Source: Figure produced and provided by Weber, Hayes & Associates in 2020

Figure 3.10-1 Watersheds and Sub-Basins on UC Santa Cruz Campus

3.10-8

UC Santa Cruz
2021 Long Range Development Plan EIR

As Figure 3.10-1 Watersheds and Sub-Basins on UC Santa Cruz Campus shows, the “...northeastern and eastern boundary of the main residential campus is drained mainly by a series of hillslope drainages within the San Lorenzo River watershed. In general, the San Lorenzo – Pogonip watershed drains much of the eastern portion of the main residential campus east of Hagar Drive from north of the Crown-Merrill Apartments south to the southern boundary of the campus and borders the City of Santa Cruz’ Pogonip Park to the east of campus.”

L13-2

Additionally, “Eight sub-watersheds comprise the larger area that are associated with a number of west-east trending gullies (Gullies A through H) that drain to the east (see Figure 3.10-1).”

“ Gully H is located in the northeastern corner of the campus with an on-campus drainage area of approximately 40 acres. Existing UC Santa Cruz development that contributes runoff to this gully includes Crown Merrill Apartments, Crown College and three large parking lots. The erosion conditions previously documented in this Hydrology and Water Quality UC Santa Cruz 3.10-14 2021 Long Range Development Plan

EIR Water Quality Comment - North Campus

EIR gully include actively migrating knickpoints, incised channel, and eroding slope gullies. Concentrated runoff is the primary cause of these conditions (Kennedy/Jenks Consultants 2004).” Channel conditions in the San Lorenzo–Pogonip watershed vary from location to location but are in general fair to poor.”

After rains drenched the areas where the CZU Fire occurred, Boulder Creek residents experienced “their water running black for a few days and “ [f]or weeks, residents in Boulder Creek, Ben Lomond, and Felton were without drinking water. In some areas — particularly those close to Big Basin Redwoods State Park, and served by the smaller Big Basin Water District — residents didn’t get water back until early January.”

Fires leave behind, “an array of incinerated plastics, lead, pesticides and other toxic particles that have the potential to contaminate water supplies.” Additionally, “[b]urnt piping and equipment, as well as potentially contaminated supplies, were largely to blame for the water shortage.” Scorched landscapes, “ add to the risk of mudslides, blocking access for water district workers.”

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that the north campus subarea is within the San Lorenzo River watershed and drains into the river and that wildfires in water supply watersheds potentially have significant water quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

All information for this section is taken from the 2021 LRDP EIR and <https://www.latimes.com/california/story/2021-02-13/wildfire-santa-cruz-boulder-creek-residents-fear-water-quality>

L13-2
cont.

L13-3

Dear Chancellor Larive,

The release of the Draft UC Santa Cruz Long Range Development Plan (LRDP) for 2021-2040 presents a critical opportunity to come together as a community and envision what development and infrastructure will be essential to the success of future UCSC students, faculty, and staff over the next 20 years. In that spirit, and on behalf of the Santa Cruz City-County Task Force on UCSC Growth Plans and the constituents of the City and County of Santa Cruz, we are appealing to you directly in an effort to ensure that policies centering the needs of future students, our community-at-large, and our cherished environment are implemented under the 2021 LRDP.

L14-1

The Santa Cruz City-County Task Force on UCSC Growth is requesting consideration of the following policies for the 2021 Long Range Development Plan:

1. Consistent with Measure U, the 2021 Long Range Development Plan will include a legally enforceable commitment to house all additional students, faculty, and staff beyond 19,500 on campus.
2. The 2021 Long Range Development Plan will tie the increase of the campus population to additional infrastructure, with infrastructure provided prior to or concurrent with enrollment.
3. UCSC will designate the UCSC Campus Natural Reserve as a permanent reserve, ineligible for development in perpetuity, except to support the uses of recreation, research, environmental conservation, and scientific education.
4. The 2021 LRDP will prioritize areas with low endemic biodiversity for development in order to protect the most biodiverse habitats on the campus and areas that have undergone substantial regeneration.
5. UC Santa Cruz will adhere to or exceed the strictest greenhouse gas emission targets and air quality standards, whether they be statewide, regional, and/or UC-specific.
6. Given the increasing severity of wildfire due to climate change and the urban-wildland interface, it is imperative that the University adequately analyze and mitigate the increase in wildfire risk that the 2021 LRDP will impose on the campus and, by extension, the community.

L14-2

In closing, we are grateful for this opportunity to collaboratively envision the future of our community and campus.

Sincerely,

The Santa Cruz City-County Task Force on UCSC Growth Plans
info@actonucscgrowth.org | www.actonucscgrowth.org

Santa Cruz County Supervisor Ryan Coonerty
City of Santa Cruz Mayor Donna Meyers
City of Santa Cruz Councilmember Sandy Brown
City of Santa Cruz Councilmember Justin Cummings

Organization Comment Letters



Erika Carpenter <escarpent

Letter
01

[eircomment] LRDP EIR Comments

'Jan Karwin' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Tue, Feb 23, 2021 at 4:12 PM

Reply-To: Jan Karwin <jankarwin@yahoo.com>To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Dear Ms. Carpenter,

Attached are comments on UCSC's LRDP DEIR from the League of Women Voters of Santa Cruz County. If you have any questions, please feel free to contact me.

Sincerely,

Jan Karwin
jankarwin@yahoo.com
831-460-1714

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **LWVSCC comments on UCSC LRDP DEIR.pdf**
173K



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February 23, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064
eircomment@ucsc.edu

Subject: LRDP EIR Comments

Dear Ms. Carpenter:

Thank you for the opportunity to comment on the UCSC 2021 Long Range Development Plan Draft Environmental Impact Report (LRDP DEIR). On a statewide level, the League of Women Voters supports a comprehensive system of public higher education that serves the personal, professional, and occupational goals of all adult Californians and advances the social, economic, and civic needs of the state. To achieve these objectives, public higher education must prioritize access, affordability, equity, and excellence. These priorities require state funding, including student financial aid that is stable, predictable, sustainable, and timely.

While we appreciate the university's contribution to our local community in terms of educational, intellectual, cultural and economic assets, we are concerned to read in the DEIR that multiple significant and unavoidable negative and cumulative impacts would result from the proposed LRDP for the Santa Cruz campus. Even after implementation of feasible mitigation measures, significant negative impacts would occur with respect to: air quality, historical resources, noise, population and housing, and water supply.

Although there are many important areas of negative impact, we will focus our comments primarily on air quality and transportation, population and housing, and wildfire hazards.

Air Quality and Transportation

As you have pointed out on page 3.16-1 of the DEIR, Senate Bill (SB) 743, passed in 2013, eliminates consideration of traffic congestion in the CEQA process. However, we believe that the DEIR has underestimated the level of greenhouse gas emissions that result from traffic backups as students, faculty and staff arrive in the morning and head home at the end of the day. Because of its unique geographic location, the UCSC campus does not have easy access to major transportation corridors or freeways. The campus is accessed primarily through two-lane residential streets. This limited vehicular access creates congestion along the few streets leading to the campus. Cars and trucks are routinely stopped with engines running for blocks along these residential streets while waiting for gridlock to clear. Residents

O1-1

O1-2

who live on or in proximity to these streets are not only subjected to the effects of carbon emissions, but also find it difficult, if not impossible, to enter or leave their own homes during these times.

O1-2
cont.

The neighborhood middle school and elementary schools that exist on these same residential streets begin and end the school day at times that overlap the hours during which commuters are arriving and leaving the UCSC campus, creating potentially hazardous conditions for the students. These significant adverse impacts have existed for years with no indication that conditions will improve. On the contrary, we believe that campus growth as described in the LRPD DEIR will exacerbate these problems.

O1-3

As you may know, early campus planners were very much aware of the potential negative impacts on neighborhoods adjacent to the new campus and suggested what they called an “eastern access” road that would bypass the neighborhoods and somehow connect Coolidge Drive to the Highway 1 and/or Highway 17 Freeways. The concept was met with strong opposition from the local community. The FEIR should explain why an “eastern access” was never constructed and why it is very unlikely to ever become a reality.

O1-4

We do not believe that housing more faculty and staff on campus would reduce vehicle miles travelled (VMT) or greenhouse gases. Indeed, it could even increase VMT. To the extent that faculty and staff have families, we expect that household members will need to make regular trips off campus to commute to work or to access services provided in the community, such as: elementary and secondary schools, day care facilities, grocery stores, pharmacies, and a multitude of other destinations in the course of normal daily life. The DEIR does not seem to address the fact that most household members living on campus would need to travel off campus on a regular basis.

O1-5

Population and Housing

The DEIR acknowledges that the proposed LRDP will create significant and unavoidable negative impacts by directly or indirectly inducing substantial unplanned population growth and housing demand.

Santa Cruz is one of the most expensive housing markets in California. Local governments struggle to find ways to provide affordable housing for lower income workers and their families. Service employees are priced out of the market as higher income buyers and renters compete for housing. The DEIR cites the volume of housing units expected to come on line in the City of Santa Cruz. But, these new housing units are mostly market rate units that do not help to fulfill the need for low-income housing. Moreover, the growth of population further increases the need for low-income housing as the demand for services increases to meet the needs of additional residents. As a result, service and workforce employees must look for affordable housing further and further from local places of employment, defeating efforts to reduce VMT and address global warming. Indeed, affordable housing for service workers is now so rare that those workers are leaving the county for areas with less expensive housing markets, leading to a dearth of those workers for the university and other local employers.

O1-6

Compounding the problem is the high cost of on-campus student housing. On-campus rental rates create an incentive for students to look for cheaper housing off-campus, competing with low-income City residents for affordable housing. Although the UC Administration promises to house 100% of the projected increase in student population, this will not alleviate the shortage of affordable housing if on-campus student housing continues to be too expensive and drives students to look for cheaper housing off-campus. Moreover, the DEIR fails to explain where the funds will come from to subsidize new student housing in order to offer on-campus rental rates that will be affordable and attractive to students.

O1-7

Historically, UCSC’s track record for providing enough on-campus student housing at affordable rates has been grossly inadequate.

O1-7
cont.

The City and County of Santa Cruz require major developments to include a certain percentage of low-income units in their development plans or pay in lieu fees to help local governments provide low-income housing. Is the University prepared to honor this low-income housing inclusionary requirement in its development plans?

O1-8

Wildfire

In the wake of global warming and the probability of increase in wildfires, we are alarmed to see the University propose additional development in the Wildland-Urban Interface areas of the campus. While the described mitigation measures seem good on paper, wildfires are unpredictable in the presence of increased human activities, dry vegetation, and high winds. It’s not clear how required and costly hardening measures and vegetation maintenance will ensure the feasibility of safely developing in areas susceptible to the hazards of wildfire. It seems irresponsible to unnecessarily put students, faculty, and staff and adjacent communities at risk when viable and more cost effective alternatives may be available, such as growing the UC system at other UC campuses not threatened by potential wildfires.

O1-9

Alternatives

Together with the No Project Alternative, the FEIR should consider the possibility of utilizing distance learning as a mitigation measure for increasing the student population. For example, if lower division classes in selected majors were offered online at reduced tuition rates, this could not only mitigate environmental impacts of additional student enrollment, but also would make higher education at UCSC more affordable for Freshmen and Sophomores. Encouraging students to transfer in as Juniors and streamlining the transfer process would be another way to leverage availability and affordability.

O1-10

Conclusion

In view of the significant and unavoidable negative impacts of the proposed 2021 LRDP, we urge the University of California to maintain the UC Santa Cruz campus at its present student population of 19,500 so that this campus of higher learning will continue to be an asset to the local community in which it resides and not become an impactful liability through unmitigated growth. We believe it would be more environmentally acceptable for the University of California to achieve its mission and goals by increasing student enrollment at some of the other excellent UC campuses that are better suited to safely accommodate growth.

O1-11

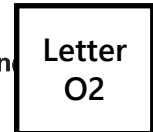
Respectfully,

Barbara Lewis
President, League of Women Voters of Santa Cruz County

Jan Karwin
LWV Representative on the Advisory Group of the
City-County Task Force to Address University Growth Plans



Erika Carpenter <escarpent



[eircomment] LRDP DEIR comments

whatisron@gmail.com <whatisron@gmail.com>
To: eircomment@ucsc.edu

Tue, Mar 2, 2021 at 12:29 PM

Erika,

Please see attached comments and please confirm that they have been received.

Thank you.

: Ron Goodman

: Springtree HOA Boardmember

: 831 272 4627

: whatisron@gmail.com

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **DEIR Comments.pdf**
935K

222 Quarry Lane
Santa Cruz, CA 95060
March 2, 2021

Attn: Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz

The Long-Range Development Plan (LRDP) will have significant impacts on the region surrounding and including the Springtree HOA. The attached comments on the DEIR enumerate concerns and questions we have. We request that you address these comments.

02-1

Sincerely,



Ron Goodman, on behalf of the Springtree HOA Board

Mitigation measures 3.10.2, 3.10.3, 3.10.4 and 3.10.5: UCSC currently drains runoff from the east side of campus into Kalkar Quarry Pond. This water is rapidly funneled into the pond causing extensive silt deposition, leading to significant environmental damage to the pond and placing the burden of maintenance on a poorly resourced HOA. The mitigations described in the DEIR failed to protect the pond ecosystem either in UCSC's current or future state as described in the LRDP.

O2-2

- 1) The V-channel along Coolidge is inadequately maintained and collects vast quantities of dirt during dry months. Rain events send this dirt and debris into the pond.



V-channel along Coolidge after rain has cleared debris

O2-3

- ① How can we have confidence that new construction and new projects will address this better?
- ② Would UCSC commit to clearing this channel of debris before rain season?
- ③ What consequences would UCSC commit to if it continues to fail to manage this channel and associated runoff?

O2-4

O2-5

- 2) The drain at the intersection of Hagar and Coolidge is poorly maintained and the runoff from the field above feeds significant quantities of silt into the pond. New construction would likely lead to less runoff absorption and more runoff entering the various drains that deliver untreated water to the pond.



UCSC floodwaters draining into Kalkar Quarry Pond (1/28/2021)

O2-6

- ① How will UCSC mitigate this impact which is not described in the DEIR?
- ② If mitigations are proposed that redirect the water, how will the impacts of reduced recharge to the karst (and resulting reduced spring flows) be mitigated?
- ③ What responsibility will UCSC take in assisting the HOA in managing the pond if despite its best efforts, LRDP projects cause further damage to the pond?
- ④ Would UCSC consider raising the drain so the sinkhole acts as a settling pond, allows more water to seep into the karst, and reduce inundations to the pond?

O2-7



Main drain inlet at Hager and Coolidge

O2-8

O2-9

- 3) The drainage from Hagar Dr. and Hagar Ct. flows into multiple gutters along Hagar Ct. delivering whatever road debris/pollutants have collected on those roads from preceding dry months.

- ① How will the University ensure that increased runoff and increasingly toxic runoff does not cause additional harm to the ecosystem of the pond?

O2-10

- ② What responsibility will the University take if despite their best efforts, the pond ecosystem is further degraded as a result of LRDP projects? O2-11
- 4) According to the California Air Resource Board, pollution from tire and brake wear is a serious environmental pollutant (<http://relynk.me/carimpacts>). Furthermore, auto speed is correlated with levels of wear (<http://relynk.me/tirewear>). O2-12
 - ② Can UCSC commit to lowering speed limits on Hagar and Coolidge to reduce the impact of this type of pollution in runoff (as well as improve safety for bicyclists, wildlife and drivers, and reduce noise pollution)?
 - ② What other solutions can UCSC implement to ensure this type of pollution does not increase if, as is anticipated, overall VMT increases? O2-13

As a result of an informal agreement to allow UCSC to pipe collected runoff into the pond, and an abdication of UCSC's responsibility to abide by its agreed management of this runoff, the current situation is that UCSC's runoff delivers substantial silt and pollutants directly into the pond without any settling or treatment. This has resulted in several problems that are difficult for the HOA to manage.

- 1) Multiple feet of silt deposition have provided habitat and shallow water that have led to complete inundation by California bullrush (*Schoenoplectus californicus*). This has eliminated the open water and created a maintenance problem that exceeds the technical and financial capabilities of the Springtree HOA. O2-14
 - ② How will UCSC address this ecosystem damage?
 - ② Will UCSC agree to pay a portion of maintenance to restore the ecosystem? O2-15
- 2) The loss of open water has eliminated habitat for waterfowl, western pond turtles, red-legged frogs, fish larger than a few centimeters, etc. This loss of species has radically impacted the diversity of the open space and created disease vector impacts like increased mosquito population. O2-16
 - ② How will UCSC monitor the biota of the pond to ensure LRDP projects are not causing damage?
 - ② What responsibility will UCSC take for any damage LRDP projects do cause to the pond? O2-17
- 3) UCSC runoff may be causing fish die-offs - Kalkar pond fish population disappeared in 2020 coinciding with first 2020 rain event in late November – <http://relynk.me/rain> . Although these events may be associative rather than causally related, this should be investigated further. O2-18
 - ② If UCSC runoff is killing mosquito eating fish, what responsibility will UCSC take to address the health risks associated with a large mosquito population?
- 4) LRDP projects may, according to **Impact 3.10-5** cause further reductions to spring flows on top of reductions that have been noted. As noted by historian Dean Silvers, “[The Dodero Spring in Kalkar Quarry] bears a complicated relationship to the Santa Margarita Sandstone aquifer located on the UCSC campus. Stanley (Warrick, Sheridan F., ed. *The Natural History of the UC Santa Cruz Campus*. Santa Cruz, Environmental Field Program, UCSC, 1982, pp. vi-vii and 81-85) notes that when the old city reservoir (near today's UCSC Arboretum) was built around 1900, people were at first unaware that it leaked through the fractured marble at a rate as high as 750,000 gallons a day! When the Cowell Reservoir was emptied in 1948, the flow of water at the Dodero Spring at the Kalkar Quarry (0.7 miles east) decreased by an equal amount of water.” O2-19

- ② Mitigation 3.10-5b states UCSC will compare flows to historic spring discharge. Flow variation is significant, so how can UCSC guarantee that the metric used to determine impact significance is sufficient and captures all impacts? O2-19
cont.
- ② Mitigation 3.10b states that if spring flows decline per a defined formula, groundwater extraction would be reduced or terminated. But changes in spring flow would likely also result from drainage pattern modifications that reduce karst absorption. The DEIR doesn't state what UCSC would do if the reduction in flow is a product of modified drainage patterns. How will UCSC mitigate reduced spring flow if the cause is due to factors other than groundwater extraction, such as modified drainage? O2-20

The DEIR fails to address these existing issues, how UCSC would mitigate these issues as they worsen, and what level of responsibility UCSC would take if they are unable to mitigate issues. New development proposed on the eastern portion of campus would exacerbate these existing problems by adding more concrete and increasing surface flow and runoff and reducing absorption of water into the karst. That would lead to more polluted water inundations, with less consistent clean spring flow throughout the year.

These issues should be mitigated in section 3-10 by:

- 1) Eliminating the V-channel along Coolidge and instead creating drainage systems that slow and trap precipitation, allowing it to be absorbed into the karst.
 - 2) Installing a system at the Hagar/Coolidge intersection to collect rainwater and allow it to seep into the karst as it would naturally do if there were less pavement and no drainage pipe.
 - 3) Requiring that any newly created storm runoff should be dispersed as sheet flow along the landscape or captured to seep into the karst, and not funneled into streams.
 - 4) Stopping use of any potentially dangerous chemicals that could end up entering the watershed (e.g., for landscaping, maintenance, pest control).
 - 5) Monitoring Kalkar spring flows (these have not been historically measured, so this should start) and ensuring that projects do not reduce these flows.
 - 6) Creating settling tanks for any runoff collected rather than allowing free flow into the pond.
 - 7) Committing to reducing automobile pollution on campus (see below).
- O2-21

Two final questions:

- ② If the University cannot commit to these or similar mitigations, how can it guarantee that the projects described in the LRDP will not have significant adverse impacts on the hydrology, flood patterns, karst, and groundwater quality? O2-22
- ② What consequences can the University commit to if it is unable to protect the Kalkar Quarry Pond as well as the downstream waterways, additional ponds, lagoon and ocean? O2-23

Mitigation measure 3.3-2 and 3.16-2: The measures described do not adequately address impacts of cars, and critically, lack substantive consequences for failing to meet targets.

O2-24

Additionally, reducing residential VMT per capita, even if successful, would lead to substantially greater total VMT. Increased automobile use has significant negative impacts on the campus, the surrounding neighborhoods, and the community at large.

O2-25

UCSC should make a stronger commitment to a future prioritizing telecommuting, bikes, electric bikes, and electric vehicles. California's governor has committed to banning the sale of gas-power vehicles by 2035 (<http://relynk.me/phaseout>). UCSC's commitment to do this would address:

- 1) Mitigation 3.10-2 and 3.10-5 by eliminating or reducing several types of auto pollution from collecting on roads (oil, exhaust, lubricants, brake pad dust). This would reduce pollution in runoff that enters streams, Kalkar Quarry Pond, and other regional water fed by UCSC runoff.
- 2) Mitigation 3.3-2 by reducing air pollution from autos.
- 3) Mitigation 3.12-14 by reducing noise pollution on campus and to nearby neighborhoods.
- 4) Mitigation 3.8-1 by helping reduce the campus' contribution to climate change.
- 5) Reduce the pressure to build new access roads and new campus circulation roads.

O2-26

The TDM described in mitigation 3.16-2 and mitigations in 3.3-2 should address this.

② Can the LRDP specifically state that where auto infrastructure is built or maintained, there is a requirement to phase out infrastructure for gas cars in favor of EV support?

O2-27

② Can the LRDP encourage EV use over internal combustion engines (ICE) cars by:

- a. requiring that a progressively increasing amount of charging infrastructure for EVs and electric bikes shall be installed throughout the campus;
- b. specifying that existing auto parking spaces should be converted to EV-charging, at a minimum, to keep pace with statewide EV sales;
- c. apportion new parking passes to a progressively higher ratio of EV to ICE cars, phasing out passes for ICE cars entirely by 2035;
- d. offering other incentives to EV drivers as possible;

O2-28

② Can UCSC encourage more bicycle and electric bike usage by:

- a. subsidizing staff purchases of bikes and electric bikes;
- b. equipping existing bike racks with electric bike charging stations?
- c. offering other incentives to bicyclists as possible?

O2-29

② Can UCSC reduce all speeds on campus to a maximum of 25MPH to improve bicyclist and wildlife safety and encourage more bicycle commuting?

O2-30

② Can UCSC redesign existing roads using accepted traffic engineering techniques to induce slower driving speeds to help ensure compliance with lower speed limits?

O2-31

② Can UCSC join other local agencies and commit to Vision Zero (<http://relynk.me/visionzero>), in part by committing to include bicycle/pedestrian improvements in all new LRDP projects?

O2-32

② Can UCSC continue offering options for students to attend classes remotely when appropriate?

O2-33

② Can UCSC commit to a transportation equity policy that emphasizes bicycles, transit, and emission-free vehicles rather than by facilitating ICE vehicles?

O2-34

② New road capacity and auto parking increases VMT, contrary to the intent of California SB 743 (<http://relynk.me/sb743>). Can UCSC commit to address transportation issues on campus via methods other than increasing road capacity and parking capacity?

O2-35



Erika Carpenter <escarpent@ucsc.edu>

Letter
03

[eircomment] Comment on UCSC's Long Range Development Plan Draft EIR.

Nancy Macy <nbbm@cruzio.com>
To: Erika Carpenter <eircomment@ucsc.edu>

Wed, Mar 3, 2021 at 6:32 PM

Dear Ms Carpenter,

Attached, please find our comments for UCSC's Long Range Development Plan Draft EIR. Please confirm that you have received it, and let me know if there is any difficulty with either of the pdf's. One is the comment letter and the other is a Soils Map to support our comments.

Thank you for the opportunity to comment on this plan,

Nancy Macy, Chair
Environmental Committee for the SLV
Valley Women's Club
www.valleywomensclub.org
831/338-6578 home
831/345-1555 cell

Attachment to Comments from VWC Environmental Committee on UCSC Draft EIR:

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

2 attachments

 **Comments from VWC Environmental Committee UCSCLRDP.pdf**
653K

 **f_klsppmxa1.pdf**
1092K



Environmental Committee
VALLEY WOMEN'S CLUB of San Lorenzo Valley
PO Box 574, Ben Lomond, CA 95005
831/338-6578
www.valleywomensclub.org

February 26, 2021

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street Santa Cruz, CA 95064
eircomment@ucsc.edu

Dear Ms. Carpenter,

The Valley Women's Club appreciates this opportunity to comment on UCSC's Long Range Development Plan Draft EIR. Started in 1978, our organization is dedicated to community action, awareness and leadership in environmental, educational, social, and political concerns that affect the health and welfare of the San Lorenzo Valley and our community.

03-1

Please find our comments as follows, organized by section.

Section 3.5 Biological Resources

Vegetation Communities

The vegetation communities section 3.5.2 states that the recent "2019 mapping effort was conducted at a coarse scale" and not used because known sensitive natural communities from the 2005 LRDP were not represented, including coastal prairie and northern maritime chaparral. The purpose of the 2019 vegetation mapping project was to produce fine scale vegetation data that would be comparable to that of surrounding counties. The minimum mapping unit is reported to be "a quarter to a half acre" according to a 2020 webcast: <https://youtu.be/QQi88BvwyNk>

03-2

The Conservation Network vegetation layer would be comparable if not finer scale than the 2005 layer shown in figure 3.5-2, and it is more recent. This information should be presented and reviewed to determine the actual vegetation, and address any additional concerns raised therein.

In tables 3.5-2 & 3 it is stated repeatedly that many sensitive *sandhills* species are not expected to occur because the LRDP area "does not contain" Zayante soil habitat or sandhills habitat. However,

03-3

according to the Santa Cruz County GISWeb, potential *sandhills* habitat is located within the LRDP area in much of the same area that is identified as Northern Maritime Chaparral. Additionally, there are no soils reports shown for that area: See attached map from the County GIS application.

The project area is also in close proximity to Zayante band-winged grasshopper critical habitat (Figure 3.5-4). Further, under Sensitive Natural Communities on page 3.5-31 the document states “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, including the Northern Maritime Chaparral.”

O3-3
cont.

More detailed vegetation community and soil surveys are necessary to support the conclusion that “the LRDP area does not contain Zayante soil habitat” and “the LRDP area does not contain *sandhills* habitat,” and how to respond if there are *sandhills* issues of concern.

Special Status Species

The LRDP zone includes habitat and terrain for 66 special-status wildlife species and 64 special-status plant species, many holding statuses CRPR 1B (Endangered in CA) and known to occur in the development zone.

The LRDP DEIR mitigation measures proposed, regarding mountain lion dens and other carnivores, are inadequate to address potential impacts of construction. They include only a time-limited survey for occupied or potential dens in the specified area within 30 days of commencement of project activities. “If the den is determined to be unoccupied by any carnivore species...no further mitigation will be required.” (ES-36)

However, in 2020 Santa Cruz County suffered the most severe wildfires in its history, directly affecting the forested lands adjoining and surrounding the UCSC campus, including Bonny Doon and the San Lorenzo Valley, and displacing many animal species, resulting in more frequent incursions into the wildland/urban interface areas by animals whose normal patterns of migration, denning, hunting and young-bearing and raising have been substantially disrupted by habitat loss. None of this is accounted for by the DEIR. In 2017, UCSC Professor Chris Wilmers, who runs the Santa Cruz Puma Project, estimated the total mountain lion population of the Santa Cruz Mountains to be 50-60, each requiring a territory of approximately 50-100 square miles. When mountain lions are displaced from their territories they come into competition with each other and humans for resources, increasing population stress and malnourishment, as well as affecting the animals’ ability to successfully reproduce. The DEIR sections dealing with wildlife were drawn up prior to the wildfire season of 2020 and should not be used as reliable guides. They fail to address harm to wildlife and offer mitigations BEFORE such harm occurs. By the time damage to species is observed, it is often too late to ameliorate or correct it. This must be addressed.

O3-4

Other animals affected by the campus expansion include coyotes, gray foxes, bobcats, bats (including Townsend’s bat, western red bats and pallid bats), ringtails, San Francisco dusky-footed woodrats, invertebrates such as the Ohlone tiger beetle (critically imperiled) and amphibians like the California red-legged frog (a federally listed threatened species), deer, and other vital prey animals. UCSC campus also contains the San Francisco Campion, Point Reyes Horkelia, Santa Cruz Manzanita, San Francisco Popcorn Flower and Marsh Microseris, among many others, all listed as State Endangered and all known to occur in the LRDP area. What has made UCSC one of the most important of the UC campuses, for the study of natural sciences, is exactly this abundance of wildlife in a vibrant ecosystem accessible for observation and study. By so extensively altering the natural landscape of its campus the University runs the risk of damaging the very programs which have made it so attractive to students, and so important to preserve.

O3-5

Section 3.7 Geology and Soils

Karst formations under the campus can, and have created sinkholes when too much or too little water is flowing through them. Will each of the proposed buildings need to have 300 feet of foundational pillars? These karst formations under the campus are also highly susceptible to earthquakes. It is troubling to imagine that so many students and faculty are currently, or in the future, may be sleeping in structures that could be swallowed in the night by a giant sinkhole. This cannot be ignored and should limit construction.

03-6

Section 3.13 Population and Housing

Right now city rental costs are almost unbearable, how can campus employment live nearby? The LRDP commits to housing 100% of *new* students, and only new students, and to housing 25% of the increase in faculty and staff. It currently costs \$1330 per month for students to use available on-campus housing--nearly \$4000 per month for a 3-bedroom shared apartment--which is driving many to seek cheaper housing off-campus, including in the San Lorenzo Valley, further impacting an already inadequate local housing market. Additionally, the loss of 925 Bonny Doon and San Lorenzo Valley (SLV) residences in the 2020 CZU fire has exacerbated the situation, forcing previously housed SLV residents into the rental market or into houselessness. How will the University ensure not just housing, but *affordable on-campus* housing for its students, faculty and staff, to reduce the impacts on housing in surrounding communities?

03-7

Section 3.16 Transportation

Right now, traffic rates an “F” around the campus. The LRDP proposes creating a “mobility hub” around its Westside Research Park facility, including bus and shuttle routes, but it does not specify any mitigation for the increased traffic along feeder roads to the hub such as Mission Drive, Swift St., Delaware Ave., and Natural Bridges Drive. The LRDP also fails to include any increase in the grossly inadequate number of carpool parking spaces set aside for students and employees. It is currently listed at 50 spaces out of a total of 5,800 spaces on the main campus. The DEIR recognizes the importance of parking policies to reduce SOV auto use and VMT, but it does not specify the number of additional parking spaces required to serve a larger campus. The failure of the University to supply sufficient on-campus housing also worsens the transportation issue, as it forces students to become commuters, adding more traffic to the area surrounding campus. This is untenable.

03-8

03-9

03-10

Section 3.17 Utilities and Service Systems

Wastewater

It is difficult to see how implementation of the LRDP would not exceed the available capacity of existing wastewater infrastructure or require the construction or expansion of treatment facilities or conveyance systems. Like the energy and fresh water networks, climate change is already exposing the potential shortcomings of our existing infrastructure. Long term droughts and intense storms such as the atmospheric rivers already threaten the capacity of the existing sewer system, without increased demand. This must be addressed.

03-11

Water Supply

The DEIR correctly states that implementation of the LRDP will result in significant, unavoidable impacts. The county is going to run out of water. Currently the county is at less than 50% of normal precipitation for the year, with surrounding population gains, the aquifers continue to be depleted. The damage to surface water sources due to the CZU Wildfire will impact water supply for years, exacerbating limited water supply, becoming impossible to meet demand. This must be addressed.

O3-12

Impacts to Karst Aquifer

This impact is identified as POTENTIALLY SIGNIFICANT, which should be of concern to all county residents, already dealing with severe water supply issues: "...lowering of aquifer water levels as a result of reduction in recharge due to increased impervious surfaces." (Impact 3.10-5, ES-59) The expansion requires millions of square feet of new paving on campus, as well as expanding from 2 million square ft. of buildings to 5 million; this will affect water runoff, percolation and aquifer recharge enough to be listed as a potentially significant impact. The city of Santa Cruz supplies UCSC with water as a condition of the 1965 charter agreement, but the city itself relies on the surrounding river and watershed systems. The Santa Margarita Groundwater Basin underlies 30 square miles of the Santa Cruz Mountains and on top of it is the San Lorenzo River watershed, which supplies 59% of the city's water. The SMGB has lost an estimated 28,000 acre feet in groundwater storage, resulting in diminished local water supply and reduced sustaining base flows to streams supporting fishery habitats. Although pumping from the SMGB has been reduced by 45% since 1997 and supply and demand have been in balance for the last 10 years, the addition of new residents in the county poses a significant draw on resources, and we are facing current and long-term water deficits due to drought, wildfire, and climate change. The Santa Margarita Groundwater Agency (SMGWA), a joint powers authority comprised of the SVWD, the SLVWD, the County of Santa Cruz, and well-owners, was formed in 2017 to protect and sustain the over-drafted groundwater basin by the development of a Groundwater Sustainability Plan, as required by State law. The GSP must be completed by 2022, and the basin must reach sustainability by 2042. How can the University mitigate the long-term strain on water resources placed on the county of Santa Cruz by its growth from 18,518 current students to 28,000 by 2040, as well as an additional 2200 faculty and staff from its current 2800, for a potential total of 33,000?

O3-13

Findings of previous UCSC LRDPs

Finally, we would like to underline the City of Santa Cruz's findings regarding campus growth resulting from 1988 and 2005 LRDPs as memorialized in the Santa Cruz Municipal Code:

16.22.030 FINDINGS.

It is hereby found and determined as follows:

1. Importance of UCSC. UCSC is a vital part of the Santa Cruz community and provides substantial economic, social, cultural, and intellectual benefits to the community at large.
2. Growth Under 1988 Long Range Development Plan (LRDP) Has Been Excessive. The 1988 LRDP provided for an enrollment increase of four thousand five hundred students, and this increase has caused massive problems for the community, particularly in the areas of traffic congestion, housing costs, and neighborhood livability.
3. 1988 LRDP Housing Mitigation Not Carried Out. The 1988 LRDP contained goals to the effect that the university would house seventy percent of the undergraduate student body, fifty percent of the graduate students, twenty-five percent of the faculty, and twenty-five percent of the staff newly attracted to Santa Cruz. However, the university in 2003-2004 provided housing for less than fifty percent of the undergraduates, about fifteen percent of the graduate students, and approximately twenty-four percent of the faculty and eighteen percent of staff recruited from outside the county of Santa Cruz.
4. Housing Crisis Has Intensified. Housing prices in Santa Cruz are among the highest in the nation. While only one of many factors, university growth and the failure of the university to implement the housing goals in the 1988 LRDP contribute to this crisis.
5. 2005 LRDP Proposes Significant UCSC Growth. According to the Environmental Impact Report (EIR) for the university's 2020 LRDP, the LRDP provides for a four thousand five hundred student increase, for a total student population of nineteen

O3-14

thousand five hundred. Faculty and staff would increase by one thousand three hundred forty over the number of employees in 2003-2004. In total, the increase by 2020 of the campus population would be five thousand six hundred ninety people, bringing the total campus population to twenty-five thousand three hundred twenty-five, almost half of the city's current population.

6. Numerous Significant Unavoidable Impacts from UCSC Growth. According to the 2005 LRDP EIR, UCSC growth would result in ten

significant, unavoidable environmental impacts despite the measures included to reduce those impacts, including impacts in the areas of air quality, cultural resources, hydrology and water quality, and noise.

7. Traffic Impacts of Proposed UCSC Growth. The 2005 LRDP EIR traffic analysis findings included the fact that "campus growth under the 2005 LRDP would cause unacceptable levels of service at ten off-campus intersections" and these cumulative impacts were significant and unavoidable.

8. Housing Impacts of Proposed UCSC Growth. The 2005 LRDP EIR found that "development under the 2005 LRDP would directly induce substantial population growth in the study area by accommodating increased enrollment and additional employment" and that this impact was significant and unavoidable.

9. Public Service and Safety Limitations. The proposed university growth, by increasing demand for public services without providing

compensating revenues, will severely tax the city's ability to provide adequate police and fire services as well as other necessary public services such as road maintenance, parks, and child care.

10. UCSC Growth Threatens Community Quality of Life. The proposed UCSC growth, by seriously increasing traffic and parking congestion, deepening the housing crisis, placing pressure on city services, and making it increasingly difficult for families and workers to live in the city, will cause the quality of life throughout the city to significantly decline.

11. UCSC Housing Commitment Inadequate. According to the proposed LRDP's EIR, the university intends to provide housing for about fifty percent of its undergraduates, twenty-five percent of its graduate students, twenty-five percent of its faculty, and three percent of its staff. This represents a significant reduction in the student housing goals contained in the 1988 LRDP and will worsen the housing crisis in the city of Santa Cruz. Moreover, since student housing is unsubsidized and the university has added a number of administrative costs to the housing fees, the on-campus housing costs are unaffordable to many students, resulting in greater student demand for housing in the community, thereby causing an inflationary effect on community rent levels.

12. Limited Water Supply. In normal rain years, the city has a limited supply of water available to serve future growth. The 2005 LRDP EIR found that, as a result of the proposed enrollment growth, in conjunction with other anticipated city growth, the city's remaining supply would be inadequate and it would need to expand its water supply capacity even during normal rain years. In drought years the current water supply serving the city is inadequate to meet existing demand.

13. Emergency Access. The streets leading to the university are so congested that lack of access during emergencies constitutes a public danger. Proposed university growth will significantly worsen this danger.

14. Federal and State Environmental Protection Laws. Past university growth has resulted in potential violations of the Endangered Species Act and the Clean Water Act. Proposed growth will result in additional threats, both on and off campus, to habitats of rare and endangered species and Clean Water Act discharge requirements.

(Ord. 2008-19 § 1 (part), 2008).

In closing, we would ask you to consider, "What will the City's future findings be? And how do you respond to these crucial findings.

Again, thank you for your time and the opportunity to offer comment on the UCSC LRDP DEIR.

Respectfully yours,

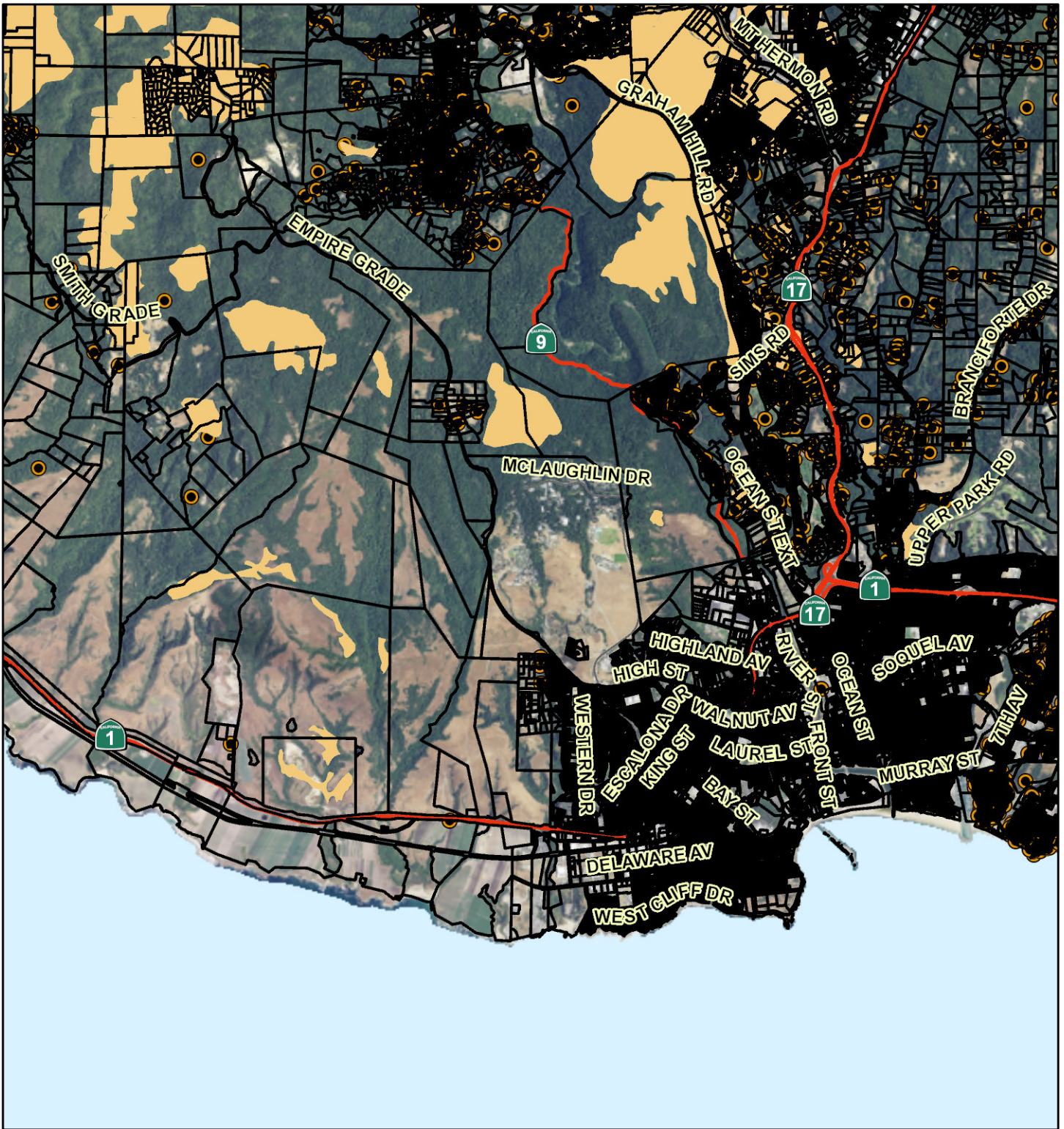
Nancy Macy, Chair
Valley Women's Club Environmental Committee for the SLV

Attachment: Sand Hills Soils pdf

03-14
cont.

03-15

Potential Sandhills and Soil Reports



February 12, 2021

1:69,097

Parcels

□ Parcels

Potential SandHills Habitat

■ Potential SandHills Habitat

State Highways

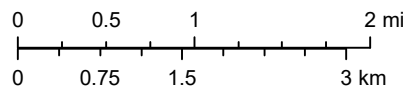
— State Highways

Soil Reports

● Soil Reports

Major Roads

— Major Roads



County of Santa Cruz



Erika Carpenter <escarpent@ucsc.edu>

Letter
O4

[eircomment] Campaign for Sustainable Transportation comments

Rick Longinotti <longinotti@baymoon.com>
To: eircomment@ucsc.edu

Thu, Mar 4, 2021 at 3:11 PM

Dear Staff,

I notice that our document submitted during the scoping period did not get included in Appendix B of the Draft EIR. I have included it here in addition to our comments on the Draft EIR for the 2021 LRDP.

Could you please reply that you have received this email?

Thank you,

Rick Longinotti, Co-chair
Campaign for Sustainable Transportation

O4-1

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

2 attachments

 **Comments dEIR LRDP.pdf**
128K

 **Zero New Vehicle Trips for LRDP.pdf**
182K



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Rick Longinotti, Co-chair Rick@sustainabletransportationSC.org

Comments on the Draft EIR for UCSC's 2021 Long Range Development Plan

The Campaign for Sustainable Transportation, organized in 2002, advocates for policies that reduce auto dependency in order to improve the sustainability and social equity of our community. The 2021 Long Range Development Plan would allow growth in student enrollment and number of employees that would result in significant increases in auto travel. Accordingly, our organization is concerned that the Draft EIR does not accurately analyze a reasonable range of alternatives to the LRDP that would result in lower environmental impact. We advocate that the EIR formulate legally binding mitigations of significant impacts such that enrollment growth envisioned by the LRDP is contingent on fulfillment of those mitigations. We propose that UCSC fulfill prior commitments to provide adequate classroom space and infrastructure for the current level of students as a condition for increasing enrollment.

O4-2

Population and Housing

P&H 1. The Draft EIR's analysis of housing demand impact should account for the economic multiplier effect

According to the *Systemwide Economic and Social Impact Analysis (2021)* commissioned by the University of California, "every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs". The EIR needs to analyze the effect on the housing market of the job-generating impact of adding new staff and students at UCSC.

O4-3

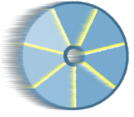
P&H 2. The Draft EIR's analysis of displacement is inadequate

The Draft EIR acknowledges "the project would result in a potentially significant impact on population and housing if it would...displace substantial numbers of people." However, the Draft EIR denies that displacement will occur as a result of implementing the LRDP and does not further evaluate displacement:

"No housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people."

O4-4

The Draft EIR's narrow definition of displacement (removing housing) misses the substantial displacement of economically stressed households that will occur with the increased housing demand due to increased population of students, staff and job-holders in induced jobs. The US Dept. of Housing and Urban Development explains, "Displacement can happen in many ways:



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direct displacement, in which residents are forced to move out because of rent increases, building rehabilitation, or a combination of both...”¹

CEQA case law maintains that the statutory goals of the EIR process are thwarted when the failure to include relevant information precludes informed decision-making and informed public participation. The EIR needs to present adequate information on the housing crisis in the Santa Cruz area. The following claim in the Draft EIR suggests that adequate analysis of the housing crisis in Santa Cruz has not been conducted:

“Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff, and non-UC employees for whom on campus housing would not be accommodated.”

The Draft EIR does not describe the vacancy rates or provide references. Nor does it analyze factors that might influence vacancy rates other than housing supply.

The EIR needs to more thoroughly analyze *the impact of additional demand from UCSC population growth on existing residents as well as new residents*. The following are some resources to begin to analyze that question.

- According to the *Out of Reach Report (2019)*², Santa Cruz is the least affordable small city in the US.
- According to reports from Apartment List over the last seven years, an average 60% of renter households in Santa Cruz County are cost-burdened (spending over 30% of household income on housing).
- *No Place Like Home*, a research project of UCSC Professors Miriam Greenberg and Steve McKay, indicates that the rent burden is even worse for households in proximity to UCSC: 73% for the Westside; 68% for Downtown; and 76% for Beach Flats/Lower Ocean.
- State legislation capping rent increases of 5% plus inflation will not prevent displacement. In the four years ending in December 2020, the consumer price index for the San Francisco Bay Area has risen on average between 2%-3%. At a 7% annual increase, the rent of a unit will double in ten years. Few households will experience a doubling of income. Some households will decide to relocate out of the area. Other households will double up in overcrowded units. HUD reports, “Overcrowding is associated with a range of negative outcomes, including for physical and mental health; personal safety and well-being; and childhood growth, development and education.”
- For years many UCSC students have coped with unaffordable housing by living in their cars or camping in the woods. Students from low-income households are especially stressed in trying to meet the cost of housing on campus and off campus. The EIR needs to analyze the affordability of on campus housing for low-income students.
- Chapple, et al, [Developing a New Methodology for Analyzing Potential Displacement](#)

O4-4
cont.



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Rick Longinotti, Co-chair Rick@sustainabletransportationSC.org

In summary, the EIR needs to analyze the extent to which area housing is unaffordable to large sectors of the community, including UCSC students, and how increased demand resulting from the 2021 LRDP may affect the housing market.

O4-4
cont.

P&H 3. The EIR Needs to Formulate an Enforceable Mitigation for the LRDP's Impact on Housing Demand

The Draft EIR concludes that:

“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.”

However, the Draft EIR fails to propose a mitigation of this significant impact:

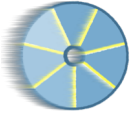
“No feasible mitigation measures are available to reduce the anticipated impact.... Lesser development and/or lesser enrollment could reduce the potential impacts associated with population growth but would not achieve the anticipated necessary level of development consistent with UC and UC Santa Cruz policy direction.”

In formulating a mitigation for the impact of housing demand, the EIR should take into account the principles developed by the Community Advisory Group that the University convened to meet with the Chancellor and take input into development of the LRDP. The first principle (published in the Draft 2021 LRDP) called for “a binding commitment to housing 100 percent of net new on-campus student enrollment.” While the LRDP articulates a goal of housing 100 percent of new students, the LRDP makes no legally binding commitment to meet the goal. Nor is there a mitigation in the Draft EIR that would bind the University to the goal. Without mitigations requiring the University to provide the housing that is proposed or tying enrollment growth to the provision of housing, the analysis of the impacts and mitigation measures proposed are inadequate under CEQA.

O4-5

Similarly, the LRDP intends to “increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus.” That is not a binding commitment to provide the housing, only a vague goal to “allow up to” 25 percent of new staff to be housed. The goal is further weakened by the contingency, “based on demand”.

The Draft EIR is deficient because it solely analyzes environmental impacts as if the goals for housing students and staff will be met. The assumption of meeting housing goals cannot be substantiated by the terms of the LRDP or any mitigation in the Draft EIR. Nor does the history of performance on past LRDP goals suggest that the housing goals of the 2021 LRDP will be met. The 1988 LRDP set a goal of housing 70% of undergraduate students, 50% of graduate students,



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Rick Longinotti, Co-chair Rick@sustainabletransportationSC.org

and 25% of faculty and staff. Actual performance never approached that goal. For decades, the actual percentage of students housed on campus has hovered around 50%. According to the Draft EIR, there are currently enough beds on campus to house 50% of the student population (9283 student beds; 18,518 student population (2018-19 baseline). There are 270 on-campus housing units for a faculty and staff population of 2800.

There are formidable structural obstacles to meeting the goal of housing 100% of new students and 25% of new staff. The principle obstacle is the cost of housing on campus. With a dorm room shared by three students costing above \$4000/month (over \$1333/mo. per student), students are motivated to find cheaper (but still expensive) housing off campus.

The DEIR does not describe how providing housing that would be more affordable to students can be accomplished. To the contrary, it fails to include or analyze extensive existing data and information from both the Campus Community Rentals Office and the April 2018 Student Housing Demand Report associated with the proposed Student Housing West Project (SHW) that demonstrate just the opposite: that the University's student housing is not affordable to a large sector of students or competitive with off campus housing.

According to the Campus Community Rentals Office data, average student rental rates are between \$500-\$1,000 per month (as of 2017), less than half of campus rates. On February 7, 2020, during the last pre-pandemic academic quarter, City On A Hill Press reported that according to the University's Associate Director of Colleges, Housing and Educational Services, there were 711 vacant beds on campus, while at the same time there were over 9,000 students living off campus. Proposed rents for SHW units show an increasing disparity between campus and off campus rates. For examples: 2 Bedroom/1 Bath unit with four students, no kitchen, \$5,580/month; 2 Bedroom/2 Baths, four students, small kitchenette, \$5,880/month; 5 Bedroom/2 Bath, 6 students, \$10,020/month. Without including or analyzing this essential data, the DEIR fails to accurately describe or analyze housing demand and impacts.

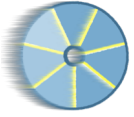
Without a credible plan to provide affordable housing, it can be assumed that meeting the housing goal is infeasible. In the absence of an enforceable means of achieving housing targets, the EIR would need to analyze the impacts of the more likely scenario in which the housing goals of the LRDP are not met. However, since it is feasible to mitigate the housing impacts of expansion by limiting enrollment growth, we propose the following mitigation:

Each incremental step in campus enrollment growth shall be contingent on UCSC actually housing 100% of new students and 25% of new faculty and staff.

O4-5
cont.

P&H 4. The EIR Needs to Further Mitigate the Impact on Housing Demand

O4-6



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The Draft EIR concludes that there may be a significant impact on housing demand even though it makes the speculative assumption that 100% of new students and up to 25% of new staff will be housed on campus. If a commitment to house 100% of new students and 25% of new staff were made legally binding, this would not alter the Draft EIR's conclusion that a significant impact on housing demand remains. Hence there is a need for additional mitigation.

Given the housing crisis in Santa Cruz, we propose an additional mitigation that would require 100% of new students and new faculty and staff to be housed in UCSC facilities. This mitigation would be enforced by a freeze on enrollment growth whenever new student and staff actually housed on campus falls beneath 100%.

Based on the multiplier effect of additional job creation, we conclude that a significant impact on housing demand is likely to exist after implementing this proposed mitigation. To prevent this and other significant and unavoidable impacts, we advocate that the EIR name the No Project Alternative as the preferred alternative. See below.

O4-6
cont.

Alternatives

Alts 1. The Draft EIR Fails to Substantiate that the Alternatives Examined Will Not Meet Project Objectives

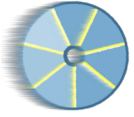
The Draft EIR examines a No Project Alternative in which enrollment would not grow beyond the 19,500 student cap set by the Comprehensive Settlement Agreement (2008). The concept of no new growth was approved by 77% of Santa Cruz City voters approving Measure U in 2018, which read: "There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP."

The Draft EIR concludes that the No Project Alternative "would potentially meet" project objectives 2, 4, 5, and 7, and does not meet project objectives 1, 3, 6, 8, 9, and 10. Below we list in italics the project objectives that the Draft EIR considers unmet by the No Project Alternative, followed by our critique in regular type.

- 1. Expand campus facilities and infrastructure to allow for projected increases in student enrollment through 2040 based on statewide public educational needs and to support the academic mission, including housing for 100 percent of the additional FTE students (above the 2005 LRDP total of 19,500 FTE students) in both colleges and student housing developments, and commensurate academic and support space.*

CEQA law prohibits the formulation of project objectives that are so specific as to disqualify alternatives that could meet the goals of the project. Expanded enrollment at UCSC is not the only strategy available to accommodate projected increases in statewide student enrollment. Other strategies that would meet statewide enrollment goals include:

O4-7



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- Expansion of the UC Merced campus beyond the 15,000 enrollment in 2030 anticipated by its 2020 LRDP. There is a large amount of land under UC ownership for this purpose.
- Establishment of a new campus. The University of California has established only one new campus since 1965, UC Merced, which was approved by the Regents in 1995.
- Increasing enrollment at satellite campuses
- Increasing the ability of students to spend a quarter or more taking online courses.

2. *Potentially met*

3. *Provide for establishment of two new college pairs at the main residential campus to provide academic services and a close-knit intellectual and social environment.*

CEQA law prohibits the formulation of project objectives that are so specific as to bias the alternatives analysis in favor of the project. Objective 3 is so specific as to unnecessarily disqualify otherwise worthy alternatives.

4. *Potentially met*

5. *Potentially met*

6. *Increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus.*

A No Project Alternative should be formulated so as to allow more housing for faculty and staff on campus.

7. *Potentially met*

8. *Develop an improved, more efficient roadway network to support transit with peripheral parking and mobility hubs.*

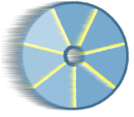
This project objective is solely formulated for the purpose of supporting the proposed growth envisioned by the LRDP. The LRDP's proposed additions to the roadway network and additional parking facilities are unnecessary if the campus enrollment does not grow. Therefore an alternative should not be disqualified on the basis that it does not allow more growth in parking and streets.

9. *Promote Transportation Demand Management (TDM) and provide infrastructure to optimize trip- and vehicle-miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.*

A No Project Alternative should be formulated so as to allow more TDM programs.

10. *Foster long-term physical and social resilience, including a response to climate change through climate resiliency and adaptation strategies and integrating sustainability leadership into campus teaching, learning, research, design, and operations.*

O4-7
cont.



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A No Project Alternative should be formulated so as to foster long-term physical and social resilience, etc.

In summarizing this list, the Draft EIR fails to substantiate that statewide enrollment goals cannot be met through a variety of strategies. The LRDP fails to formulate a No Project Alternative that would allow housing a higher percentage of staff on campus; measures to reduce vehicle miles traveled; and measures to improve physical and social resilience. The LRDP formulates objectives that are so specific as to unnecessarily bias the analysis towards rejection of viable alternatives.

O4-7
cont.

The Draft EIR further elaborates why the No Project Alternative does not meet project objectives:

The transportation improvements described in Chapter 2, “Project Description,” would not be implemented within the LRDP area, which would impede UC Santa Cruz from providing a close-knit intellectual and social environment and improving means of active and alternative transportation within the campus.

O4-8

The Draft does not explain how *not adding* new roads, parking, and transit stops to the campus would impede UCSC from providing a “close-knit intellectual and social environment”. Nor does it explain how the proposed additional transportation infrastructure will improve means of active and alternative transportation. Without credible explanations, these grounds for dismissal of the No Project Alternative are unpersuasive.

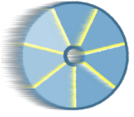
The Draft further explains why the No Project Alternative does not meet project objectives:

Additionally, because this alternative would provide a lesser amount of new academic/administrative space, it would limit the ability for UC Santa Cruz to continue to create a dynamic environment for learning and discovery through the provision of new academic programs and disciplines.

While it is reasonable to conclude that more academic/administrative space would increase the breadth of programs and disciplines, the Draft EIR does not explain why those programs should not be made available at a new campus or satellite campuses. The EIR makes an unexamined assumption that larger size and more programs equate to a more “dynamic environment for learning and discovery”. The EIR offers no research or analysis of the relationship between the size of enrollment and the quality of education.

O4-9

The EIR needs to take into account the research on alienation associated with large institutions. UCSC’s founding Chancellor Dean McHenry wanted UCSC to be a major research university, yet his vision for the small colleges was to encourage intimacy.



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Alts 2. The Draft EIR is invalid under CEQA since the decision on assigning enrollment growth among campuses in the UC System has not been subject to environmental review.

It is not legal under CEQA to segment a project so that the cumulative impacts of the total project are not subject to environmental review. The prior UC decision allocating statewide enrollment growth among the UC campuses means that UCSC's 2021 LRDP is a segment of a larger master plan.

The Draft EIR asserts that the No Project Alternative does not meet the UC system's goal of enrollment growth to serve California students:

Student enrollment would be limited to 19,500 FTE students approved under the 2005 LRDP, which would be considered counter to the overarching goal of the UC to provide a dynamic learning environment for residents of California...

Because the 2005 LRDP does not reflect the current planning goals of UC Santa Cruz or the State of California's public education plans and policies, this alternative would not provide the best framework for growth and development within the LRDP area.

The Draft EIR's assumption is that the University of California's decision to allocate a portion of system-wide enrollment growth to UCSC is indisputable and beyond the scope of the EIR. This sidesteps the CEQA requirement to examine a full range of reasonable alternatives to the dramatic growth in population proposed for the Santa Cruz campus. If UC's policy for distributing enrollment growth had been subject to an environmental impact report, the UCSC's 2021 LRDP would be tiered from that EIR. Since no EIR exists for the UC System's enrollment plan, the EIR for UCSC's 2021 LRDP is not compliant with CEQA.

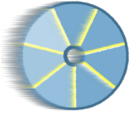
O4-10

Alts 3. An Environmental Impact Report on enrollment growth in the UC system is needed

The assumption that the UC system needs to increase enrollment needs to be reconciled with the latest [projections for high school graduation rates](#) conducted by the Western Interstate Commission for Higher Education. California's high school graduation rates are expected to peak in 2024 followed by a steady decline. By 2026 the number of high school graduates will be lower than the number who graduated in 2019. (See the graph below taken from the report.)

The EIR on UC's enrollment plan should account for this decline in high school graduation rates. It should also explain UC policy on admitting out-of-state and foreign students and the impact of that policy on growth projections.

O4-11



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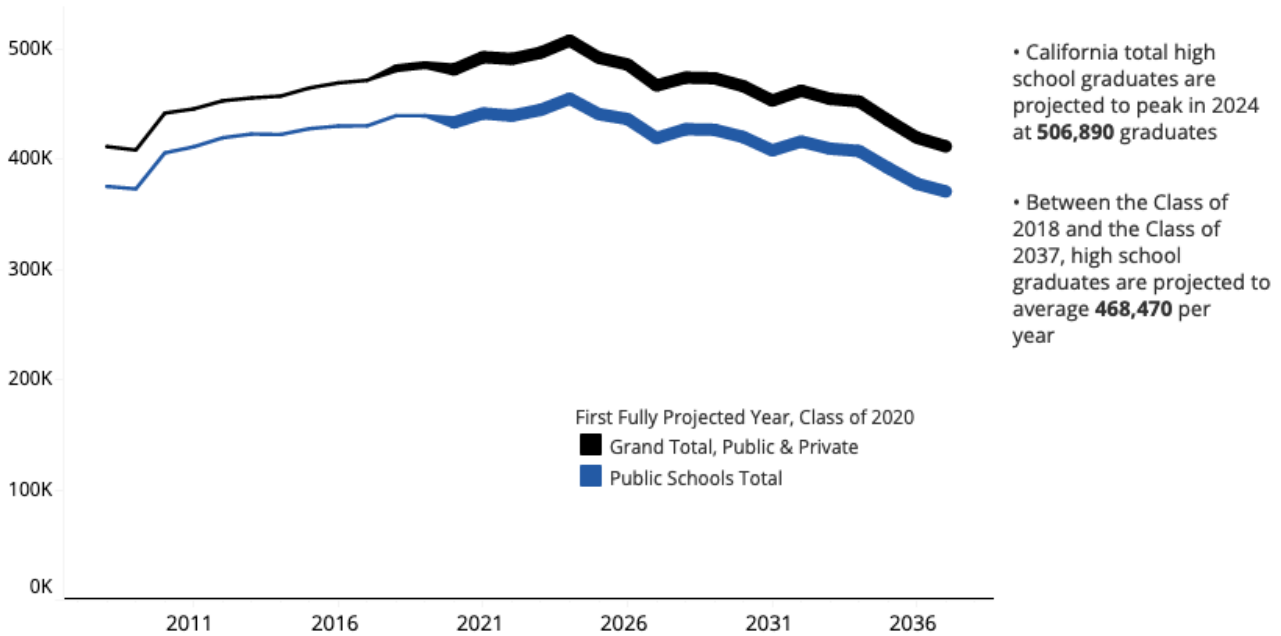
High School Graduates Profile for

California



Projected values are displayed as either thicker or darker in the profile charts. See the notes for more details.

Total & Public High School Graduates, Class of 2008 to 2037



04-11

Alts 4. The Draft EIR Lacks a Reasonable Range of Alternatives

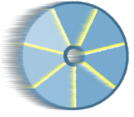
The Draft EIR names the No Project Alternative as the environmentally superior alternative. All impacts that the EIR considers significant and unavoidable for the 2021 LRDP would be rendered less than significant in the No Project Alternative. The Draft EIR considers three alternatives besides the No Project Alternative. None of those three alternatives have been designed to eliminate the water, housing demand, and other impacts that the EIR names as significant and unavoidable. The EIR should correct this deficiency and formulate alternatives that significantly reduce or eliminate those impacts.

04-12

Among the alternatives considered, but dismissed from further consideration is an expansion of UC's MBEST facility at Fort Ord. The reasons for dismissing this option are not substantiated. The Draft EIR states:

The development of a full university campus at MBEST and the addition of another UC campus to the UC system is not considered feasible at this time, given State fiscal constraints.

04-13



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Rick Longinotti, Co-chair Rick@sustainabletransportationSC.org

CEQA case law requires that an EIR must provide substantial evidence why it is not fiscally feasible to pursue an alternative. In this case, this evidence must reconcile this claim of fiscal infeasibility of a new campus or expanding the MBEST campus with the fiscal feasibility of building an additional 5.6 million square feet of building space on the UCSC campus, which is 1.5 times the amount of new building space as currently exists on campus.

O4-13
cont.

Transportation

Trans 0. The Draft EIR’s choice of VMT per capita as a performance standard is not consistent with state and UC goals for greenhouse gas emissions reduction

California has set a goal of reducing greenhouse gas emissions 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 (SB 32 and AB 32). While lead agencies are given leeway in choice of performance standards for a project’s transportation impacts, the Draft EIR’s choice of vehicle miles traveled per capita serve to mask large increases in total greenhouse gas emissions that will result from the project. The EIR should plainly state the estimated total increase in vehicle miles traveled and greenhouse gas emissions resulting from the project. Failure to do so prevents the public from understanding the large amount of ghg emissions that contribute to a cumulatively significant climate change impact.

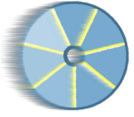
O4-14

The California Air Resources Board’s 2017 Scoping Plan states, “Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” The Scoping Plan does not require net zero emissions. However, it places the burden on a project that does not achieve net zero emissions to “develop evidence-based numeric thresholds (mass emissions, per capita, or per service population) consistent with this Scoping Plan, the State’s long-term GHG goals, and climate change science.” The Draft EIR fails to meet this requirement. There is no evidence that the per capita emissions targets will result in reduced ghg emissions commensurate with state goals as legislated in SB 32. The EIR must be able to prove that the choice of per capita emissions does not mislead the public that this project will not create a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

O4-15

The University of California has signed the American College and University Presidents Climate Commitment (ACUPCC). Each signatory commits to completing an inventory of GHG emissions within one year, and to developing, within two years, an institutional plan to achieve carbon neutrality as soon as possible. This EIR should incorporate UCSC’s plan for carbon neutrality. It should be noted that even if all projects in the State of California adopted a goal of carbon neutrality, we would fall short of the SB 32 goal of reducing ghg’s 40% by 2030. Nevertheless, a carbon neutrality goal for UCSC transportation is an achievable and worthy goal. We therefore propose that an achievable mitigation most aligned with state and UC goals would be: *Achieve net*

O4-16



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zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.

04-16
cont.

Trans 1. The Draft EIR fails to analyze the vehicle miles traveled impact of new roads on campus

CEQA requires that agencies must analyze:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project’s consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)34

04-17

The Draft EIR describes the plan for additional roads on campus, including a new northern entrance to campus. The Draft EIR fails to analyze the increased Vehicle Miles Traveled that would result from the additional roadways. This would require a traffic study. The Draft EIR should use current methods of estimating induced travel resulting from new roadway mileage.

Trans 2. The Draft EIR fails to analyze the impact on the transit system of new roads on campus

CEQA requires an analysis of the impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)

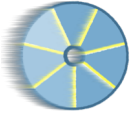
The Draft EIR does not analyze the potential for a negative impact on the bus transit system of adding roads to campus, which would necessitate additional loops in transit service. Transit planners understand how adding a forking branch to a bus line diminishes transit frequency downstream of the branch (as bus service is split between branches). This has an adverse impact on travel time and ridership. See *Human Transit*, by Jarrett Walker

04-18

Instead, the Draft EIR makes the claim that the new roadway system and transit stops will increase the efficiency of the transit system. The EIR should either drop this claim, or substantiate it by demonstrating how transit service will operate.

Trans 3. The target for reduced vehicle miles traveled is inconsistent with goals of the Campus Sustainability Plan

04-19



Campaign for Sustainable Transportation

Rick Longinotti, Co-chair Rick@sustainabletransportationSC.org

The Draft EIR claims that Mitigation Measure 3.16-2 “is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022.”

04-19
cont.

This statement is not accurate. This mitigation measure intends to “reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average.” Reducing VMT *per capita* is not the same as reducing total commute vehicle miles traveled.

Goal #3 of the *Campus Sustainability Plan 2019 Update* calls for “reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022. The Draft EIR does not address this goal. Nor will it be possible to achieve this goal with the implementation of the 2021 LRDP, which will result in increased commuter trips to campus.

04-20

Trans 4. Mitigation Measure 3.16-2 needs to be made enforceable regarding parking goals.

Mitigation Measure 3.16-2 includes, “Establish ‘no net new commuter parking’”. The EIR should further define net new commuter parking or how it would be measured. It should also articulate consequences should the goal not be met, such as a moratorium on enrollment growth.

04-21

Trans 5. New parking planned in the 2021 LRDP is inconsistent with Mitigation Measure 3.16-2 and the UC Sustainable Practice Policy

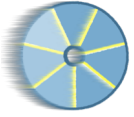
The LRDP’s proposal “to provide some new commuter parking for staff, faculty and students,” runs counter to the goal of no net new parking demand. You cannot simultaneously provide more parking and reduce parking demand. A [recent study by Adam Millard Ball et al](#) demonstrates that the provision of parking induces additional vehicle ownership, and results in more driving.

04-22

The *University of California Sustainable Practices Policy* states:

Each location shall develop a business-case analysis for any proposed parking structures serving University affiliates or visitors to campus to document how a capital investment in parking aligns with each campus’ Climate Action Plans and/or sustainable transportation policies.

The Draft EIR does not explain how the capital investment in parking aligns with the *Campus Sustainability Plan* or other campus sustainable transportation policy.



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Trans 5.1 The Draft EIR does not incorporate the goals of the UC Sustainable Practices Policy, which states:

- Each location shall strive to reduce its percentage of employees and students commuting by single occupancy vehicle (SOV) by 10 percent relative to its 2015 SOV commute rate and have at least 4.5 percent of commuter vehicles be ZEVs by 2025.
- Each location shall strive to have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV and have at least 30 percent of commuter vehicles be ZEVs by 2050.

04-23

The Draft EIR should explain how these goals will be implemented, and what the consequences will be for failing to reach the goals.

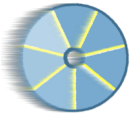
Trans 6. The Draft EIR lacks essential information about parking and commute trips to campus

The Draft EIR acknowledges the importance of parking policy to achieve goals for reducing VMT. Yet the neither the LRDP nor the Draft EIR specifies the number of additional parking spaces proposed.

The Draft EIR presents the number of vehicle trips to campus for one year, spring 2019. The Draft should include information about prior years in order to observe the trend of vehicle trips to campus. The graph below shows the history of trips to campus (blue bars) compared to student enrollment (red bars). It shows that vehicle trips increased to a peak in 2003-2006, and subsequently declined until 2013. Since 2013, vehicle trips to campus are growing at a faster rate than student enrollment.

04-24

The EIR should analyze whether this disproportionate growth in vehicle trips results from longer student and staff commutes as a result of the lack of affordable housing near campus. The EIR should present any other information available on the distance commuters are traveling.

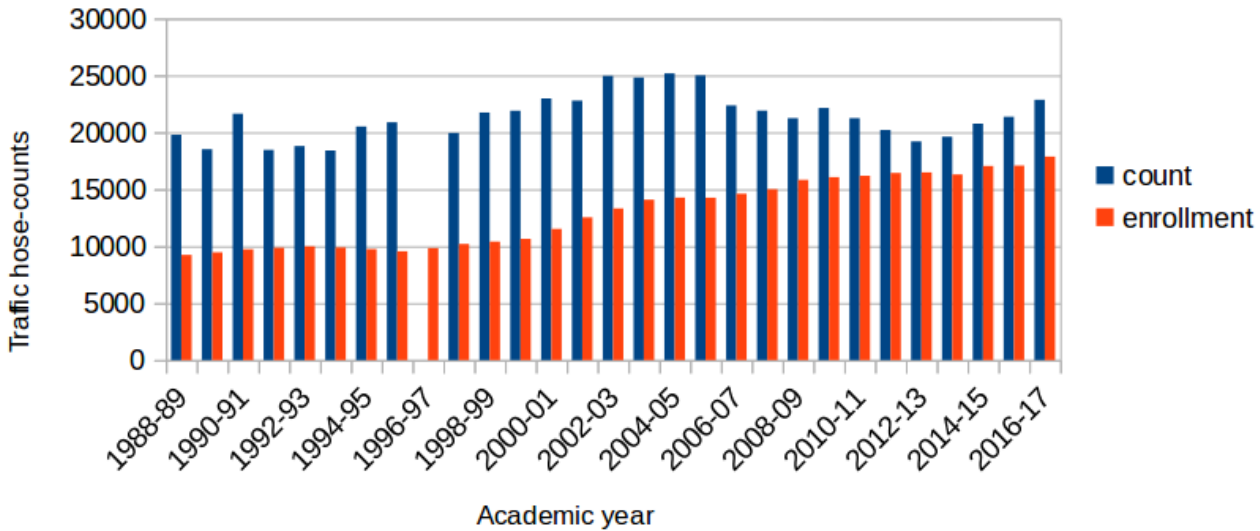


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Term Weekday Vehicle Traffic through Both UCSC Entrances: Academic Year Ave

Larry Pageler, UCSC TAPS Created: October 27, 2017



O4-24
cont.

Trans 7. Mitigation Measure 3.16-2 fails to be legally binding and enforceable

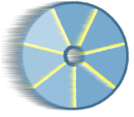
CEQA Guidelines require that mitigations be legally binding and fully enforceable.

This mitigation measure is intended to reduce the impact of increased vehicle miles traveled (VMT) to a less than significant level. It calls for implementation of a Transportation Demand Management Program, intended to reduce total campus per capita vehicle miles traveled to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average. As currently drafted, the mitigation measure imposes no consequence for failing to achieve the performance standards for reduced VMT, other than the following:

O4-25

“an outline of additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years should the VMT performance standard of at least 15 percent below baseline VMT levels is not reached.”

Note that there is no timeline for implementation of corrective measures other than the vague “in subsequent years”. Without language to make this mitigation measure enforceable, such as a moratorium on increases in student enrollment until the VMT performance standards are met, it is quite possible that the campus will never achieve the performance standards.



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Trans 8. Mitigation Measure 3.16-2 lacks simple and transparent performance criteria and a monitoring program that can be independently evaluated.

The Draft EIR proposes a mitigation to reduce vehicle miles traveled and a monitoring program to report performance. However, the method for calculating VMT reductions is so highly complex as to be inaccessible for independent review. Likewise, the cell phone data necessary to make those calculations is inaccessible to the public. No agency or members of the public will be able to independently assess the University's adherence to their performance criteria. Consider the complexity of measuring performance described by the Draft EIR:

The VMT metrics presented in this chapter were developed using the SCC Travel Model, while the annual monitoring would occur using data collection. Based on current technologies, the campus' VMT performance could be most effectively monitored by using hose counts to measure the number of trips and anonymous cell phone data, which is "big data" that aggregates trip data using cellphones and navigation divides, to determine trip lengths. Since current technologies, including anonymous cell phone data, do not allow the tracking of employment trip lengths separately from the trip lengths generated by other campus uses (i.e., residential trips), the TDM Program shall develop a performance standard for the employment VMT threshold that is a weighted average of VMT generated by campus commuters and other campus users.

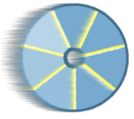
The Draft EIR gives no indication of how any agency or member of the public would be able to access anonymous cell phone data. And reliance on a travel model can result in gross inaccuracies, as the Draft acknowledges:

The Santa Cruz County Model overestimates by approximately 200 to 400% the number of trips generated by resident students and by both the resident and commuter faculty compared with the UCSC tool. The model also underestimates by 90% the trips generated by commuter students.

CEQA Guidelines allow the use of a travel model to estimate vehicle miles traveled from a project. And a lead agency "may revise those estimates to reflect professional judgment based on substantial evidence." The Draft EIR fails to provide substantial evidence that the revisions that were made in the model can accurately assess vehicle miles traveled in future years. No substantial evidence will be available for several years, since such a complex model is a work in progress, needing continual revision to match existing conditions. The Draft EIR lists revisions to the model that diverge extremely from the model's original assumptions, e.g.:

- The SCC Travel Model's commuter student trip rate was increased from 0.22 trips per commuting student to 1.83 trips per commuting student and the resident student trip rate was decreased from 6.31 trips per student to 2.06 trips per resident student
- Campus employees in the SCC Travel Model were estimated at 6.88 daily person trips per employee. This was reduced to 1.8 trips per employee.

04-26



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The DEIR transportation analysis assumes that 100% of additional students will be housed on campus, but does not offer any analysis of how VMT calculations, resultant impacts, and necessary mitigations will vary in relation to percentage of students actually housed on campus. Not reaching the goal of housing 100% of additional students on campus is a reasonably foreseeable event based on both the past history of campus student housing percentages and the relatively high price of campus housing.

Given the Draft EIR's a) failure to analyze impacts associated with actual percentages of students housed on campus; b) inability of the revisions in the model to be empirically evaluated at this time and c) the inability of the public to independently assess UCSC's compliance with vehicle miles traveled performance, this mitigation fails to be enforceable. We propose a mitigation where monitoring is simple and can be carried out by the City of Santa Cruz:

Proposed Mitigation: Achieve net zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.

04-26
cont.

Capping the number of vehicle trips to campus would achieve the goal of reducing VMT per capita below significant levels, since growth in person-trips would not result in increased vehicle trips. We know it is feasible to prevent an increase in vehicle trips due to growth through the experience of Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new peak hour vehicle trips to campus. Since 2001, periodic traffic counts at each entrance to campus confirm that Stanford has complied with this condition. During the following 14 year period, 5000 additional people commuted to campus, but peak hour vehicle trips did not increase, according to the former Director of Stanford Parking and Transportation Services.

See the attached article *Getting to Zero New Vehicle Trips for the LRDP* for further discussion of how this mitigation could be implemented.

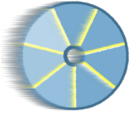
Trans 9. The EIR should analyze and recommend complete neighborhood strategies for trip reduction.

Under the heading, *Complete Neighborhoods*, the City of Santa Cruz General Plan states, "Residents...need stores nearby so that they don't have to drive across town to do laundry or buy a few groceries." The Draft EIR assumes a high number of vehicle trips due to on-campus residents traveling off campus to meet their needs. The LRDP should designate areas for on-campus food shopping, hair salons, and other amenities.

04-27

Trans 10. The EIR should analyze the structural obstacles to implementing transit improvements and propose solutions

04-28



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Transit costs fall on students disproportionately compared to other campuses. Stanford uses parking revenue to pay all public transit costs for students and staff. At UCLA there is no student fee for transportation. Instead, parking revenue subsidizes bus passes available to students at \$33 per quarter (2018). At UCSC there is no parking revenue used for student transit. Students pay for METRO passes and the campus shuttle through a quarterly fee.

The cost burden on students sets a practical limit on expansion of bus service Under the current manner of financing transit, UCSC students will need to vote a fee increase, just to maintain current levels of service. In Spring 2018 a fee increase measure did not pass due to student voter turnout lower than the required 25%. Due to the failure to raise revenue, UCSC has cut back on campus shuttle service. Given the steepness of the fee increases proposed in the 2018 measure, it is unlikely that a student vote to increase fees can be counted on to fund the expanded METRO service envisioned by the Draft EIR.

The EIR should analyze a policy of using parking revenue to substantially support transit and TDM programs.

O4-28
cont.

Trans 11. Additional TDM measures for inclusion in the EIR

The Draft EIR’s Mitigation Measure 3.16-2 enumerates a number of Transportation Demand Management Measures that UCSC could utilize to reduce vehicle trips to campus. Based on research on the effectiveness of TDM policies, we conclude that the most effective measure on this list may be:

O4-29

- Replace monthly/annual parking fee with “pay at exit” use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.

We note that this measure is listed for “Implementation level 2”. Since this is a policy that could be implemented immediately, we recommend that it be designated for level 1 implementation.

Additional TDM measures could include:

- UCSC collaboration with a private vendor for a bike-share and/or scooter/share program
- Collaboration with the City of Santa Cruz in placement of a fee for ride-share trips (e.g. Uber & Lyft)
- Exploration with the City of Santa Cruz of a congestion pricing program and/or City tax of on-campus parking to pay for transit and active transportation improvements in the City.

O4-30

Greenhouse Gases

As explained in section Trans 0, above, the choice of the per capita VMT at the s

I O4-31



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Water

W1. Mitigation measure for water impact needs to be strengthened

The City of Santa Cruz is heavily dependent on surface water sources and hence is vulnerable to drought year shortages. Storage of water for use in drought years is diminished by growth in water demand. The City’s report, *Adequacy of Municipal Water Supplies to Support Development (2004)*, offers an explanation that is just as relevant today as when it was written:

“It is important to note that, even in normal water conditions, three of the four major sources [North Coast streams, San Lorenzo River, Live Oak wells, and Loch Lomond] are presently being utilized at maximum capacity for a significant portion of the year...What this means operationally is that any future increase in seasonal or annual demand for water will be felt through greater and greater withdrawals from Loch Lomond reservoir.”

The Draft EIR acknowledges this impact of growth on the City’s water reliability:

“UC Santa Cruz’s remaining water demand with implementation of the 2021 LRDP would contribute to the need for the City to further restrict water deliveries or secure a new water source for multiple dry water year conditions... The 2021 LRDP would therefore result in a significant impact.”

In order to reduce this impact, the Draft EIR proposes a mitigation that would reduce campus water use through various conservation measures. However, the impact remains significant after the mitigation.

The mitigation measure needs to be strengthened. For example, although the Draft EIR acknowledges that UCSC growth would contribute to the need for a new water source, the mitigation does not include a financial contribution towards developing a new water source. CEQA recognizes that fair-share mitigation fees can ameliorate impacts. When other new development occurs in the City’s water service area, developers pay a system development charge. As part of previous LRDP’s, UCSC has paid a system development fee to the City.

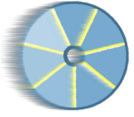
O4-32

W2. UCSC should agree to seek LAFCO approval for water service outside of City service area

The Draft EIR states,

“UC Santa Cruz does not believe that further compliance with state or local laws, including approval by the Local Agency Formation Commission (LAFCO), is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County.”

O4-33



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The EIR must go beyond describing what UC Santa Cruz “believes”, and offer an independent judgment about the legal responsibilities of the University. The EIR should acknowledge that under CEQA, LAFCO is the Responsible Agency for proposed expansion of utility service areas and clarify that UCSC must seek LAFCO approval for such expansion.

O4-33
cont.

W3. Mitigations should comply with LAFCO policies

The EIR should create a mitigation for the impact of extending water service outside of the City’s service area that complies with LAFCO’s policies including the following:

“In cases where a basin is overdrafted or existing services are not sustainable, a boundary change proposal may be approved if there will be a net decrease in impacts on water resources.”

O4-34

Since the Draft EIR is deficient in many respects and fails to include import information to substantiate conclusions regarding impacts and mitigation measures, the University must correct these deficiencies and release a Revised DEIR for public comment.

¹ HUD, *Displacement of Lower-Income Families in Urban Areas Report* (2018)

² National Low Income Housing Coalition, *Out of Reach Report* (2019)

Getting to Zero New Vehicle Trips to UCSC

By Rick Longinotti, Co-chair, Campaign for Sustainable Transportation

Rick@sustainabletransportationSC.org

Updated December 3, 2019

On January 12, 2018, Chancellor George Blumenthal announced that UCSC's Long Range Development Plan would allow for an increase to 28,000 students by the year 2040. In response the local political leadership spoke with unanimity, calling on UCSC to limit growth. The Santa Cruz City Council put Measure U on the June ballot authorizing City officials to "take policy and legal actions to limit the growth proposed for UCSC". Voters approved Measure U with 77% voting yes.

Background: Local Opposition to UCSC Growth Impacts

For decades, residents of Santa Cruz have advocated that UCSC house a greater number of students, faculty and staff. UCSC responded in its 1988 LRDP with the goal of housing 70% of undergraduate students, 50% of graduate students, and 25% of faculty and staff. These goals were not achieved. Currently UCSC houses 53% of its student enrollment. UCSC employs 4700 faculty and staff (some of whom work at the Coastal Sciences Center on Delaware and Scotts Valley Center)¹. Currently there are 239 units of faculty and staff housing on campus.

In the 2005, the University of California, Santa Cruz, created a Long Range Development Plan for the next 15 years. The LRDP anticipated a large increase in the student population, and a significant increase in vehicle trips to campus. In response to UCSC growth plans, the City Council put a measure on the 2006 ballot that would require voter approval before the City would extend water service to the proposed area of UCSC expansion north of campus. Measure J passed with over 80% approval. University lawyers went to court to overturn the results of Measure J, arguing that the City Council session in which the measure was placed on the ballot did not have the proper public notice. The court overturned the results of Measure J.

Residents of Santa Cruz who were unhappy about the impacts of UCSC growth on housing, traffic and water supply formed the Coalition to Limit University Expansion (CLUE). This group sued the University, claiming that the Environmental Impact Report for the LRDP had not adequately dealt with these impacts. The City of Santa Cruz and Santa Cruz County joined the CLUE lawsuit.

The judge presiding in the CLUE/City/County of Santa Cruz lawsuit found sufficient merit in the plaintiff's case to instruct the University to enter into negotiations with the plaintiffs. In 2008, the University and the plaintiffs signed a Comprehensive Settlement Agreement (CSA). According to the terms of the agreement, enrollment would be capped at 19,500. For the first time UCSC agreed to legally binding targets for housing students. Two thirds of additional students would be housed on campus. Daily vehicle trips to campus would be capped at 28,700, a 15% increase from the peak levels during 2003-2006. The CSA allows UCSC to raise the cap by 1300 trips per day if the University is prohibited from developing the North Campus or if the City denies water service for North Campus expansion.

The 2005 LRDP envisioned expansion into 275 acres of undeveloped oak woodland and redwood forest known as the "North Campus". After the Comprehensive Settlement Agreement, the City of

¹ Source: <https://lrdp.ucsc.edu/2020/files/community-minded.pdf>

² Presentation by Brodie Hamilton, former Director of Stanford Parking and Transportation Services

Santa Cruz collaborated with the UCSC in applying to LAFCO to extend water service beyond the City's service boundaries to the North Campus. Considerable opposition formed to developing the North Campus, especially among students. Opponents of development sought to protect the natural area that is popular with hikers and bicyclists. They criticized development plans as urban sprawl in an era when infill is recognized as a more environmentally sound policy.

In 2011 a group called Habitat and Watershed Caretakers (HAWK) sued the UC Regents over the EIR for the expansion of water service to the North Campus. The court ruling invalidated the EIR. Rather than complete a new EIR, UC decided to defer any expansion into the North Campus until the next Long Range Development Plan. The draft for that plan will be published in 2021.

UCSC's recent plan to locate its Family Student Housing on the East Meadow has set off a wave of protest among alumni and major contributors to the University. In spite of taking a major hit in its fundraising efforts, the UC Regents approved the project in March, 2019. HAWK and the East Meadow Action Committee have sued the Regents over the EIR for the project.

Zero Growth Or Mitigate Growth?

Measure U, passed by Santa Cruz voters in 2018, states, "There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP." However, UCSC is not bound by local land use planning decisions, other than the boundaries and restrictions set by LAFCO. Anticipating that UC will not agree to zero new growth, Measure U continues, "If there is additional enrollment growth at UCSC, UCSC should house the net new growth of students, faculty and staff on campus."

Clearly the most effective way to minimize the impact on the local housing market as well as traffic impacts would be to house 100% of new students, faculty and staff on campus. To optimize trip reduction among people living on campus, more amenities need to be located on campus, such as child care, grocery shopping, etc.

In the current LRDP process, UCSC proposes to house 100% of new students (above 19,500) and 25% of new faculty and staff. While laudible, these goals would need to be legally binding in order to avoid the failures of the past. The LRDP needs to peg additional enrollment growth to success in housing students and staff on campus.

There are many obstacles to housing students on campus. In 1960, the California's Master Plan for Higher Education required that student housing be self supporting.

The operation of all such ancillary services for students as housing, feeding, and parking be self-supporting. Taxpayers' money should not be used to subsidize, openly or covertly, the operation of such services.

The UC system's policy of self-financing for student housing means that new construction---and new debt---raises the cost of student housing on campus. Dorm costs at UC Merced are among the highest in the nation since that the campus is relatively new and construction debt has not been retired. A fast pace of new housing construction at UCSC could accelerate increases in the cost of student housing. The cost of housing on campus already detracts from UCSC's goal of equity and inclusion. The current cost of a dorm bed in a room shared by three students is \$1100/month. At this

high rate, students are attracted to live off campus where housing costs are high, yet not so high as on campus.

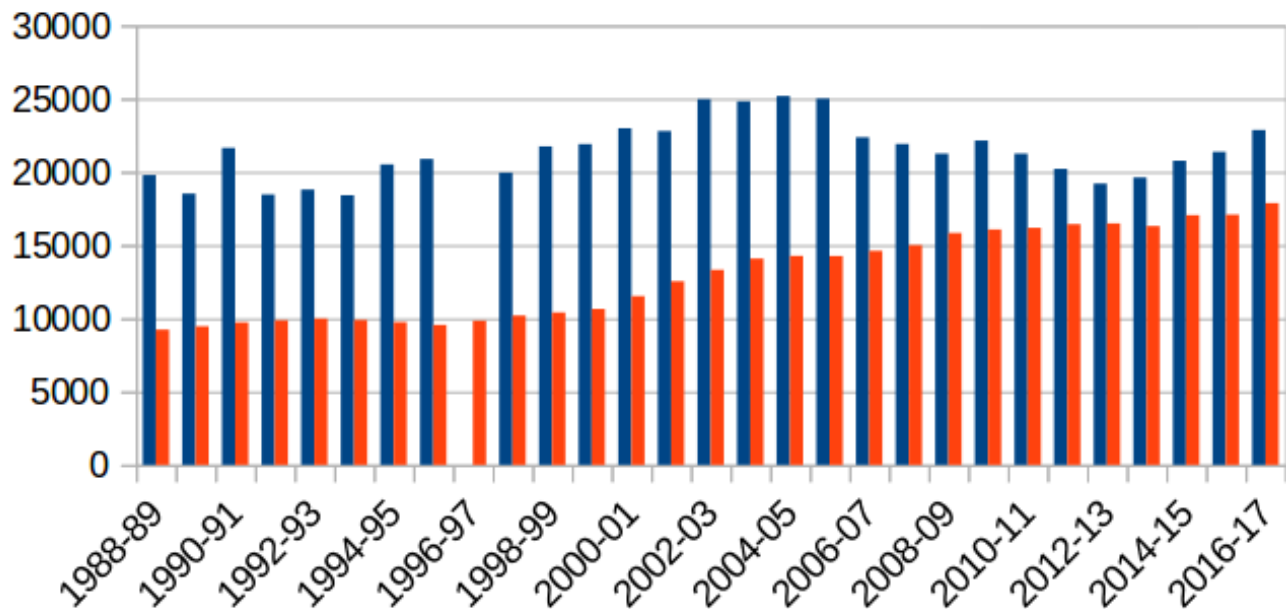
Whatever the outcome of UCSC's housing goals, it is possible for the City of Santa Cruz to implement measures that would result in zero new trips to campus. We know it is feasible to prevent an increase in vehicle trips due to growth through the experience of Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new vehicle trips to campus. Since 2001, periodic traffic counts at each entrance to campus confirm that Stanford has complied with this condition. During a 14 year period, 5000 additional people commuted to campus, but vehicle trips did not increase.²

This paper examines how existing UCSC Transportation Demand Management programs could be improved in order to reduce vehicle trips. It also examines the potential for the City of Santa Cruz to implement congestion pricing, a powerful tool to reduce vehicle trips.

Trends in UCSC Traffic Growth

Traffic congestion is more unpopular than ever in the City of Santa Cruz. In a City of Santa Cruz poll in July 2017, 84% of likely voters listed traffic congestion as a serious concern. Measurements of traffic give reason to be concerned.

The graph below shows the history of trips to campus (blue bars) compared to student enrollment (red bars). It shows that vehicle trips increased to a peak in 2003-2006, and subsequently declined until 2013. Since 2013, vehicle trips to campus are growing at a faster rate than student enrollment.



² Presentation by Brodie Hamilton, former Director of Stanford Parking and Transportation Services

Larry Pageler, former UCSC Transportation and Parking Services Director, offered reasons for the recent uptick in traffic growth.

“The factors affecting continued progress are many: lack of affordable/available housing for students and employees within the City of Santa Cruz; expansion of UCSC’s traditionally tight “commute-shed” as commuting affiliates reside in mid-county, south county or outside of Santa Cruz county altogether; reductions in SCMTD transit services countywide (despite UCSC’s “buy-back” restoring services to the main campus.”

Ride service trips (Uber and Lyft) may play a role in trip growth. UCLA estimates that there are 9,000 ride service trips a day to campus, out of a total of 90,000 trips per day. At this point the information from Uber and Lyft to UCSC Transportation is not sufficient to analyze this growth. Note: Uber and Lyft are signatories on the [Shared Mobility Principles for Livable Cities](#). One of the principles is “We aim for public benefits via open data”. Communities need to press Uber and Lyft to live up to the principle.

Getting to Zero New Trips

Transportation Demand Management Programs

UCSC’s program of reducing solo auto commutes compares favorably to other California employers. As of Spring Quarter, 2017, 35% of commuters to campus are solo drivers, compared to 58% of commuters to Downtown Santa Cruz. UCSC has a high rate of carpoolers/shared riders (22% of commuters); bus riders (26% of commuters) and commuters using the campus shuttles, and vanpools (11%).

The following are UCSC programs that reduce solo auto commutes and suggestions for improvements that could lead to zero new trips.

Student Bus Pass

UCSC students first instituted a \$3.50 transit fee per quarter in 1972. Proposals to increase the Student Transit Fee occurred eleven times between 1972 and 2006, two of which failed due to lower-than-required voter turnouts. A portion of the student fee goes to Santa Cruz Metropolitan Transit District (METRO) and all students can board METRO buses (other than the Hwy 17 Express) by showing their student ID card. A portion of the fee funds UCSC-operated shuttles, including buses that loop around campus, buses that run at night, a bike shuttle from the lower Westside of Santa Cruz, and disability vehicles. Average weekday ridership averages 12,000-13,000 boardings.

In Spring 2018 a new measure to increase those fees did not pass due to voter turnout of lower than the required 25%. Due to the failure to raise revenue, UCSC has cut back on campus shuttle service. There will be another attempt at a fee increase soon.

The cost of the transit fee begs the question: *should students be solely responsible for paying for transit services?* In the early 1960’s the Regents of the University of California decided to build UCSC on a hill outside of the urban area of Santa Cruz. UC policy has resulted in UCSC housing 53% of

students and very few staff on campus. These decisions have created a demand for transportation. Should the students bear the whole cost of meeting this demand?

There are other funding sources (parking fees and congestion pricing) that should be tapped in order to lighten the financial burden on students. At UCLA there is no student fee for transportation. Parking revenue subsidizes local transit agencies who issue bus passes to students at \$33 per quarter. Stanford uses parking revenue to purchase transit passes for students and staff. At UCSC there is no parking revenue used for student transit.

Parking revenue at UCSC goes to pay for parking infrastructure, administrative staffing of Transportation and Parking Services, and TDM programs for staff. UCSC has significant annual debt service resulting from its decision to build the Core West Parking Structure in spite of the alternative that was available at that time: expanding TDM measures. Although near and remote parking rates are significantly lower at UCSC than at UCLA and UCB, historically there has been resistance among staff and students to raising fees.

Staff Incentives

The following programs are subsidized or fully funded by parking fees. UCSC staff are able to purchase METRO passes for \$14 per month. The regular cost of an adult monthly bus pass to the general public is \$65. In addition to the METRO passes, UCSC encourages bike and bus commutes through the Bike Commuter Shower Program at the East Field House, Emergency Ride Home Program (vouchers for taxis), bike maintenance clinics, and a 0% Interest Bike Loan. UCSC has a vanpool program for employees and students commuting along vanpool routes.

Stanford pays for all public transit costs for employees, including Caltrain, SamTrans and VTA. In addition Stanford offers \$300 per year to members of its Commute Club. To join the Commute Club, employees agree to limit their purchase of daily parking permits to 8 per month. Stanford's former TAPS Director Brodie Hamilton emphasizes that a robust outreach program to employees is necessary to achieve high participation rates.

Parking Policy

UCSC does not allow first and second year students who live on campus to purchase a parking permit. This policy should be expanded to any student living on campus (with needs-based exceptions).

The price of parking permits is a disincentive to drive to campus. Parking permits for the remote parking lots cost \$570 for both student and faculty. Faculty and staff pay \$864 per year for close-in parking. The chart below compares parking rates at other UC's and Stanford. (information is from 2018) Note that the more urban campuses of UCLA and UCB have much higher parking rates than Stanford or UCSC.

	Close	Remote
UCSC	\$864	\$570
Stanford	\$1116	\$396
UCLA	\$1776	\$972

UC Berkeley	\$1812; \$1308	\$972
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The 2005 Long Range Development Plan (LRDP) lists 5,000 parking spots on campus at that time³. On average 70%-80% of them were occupied on weekdays. The 2005 LRDP proposed to add an additional 2,100 spaces, an increase of 42% as enrollment increased to 19,500. This increase has not materialized due to legal delays in implementing the LRDP. As of 2017 there are 4,840 parking spots on campus.

Although the Settlement Agreement capped the number of vehicle trips to campus, there was no modification to the LRDP's plan for increasing parking. A 2016 report by Transportation and Parking Services calls for expansion of the East Remote Parking Lot. That proposal would add 250-300 parking spaces to the north of the existing lot.

Parking permits that allow unlimited parking over an extended time period such as a quarter or year encourage driving in contrast to permits that charge by the number of days parked. The latter type of permit rewards the commuter's decision to use an alternative commute mode some of the time. As noted above, Stanford has shifted towards daily parking charges by rewarding commuters who limit their parking to 8 days per month. The most effective tool for reducing vehicle trips to campus is eliminating long-term parking permits in favor of charging by days parked.

Congestion Pricing

Congestion pricing is used in cities around the world in order to reduce traffic congestion and raise funds for public transit. London implemented congestion pricing in 2003 and it led to a 15% reduction in traffic, and a 30% reduction in travel delays. Stockholm experiences a 20-25% reduction in traffic volumes on most congested roads. Singapore began a congestion pricing system in 1998 and it reduced traffic by 13% and increased vehicle speed by 22%.

The implementation of congestion pricing at UCSC could be relatively simple given the campus has only two entrances. In the FasTrak bridge toll and highway toll lane system in the Bay Area, vehicle owners can purchase a toll tag that charges them electronically for each trip. License plate recognition is used to charge vehicles that aren't equipped with the toll tag.

Congestion pricing can work in conjunction with local charges on ride service companies. A recent article in the New York Times called "Uber Fees Pay for Road Repairs, Subway Upgrades, Even Schools", described how Massachusetts, New York, South Carolina, Chicago, Philadelphia and Portland are charging a ride fee and the proceeds are going to a variety of public services. Ride service companies are promoting congestion pricing for all vehicles. Uber spokeswoman Alix Anfang stated "A comprehensive congestion pricing plan that is applied to all vehicles in the central business district is the best way to fully fund mass transit, reduce congestion and improve transportation for outer borough New Yorkers".

Congestion pricing offers the City of Santa Cruz a tool that it can employ even if it is not able to secure the cooperation of UCSC on housing and trip reduction goals.

³ As of 2017, the number of parking spaces is 4840. (source: TAPS)

Improving METRO Service

Reducing vehicle trips to campus is limited without improving METRO service. While bus service between Downtown and UCSC is good, many students and staff live beyond the downtown where bus service is not so frequent. Recently the internationally known transit consultant Jarrett Walker told a Santa Cruz audience, “You do not have very much transit for a county your size.” Walker noted that on the Soquel Dr. corridor which serves Cabrillo College and Dominican Hospital, the interval between buses averages 30 minutes, limiting its attraction of potential riders. Reducing the interval to 15 minutes would require twice the number of buses and drivers. Without additional revenues, METRO won’t be able to accomplish this.

Given our county’s existing transportation funding priorities, a reasonable expectation is that METRO could only modestly improve transit service. In 2016, the Regional Transportation Commission (RTC) allotted 16% of sales tax Measure D to METRO, an amount that was insufficient to prevent a 15% cutback in METRO service hours. METRO service would have been cut to UCSC had it not been for an agreement that UCSC would increase its contribution from the student fee. Student fees for Metro increased from \$2.5 million in 06-07 to nearly \$4.3 million in 17-18, a 65% increase over eleven years.

In the 2016 ballot Measure D, the RTC allotted 22% of funds to construct four miles of auxiliary lanes (exit-only lanes) on Highway 1 between Santa Cruz and Aptos, despite an Environmental Impact Report that indicates that the auxiliary lanes will have insignificant impact on reducing congestion. So long as the misguided hope for congestion relief from highway expansion persists, METRO is likely to remain underfunded. Academic studies point to congestion pricing as the only strategy producing lasting relief from traffic congestion. It is also a potential funding source for transit. When asked at an RTC meeting what revenue source might be a game-changer for transit service in our cities, Jarrett Walker replied, “Congestion pricing”.

Although system-wide improvements to METRO don’t appear realistic without a shift in the priorities of County leaders, the funds generated by parking revenue and congestion pricing could enable more buses to serve UCSC, including buses from the east that bypass the downtown.

Social Equity Concerns

Solutions such as congestion pricing and high parking fees have more impact on people of low income than those who can easily afford the fees. These fees are a form of regressive taxation. And as with other kinds of regressive taxation, such as high taxes on cigarettes, it can only be justified if the benefits in social equity outweigh the impact.

Bogota Mayor Enrique Peñalosa points to the resolution of the social equity issue, saying, “A developed country is not a place where the poor have cars. It’s where the rich use public transport.” The goal is for everyone (special cases excepted) to commute to their jobs or classes by shared transport, rather than individual vehicles. The impacts of auto dependency are so severe that this must be the goal. These impacts fall disproportionately on those of low income: sea level rise; mega-storms; oil spills from pipelines, rail cars, and ocean oil rigs; aquifers polluted by fracking; wars for oil and defense spending; vehicle injuries and deaths; and health impacts from air pollution and diminished physical exercise.

The rise of the automobile has produced a severe loss of social equity, as daily destinations that used to be accessible on foot or by streetcar in the early 20th century are now so far apart that people are second class citizens if they don't own a car. The pressure to own an automobile has made transportation costs the second highest household expense, after housing.

Hence revenue from parking and road pricing that improves public transit helps reverse this social inequity. Donald Shoup and other UCLA researchers studied 35 student transit pass programs around the country noted that students can save a significant cost of attending college if they don't need to own a car. The household of a UCSC staffer who commutes by bus or vanpool from Watsonville can save in excess of \$5,000 by owning one less car.⁴

Getting to Zero New Car Trips---Recommendations for UCSC's LRDP

1. UCSC: Commit to zero new vehicle trips to campus and make growth contingent on achieving this goal.
2. UCSC: In light of the large externalized environmental and social costs of auto travel, reform the parking permit program to charge per-day rates. Raise the price of parking and use parking proceeds to support:
 - a. a significant share of the cost of campus shuttles and UCSC's contribution to METRO, allowing a reduction in student fees for transit
 - b. free transit passes for all faculty and staff
 - c. vigorous marketing of alternative commutes
3. UCSC: Stop building more parking capacity and begin to repurpose parking lots for infill development.

Recommendations for the City of Santa Cruz

1. City of Santa Cruz: Instead of spending limited resources on building new parking facilities and widening intersections, use parking revenue and traffic impact fees to fund:
 - a. safe pedestrian and bicycling routes to campus
 - b. bus prioritization on City streets
2. City of Santa Cruz: Collaborate with UCSC in implementing a charge on ride service companies (e.g. Uber/Lyft) and a congestion pricing program for all vehicle trips to campus, with proceeds going to transit and transportation demand management measures.

Resources:

Brodie Hamilton, [The Transportation Demand Management Experience at Stanford University](#)

Donald Shoup, et al, [Fare-Free Public Transit at Universities: An Evaluation](#) (2003)

UC Berkeley, [Parking and Transportation Demand Management Master Plan \(2011\)](#)

UCLA, [Sustainable Transportation Plan \(2014\)](#)

⁴ assuming the IRS rate per mile for auto travel of \$0.54 and 40 mile round trip to campus



Erika Carpenter <escarpent



[eircomment] LRDP comment

James Clifford <jcliff@ucsc.edu>
To: eircomment@ucsc.edu

Sat, Mar 6, 2021 at 9:08 AM

Please see attached file.

--
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3/4/21

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Comment on the proposed 2020 Long Range Development Plan

East Meadow Action Committee (EMAC)
Karen Bassi, James Clifford, Christopher Connery, Gail Hershatter, Paul Schoellhamer

Our comment focuses on the importance of open spaces, and especially the spectacular grasslands, for campus planning. In 1963, the essential act that shaped UCSC's world-famous campus was the decision to move construction out of the fields and uphill into the trees. Future growth would be accomplished by building in the core area and developing the north campus. For more than fifty years, keeping the meadows open has been a consistent design principle.

O5-1

The draft LRDP abandons this principle in several important areas: the lower East Meadow, Meyer Drive extension, construction in the northern portion of the Great Meadow, and development of a large technical support area in its lower portion.

The present draft justifies building in the meadows by invoking the first LRDP and featuring two 1963 maps of UCSC at build-out (pp. 40-41) The maps show construction scattered widely around the campus footprint, with two (of ten) "professional schools" located in the East Meadow (though not in the area currently planned for development). The proposed overall expansion to 28,000 students is represented as simply a delayed completion of the planners' original intention. This is badly misleading.

First, 2021 is a very different historical moment. Important aspects of the original LRDP no longer make sense, for the following reasons: 1) The 1963 maps, along with other early projections of a completed university, were speculative. No serious site surveys or environmental planning had yet been accomplished. 2) The LRDP's 25-year timeline to buildout was wishful thinking, based on an unsustainable economic and political context. The postwar economic boom, which supported rapid UC campus construction, ended abruptly in the 1970s. 3) At that time, the City of Santa Cruz reversed its enthusiastic attitude to growth. Creation of Pogonip preserve closed off the planned eastern access road that was crucial for managing traffic to a large campus. 4) Throughout the State, environmental awareness of the limits to growth (water, fire, power, wildlife protection) has deepened dramatically, undermining the 1963 LRDP's optimistic projections. Its confident march to 28,000, evoked uncritically 55 years later in the present draft, is a vision at odds with a changing reality.

O5-2

Second, the 1963 LRDP is a complex, and sometimes contradictory, document. While it presupposed the postwar expansionist boom and rapid growth, it also embraced emerging principles of restrained environmental and architectural design: careful construction and sensitivity to terrain, flora and fauna. These practices, championed by UCSC's founding landscape architect, Thomas Church, have been respected and applied by generations of planners and architects. The result is UCSC's unique, and world-famous, campus.

O5-3

The 2020 draft LRDP invokes this tradition of restraint.

The 1963 UCSC LRDP noted the unmatched natural beauty of the site and the importance of both respecting and celebrating this beauty over the life of the campus. The 1963 LRDP understood that planning and development in this unique space **"must grow out of the problems, restrictions, and potentialities of the site..."** The plan noted that "The general effect ... must be one of sensitive collaboration between the designer and this spectacular environment." (emphasis added, p. 89)

We applaud this prominent evocation of principles for campus planning and design. But it seems that the tradition which has guided (and appropriately constrained) planners for decades is being reduced to lip service. Many aspects of this current vision for growth to 28,000 students violate its spirit.

O5-4

In section 3.2 (p.92), the 2020 LRDP draft lists a fundamental goal: "to maintain the unique character of the UC Santa Cruz campus by respecting and reinforcing the Physical Planning Principles and Guidelines" (introduced in section 4.2). Principle # 1, "Preserve integrity of landscapes," "meadow, ecotone and forest," and # 3, "Minimize disturbance to open space," are violated by the construction of oversized buildings at the forest edge and by blocking the iconic campus gateway-view across the East Meadow. The draft LRDP's very general Physical Planning Principles do not adequately address the specificities of building in grassland, ecotone, and forest landscapes.

Specific comments:

1) The widely contested plan to develop the lower East Meadow blatantly violates UCSC's design tradition. The housing sprawl envisaged there--hasty spillover from a project conceived for another place on campus-- in no way "grow(s) out of the problems, restrictions, and potentialities of the site."

O5-5

The 1963 LRDP was particularly concerned with the view of the campus when entered from below. "The major decision with regard to siting - that the great meadow toward the south of the campus should not be built upon, **that the first buildings to be encountered in entering the**

site would be at the crest of the hill where the trees begin.” (p. 39) The open lower East Meadow and the drive uphill through the fields are essential for this dramatic entry to UCSC. The DEIR improperly excludes this “significant public vista,” (3.1 Aesthetics: policy 5.10.3) from the views it claims it will protect. And overall, it fails to address the crucial views uphill to the campus, whether at the West or East entries.

O5-5
cont.

The present LRDP draft shows the East Meadow portion of the Student Housing West project as a *fait accompli* when in fact, there is still uncertainty as to whether the development will be built. At the LRDP Advisory Committee meetings last Spring, discussion of the issue was arbitrarily forbidden. The land use plan should at this point show the southern portion of the East Meadow either as Natural Space (in the proposed system of land use designations) or as Campus Resource Land (as in the current system).

In the same spirit, there should be no development in the upper meadow south of the existing East Remote Parking. The “temporary” corporation yard on the south edge of that parking area must be removed entirely and the land restored. It has been a “temporary” facility for more than a decade, has never been indicated on any LRDP, has never been through any environmental review, and is a shoddy spectacle greeting those arriving on campus.

O5-6

2) The proposed extension of Meyer Drive to form a connecting road across the top of the Great Meadow to the East Remote parking area is a major abandonment of the open meadows policy. The preservation of unimpeded views across open fields out to the Bay is a campus signature and has been clearly expressed in every LRDP. Claims that the road’s impact will be mitigated by contours in the land (p. 164) are disingenuous. It is absurd to imagine that busses and cars passing in the foreground will not disrupt the experience of open space. There are other approaches to campus traffic congestion which do not inflict irreparable damage to an especially sensitive location.

O5-7

While some limited building along the eastern tree-line, below the ARC Center, may be acceptable within campus design guidelines, it should not extend out into the meadow as shown on DEIR maps. There here must be no development south of the existing structures at the north end of the Great Meadow. The open grassland from the southern edges of University House and the Music Center/Recital Hall down to the north edge of the corporation yard should entirely be designated Natural Space except where designated Natural Reserve.

3) The growth of the corporation yard at the lower end of the Great Meadow is a cause for concern. While we recognize that recycling and construction require staging areas, the possibility of moving more of the campus building operation to this area would create a built environment radically out of character with the sweeping meadow as well as with the adjacent Farm and Arboretum environments.

O5-8

4) We urge that development of the Westside Research Park on Delaware Avenue be maximized. This is an area with adequate space and appropriate zoning of the neighboring

O5-9

blocks. It could encourage a productive interaction of City and University while relieving pressure on sensitive campus sites.

| O5-9
| cont.

5) The US Fish and Wildlife Service has long urged the administration to do a campus-wide Habitat Conservation Plan, so that habitat conservation issues do not arise at the last minute, in the push to get a project built, as happened to the detriment of the Student Housing West project. We feel that this should be an immediate priority, concurrent with this LRDP process.

| O5-10
|



Erika Carpenter <escarpent



[lrp] comments on the DEIR of the draft LRDP

Micah Posner <micahposner@cruzio.com>
Reply-To: lrdp+managers@ucsc.edu
To: lrdp@ucsc.edu, eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:29 PM

Dear Erika,

Please confirm receipt of these comments on the DEIR for the LRDP from the Sierra Club.

Micah Posner

Chair of the local Sierra Club

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March 7, 2021

RE: COMMENTS ON UCSC 2021 LRDP DRAFT EIR

Dear Erika Carpenter:

This is a response from the Sierra Club to the Draft Environmental Impact Report (DEIR) on the draft 2021 Long Range Development Plan (LRDP), the document which would guide growth at the University of California at Santa Cruz (UCSC) for the next 20 years. The LRDP envisions growing UCSC by approximately fifty percent, with many serious impacts to the natural and human environment as a result. The Sierra Club appreciates being able to work with the University to analyze these potential impacts prior to any plans for growth being enacted.

We appreciate the relevant information and analysis contained DEIR. However, in its draft form, we find it to be deficient in key, critical categories. As such, it requires revision and recirculation in order to act as an accurate measure of the effects of the proposed growth and to comply with the California Environmental Quality Act (CEQA). As is documented below, in numerous cases the potentially significant impacts are understated, inadequate mitigation measures are proposed, feasible mitigation measures and alternatives are missing, and important, available data and evidence are not provided.

The Sierra Club has focused on the following:

- Section 3.13 Population and Housing
- Section 3.16 Transportation
- Section 3.10 Hydrology and Water Quality
- Section 3.5 Biological Resources

O6-1

SECTION 3.13 – POPULATION AND HOUSING

The DEIR’s Analysis of Displacement is Inadequate. The DEIR acknowledges the project would result in a potentially significant impact on population and housing if it would displace substantial numbers of people. Then the document claims that the LRDP does not cause displacement but the DEIR’s narrow definition of displacement is not reasonable. The US Dept. of Housing and Urban Development explains, (Displacement of Lower-Income Families in Urban Areas Report, 2018), “Displacement can happen in many ways: direct displacement, in which residents are forced to move out because of rent increases, building rehabilitation, or a combination of both.” How does the DEIR address the HUD definition of displacement?

O6-2

The DEIR fails to include relevant information regarding the housing crisis in the City of Santa Cruz thus precluding informed decision making and informed public participation. The DEIR needs to analyze the extent to which housing is unaffordable to large sectors of the community in the county. It needs to particularly study those markets closest to UCSC which provide the majority of housing for off campus students, and it needs to analyze how increased demand due to UCSC growth may affect these housing markets.

The DEIR asserts, “Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff and non-UC employees for whom on campus housing would not be accommodated.”

This assertion is not consistent with the experience of the general population and its elected officials. What “existing data” is this statement referring too? What is the basis for assuming that planned increases in housing will be available to UC staff and students and not to current City and County workers who participate in long commutes due to the housing shortage?

O6-3

The DEIR needs to more thoroughly analyze the impact of additional demand on housing due to UCSC expansion. The following are some resources that need to be analyzed in this context:

- “Out of Reach Report,” (2019), National Low Income Housing Coalition finds that Santa Cruz is the least affordable small city in the Us.
- “No Place Like Home,” (2017) is a research project of UCSC Professors Miriam Greenberg and Steve McKay. Their study shows an unacceptable rent burden (more than 30% of income) for households close to UCSC: 73% for the Westside of Santa Cruz, 68% for Downtown and 76% for Beach Flats/ Lower Ocean.
- Apartment List.com reports that over the last seven years, an average of 60% of renter households in Santa Cruz County are cost burdened.

The DEIR needs to analyze the affordability of on- and off-campus housing for low-income students. Low-income students have a long history of living in cars or camping in the woods behind campus. How will the proposed LRDP affect the ability of low-income students to obtain appropriate housing?

O6-4

The DEIR needs to commit to an enforceable mitigation for the LRDP’s impact on housing demand. In a broad statement, the DEIR does conclude that “*the total on-campus population increase accommodated by the 2021 LRDP may directly or indirectly induce substantial housing demand in the region.*” and admits that “*This impact would be significant.*”

However, it fails to provide an enforceable mitigation for this significant impact. In Table 3.113-11, the DEIR does promote the idea of increasing building space under the LRDP to house approximately 8,500 students, or approximately 90% of proposed growth. This appears to be included as a response to a request of the Community Advisory Group convened by the University, which called for “a binding commitment of housing 100 percent of new students”, but the mitigation fails to meet that goal on two points:

- **Providing land for housing is in no way the same as building the housing. In fact, UCSC has a history of not meeting its housing goals.** The 1988 LRDP set a goal of housing 70% of undergraduate students, 50% of graduate students and 25% of faculty and staff. In reality, performance never approached that goal with the actual percentage of students housed on campus hovering at around 50%. There is every reason to assume that the structural obstacles that have prevented UCSC from meeting the housing goals of the 1988 LRDP will be repeated with regard to the current draft LRDP.
- **For on-campus housing to occupied it has to be priced so that its cost is competitive with off-campus rents.** The formula under which the UC system builds housing states that rental income has to pay for the costs of housing construction and maintenance. Historically, these costs have triggered rental rates that priced campus housing well over off campus housing. A dorm room shared by three students costs above \$4000 a month, but a typical room in a house with a kitchen and full amenities rents for \$1000. This explains the relatively high vacancy rate of 7.65% on campus, with 711 vacant beds at last count as compared to the vacancy rate on rentals in the County of 1.9% referenced on page 3-13-4. The EIR should do more analysis on the disparities between the relative vacancy rates and include the vacancy rates for rentals in the City of Santa Cruz, which is more relevant to UCSC. As noted in its own documentation, the vacancy rates for housing as a whole, referenced in table 3-13-3, which include vacation housing and second homes, are irrelevant.

O6-5

CEQA law demands that a realistic funding source be available for the project and its mitigations. In the case of the aforementioned mitigation, how will the proposed housing be built in such a way that its costs will be comparable to off campus housing? Given its history and the continuing policies on which its failure to build projected housing are grounded, how can the public be confident that this mitigation will be accomplished, and how is the DEIR accurate if it provides a mitigation that is unlikely to be achieved?

O6-6

Without a credible plan to provide housing that is reasonably priced, it can be assumed that meeting the housing goal is not feasible. We propose a simpler solution, in line with the request of the Community Advisory Group, which would assure that the LRDP’s housing projections are fully mitigated.

PROPOSED MITIGATION

Each incremental step in campus enrollment growth shall be contingent on UCSC actually housing 100% of new students and 25% of new faculty and staff.

O6-7

SECTION 3.16 – TRANSPORTATION

If housing mitigations are not successful, the EIR analysis of projected increase in vehicle miles traveled is not accurate. As discussed above the current goals to house students and staff are not feasible, but expected air pollution as represented by projected increases in vehicle miles traveled, are dependent on the housing goals being met. Simply put, if fewer people live on campus than envisioned, there will be more automobile use to bring students and staff living off campus to the University. Therefore, the lack of feasibility of the housing goals (as discussed above) calls into question the accuracy of the section on vehicle miles traveled. Unless binding mitigation as proposed above is adopted into the DEIR and LRDP, the vehicle miles traveled analysis of the document is not accurate.

O6-8

Target for reduced vehicle miles traveled is inconsistent with goals of the Campus Sustainability Plan. The DEIR claims that Mitigation Measure 3.16-2 is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022. This claim is not accurate. This mitigation measure intends to “*reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countrywide average.*” Reducing VMT per capita is not the same as reducing total commute vehicle miles traveled.

O6-9

Goal 3 of the Campus Sustainability Plan 2019 Update calls for “*reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022.*” The DEIR does not address this goal. Nor will it be possible to achieve this goal with the implementation of the 2021 LRDP, which will result in increased commuter trips to campus. If the Campus Sustainability Plan is a guiding planning document, how can the draft LRDP establish acceptable thresholds that are not in accordance with this plan?

O6-10

Comparing on-campus students to county average VMT is not a reasonable measure of significant impact. The DEIR claims that the addition of some 15,800 additional vehicle trips to be undertaken by additional students and staff (as per table 3-16-6) is not a significant impact. This contradicts the definition of the word significant “*sufficiently great or important to be worthy of attention; noteworthy.*” (Source: *The Oxford English Dictionary*). This runs contrary to common sense and continuing to assert it as fact undermines the University’s credibility.

The claim that 15,800 additional trips is not a significant impact is reasoned by adopting standards developed by the state OCP for the addition of housing developments and businesses. UCSC is significantly different from these types of developments for two reasons: First, the proposed growth is so large that it would add approximately 20% new residents to the City of Santa Cruz, thus causing significant changes to the entire City. This type of impact cannot just be measured using averages and normatives. It needs to be examined with regard to the significance of its impact on its own merits. Second, UCSC provides housing to approximately half of its students, thus already providing both the origin and the primary destination of their potential vehicle miles traveled. Using the OCP guidelines for this kind of institution would mean that a category of projects would be effectively exempt from reducing their VMT and thus participating in statewide reductions in greenhouse gas emissions. This category would include any type of boarding school, nursing homes, sleep over camps, and prisons. UCSC needs to show how the OCP guidelines apply in its particular case. It is not reasonable to judge its vehicular emissions with the same standard used for a small apartment complex or family business.

O6-11

Having claimed that adding 10,000 new students will have no significant impact, the document than admits that there will be a small but significant impact due to the VMT increases from faculty and staff. The calculation of this VMT increase is greatly reduced by current and planned housing on campus for faculty and staff. This reduction needs to be reexamined based on the same criteria outlined above.

06-12

The way that traffic is being studied effectively exempts UCSC from contributing to state, city and county plans to reduce greenhouse gas emissions. Automobiles are our state's, city's and county's largest source of greenhouse gas emissions. The reason that standards governing vehicular travel were changed to represent VMT instead of congestion standards was so that the reduction of VMT could contribute towards reducing our state's greenhouse gasses. The way in which the DEIR is counting VMT effectively exempts it from any and all legislative action to reduce greenhouse gas emissions by controlling its primary source transportation. **In what way will the draft LRDP come into compliance with state and local climate action plans to reduce overall VMT so as to address climate change?**

06-13

PROPOSED MITIGATION

Overall VMT shall be reduced by 5% as per the Campus Sustainability Plan

By adopting this standard, the DEIR will actually be in compliance with climate legislation, including its own Sustainability Plan, and the expectations of local citizens and their elected officials. This condition for growth would mirror a successful policy at Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new peak hour vehicle trips to campus. According to the former Director of Stanford Parking and Transportation Services, Stanford added an additional 5000 students and staff/faculty between 2001 and 2015 without adding additional vehicular trips to campus, as measured by periodic traffic counts at each entrance. A reduction in the number of people in California who own automobiles, especially those of college age, will continue to make it easier to reduce automobile trips. Several of the mitigations to unacceptable staff VMT will help to achieve this goal as will additional mitigations proposed below. **We ask you to seriously consider this goal and explain your reasoning why or why not it is not adopted.**

06-14

Mitigations of the increased VMT of faculty and staff are insufficient. Even using the document's aforementioned algorithm, the DEIR admits that its faculty and staff will create VMT above the level it deems acceptable and suggests mitigations for that impact. The projections are flawed and the mitigations need to be fully explored as per below. **Please respond to the proposed mitigations below as well as our criticism of one aspect of the projected VMT per capita calculations.**

06-15

The addition of a new entrance will induce more staff and faculty traffic. This needs to be added to VMT predictions. Vehicle-miles-traveled statistics for staff and faculty use current commute patterns based on two vehicular entrances to campus. Adding a third entrance will make it easier to commute to campus and thus induce traffic thereby increasing VMT per capita. Specifically, a third entrance will increase vehicular access from another neighborhood along Empire Grade not easily accessed by current entrances, thereby encouraging staff and students who live in this neighborhood to drive. It will also encourage staff who live in the proposed housing near the new entrance to drive to campus. **Has this induced traffic been accounted for in the current VMT projections?** Instead of building a road for automobiles the proposed roadway could have a one lane and/or decomposed granite treatment sufficient for it to be used by emergency vehicles and, possibly, transit vehicles. In so doing, it would still serve as the mitigation of potentially reduced emergency access mentioned in the DEIR. Please study this alternative with regard to VMT and impacts on the habitats to be bisected by the proposed road.

06-16

PROPOSED MITIGATION

Increase parking fees to pay for transit system. We appreciate the commitment made as part of the TDM mitigation to have “no net increase in parking.” Decreasing parking supply on a per capita basis will raise its value, and parking fees should be raised accordingly so as to further disincentivise personal automobile use. Monies gained by raising these fees should be used to pay for public transportation for staff and students. Current policy seems to rely on increasing student fees to pay for transit but as shown by the recent defeat of such a measure in 2018, this funding source is not entirely reliable. If students do agree to raise fees for transit, it should be go for additional service, while parking fees should be used to maintain basic levels of transit service.

O6-17

PROPOSED MITIGATION

Designate additional parking spaces—currently used by single occupant drivers—as carpool-only spaces. This will provide an incentive to carpool and provide an option for low income staff and students to mitigate the financial impact of increased parking fees.

O6-18

PROPOSED MITIGATION

Provide free electric charging for automobiles and electric bicycles. Incentivizing electric cars over gas cars would not affect VMT, but would reduce air pollution caused by automobiles, which is a primary end goal of VMT legislation.

O6-19

PROPOSED MITIGATION

Implement traffic calming measures on all campus streets and reduce the speed limit to 25 mph. While this would not necessarily reduce VMT, a reduced speed limit enforced via hardscape changes to the roads (speed reduction platforms being the most common example) would reduce pollution caused by tires, as well as deaths and injuries to human beings and animals.

O6-20

SECTION 3.10 – HYDROLOGY AND WATER QUALITY

Potential Impacts to Karst Aquifer

The DEIR properly states, “*Potential impacts on groundwater that could result under the 2021 LRDP include 1) reduced spring flows and lowering of aquifer water levels as a result of a reduction in recharge due to increased impervious surfaces, and as a result of a potential groundwater extraction in the event that groundwater pumping is implemented to reduce demand for water from the City’s supply...Impacts associated with new development on the karst aquifer would be potentially significant.*” (3.10-33) The campus expansion requires millions of square feet of new paving, as well as expanding from 2 million square feet of buildings to 5 million. **How will systems directing water runoff be renovated so as to insure that additional runoff does not damage surrounding habitats including the Kalkar pond on the east side of campus?**

O6-21

Water Supply

The city of Santa Cruz has supplied UCSC with water since its founding in 1965, and will continue to do so, but the city itself relies on the surrounding river and watershed systems. The Santa Margarita Groundwater Basin (SMGWB) underlies 30 square miles of the Santa Cruz Mountains and on top of it is the watershed of the San Lorenzo River, of which the river itself supplies 59% of the city's water. The SMGB has lost an estimated 28,000 acre feet in groundwater storage since data has been recorded, resulting in diminished local water supply and reduced sustaining base flows to streams that support fishery habitats. Although pumping from the SMGB has been reduced by 45% since 1997, and supply and demand have been in balance for the last 10 years, the substantial increase in county residents projected by the LRDP poses a significant strain on resources, particularly as we face current and future water deficits due to drought, wildfire, and climate change. The Santa Margarita Groundwater Agency (SMGWA), a joint powers authority comprising the Scotts Valley Water District, the San Lorenzo Valley Water District, and the County of Santa Cruz, was formed in 2017 to protect and sustain the overdrafted groundwater basin by the development of a Groundwater Sustainability Plan (GSP). The GSP must be completed by 2022, and the basin must reach sustainability by 2042. Regardless of suggested UCSC mitigation measures, if the campus continues to rely on the city for a majority of its water, the expansion places a significant strain on a limited resource.

O6-22

How does the University intend to mitigate the long-term strain on water resources placed on the county of Santa Cruz by its growth from 18,500 current students to 28,000 by 2040, as well as an additional 2200 faculty and staff from its current 2800, for a potential total of 33,000?

Comments on UCSC Long Range Development Plan Water Supply Evaluation, Appendix J of the DEIR including the need for an approved habitat conservation plan.

7.0 Determination of Water Supply Sufficiency Based on the Requirements of SB 610. Table 7-1, which lists City of Santa Cruz Water Supply and Demand in Normal Years, Single Dry Years and Multiple Dry Years, MGY, presents unrealistic and inaccurate information for the Supply Totals. With this error, the Demand vs. Supply ratios are not accurate and will not provide proper compliance to SB 610, nor to this environmental review process.

The DEIR must include accurate assessments and this listing of available water supply is not accurate. An accurate assessment of available water supply must include requirements for water to be set aside for fish and wildlife identified by a Habitat Conservation Plan (HCP), but the city of Santa Cruz has not had an approved HCP since 2002. Prior to expanding water supply to UCSC, an HCP must be approved by relevant state and federal agencies.

O6-23

The LRDP rightly notes, at page 27 of Appendix J, that the HCP issue exists. However, no accounting of the coming reduction in supply is shown in any projections. In a February 10, 2012, letter from NOAA National Marine Fisheries Service (NMFS) to Local Agency Formation Commission (LAFCO), NMFS stated that "it does not appear that current *water supplies are sufficient to meet current demand and protect listed salmonoids, let alone allow for increased demands.*" (Emphasis in original.) The clear and obvious inference is that the City does not and will not have the water supply listed in this DEIR once the mandated allocations are made to account for protection of listed species. **How does this DEIR permit a water supply analysis that is clearly incorrect projecting forward?**

Water District Boundaries Need Relevant Approvals

The DEIR should acknowledge that expansion of the City water supply into North Campus is subject to approval by LAFCO. Under CEQA, LAFCO is the Responsible Agency for proposed expansion of utility

O6-24

service areas. It is the responsibility of LAFCO to review challenges to the water supply and UCSC’s history and projections of reducing water use per capita, and then to make a consideration. In so doing, LAFCO would safeguard the water supply for UCSC as well as other City users. The DEIR acknowledges that providing city water for the projected increase in students and staff is a significant impact even after mitigations are put into place: UCSC’s remaining water demand with implementation of the 2021 LRDP would contribute to the need for the City to further restrict water deliveries or secure a new water source for multiple dry water year conditions.”

O6-24
cont.

During an earlier process step in this University expansion plan, in 2012, it was deemed necessary to expand the Water District boundaries, as much of the new, expanded development is situated outside the Water District Boundary. LAFCO received significant pressure from the community to not expand this boundary until the City fulfilled its legal obligations with regard to the HCP. The boundary was not expanded.

It is no coincidence that UCSC now claims that the Water District Boundary does not need to be expanded, as that would have required an HCP which will surely reduce available water supply. But the requirement to implement an HCP did not disappear due to assertions that the City water supply can be expanded outside its boundaries without legal approvals from LAFCO.

SECTION 3.5 – BIOLOGICAL RESOURCES

Wildfire impact on wildlife populations is not noted in this section of the DEIR. This is a critical oversight as in August and September of 2020 Santa Cruz and San Mateo Counties experienced the most severe wildfires in their history with the ignition of the CZU Lightning Complex Fire which burned 86,500 acres and resulted in significant habitat loss and displacement of thousands of individuals of many animal species. The fire event is noted in the DEIR’s wildfire section (3.18) with the acknowledgement that the CZU fire occurred after the NOP for the 2021 LRDP had been published (3.18-9), but the DEIR Biological Resources section does not account for the fire’s impact on wildlife. This is of serious concern as the UCSC campus adjoins forested areas of the Santa Cruz Mountains which were heavily affected by these fires, burning large portions of Bonny Doon, upper San Lorenzo Valley and along the coast, all of which had a high fuel load accumulated over many decades of fire suppression. In some areas, notably Big Basin California State Park which housed populations of the endangered marbled murrelet, the fires were of crown-destroying intensity, and occurred at a critical juncture in the species’ nesting period. It will take decades for these areas to fully recover, if such recovery is possible with the accelerating effects of climate change and human activity. Damage to natural resources is still being assessed, with possibly as much as 40% of redwoods in the Santa Cruz Mountains suffering burns.

O6-25

With this in mind, any mitigation offered in the DEIR in consideration of species such as mountain lions, foxes, coyotes, bobcats, etc. is not adequate because it fails to address the disruption of wildlife’s normal patterns of migration, denning, hunting and reproduction caused by both the CZU fire and the following months of extensive tree-removal operations, utility work, logging road construction, debris removal, site-scraping, clear-cutting and general construction and repair work taking place in the areas adjacent to UCSC’s North Campus, the long-term effects of which on habitat and species may not be known for some time. This creates significant pressure on animal populations in the fire zones, and may result in some individuals entering the LRDP area when they otherwise would not have. How does the University plan to address these concerns?

O6-26

In 2017 UCSC Professor of Environmental Studies Chris Wilmers, who operates the joint UCSC/CDFW Santa Cruz Puma Project, estimated the number of mountain lions in the Santa Cruz Mountains. at 50-60, each with a territory of anywhere from 5-100 square miles. When these individuals are displaced by a natural disaster such as the CZU, they come into competition with each other and with humans for resources, increasing population stress, malnourishment, and affecting reproduction as well.

The DEIR acknowledges potentially significant impacts to this population but based on the fact that it does not account for changes in environment caused by the CZU fire, the suggested mitigation is inadequate and should be re-assessed. The LRDP DEIR mitigation measures proposed in regard to mountain lion dens and other predators are insufficient to address potential impacts of construction. Mitigation Measure 3.51a specifies, “Within at least 30 days before commencement of project activities, a qualified wildlife biologist with familiarity with mountain lion...will conduct focused surveys of habitat” (3.5-61) and “If no potential dens are found...no further mitigation will be required.” The language given for this survey period is too vague to provide clear data. As worded, the time-frame of the survey allows for it to have occurred ANY TIME prior to 30 days before project activity commences, thus permitting outdated survey data to be used. We request that this mitigation be re-written to provide reasonably current data. Also, since there is no sunset clause, an outdated 2021 survey could be used many years from now if the expansion is delayed (as it has been in the past).

O6-27

The LRDP zone includes habitat and terrain for 66 special-status wildlife species and 64 special-status plant species, many holding statuses CRPR 1B (Endangered in CA) and known to occur in the development zone.

Other animals affected by the campus expansion include coyotes, gray foxes, bobcats, bats including Townsend’s big-eared bat, western red bats and pallid bats, American badger, ringtails, San Francisco dusky-footed woodrats, invertebrates such as the Ohlone tiger beetle (critically imperiled) and amphibians like the California red-legged frog (a federally listed threatened species), deer, and other vital prey animals. UCSC campus also contains the San Francisco Campion, Point Reyes horkelia, Santa Cruz Manzanita, San Francisco Popcorn Flower and Marsh Microseris, among others, all listed as State Endangered and all known to occur in the LRDP area. What has made UCSC a focus of the UC system for life sciences is exactly this abundance of wildlife in a vibrant ecosystem accessible for observation and study. By so extensively altering the natural landscape of its campus the University runs the risk of damaging the very programs which have made it so attractive to students.

O6-28

Ohlone Tiger Beetle

Native coastal prairie habitat on campus critical habitat for the endangered Ohlone tiger beetle. Future housing development is proposed within and adjacent to coastal prairie habitat mapped at Crown Meadow, and within a short walk or bike ride from Marshall Field. Concentrated bike and traffic and picnicking activity would cause significant “take” of Ohlone tiger beetles in open areas, foot paths, roads and cleared areas, as the beetles concentrate in open areas during breeding season to look for mates, dig burrows and deposit eggs. These potential impacts must be disclosed and addressed through project modification and mitigation.

O6-29

The proposed development zone would convert to residential uses the entire area of Habitat Conservation Plan Area 1D, a former Ohlone tiger beetle habitat that was restored to support reintroduced tiger beetles. If re-establishment effort has not yet proved successful, the management effort benefits coastal prairie restoration habitat and should be continued. This effort should be one of multiple measures to address the increased cumulative adverse impact on the Ohlone tiger beetle of the closer proximity of development, elevated population and intensified activity associated with the proposed LRDP.

Not only would the UCSC human population increase from 18,500 to 28,000 on campus under the proposed LRDP, but the number of student beds would increase from 9,300 to 17,700 and the number of staff and faculty units would grow from 270 to 828. Much of the proposed residential development would be placed in the north campus area, with easy access to native grassland habitat in Marshall Field that supports one of only a handful of remaining occurrences of Ohlone tiger beetle, a federally endangered species endemic to the marine terraces in Santa Cruz County characterized by Watsonville loam soils.

The increased bicycle and foot traffic associated with a substantially increased population of students, and the increased reliance on outdoor activity, will inevitably result in the increased mortality and disturbance of adult and larval Ohlone tiger beetles, by roughly doubling human activity in the meadows and open patches of bare ground that the Ohlone tiger beetle depends on for foraging, mating, thermoregulation and oviposition. This is a potential cumulative impact of all the development proposed by the LRDP to cover the next two decades, comprises a “take” of the Ohlone tiger beetle incurred by the action of the UC Regents and cannot be addressed by piecemeal evaluation of individual construction sites. A piecemeal approach to such impacts, without analyzing and mitigating the cumulative impact, comprises “segmentation” and is prohibited under CEQA law. Unless the University develops and implements an adaptive Habitat Conservation Plan approved and supervised by the United States Fish and Wildlife Service, the most important remaining populations of OTB are likely to be extirpated. Simply stated, the LRDP poses an imminent threat to the survival of the species.

O6-29
cont.

The deficiency of the EIR in failing to consider potentially significant recreation impacts to the OTB extends to the recreation section, where the trail network map provided by Figure 3.15-1 omits three trails that pass right through OTB HCP Area 1A-A. This omission is important not only because it fails to disclose a significant source of adverse impacts to OTB, but also because the recreation section proposes a University strategy to increase in outdoor recreation by expanding formal trail links to adjoining State and County parks. This would intensify activity on three trails that intersect within Inclusion Area 1AA. The recreation section (falsely) asserts that, although the campus population and potential demand for recreational facilities would nearly double, the impact on existing recreational facilities would be less than significant even without mitigation and without any commitment of the UC Regents to construct additional recreational facilities. This failure to accommodate recreational demand would place even greater pressure on trails, meadows and outdoor recreation areas, particularly Inclusion Area 1AA, which is located at the intersection of several campus trails and an ad-hoc access point from Meder Street.

The vulnerability of the Ohlone tiger beetle population to increased human presence and outdoor movement underscores the inadequacy of the existing habitat preserve Area 1A-A, which comprises approximately 12 total acres, of which only about 10.8 acres are effective habitat, and the rest is oak woodland. To protect an organism that is clearly in retreat from human activity and development, that has been extirpated from numerous sites adjoining urban development in Soquel and Santa Cruz, larger habitat set-asides are required. The Ohlone tiger beetle will become extinct unless protected areas are large enough to include all of the suitable habitat, characterized by USFWS (reference below) as “shallow, pale, poorly drained clay or sandy clay soil that bakes



Existing Ohlone tiger beetle Habitat Conservation Area 1AA (dark purple) and recommended conservation area (light purple).

O6-30

to a hard crust by summer, after winter and spring rains cease,” including “barren areas among low or sparse vegetation within the grassland. Ohlone tiger beetles require these open areas for construction of larval burrows, thermoregulation, and foraging.” Adequate mitigation for the potential impact to this species of LRDP development must include adding the mima mound habitat west of Empire Grade, comprising approximately 80 acres, and protecting and managing all existing and suitable OTB habitat in upper and lower Marshall Field.

O6-30
cont.

The EIR proposes to survey for rare plants and wildlife only “within a project site,” and only when the proposed LRDP could result in direct disturbance of OTB. This approach to impact mitigation fails in this regard: it would allow housing development to be placed entirely around the central area of the Crown Meadow on north campus with no biological survey of potential occurrence of the OTB or its habitat within Crown Meadow or nearby Marshall Field. This failure alone renders the EIR deficient in failing to assess the presence of an endangered species or to consider the potential multifold impacts of surrounding sensitive habitat with intensive human activity.

O6-31

According to “Ohlone Tiger Beetle (*Cicindela ohlone*) 5-Year Review: Summary and Evaluation” prepared by the U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office (Ventura, California, 2009) (https://esadocs.defenders-cci.org/ESAdocs/five_year_review/doc3220.pdf), six of the seven then remaining Ohlone tiger beetle occurrences were located on open space or park areas accessible to the public and vulnerable to the same types of impacts proposed by the LRDP. By 2013, only five segmented subpopulations of the OTB remained¹ Arnold and Knisley (2018) found the OTB total population at its four primary sites to range between 500 and 1,750 individuals.² It is unknown whether the species can colonize or migrate between colonies, although Cornelisse et.al. (footnote next page) demonstrated that migration reduces the possibility of OTB extinction.

OTB subpopulations are already experiencing significant impacts from invasive vegetation, fire suppression, removal of grazing pressure and direct human disturbance, sufficient to reduce known subpopulations by 30% in less than a decade, and to reduce the area occupied by larval burrows at Marshall field, for example, from 13,000 square feet in 2003 to 770 square feet in 2017, a decrease of 95%. In the absence of grazing at Marshall Field, bare ground areas are maintained primarily by bike traffic, which has a deleterious effect on the OTB but, in the absence of superior management measures, provides a means of maintain bare earth. Any exacerbation of these existing significant impacts of human activity and development on OTB populations must be considered significant.

O6-32

Without active habitat management, OTB habitats are also likely to be subsumed by invasive vegetation. According to the FWS report, Ohlone tiger beetles have been potentially extirpated from two of the five geographic areas as a result of habitat degradation primarily caused by the lack of a habitat management program. The report stated, “*Habitat degradation continues to be a threat to all remaining Ohlone tiger beetle occurrences. Without management efforts to reduce and control encroachment by nonnative plants, the Ohlone tiger beetle will likely continue to decline and the risk of extinction will increase. Without active habitat management, increased growth of nonnative vegetation can severely reduce the availability of bare or sparsely vegetated ground.*”

1. Tara M. Cornelisse*, Michelle K. Bennett, Deborah K. Letourneau, “The Implications of Habitat Management on the Population Viability of the Endangered Ohlone Tiger Beetle (*Cicindela ohlone*) Metapopulation.”

2. Richard A. Arnold and C. Barry Knisley, “Biology and Conservation of *Cicindela ohlone*, the Endangered Ohlone Tiger Beetle.” <https://ucscampusreserve.ucsc.edu/documents/arnold-knisley-2018>

According to the USFWS report, nonnative plants, including French broom (*Cytisus monspessulanus*), velvet grass (*Holcus* spp.), filaree (*Erodium* spp.), and Eucalyptus spp. are encroaching into grassland habitats and out-competing native grassland vegetation (Morgan, in litt. 1992; Hayes, in litt. 1997; Sculley, pers. obs. 1999, 2000). Nonnative grasses, such as bromes (*Bromus* spp.) and oats (*Avena* spp.), can rapidly invade California grasslands. Filaree is abundantly invasive on the UCSC campus.

OTB populations also cannot survive without an adequate prey base of small invertebrates. OTB prey availability is proportionate to the availability of bare ground. Additionally, the precipitous drop in worldwide insect populations documented by scientific studies is attributed to the lack of large, intact habitat areas away from the proximity of urban and/or agricultural development and the associated impacts of pesticides, air pollutants, dust, noise, light, meso-predation, declines in songbirds, and invasion of exotic plants and wildlife. The increasing proximity of residential and public facilities to native grasslands and OTB habitat may have similar effects. The reasons for the failure of conservation area “Parcel D”, which was managed to maintain the required habitat physiography, are apparently not fully understood, but the site was immediately adjacent to a residential development.

Cornelisse, et.al demonstrated that active management of existing subpopulations to increase or maintain bare ground through direct scraping or by imposing livestock grazing, with measures to slow bicycle speeds, had a significant positive effect on beetle populations. Reducing bicycle speed to 8–12 kph increased population growth by 42–58%. The study warned against over-management of existing colonies, however, and recommended “at a landscape level both recently extirpated sites and potential coast prairie habitat should be managed to maintain suitable *C. ohlone* habitat for future colonizations.” Adequate mitigation of the potential disturbance impact of the LRDP on existing OTB populations thus requires setting aside enough habitat to allow development of new colonies in suitable habitat areas near each other, and actively managing and monitoring these areas. The University should also obtain offsite conservation easements for OTB habitat management and expansion, including habitat set asides on the Goode property adjacent to the University parcel south of Empire Grade.

The potential adverse impact to Ohlone tiger beetle of the proposed LRDP would not be reduced to “less than significant” unless the following change is made to the proposed mitigation and monitoring plan:

To the extent the project may result in “take” of the species, UC Santa Cruz shall develop and implement an HCP addressing existing and potential Ohlone tiger beetle habitat across the UC Santa Cruz campus, consistent with Mitigation Measure 3.5-2a, which would require authorization by USFWS under Section 10 of the ESA.

Further, in order to ensure that the required HCP is effective in protecting beetle populations, and in to support a finding of less than significant impacts to the OTB, the EIR will remain deficient unless the HCP include the following measures:

- Manage the location, extent and timing of foot and bicycle traffic, and bicycle speed, to maintain appropriate habitat and limit the risk to adult and larval Ohlone tiger beetles.
- Implement manual habitat scraping and compaction rather than relying on incidental foot and bicycle traffic.
- Control residual dry matter in OTB habitats through effective implementation of grazing, fire management, mowing, hand removal and shrub mastication.

O6-32
cont.

O6-33

- Control invasive vegetation, particularly invasive forbs and grasses in grassland habitats, by grazing, manual removal, controlled burning or flaming, chemical control, scraping, shallow scarifying, or other means as appropriate.
- Employ adaptive management: Test the efficacy of the above management measures and adapt changes to ensure that the measures achieve reduction in RDM and increase bare soil areas. Monitor OTB populations and adjust management measures to arrest population declines.
- Require the HCP to, at minimum, maintain OTB populations with no decrease.

O6-33
cont.

Coastal Prairie/Grassland

The Ohlone tiger beetle is one of the most important, but not the only rare or declining wildlife species in Santa Cruz County that requires grasslands and Coastal prairie habitat to survive. Coastal native grassland prairie in Santa Cruz County supports a wide variety of special status birds, mammals, plants and insects. The DEIR states that on the UC campus, five special status plant species are known to occur on campus, all in the Marshall Field complex, as follows:

San Francisco popcorn flower (*Plagiobothrys diffusus*)

Point Reyes horkelia (*Horkelia marinensis*)

Marsh microseris (*Microseris paludosa*)

Santa Cruz clover (*Trifolium buckwestiorum*)

Pacific Grove clover (*Trifolium polyodont*)

O6-34

The list omits Shreve Oak (*Quercus parvula var. shrevei*), a species describes as “near threatened” on the International Union for Conservation of Nature’s Red List of Threatened Species.

In addition to the listed plant species, a number of special status bird and mammal species rely on Coastal prairie habitats found on campus. As the EIR observes, two species of State Special Concern, burrowing owls and Bryant’s savannah sparrow, breed in campus grasslands. Northern harrier (Protected, SSC) and loggerhead shrike (SSC) occur during breeding season. American badger, a State mammal of special concern, also appears to breed on campus. Protected Golden eagles, a species only recently delisted that incorporate the campus into their breeding territories, some seasons visiting virtually every day to exploit the prey base of ground squirrels, rabbits and other small mammals.

California’s relatively intact grasslands are reservoirs of biodiversity. Grassland birds, mammals, reptiles, insects, pollinators and other animals depend on the resources these plants and spaces provide. “Old-growth” grasslands are ancient ecosystems characterized by high herbaceous species richness, high endemism, and unique species compositions. Native grasslands support about 40% of California’s total native plant species (Wigand 2007:55). An astounding 90% of California’s rare and endangered plant species reside in grasslands (Skinner & Pavlik, 1994). Currently 73 grassland-associated species are listed by the state and

federal Endangered Species Acts: 14 vertebrates and 59 plants, and 14 invertebrates, including 6 butterfly species. This count does not include unlisted native pollinators and other plants and animals experiencing sharp declines. The importance of UCSC coastal prairie habitat to a diversity of plant species and insect pollinators was documented by the late naturalist Randall Morgan, whose insect collection is housed at the Kenneth S. Norris Center for Natural History, where it inspires and serves as a reference point for student and faculty research, providing a rich cultural tradition on campus.

Randall Morgan, who discovered and named several of the special status plant species potentially occurring on the UCSC campus, ranked “native grassland/flowerfield” as one of the most sensitive habitats in Santa Cruz County, with the greatest number of endemic or special status taxa, the most severe threats, immediate and continuing, and the greatest percentage lost or degraded, in a formal habitat rating system developed for open space acquisition purposes:

Habitat Evaluation Matrix						
<i>Natural communities/habitat types occurring in Santa Cruz County, ranked on a scale of 1-5 (one being highest) on each of six parameters</i>						
Natural communities/ habitat types	Evaluation parameters					
	Greatest number of endemic or special-status taxa	Most severe threats, immediate and continuing	Greatest percentage lost or degraded	Smallest total area remaining	Smallest area under legal "protection"	Lowest potential for recovery once lost or degraded
Sand parkland	1	2	2	1	2	1
Central maritime chaparral ¹	3	1	2	1	1	2
Native grassland/flowerfield	1	1	1	4	2	2
Coastal headlands	2	2	3	2	1	1
Freshwater wetlands	3	2	3	3	2	3
Beaches, coastal dune	2	2	3	3	3	4
Riparian deciduous forest	4	3	2	3	3	2
Northern maritime chaparral ²	2	3	4	4	2	3
Estuaries, salt marshes	3	3	4	2	2	4
Primary forest (conifer)	3	3	1	4	4	4
Perennial streams	4	3	4	3	2	4
Northern mixed chaparral ³	3	3	5	4	3	3
Coastal sage scrub	4	5	4	4	2	5
Non-native grassland	2	4	5	4	4	5
Ocean	3	5	5	5	5	5
Mixed hardwood forest	4	5	5	5	5	5
Secondary forest (conifer)	5	5	5	5	5	5

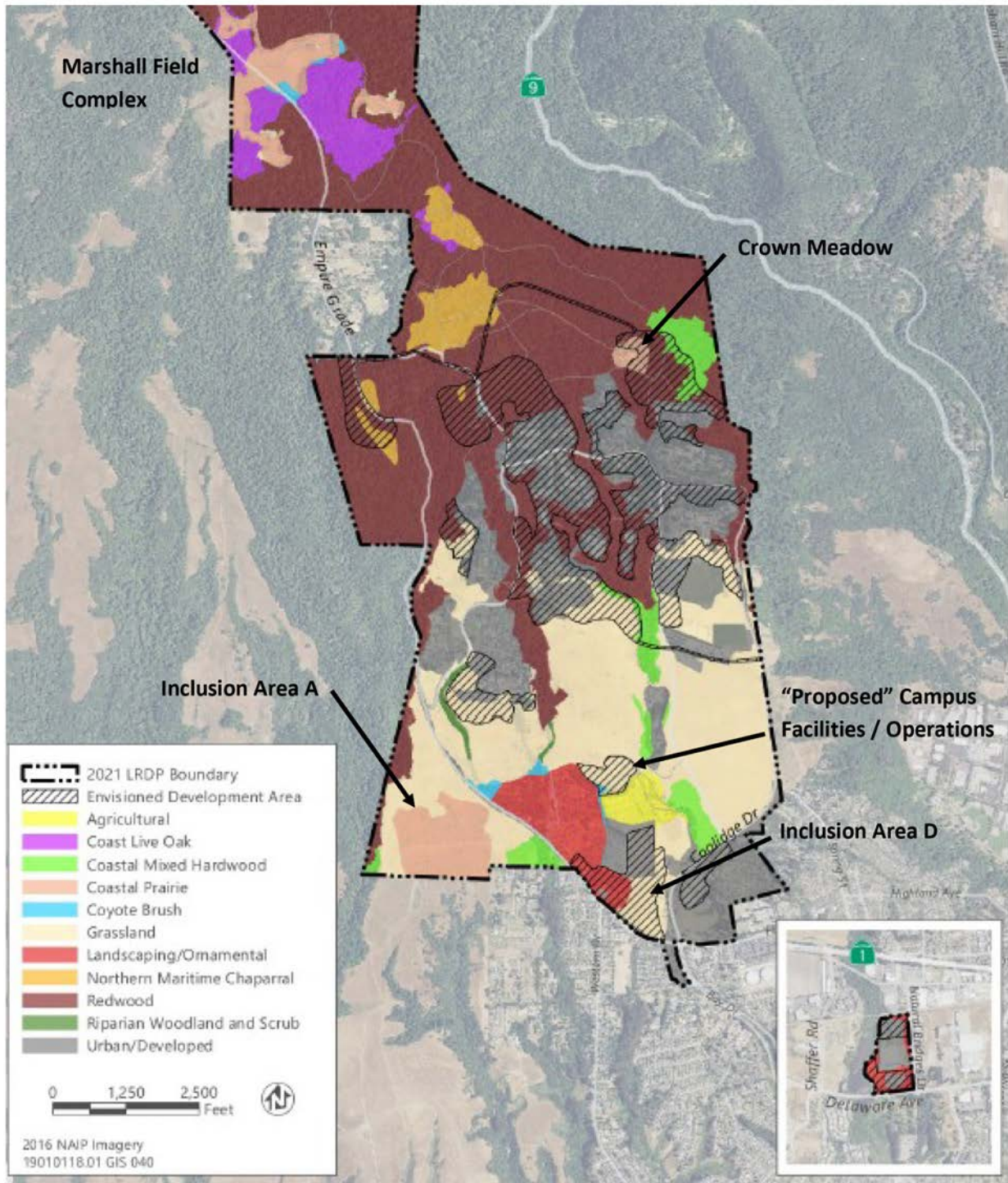
O6-34
cont.

The decline in native grasses and grasslands in the last two centuries has been caused by intensive cultivation, poorly managed grazing, urbanization, fire suppression, and the introduction of invasive, nonnative species. Agriculture, invasion by exotic species, development, and other human-related activities have reduced California native grasslands by 99 percent.

The proposed LRDP would convert to housing and office buildings approximately 70 acres of grassland habitat, including 2-4 acres of coastal prairie habitat at Crown meadow on north campus that would experience a combination of direct conversion and indirect adjacent impacts from proposed housing. Residential uses immediately adjacent to sensitive grassland resources would introduce trampling, disturbance, litter, non-native vegetation and fire hazards that would undermine habitat quality or change the plant composition to a ruderal habitat type. The proposed residential zone is deformed towards the meadow and was evidently designed to encircle the habitat. A slight modification of the proposed development area at Crown meadow to avoid the habitat and provide a habitat buffer setback would eliminate the direct impact and significantly reduce indirect effects. This reconfiguration could easily be accomplished by adding height to the proposed buildings or by extending the habitat to the north and east, where it would

O6-35

affect mixed hardwood and second growth conifer forest, rated the least sensitive habitat by Morgan. The EIR is obligated to avoid identified sensitive habitat where feasible. At minimum, the EIR should evaluate the feasibility of reconfiguring the North Campus housing zone as a project alternative, to provide a buffer area between the development area and the grassland.



O6-35
cont.

The University has already damaged or destroyed 16-20 acres of existing grassland habitat on campus, including all of area proposed for the campus facilities and operations adjacent to the Great Meadow, and part of Inclusion Area D, the site restore coastal prairie and Ohlone tiger beetle restoration. The affected areas have been cleared of vegetation and used for refuse management, including discharge of debris piles and fill and storage of waste receptacles. Development prior to environmental review constitutes a violation of CEQA and the responsible parties should be identified and held responsible. This type pre-emptive habitat destruction is a commonplace occurrence in private development but reprehensible at an institution that is supposed to set an example of the highest ethical standards for its students and faculty. The photographs below document the CEQA violation:

Proposed Campus Facilities and Operations, 2007:



Proposed Campus Facilities and Operations, 2020:



O6-36

Dumpsters, debris boxes and other waste receptacles at the “proposed” facilities site:



Inclusion Area D, 2016 to 2020 (left to right), indicating recent vehicular activity and dumping:



Impacts

The DEIR proposes essentially three measures to mitigate potential impacts to sensitive plants and plant communities: avoidance at the project phase, or transplantation/offsite restoration where avoidance is not feasible.

These mitigation measures are all inadequate. Avoidance of sensitive plants must be implemented at the program phase, when roads, proposed development zones and infrastructure can be reconfigured to avoid plant habitats. When roads, neighboring buildings and infrastructure already have been constructed, avoidance is no longer feasible. It is not effective or realistic to avoid sensitive plants by retaining them in a tiny island of open space surrounded by development, and such cannot be used as a basis for a finding of less than significant.

O6-36
cont.

O6-37

Transplantation or creating habitat is rarely effective. The high degree of failure of transplantation and habitat creation is such that it cannot be used to justify a determination of “less than significant” impact at the project phase. As coastal prairie expert Randall Morgan observed, if plants were meant to grow in the new location, they would be there already.

In terms of restoring existing degraded habitat, the campus should be managing its sensitive coastal prairie habitat to prevent degradation, not waiting for an opportunity to restore them in response to development. This incentivizes neglectful management. Numerous scientific papers have documented the existing, ongoing degradation of coastal prairie within and around campus lands by invasive European grasses and non-native trees and shrubs. Degradation, either deliberate or neglectful, is also affecting prairie habitat and wildlife through off-road vehicular use, dumping, mountain biking and other human activities. Not only to maintain the quality of this existing sensitive plant community, but to maintain the Ohlone tiger beetle and other special status wildlife, the University should be implementing, improving and expanding grassland management measures.

The following mitigation measures shall be required to adequately address CEQA:

1. The 50 to 60 intact acres of grassland habitat affected by proposed development zones shall be subject to a comprehensive data, literature and on-the-ground surveys to identify sensitive plants and wildlife currently existing, prior to EIR certification.
2. Areas with sensitive plants, animals or plant communities shall be avoided by redrawing proposed development zones.
3. If the extent or location of the sensitive species precludes full avoidance, the resultant habitat degradation shall be mitigated by purchasing conservation easements or fee-simple acquisition of comparable offsite habitat at a 3:1 area ratio as the LRDP is implemented.
4. Inclusion Area D, an established habitat restoration area with soil substrate that supports coastal prairie management, shall be removed from the development area.
5. The residential zone surrounding Crown Meadow shall be redrawn to avoid the habitat and provide a 200-foot buffer from housing development.
6. The LRDP shall call out the proposed phasing of development, and place development of more sensitive habitats and potential habitat last in order. The development zone proposed along the north side of the Great Meadow is sensitive, and should be among the last sites developed, if developed at all, for multiple reasons:
 - a. Intact grassland habitat blocks are important to preserve, to avoid fragmentation;
 - b. The Great Meadow is inhabited by American badger, which is sensitive to vibration, dust noise and human activity, and is likely to be extirpated if this area is developed. The proposed strategy of identifying dens and fencing these off until they are abandoned is not a mitigation, it is an adverse impact;

O6-37
cont.

- c. Special status raptors, Bryant’s savannah sparrow and loggerhead shrikes breed in the meadow or include in breeding territory for foraging;
 - d. Part of the development area proposed on the edge of the Great Meadow is believed to be potentially suitable habitat for OTB, according to a report prepared by entomologist Richard Arnold (citation above).
 - e. The proposed development would impose in an ecotone along the north border that is important habitat and a wildlife corridor for movement.
 - f. The proposed development would have visual impacts and intrude / disturb / disrupt recreational and research uses.
 - g. The topography may suggest possible karst / geologic constraints.
7. The University shall permanently protect the Marshall Field Complex from any future development of roads, structures, recreational facilities or other uses that could damage sensitive plant species found in the coastal prairie habitat.
 8. The University shall prepare and implement a comprehensive habitat conservation plan (HCP) to maintain and expand native and mixed native coastal prairie habitat in the Marshall Field complex and in Inclusion areas A and D.

O6-37
cont.

Summary

The Sierra Club appreciates this opportunity to comment on the University of California Santa Cruz 2021 Long Range Development Plan Draft Environmental Impact Report. We appreciate the educational mission of the University and its contributions locally, regionally, and beyond. We look forward to working with the University to determine the scope of its proposed growth over the next 20 years based on a complete and accurate analysis of its potential impact to the environment.

O6-38

Yours Sincerely,



Micah Posner, Executive Committee Chair



Erika Carpenter <escarpent

Letter
07

[eircomment] LRDP EIR Comments

Stephanie Clarke <sclarke@volkerlaw.com>

Mon, Mar 8, 2021 at 4:55 PM

To: eircomment@ucsc.edu

Cc: Stephan Volker <svolker@volkerlaw.com>, Jamey Volker <jvolker@volkerlaw.com>, Alexis Krieg <akrieg@volkerlaw.com>

Ms. Carpenter,

Please find attached a single pdf containing the Comments on the Draft Environmental Impact Report for the UC Santa Cruz 2021 Long Range Development Plan on Behalf of Habitat and Watershed Caretakers, Don Stevens, Russell B. Weisz, Hal Levin, Harry D. Huskey, and Peter L. Scott, SCH # 2020029086, and Exhibits 1 and 2 thereto.

Please confirm receipt of these comments and include them in the public record for this matter.

If you have any trouble opening the attachment, please contact me at the information below.

Thank you,
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eircomment mailing list

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2021-03-08 HAWC 2021 LRDP DEIR Comments.pdf
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March 8, 2021

VIA EMAIL AND U.S. MAIL

Erika Carpenter
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**Re: LRDP EIR Comments:
Comments on the Draft Environmental Impact Report for the UC Santa
Cruz 2021 Long Range Development Plan on Behalf of Habitat and
Watershed Caretakers, Don Stevens, Russell B. Weisz, Hal Levin, Harry D.
Huskey, and Peter L. Scott, SCH # 2020029086**

Dear Ms. Carpenter:

The University of California at Santa Cruz (“UCSC”) campus is situated in an extraordinary environment whose deep, lush redwood forests give way to sweeping meadows overlooking Monterey Bay. This breath-taking setting hosts a vast array of sensitive plants and animals, and is blessed with iconic landscapes and world-class vistas. To date, the campus has been carefully interwoven into the natural fabric of its environment, sparing the most significant and sensitive natural features from irreparable ecologic and scenic harm. Indeed, “commitment to environmental stewardship and community engagement are central to the core values of UC Santa Cruz.” UCSC, *Campus Overview: About UC Santa Cruz*, available at: <https://www.ucsc.edu/about/campus-overview.html> (last accessed March 4, 2021) (“*Campus Overview*”).

However, that thoughtful balance is now threatened. The rapid and unsustainable growth contemplated in the University’s 2021 Long Range Development Plan (“LRDP” or “Project”) hints darkly of a jumbled, urban-style mega-campus oblivious to the unique natural amenities of this site and the heuristic values they hold. While UCSC is obliged to update its LRDP to address potential growth pressures, it must also recognize the opportunities thus presented to identify, analyze and protect the vulnerable and irreplaceable natural resources that inspired its

O7-1

founders to select this one-of-a-kind site for higher learning.

The Draft Environmental Impact Report (“DEIR”) for the campus’s 2021 LRDP fails to identify and protect those important resources, and instead accepts the cookie-cutter premise that the campus will grow to the standard-issue UC campus size of about 28,000 students by the 2040-2041 school year. DEIR at 1-3. It then trumpets its supposed need to “accommodate the increased campus population” it preordained to justify plans to construct “an additional 3.1 million assignable square feet of academic and support building space.” DEIR at 1-3. The 2021 LRDP must not presume such unsustainable growth in the student population, and it certainly should not rely on that improvident growth to justify unnecessary campus expansion.

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cont.

The DEIR also fails to fully analyze that Project’s impacts, and consider a broad range of creative alternatives – including in particular those that encourage and nourish off-site learning – that would avoid or lessen those impacts, as discussed below. Because the California Environmental Quality Act (“CEQA”) requires fact, not fiction, and demands environmental accountability, the DEIR violates CEQA. It must be revised to adequately consider the Project’s impacts, and protect the campus’ place as “one of the most visually spectacular settings in higher education.” *Campus Overview*.

I. Project Description

An adequate project description is an essential starting point for analysis of a project’s environmental impacts, and all environmental impact reports must provide one. 14 California Code of Regulations [“CEQA Guidelines”] § 15124. As directed by the CEQA Guidelines, the project description “shall contain . . . A statement of objectives sought by the proposed project[, which] will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR The statement of objectives should include the underlying purpose of the project.” CEQA Guidelines § 15124(b). It must not be so narrow as to unduly constrain the consideration of alternatives to the project. *North Coast Rivers Alliance v. Kawamura* (“*North Coast*”) (2016) 243 Cal.App. 4th 647, 668-669. “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” *County of Inyo v. City of Los Angeles* (“*County of Inyo*”) (1977) 71 Cal.App.3d 185, 193.

O7-2

The DEIR provides an artificially narrow Project description that constrains the alternatives and impacts analysis in violation of CEQA. CEQA Guidelines § 15124(b); *North Coast*, 243 Cal.App. 4th at 668-669. It admits that 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 of [UCSC].” DEIR at 2-8. Yet the objectives discussed immediately thereafter demand rapid student growth despite its impacts on housing, traffic, water and other resource constraints, and ignores off-site alternatives for growth including remote learning that would accommodate those constraints. DEIR at 2-8 to 2-9. Such a narrowly constrained set of objectives precludes any other outcome besides the proposed Project, thereby subverting

CEQA's entire purpose.

The DEIR's artificially narrow objectives require the University to "[e]xpand *campus* facilities and infrastructure *to allow for projected increases* in student enrollment," "[e]nsure *compact and clustered development*," create "two new college pairs *at the main residential campus*," and "allow the campus to function as a *center of public cultural life*." DEIR at 2-8 to 2-9. These objectives leave no room for any proposal aside from the Project. And notably, they are not necessary to accomplish the "overall objectives" of the 2021 LRDP – UCSC's teaching, research, and public service missions.

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UCSC's public service mission is especially important here, because UCSC specifically prides itself on its "uncommon commitment to . . . public service." *Campus Overview*. The DEIR must ensure that all aspects of UCSC's mission are valued and considered when defining the Project's objectives. Yet, this vital public service mission is almost entirely overlooked in order to promote campus growth. DEIR at 2-8 to 2-9. The LRDP "anticipates . . . potential enrollment of 28,000 [full-time equivalent "FTE"] students (three-quarter average) by the 2040-2041 academic year," and plans to construct "an additional 3.1 million assignable square feet of academic and support building space" to "accommodate the increased campus population." DEIR at 1-3. This reflexive obeisance to the premise of rapid campus growth precludes the careful and detailed consideration of less impactful alternatives that CEQA demands..

The DEIR claims that "the 2021 LRDP does not mandate growth or the provision of new facilities," but then commits to providing for up to 28,000 FTE students. DEIR at 1-3. It asserts that the proposed 28,000 student assumption is "based on overall UC and campus population projections, demonstrated need for additional public university capacity in California, and an understanding of campus needs." DEIR 2-9. This reasoning stands CEQA on its head by allowing the "growth projection" tail to wag the environmental planning dog. If growth on the UCSC campus occurs, it will be because the University allows it. The DEIR's framing of student enrollment growth as an unstoppable force that it must accommodate infects the entire DEIR, starting with the Project description.

O7-3

Indeed, the "growth projection" tail is directing the scope of the entire 2021 LRDP. Unlike past LRDPs – which were effective for set periods of time – the proposed 2021 LRDP is effective for as long as it takes to reach the ultimate goal of 28,000 FTE students. DEIR at 1-3. "[T]he 2021 LRDP does not sunset, and there is no set timeframe for when a new LRDP would be needed. However, for analytical purposes, [the DEIR] assumes that the forecasted student and faculty/staff growth would occur by the 2040-2041 academic year, along with development of related facilities and housing." DEIR at 1-3. But this change in scope is not warranted, and it unduly places growth objectives above all other important educational goals, including public service and environmental protection and sustainability.

In summary, the DEIR prematurely commits and subordinates the LRDP to the rapid and

unsustainable “anticipated growth in on-campus student population from an estimated 18,518 FTE students (three-quarter average) for the 2018–2019 academic year to a potential enrollment of 28,000 FTE students (three-quarter average) by the 2040–2041 academic year.” DEIR at 2-9. This embedded premise that rapid on-campus growth is unavoidable because it is pre-ordained in the University’s “growth projection” defeats the entire purpose of the long-range planning process. It is akin to announcing the winner of a race before the starting gun is fired. It subverts UCSC’s public service commitment and renders the CEQA process a hollow exercise. It must not be allowed to constrain the EIR’s statement of objectives.

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II. Environmental Setting

Normally, the “EIR must include a description of the physical environmental conditions in the vicinity of the project . . . as they exist at the time the notice of preparation is published.” CEQA Guidelines § 15125(a) (emphasis added). However, this presumption does not apply to a project approval that the University knows the courts have already set aside. Because the Student Housing West Project’s approval was vacated by the Santa Cruz County Superior Court on October 30, 2020, and indeed, additional challenges to its legality remain pending – one on appeal and one in Superior Court – the DEIR must not indulge the fiction that this project whose approval has been vacated by the courts remains within the existing environmental setting. Indeed, the DEIR admits that the Student Housing West Project approvals were overturned by the Superior Court, and that it cannot proceed unless and until it is re-approved – which is not yet, and may never, be the case. DEIR 3.13-7. Therefore, it must not be included in the baseline conditions. Rather, and as required by Guidelines section 15125(a), the environmental setting should describe the campus as it now exists, with sweeping ocean views and untrammled open spaces, including most prominently, its iconic East Meadow. But the DEIR fails to abide by this mandate, and instead includes a project it knows was illegally approved and properly set aside by the Superior Court – as if the Judicial Branch does not exist. DEIR at 3.3-29.

O7-4

In an apparent attempt to mask the fact that the Student Housing West Project has been set aside and the University failed to timely appeal that judgment, and thus this project is not part of the environmental setting, the DEIR also refers to the Student Housing West Project as a cumulative project. DEIR 4-3. But this project is never actually analyzed as a cumulative project. Instead, this reference is in name only. Rather, the Student Housing West Project is discussed throughout the environmental setting section of the DEIR as if it were already part of the existing environment, and the student beds it might have provided had it been lawfully approved – instead of being set aside by the court – are presumed to already exist in the DEIR’s discussion of impacts. DEIR at 3.6-12, 3.10-29, 3.13-2, 3.13-7, 3.16-34.

This erroneous presumption is particularly marked in the DEIR’s discussion of Project alternatives. As further discussed below, the no project alternative mistakenly includes the Student Housing West Project. DEIR at 6-10. But the Student Housing West Project is not built and therefore cannot be considered an existing condition that will be present. The disconnect

between the DEIR’s conflicting claims that this project is a “cumulative project” yet subject to “baseline” treatment is at best confusing and at worst, a contrived fiction to evade required CEQA review.

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III. Alternatives

CEQA requires an EIR to describe a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of its significant effects. CEQA Guidelines § 15126.6(a) and (f). “An EIR’s discussion of alternatives must contain analysis sufficient to allow informed decision making.” *Laurel Heights Improvement Association v. Regents of the University of California* (“*Laurel Heights*”) (1988) 47 Cal.3d 376, 404. An alternative may “not be eliminated from consideration solely because it would impede to some extent the attainment of the project’s objectives.” *Habitat and Watershed Caretakers v. City of Santa Cruz* (“*HAWC*”) (2013) 213 Cal.App.4th 1277, 1304; CEQA Guidelines § 15126.6(b). “The EIR is required to make an in-depth discussion of those alternatives identified as at least potentially feasible.” *HAWC*, 213 Cal.App.4th at 1303 (emphasis and quotation omitted).

As discussed above, protecting UCSC’s unique environment and advancing its public service mission are central objectives to the University and thus must be achieved in the LRDP. Therefore, the DEIR should have considered alternatives that assure those objectives will be achieved. Alternatives that temper on-campus population growth in order to protect the campus’s extraordinary environment must be given full consideration, as they can be fashioned to achieve the LRDP’s stated objective to “support [] the teaching, research, and public service missions of [UCSC].” DEIR at 2-8. Limiting FTE on-campus student enrollment will allow UCSC to put more resources toward education and research for its students, while at the same time achieving its public service and environmental preservation objectives.

O7-5

Yet, not a single one of the DEIR’s alternatives considered shifting some student growth to other UC campuses that have greater carrying capacities, such as greater water supplies and fewer environmental impacts and constraints. DEIR at 6-3 to 6-6. While two alternatives did consider a proposed enrollment of 26,400 FTE, a mere 1,600-student reduction from the proposed Project would still amount to an unnecessary and excessive expansion that would allow construction of 2.5 million assignable square feet of academic and administrative facilities. DEIR at 6-11, 6-13, 6-17. Such intense growth on a site hosting vulnerable and irreplaceable environmental resource must be weighed against an alternative that shifts growth elsewhere, such as other campuses that have the space and the resources to expand. Instead of assuming that UCSC’s on-campus student population must be expanded, and keep expanding, to accommodate more and more students on a campus that cannot support that growth, the LRDP should limit UCSC’s on-campus growth to a more sustainable population, and explore off-campus alternatives.

Indeed, the University is contractually obliged to conduct a “comprehensive analysis of potentially feasible alternative locations to accommodate proposed UCSC enrollment growth” including “satellite campuses [and] remote-classrooms.” Comprehensive Settlement Agreement between the University and the local residents on whose behalf these DEIR Comments are submitted, attached as Exhibit A to the Judgment filed September 22, 2008 in the matter *Don Stevens, et al. v. University of California Santa Cruz, et al.* Civ. Nos. CV 155583, et al. Santa Cruz County Superior Court, § 5.1.

But the DEIR dismissed all but one of those alternatives, violating its contractual duty to provide – and the Superior Court’s Judgment requiring – a comprehensive analysis of alternative locations to accommodate growth. DEIR at 6-3 to 6-6. Based on a single perfunctory and conclusory paragraph each, the DEIR dismisses four off-campus site alternatives, and one remote/distance alternative, on the erroneous premise that they do not meet the project objectives. DEIR at 6-3 to 6-6. But as discussed above, those objectives are artificially contrived to preclude consideration of the reasonable range of alternatives that CEQA requires. *HAWC*, 213 Cal.App.4th at 1304; CEQA Guidelines §§ 15124(a), 15126.6(b). Indeed, the DEIR dismisses every off-campus alternative on the basis that it fails to meet the “objective of placing new facilities near existing facilities to enhance synergies between existing and new educational and research programs.” DEIR at 6-4 to 6-6. But there is more than one way to “enhance synergy” between new and existing educational resources. Restricting all alternatives to on-campus ones – in a time where we can readily observe how successful remote learning can be – subverts CEQA’s core purpose of exploring a reasonable range of alternatives to avoid and reduce environmental harm.

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UCSC has an unprecedented opportunity to analyze the challenges that the world is facing, and utilize some of the new procedures and practices to its benefit. A distance learning alternative would alleviate many of the potential effects of campus growth, including water and transportation impacts, while still enabling sustainable growth and public service, and potentially opening up enrollment to students who may not have been able to attend otherwise. And, as noted, “comprehensive” consideration of this alternative is already required under the Comprehensive Settlement Agreement the University signed in 2008 with the local residents on whose behalf these DEIR Comments are submitted. The DEIR’s cursory dismissal of this alternative violates both CEQA and the Comprehensive Settlement Agreement. DEIR at 6-6.

The DEIR also fails to consider an alternative “that could avoid or lessen the significant environmental impact of [campus expansion] on the [City of Santa Cruz’s] water supply.” *HAWC*, 213 Cal.App.4th at 1305. As discussed below, UCSC relies on the City of Santa Cruz (“City”) for its water supply and that water supply is “anticipated [to have] shortfalls under drought conditions.” UC Santa Cruz LRDP 2005-2020 (“2005 LRDP”), 88; DEIR at 3.17-24. While UCSC did reduce its water use after 2005, it has been increasing again since 2014. And the City of Santa Cruz expects the demand for water to exceed supplies by 2025. DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6, 6-24. Because

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UCSC campus growth will necessarily increase water demand, the EIR must consider an alternative that reduces that impact on the City’s water supply. DEIR at 3.17-19 to 3.17-21.

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The DEIR’s no project alternative likewise violates CEQA. As discussed above, the Student Housing West Project is not currently constructed, and may never be built. As noted, the Student Housing West Project approvals were overturned by the Superior Court and it cannot proceed unless it is reapproved and the reapproval survives the pending legal challenges. DEIR at 3.13-7. Yet this speculative project is presumed constructed under Alternative 1– the no project alternative. DEIR at 6-10. “The no-project analysis is required to discuss ‘the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved.’” DEIR at 6-7. But the Student Housing West Project is not built, and at the time of the notice of preparation was the subject of litigation making its future uncertain. Its inclusion in the no project alternative despite the Superior Court’s October 30, 2020 Judgment vacating its approval, and the additional legal challenges still pending, ignores the proper role of the courts in enforcing CEQA’s mandate, and therefore violates CEQA. CEQA Guidelines § 15126.6(e)(2).

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IV. Impacts and Mitigation Measures

CEQA mandates that the DEIR adequately analyze a project’s effects to foster informed decisionmaking and allow the public to understand those impacts. Public Resources Code (“PRC”) § 21002.1; CEQA Guidelines §§ 15121, 15126, 15126.2. Where possible, the lead agency must employ feasible mitigation measures that could minimize the project’s significant adverse impacts. PRC § 21002; CEQA Guidelines §§ 15121, 15126.4. The EIR must provide information in “an analytically complete and coherent” manner to foster CEQA’s informational purpose. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (“*Vineyard*”) (2007) 40 Cal.4th 412, 440; *Berkeley Keep Jets Over the Bay Committee v. Board Port of Commissioners* (2001) 91 Cal.App.4th 1344, 1355-1356; CEQA Guidelines §§ 15121, 15144. Yet, the DEIR failed to adequately discuss and mitigate the Project’s impacts in at least the following nine ways.

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A. Aesthetics

“The visual character of the campus is defined initially by its spectacular natural environment of open meadow spaces, coastal oak forests and redwood groves.” DEIR at 3.1-10. According to the 2005 LRDP, the campus site was selected because it was “overlooking Santa Cruz and the Monterey Bay. . . . Often called the most spectacular university site in the world, the campus landscape has played a vital role in shaping UCSC’s physical and academic development.” 2005 LRDP, 16. “The natural landscape is the formative, iconic element of the UCSC campus and the dominant component of its powerful array of open spaces.” 2005 LRDP, 33. Notably, the proposed 2021 LRDP does not discuss the history of why this site was chosen and simply distills the campus’ beauty down to single sentence that does not do it justice: “The

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campus enjoys panoramic views overlooking the Monterey Bay and the Pacific Ocean.” Draft 2021 LRDP at 51.

Rather than ensure that these “vital,” “spectacular” and “iconic” views are preserved and protected by the 2021 LRDP, the DEIR brushes potential impacts aside and declares that the addition of nearly 10,000 new students and 3.1 million square feet of facilities and infrastructure will not have a significant affect on any scenic views. DEIR at 3.1-38 to 3.1-39.

For example, “[e]xpansive meadows at the campus’s main entrance gradually transition to the rugged redwood forests of the Santa Cruz mountains, providing an incomparable natural setting.” 2005 LRDP, 16. But UCSC has apparently already committed to develop “[a]n enhanced historic district at the entrance to the main residential campus.” DEIR at 2-9. And the DEIR fails to provide any discussion of what that “enhanced” historic district will entail or how it will impact the current views of the “incomparable” East Meadow. The failure to evaluate these impacts, and analyze alternatives and mitigation measures that would avoid or reduce them, violates CEQA.

Impacts to the East Meadow cannot be dismissed from careful analysis because UCSC wants to build the Student Housing West Project. As discussed above, this project’s structures do not exist currently and the project must be re-approved and survive additional legal challenges before it may proceed. The impacts from the proposed Student Housing West Heller site likewise cannot be ignored on the mistaken grounds that this project is already part of the existing environment. It isn’t. Just like the University’s approval of the Hagar site’s student housing proposed for the East Meadow, the University’s approval of the Heller site’s student housing near the West Campus entrance to the campus was set aside by the Santa Cruz Superior Court on October 30, 2020. That project cannot proceed unless and until (1) it is lawfully reapproved by the University and (2) it survives two lawsuits raising additional legal challenges. The EIR must consider the impacts of the Student Housing West Project on the campus at both locations as they currently exist – *without* this project.

The fact that additional new development is also planned for areas of the campus on which there is existing development does not negate the impacts that additional new development, and its thousands of new students, will have on the extraordinary aesthetic resources of this unique campus. The DEIR must, as CEQA requires, recognize and describe the “iconic” and “incomparable” nature of these scenic resources, fully disclose and analyze the severe impacts that contemplated campus development will have on them, and evaluate a broad range of alternatives and mitigation measures that would avoid or lessen those impacts. Unless the DEIR is revised to address these significant impacts, these extraordinary and irreplaceable scenic resources are at serious risk of irreparable degradation and loss due to contemplated, but insensitive and unnecessary, rapid and unsustainable campus growth.

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B. Biological Resources

In the past, the United States Fish and Wildlife Service (“USFWS”) has noted that “[t]he piecemeal approach that UCSC has taken in terms of implementing individual development projects over time makes it difficult for the Service to adequately assess cumulative impacts.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 2, p. 2. USFWS also expressed similar concerns about the 2005 LRDP DEIR, “includ[ing] the following: ‘1) underestimating the effects of various development projects on federally listed species, 2) [inadequate] UCSC land use designations regarding conservation of federally listed species, and 3) the lack of a comprehensive management plan for listed species at UCSC.’” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 2, p. 2 (citing USFWS January 11, 2006 comment letter to UCSC on the 2005 LRDP DEIR).

These same concerns apply here. Because the DEIR fails to fully address the cumulative and indirect habitat impacts from all the development that the LRDP would allow over its life, those impacts will be hidden within piecemealed, individual project assessments. Thus buried from public and agency view, those impacts may never be recognized, leaving USFWS, the City and County, other agencies, and the public without a clear and complete understanding of the LRDP’s cumulative and indirect biological impacts. Leaving agencies and the public in the dark places those impacted resources at unnecessary risk.

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An agency must review the entire activity – in this case, the LRDP over its entire life – as a whole, rather than segment it into smaller parts. *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1230; *Laurel Heights Improvement Association v. UC Regents* (1988) 47 Cal.3d 376, 406; CEQA Guidelines § 15378(a), (c), (d). Because UCSC campus development has the potential, over the course of the LRDP’s implementation, to significantly impact a long list of vital and vulnerable biological resources, the EIR must address all of those potential impacts, both short-term and long-term, now – when the go/no-go long-range planning decision is made – and before any further development may be allowed to proceed. But the DEIR defers all surveys, studies, plans, and avoidance measures to project-specific analyses. DEIR at 3.5-39 to 3.5-70. The failure to consider these impacts as a whole diminishes their perceived significance, ignores the impacts at the critical planning stage when the ability to avoid or mitigate those impacts is greatest, and thereby needlessly risks harm to these resources.

The EIR’s biological resources analysis also entirely fails to include a discussion of the Student Housing West Project. As noted above, that project has not been reapproved, let alone constructed, and therefore is not part of the existing environment. If it is eventually constructed, it will have significant impacts on biological resources. Even if this unlawful project is later approved under the 2021 LRDP, at that point it will be part of that larger, 2021 LRDP Project and yet will not have been examined as such. Therefore, the EIR’s failure to consider the impacts of the Student Housing West Project together with the impacts of the other development

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proposed under the 2021 LRDP, violates CEQA.

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C. Greenhouse Gas Emissions

As the “physical development and land use plan to meet the academic and institutional objectives,” the LRDP has the potential to significantly affect greenhouse gas (“GHG”) emissions on campus. DEIR at 1-1. Indeed, “the 2021 LRDP would result in a net increase in campus-wide GHG emissions caused by additional construction activity; on-road VMT [vehicle miles traveled]; building energy consumption; water, waste, and wastewater emissions; and additional stationary source emissions.” DEIR at 3.8-21. But the DEIR fails to adequately analyze and mitigate that significant impact.

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The DEIR admits that the quantity of GHG “emissions that has accumulated in the atmosphere is enormous and has resulted in climate change, which is a significant cumulative impact.” DEIR at 4-30. But the DEIR still limits its analysis to the impacts in and around the UCSC campus only. DEIR at 3.8-21 to 3.8-27. GHG emissions are not confined by the borders of the University, or the City. GHG emissions by UCSC have the potential to impact much more than just the campus and the City, and those cumulative impacts cannot be ignored. As the DEIR states, “[b]ecause climate change is a global phenomenon, the impacts of GHG emissions are inherently cumulative,” and must be analyzed on a regional level. DEIR at 4-30. Because the DEIR’s GHG emissions analysis fails to provide that regional (and global) evaluation, it violates CEQA.

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Under CEQA, GHG emissions must also be analyzed in a manner that recognizes the entirety of the project’s “lifecycle” impact, including the emissions from the mining and gathering, cultivation and harvest, and manufacturing of the project’s components, their fabrication, their transportation to the site, the on-site grading and construction of the project, and its long-term operation and ultimate decommissioning. This comprehensive review of a project’s GHG emissions, widely known as a lifecycle analysis, is required by CEQA but never completed for the DEIR. DEIR 3.8-21 to 3.8-27. The LRDP should require a lifecycle analysis of all development that is proposed pursuant to the LRDP. Such an analysis would provide a more accurate and complete understanding of the Project’s GHG emissions and its impact on the surrounding environment. Without such an analysis, the public and decisionmakers are left in the dark about the Project’s true GHG impacts.

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D. Hydrology and Water Quality

Campus development under the LRDP will impact the site’s hydrology and water quality. The campus is underlain by extremely complex and readily erodible geologic formations known as “karst,” as hydrologist and karst specialist Tom Aley explains in his accompanying comments, which are attached as Exhibit 1. The karst system is a landform that is “produced primarily through the dissolving of rock” and features “sinkholes, caves, large springs, dry valleys and

07-17

sinking streams.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 11. Because of these features, karst landscapes pose unique hazards for surface development, and are very difficult to evaluate for potential use of groundwater stored in them. “In karst areas, water commonly drains rapidly into the subsurface at zones of recharge and then through a network of fractures, partings, and caves, [and] emerges at the surface in zones of discharge at springs, seeps, and wells.” *Id.*; Thomas Aley, Hydrogeologic Review of University of California Santa Cruz 2021 Long Range Development Plan EIR, March 4, 2021, p. 1-2, 7-8 (attached hereto as Exhibit 1).

Karst landscapes present numerous environmental uncertainties that make development pursuant to the LRDP and its impacts especially problematic. “Karst regions require special care to prevent contamination of vulnerable groundwater supplies and to avoid building in geologically hazardous areas.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 7. “Most of the rain that falls in a karst area drains into the ground rather than flowing to a surface stream.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 28. LRDP development, such as construction of the Student Housing West Project, can increase “pollution of groundwater by sewage, runoff containing petrochemicals derived from paved areas, domestic and industrial chemicals, and trash.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 7. “Contamination is common in karst aquifers beneath urban areas with high population densities.” DEIR Appendix B at HAWC’s April 8, 2020 Scoping Comments, Exhibit 3, p. 30.

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cont.

Despite all of these perils and uncertainties, the DEIR makes assumptions about the karst aquifer and its availability for groundwater storage and pumping that ignore its inherent unsuitability for development and vulnerability to contamination and dewatering. Exhibit 1, pp. 3-8. For example, the DEIR makes baseless assumptions that overstate the groundwater storage capacity of the karst aquifer in order to sidestep hard questions about providing an adequate year-round water supply for the LRDP’s rapid growth should the University be unable to secure adequate water supplies from the City of Santa Cruz. The City has already concluded, as noted above, that it will face water shortages by 2025. “While human demands for water on the University campus with a dramatically enlarged population will be relatively constant, the key issue is the adequacy of groundwater from the karst aquifer . . . under dry weather conditions.” Exhibit 1, p. 2. But rather than analyzing the impact of pumping groundwater during dry periods when water supplies are limited, the DEIR erroneously bases its analysis on a groundwater pumping study that was conducted when the karst formation’s discharges to down gradient springs and creeks were 15 times greater than those watercourses’ minimum flows. Exhibit 1, p. 6.

As Mr. Aley explains, “UCSC failed to collect adequate spring flow data during the period 1984 through 2019. As a result, the University has no credible estimate of the rates at which water has been discharged from the karst aquifer during this 35 year period and how rapidly water that enters the aquifer is discharged through the springs.” Exhibit 1, p. 3. UCSC

contends that pumping water from these aquifers may fill any deficit in water supply during dry years, but the karst system may not support the “113,700 gallons per day . . . projected demand.” Exhibit 1, pp. 3-4. “An adequately comprehensive network of monitoring wells for routinely measuring water level elevations is a key part of understanding and managing groundwater basins,” but the DEIR entirely failed to conduct adequate hydrologic investigations. Exhibit 1, pp. 4-5; DEIR 3.10-20, 3.10-24. Indeed, there are only 4 wells on campus and three are located within approximately 40 feet of one another. *Id.* More is needed to comply with CEQA’s informational mandate.

As Mr. Aley concludes, “[t]here is insufficient information available on the marble aquifer to conclude that it is capable of providing a daily volume of 113,700 gallons of water to extraction wells that would serve the University during dry periods without causing significant environmental problems. Those environmental problems include cessation of flow from springs and an increased risk of land subsidence or sinkhole collapse on University property.” Exhibit 1, p. 8. Because the DEIR fails to provide the University, the City, the Santa Cruz County Local Agency Formation Commission (“LAFCO”) and the public with the information necessary to make an informed and thoughtful decision regarding this Project’s impacts on water quality and supplies, it violates CEQA

O7-17
cont.

Furthermore, the DEIR fails to address other obvious impacts on water resources. For example, it overlooks the impacts on water resources from the Project’s creation of large areas of impervious surfaces. It admits that “[s]everal currently undeveloped areas along the upper/north campus are proposed for development under the 2021 LRDP,” which will create new impervious surfaces. DEIR at 3.10-33, 4-34. “Infiltration of rainfall is a significant source of recharge of the shallow aquifer on the north campus. Although this shallow groundwater is not extracted as a water source on the campus, it supplies water to springs and seeps located throughout the north campus and in adjacent drainages.” DEIR at 3.10-33; see also DEIR 3.10-10, 3.10-25 to 3.10-26, 4-34 to 4-35; Exhibit 1, p. 2, 7-8. Therefore, any changes in impervious surfaces can have a significant effect on the shallow aquifers of the area. Yet, while the DEIR notes that these changes are likely, it entirely fails to address the potential impacts on these vulnerable water resources from that reduced infiltration. DEIR at 3.10-33 to 3.10-34.

O7-18

As with the upper/north campus, likewise throughout the campus, surface discharge from shallow aquifers supplies headwater streams and saturates low areas and depressions. DEIR at 3.10-10, 3.10-25 to 3.10-26, 3.10-33; Exhibit 1, p. 2. Although small in acreage, these streams provide myriad habitats that support diverse plants and animals, as well as shelter, food, spawning sites and wildlife movement corridors. DEIR at 3.5-8, 3.5-10, 3.5-12 to 3.5-13, 3.5-16, 3.5-20, 3.5-26, 3.5-31, 3.5-33. However, the Project’s addition of impervious ground cover could result in reduced rainfall infiltration, and adverse effects on headwater stream flow, seeps, saturated depressions, and springs, and to the biota that rely on them. Because these shallow aquifers are often small, a single acre of added impervious surface can have a significant impact. DEIR, Appendix G at Table G1-2. The smaller the watershed the greater the impact. But despite

these facts, the DEIR fails to address the reduction in infiltration to these aquifers from the Project's construction of greater impervious surfaces.

07-18
cont.

The DEIR likewise fails to provide an adequate discussion of the Project's cumulative impacts on hydrological resources. It claims that "on-site retention of stormwater" is required "to comply with UC Santa Cruz Post- Construction Requirements," and "therefore, continued compliance prevents a reduction in flow to springs and to recharge the karst aquifer." DEIR at 4-35. But that assessment is incomplete. It implies – but does not explain if or how – runoff would be impounded close to the new, added impervious surfaces, or address how the impoundments will be designed to readily infiltrate the captured water in a manner that mimics the natural process. Without this information, the cumulative hydrological effects analysis is incomplete, and leaves the public in the dark about the Project's hydrological impacts.

07-19

E. Geology and Soils

As discussed above, the karst formation below the UCSC campus is fragile and presents numerous hazards and impacts. "The portion of the main residential campus underlain by karst is pockmarked with dolines (or sinkhole)." DEIR at 3.7-12. In addition to the hydrologic uncertainties posed by an underlying karst formation, the topography also creates geologic risks. "Problems occur when the landscape is altered by urban development. Erosion is a common side effect of construction, transporting soil to the lowest part of the sinkhole where it clogs the drain." DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 3, p. 28. Development also "increases the risk of induced sinkhole collapse." *Id.* at p. 27. Yet the DEIR all but dismisses this impact. DEIR at 3.7-27 to 3.7-28. After admitting that "[c]onstruction in karst terrain is potentially hazardous because many karst features are not visible at the surface," and that "boring data from prior investigations [shows] the surface of the marble bedrock is highly irregular, varying in elevation by more than 100 feet over a horizontal distance of 10 feet or less," the DEIR erroneously concludes that the Project's impacts will be less than significant. DEIR at 3.7-27. But the conclusion does not follow from the facts. The irregularity of the karst formation makes the impacts of any construction potentially significant. There are numerous alternatives that could lessen or avoid those impacts, including offsite learning options as noted above, that must be considered in light of these serious concerns. The DEIR's failure to adequately assess and mitigate these impacts violates CEQA.

07-20

F. Land Use and Planning

The DEIR declares that the 2021 LRDP would not conflict with existing land use plans. DEIR at 3.11-8. It claims that "UC Santa Cruz is not subject to municipal regulations of surrounding local governments, such as the City and County of Santa Cruz general plans or land use designations, for uses on property owned or controlled by UC Santa Cruz." DEIR at 3.11-11. But as discussed below, development proposed in the LRDP includes area outside the City's approved water service area, and the City's General Plan demands that any extension of a water

07-21

service area must be approved by LAFCO. DEIR at 3.17-11, citing City of Santa Cruz General Plan, Policy CC3.7. Accordingly, the EIR’s failure to identify the potential need for LAFCO review should the Project require an extension of the City’s water service area violates CEQA.

07-21
cont.

G. Population and Housing

The area around UCSC has traditionally been a “very tight housing market, especially as it relates to rental housing.” DEIR at 3.13-5. According to the 2005 LRDP, housing is a “key issue[] essential to the planning processes of UCSC.” 2005 LRDP, 23. The “housing market is influenced by several factors, including proximity to major job centers, low for-sale inventory, and an “extremely tight” rental market.” DEIR at 3.13-5.

Yet the University still plans to expand the campus by nearly 10,000 students. DEIR at 1-3. Furthermore, it plans to add an additional 2,200 FTE faculty and staff members, but it will only house 25% of that additional faculty and staff. DEIR at 1-3. The LRDP will therefore leave an additional 1,650 faculty and staff members to find housing in an already scarce and problematic market. The University claims that it plans to work with the City, yet its current plan will significantly drive up housing costs. And the DEIR fails to adequately discuss this impact and consider alternatives and mitigation measures to lessen it, including the use of off-site alternatives such as satellite campuses and remote classrooms. The assumption that on-campus student population growth is an inevitable force that the campus must accommodate underlies the entire DEIR, and creates a false barrier to consideration of alternatives that would lessen these significant impacts.

07-22

At our request, a nationally-recognized expert in evaluating the viability and impacts of real estate development, Lewis (“Lew”) Goodkin, evaluated the DEIR’s analysis of the Project’s impacts on housing for students and others. His analysis is attached as Exhibit 2. His conclusions are sobering, and demonstrate severe flaws in the DEIR’s review. Mr. Goodkin concluded that the DEIR’s conclusion that the Project would have “less-than significant impact [on housing] overlooks two salient facts that are never acknowledged, let alone analyzed.” Exhibit 2, p. 2. First, “The DEIR fails to address the fact that the price of [the Project’s] student housing is so high relative to the price of off-campus housing that the occupancy of the new student housing units will fall far short of the DEIR projections, causing a large percentage of the new students to seek housing off-campus.” *Id.* Mr. Goodkin then explains that “[t]he new, unmet demand for off-campus housing will have several impacts that the DEIR fails to analyze, such as the much greater traffic, and the related parking demands and associated air emissions from this additional traffic, from new students who will commute to, rather than live on, campus.” *Id.*

07-23

Second, Mr. Goodkin points out that “the DEIR fails to address the fact that as an increasing number of new students are forced to find housing off campus because it is far less expensive, the resulting and growing unmet demand for off-campus housing will displace

07-24

existing renters from the off-campus units that the new students will be able to occupy due to their greater purchasing power compared to the average renter in Santa Cruz County. The DEIR never analyzes the resulting environmental and socio-economic impacts on the surrounding community as existing renters of off-campus residential units are displaced to other areas farther from their existing places of employment, the schools their children attend, and the other urban services such as stores they presently utilize.” *Id.* at p. 3.

07-24
cont.

For these compelling reasons, Mr. Goodkin concludes that “the DEIR is substantially deficient.” *Id.*

In summary, the severe adverse impacts on the environment from the Project’s failure to provide affordable housing to its students and staff (or alternatively, to provide for off-site learning alternatives) are ignored, in violation of CEQA.

H. Public Safety

As the DEIR admits, the Project will create significant fire risks including both ignition and response risks during construction. DEIR at 3.18-13 to 3.18-16. But it is not simply *construction* that would cause these impacts. Off-shore winds blowing from the north toward Monterey Bay occur frequently, especially during the peak fire season in the fall. In the event of a big fire propelled by off-shore winds blowing from the north, LRDP development in the West Campus area will create immediate and obvious fire evacuation hazards. DEIR at 3.18-13.

Many of the nearly 10,000 proposed additional students on the main campus, along with the faculty and staff housing proposed in the Coastal Zone, could only evacuate a wildfire via Empire Grade Road by exiting through the current West Campus entrance and the proposed bridge over Cave Gulch to Empire Grade. In certain likely fire scenarios, all of the population of Bonny Doon would have only Empire Grade Road available as an evacuation route.

07-25

This outflux of people frantically evacuating to the south via Empire Grade Road would create instant gridlock, backing up south-bound traffic on Empire Grade Road toward the north—in the direction of the on-coming fire. Adding thousands of evacuees from the LRDP’s proposed new development would create a death trap. Building up the West Campus would thus be a blueprint for disaster similar to the traffic gridlock that trapped and killed residents of Paradise fleeing from the Camp Fire in October 2018. It behooves the University to pay careful attention to this critical public safety issue, yet it only considered the potential wildfire impacts during construction.

Likewise, Mitigation Measure 3.9-4, calling for the preparation of Site-Specific Construction Traffic Management Plans, fails to mitigate any impacts from the 10,000 new FTE students that the 2021 LRDP allows. DEIR at 3.9-25 to 3.9-26, 3.18-14. Construction Traffic Plans will not help the thousands of students who will utilize Empire Grade Road to try to

07-26

evacuate in an emergency.

O7-26
cont.

I. Utilities

1. The City's Water Supply Is Insufficient

Most of the UCSC campus is within the City of Santa Cruz Water Department ("SCWD") water service area. DEIR at 3.17-5. But "[t]he City of Santa Cruz is facing several obstacles in meeting its present and future water supply needs." DEIR at 3.17-14. "While the City of Santa Cruz water supply system is essentially the same as in 1960, the service population has increased 190 percent and is expected to increase. In normal and wet years, the water supply system is capable of meeting the needs of the current population, but even without population increases, the system is highly vulnerable to shortages in drought years." 2005 LRDP, 25. According to the City's Urban Water Management Plan ("UWMP"), "the City has had to declare a water shortage in five of the . . . seven years" between 2009 and 2015. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, p. 8-1. And the UWMP predicts that the SCWD will face a shortfall by 2025. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6 (projected water use in 2025 is 3,225 mgy), 6-24 (projected water supply in 2025 is 3,164 mgy).

"Adequate water supply is a primary issue for UCSC and the City of Santa Cruz given future anticipated shortfalls." 2005 LRDP, 23, 88 (quote). Increased development under the LRDP would necessarily increase water demand, and as the DEIR admits, "UC Santa Cruz's water demand under the 2021 LRDP would contribute to the need for the City to secure a new water supply source to address the shortfall under multiple dry water year conditions." DEIR at 3.17-24. The DEIR claims that "groundwater can be extracted from [a well within the karst aquifer] without substantially reducing the flow rates of any individual spring in the area." DEIR at 3.10-25. But as shown above, that is simply not true and would have detrimental effects on the perilous karst system. Exhibit 1, pp. 1-4, 7-8.

O7-27

This impact is not unavoidable, as the DEIR claims. The DEIR throws up its hands claiming that it "would be speculative to assume that implementation of additional measures would reduce the campus's water demand sufficiently to avoid or substantially reduce the 2021 LRDP's significant impact on water supply." DEIR at 3.17-35. But that logic only holds true under the erroneous premise that rapid and massive UCSC student population growth is inevitable. It is not, and consideration of an alternative that shifts campus growth to other off-site alternatives would significantly minimize this impact in compliance with CEQA and the Comprehensive Settlement Agreement.

2. Increased Water Demand Will Be Detrimental to Special-Status Fish Species T O7-28

The City's water sources support populations of Central California Coast ("CCC") Distinct Population Segment steelhead (*Oncorhynchus mykiss*), a threatened species (62 Fed. Reg. 43937 (August 18, 1997)), and CCC Evolutionarily Significant Unit (ESU) coho salmon (*Oncorhynchus kisutch*), an endangered species. 70 Fed.Reg. 37160 (June 28, 2005); 64 Fed.Reg. 24049 (May 5, 1999). The endangered CCC coho relies on the San Lorenzo River watershed for recovery. 64 Fed.Reg. 24049. The prospects for recovery of the CCC steelhead and coho are dependent on suitable habitat being restored and maintained. Certain minimum levels of flow and temperature are required in streams for the proper development, growth and spawning of salmonids.

"The City of Santa Cruz is facing several obstacles in meeting its present and future water supply needs." DEIR at 3.17-14. Currently, in critically dry years, the City does not have enough water to meet the City's existing needs, including the instream needs for fish. 2005 LRDP, 88. And the City projects a water supply shortfall by 2025. DEIR Appendix B at HAWC's April 8, 2020 Scoping Comments, Exhibit 1, pp. 4-6, 6-24. During dry years maintenance of instream flow is critically important for the survival of the salmonids, as rearing juveniles are typically unable to rear in small tributaries and will need adequate water flow in the main stem of the San Lorenzo River. As climate change continues to alter ambient temperatures, the need for cool water flows will increase, requiring corresponding reductions in water supplies for human uses, further limiting the City's ability to meet water demands. Yet the DEIR entirely fails to address this concern when calculating the City's ability to meet water demand in light of UCSC's proposed development. This omission violates CEQA. *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 874-875 (EIR must address cumulative impacts of upstream and downstream diversions of water for human uses on salmonid species in the river); *Vineyard*, 40 Cal.4th at 448-449 (EIR must examine impact of seasonal reductions in river flow on both salmonids and human water supply).

O7-28
cont.

V. Information Needed by Responsible Agencies

The development proposed in the LRDP includes areas outside the City's approved water service area. Providing water to such areas requires the approval of the Santa Cruz County LAFCO, which is therefore a responsible agency for this Project under CEQA. DEIR at 3.17-11, citing City of Santa Cruz General Plan, Policy CC3.7. Accordingly, the EIR must address impacts on water supply in a manner that addresses the informational needs of LAFCO. *HAWC*, 213 Cal.App.4th at 1305.

But instead, the DEIR fails to address LAFCO's informational needs entirely. It states that UCSC "does not believe that . . . approval by [LAFCO] is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County." DEIR at 3.17-5. Rather than comply with this mandate, UCSC "requested judicial intervention to seek clarity regarding the City's legal obligations," which is currently pending before the court. DEIR at 3.17-5. CEQA demands more.

O7-29

Erika Carpenter
University of California, Santa Cruz
April 8, 2020
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VI. Conclusion

Because the UCSC campus possesses extraordinary, yet vulnerable and irreplaceable, environmental resources that the LRDP's proposed development threatens, those unique concerns merit heightened analysis and creative solutions – including off-site alternatives such as remote learning and satellite campuses – in the EIR. CEQA requires a thorough evaluation of the Project's potential impacts and alternatives that informs the public and decision makers about how best to avoid and lessen these potentially severe impacts. Yet the DEIR failed in this informational goal. The DEIR defined the Project objectives too narrowly, ignored plausible and beneficial alternatives, and failed to consider and mitigate significant Project impacts. The DEIR therefore violates CEQA and must be revised.

Please include these comments in the public record for this Project.

Thank you for your attention.

Very truly yours,

Stephan C. Volker

Attorney for Habitat and Watershed Caretakers,
Don Stevens, Russell B. Weisz, Hal Levin, Harry D.
Huskey, and Peter L. Scott

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Exhibits

- Exhibit 1:** Thomas Aley, Hydrogeologic Review of University of California Santa Cruz 2021 Long Range Development Plan EIR, March 4, 2021
- Exhibit 2:** Lewis Goodkin, Goodkin Consulting, Review of University of California Santa Cruz 2021 Long Range Development Plan Draft EIR, March 8, 2021

EXHIBIT 1

**Hydrogeologic Review of
University of California Santa Cruz 2021 Long Range Development Plan EIR**

March 4, 2021

**Thomas Aley, PHG & RG
Senior Hydrogeologist and President
Ozark Underground Laboratory, Inc.**

Introduction

I have been retained by Stephan C. Volker, Esq., to conduct a review of hydrogeologic statements in the UC Santa Cruz 2021 Long Range Development Plan Draft Environmental Impact Report (DEIR). A copy of my resume is attached to this hydrogeologic review as Appendix A. I hold BS and MS degrees from the University of California, Berkeley and have spent my career as a professional hydrogeologist specializing in karst hydrogeology and groundwater tracing studies using fluorescent tracer dyes. I hold national certification as a Professional Hydrogeologist (#179) from the American Institute of Hydrology and am licensed as a Registered Geologist or Professional Geologist in the states of Missouri, Arkansas, Kentucky, and Alabama. I am the author of a chapter on groundwater tracing with fluorescent dyes in the textbook "Practical Hydrogeology Principles and Field Applications" published by McGraw Hill (Aley, 2019) and have taught numerous professional short courses on karst hydrology and groundwater tracing.

07-31

Comment 1. A basic understanding of the nature of porosity in karst aquifers and their ability to store and transport groundwater will assist readers of this evaluation in understanding subsequent comments.

Karst aquifers have three types of porosity; some authors have assigned slightly different terms but the following are commonly used.

- Matrix porosity is intergranular porosity and in this marble aquifer is insignificant and does not produce any significant water that could be extracted by wells. DEIR page 3.10-20 describes a boring drilled 300 feet deep within 30 to 50 feet of an inferred north-south fracture zone in Lower Jordan Gulch that "*did not encounter groundwater*". This illustrates matrix porosity; areas with matrix porosity must be expected to routinely form effective barriers to lateral and vertical water movement in the karst aquifer under the UCSC campus.
- Fracture porosity is the primary provider for wells that do not intersect solutionally enlarged karst conduits. Page 3.10-23 of the DEIR summarizes construction details on four wells on the UCSC campus. No well yield is given for MW-1B but it is undoubtedly

07-32

small and is reflective of water yields from fracture porosity. DEIR page 3.10-24 states: *“Monitoring Well MW-1B is located approximately 37 feet west of [Water Supply Well 1] WSW#1, at the western edge of Jordan Gulch. Although this well is completed in fractured marble at a similar ground surface elevation and depth as WSW#1 and MW-1A, it is evidently completed in a separate hydraulic fracture regime and shows a distinctly higher water level (i.e. 40 to 50 feet higher), and no pumping influence from pumping in WSW#1 in 1989 or 2007.”* Water stored in most brecciated zones are part of fracture porosity. Water derived from fracture porosity supplies much of the water discharging from karst springs under dry weather conditions.

- Conduit porosity is provided by solutionally enlarged openings. WSW#1 (described in the DEIR at page 3.10-20) encountered conduit porosity described as: *“abundant open to rubble-filled fractures and void spaces. Problems with borehole collapse and loss of circulation were frequent.”* The ability of this well to extract 92.5 gallons per minute (gpm) is consistent with a well encountering conduit porosity. Conduit porosity is likely associated with what are identified as “major fractures” on the UC Santa Cruz campus (DEIR Figure 3.10-4). WSW#1 was constructed at the intersection of two of the major fractures. Sinkholes that can accept water at rates of at least 5 or 10 gpm are commonly directly connected with conduit porosity. DEIR page 3.10-18 states: *“More than 50 sinkholes are located throughout the marble-underlain area on the main residential campus and these features are estimated to capture up to 40% of campus runoff (Johnson 1988).”* Conduit flow accounts for most of the water discharging from springs surrounding the UCSC campus.

07-32
cont.

Comment 2. Based on data in the DEIR approximately 1,000 acres of land is underlain by the marble aquifer. The marble aquifer is a conduit-dominated aquifer that is recharged by surface water derived from lands not underlain by marble and by precipitation that falls on lands that are underlain by marble. Substantial recharge to the karst conduits occurs through sinkholes of which there are more than 50 known on campus. Many of the conduits are expected to be preferentially located along mapped major fracture zones (see DEIR Figure 3.10-4). It appears that most water that enters the aquifer is rapidly transported to one or more of 14 identified springs located west, south, and east of the campus. Flow rates of the springs vary widely as a direct result of precipitation events and stormwater runoff onto the marble.

07-33

Comment 3. The DEIR focuses on average hydrologic conditions rather than on conditions when water supplies are limited. While human demands for water on the University campus with a dramatically enlarged population will be relatively constant, the key issues is the adequacy of groundwater from the karst aquifer to supply adequate amounts of water under dry weather conditions without creating significant adverse impacts. Information in the DEIR does not adequately address this key issue.

07-34

Comment 4. A conclusion I reached in a report on a 1992 groundwater tracing study on the UCSC campus (Aley and Weber & Associates, 1994) related to extracting a relatively minor amount of water from WSW#1 to supply a greenhouse. That statement should not be viewed as suggesting that more than relatively small amounts of water can be extracted from this well under dry weather conditions without substantially reducing the flow rates of individual springs in the area.

At page 3.10-25 of the DEIR under the heading "Dye Trace Studies" a dye tracing study I directed in 1992 in cooperation with Weber & Associates is discussed. The statement is made: *"The study concluded that WSW#1 is hydraulically connected to major portions of the karst aquifer and that groundwater can be extracted from well WSW#1 without substantially reducing the flow rates of any individual spring in the area."* That statement in the DEIR fails to recognize that the dye tracing study conducted during the period January to March, 1992 and reported upon in 1994 (Aley and Weber & Associates, 1994) was conducted to assess potential impacts on springs of putting well WSW#1 into production to supply a greenhouse and perhaps some outside plants in the vicinity of the greenhouse. This is a relatively minor amount of water. The DEIR at page 3.17-20 shows an average daily water demand for a greenhouse as 62 gallons per day; I presume that is the same greenhouse.

O7-35

Comment 5. UCSC failed to collect adequate spring flow data during the period 1984 through 2019. As a result, the University has no credible estimate of the rates at which water has been discharged from the karst aquifer during this 35 year period and how rapidly water that enters the aquifer is discharged through the springs. Adequate measurements would have shown whether or not the University could withdraw water from the karst aquifer at a projected mean rate of 113,700 gallons per day under dry weather conditions without depleting the aquifer and/or decreasing or eliminating flow from springs fed by the aquifer. The 113,700 gallons per day value is the projected demand for University activities located outside the service area for the City of Santa Cruz which the University contends could be met by extracting water from the on-campus karst aquifer.

Except for a 7-day duration pumping test at WSW#1 in February, 1989 at an apparent constant rate of 100 gpm; a 3-day duration pumping test at WSW#1 in November, 2007 at an average rate of 92.5 gpm; and pumping to develop wells; the only known discharges from the campus aquifer from 1984 to present have been through approximately 14 springs located generally east, south, and west of University property. The University did make occasional flow rate measurements during the period 1984 through 2019. The most consistent of these were made during the period from 1999 through 2019. During this period flow measurements were usually made on one day in March and one day in September of each year at 13 of the 14

O7-36

springs for the period 1999 through 2008 and at 9 of the 14 springs for the period 2009 through 2019.

As shown in DEIR Table 3.10-5 the measured flow rates of all 14 springs vary widely. Seven of the 14 springs have intermittent flow with zero flow for an unknown number of days per year. Of the remaining 7 springs maximum measured flow at Bay Street Spring is 11 times greater than minimum measured flow; the ratio is 66 times greater at Messiah Lutheran Spring; 9 times greater at Pogonip Creek System; 272 times greater at Pogonip Spring#1; 53 times greater at Pogonip Spring#2; 714 times greater at Lower Cave Gulch; and 640 times greater at Wilder Creek Spring. This wide variation between maximum and minimum measured flow rates means that a disproportionate amount of the total annual flow from the springs occurs during a relatively few days of each year.

Approximately half of the flow rate measurements of springs were made during months (and especially March) when periods of high spring discharge are likely to occur and the other approximately half of the measurements were made during months (and especially September) when low discharges are likely to occur. The DEIR calculates average spring flow rates as the mean of all measured values. This is a specious value that has no technical credibility; the same applies to the statement that the springs discharge an average of 181 MGY. There is no way to recover the critical data on flow rates of the springs, especially flow rates during dry weather periods.

O7-36
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Continuous records of flow should have been measured from the 14 springs believed by UCSC to drain the karst aquifer during the period 1984 to 2019. Automatic monitoring equipment serviced monthly would have provided adequate information. This is not difficult; there are thousands of stream and spring flow rate measuring stations in the United States that routinely and continuously record similar information. Absent that information, the University lacks credible data for determining how much water could be withdrawn from the karst aquifer without lowering groundwater elevations in the aquifer and/or increasing the frequency and duration of zero or unacceptably low flow volumes from aquifer-related springs.

Comment 6. UCSC has failed to conduct adequate hydrogeologic investigations to characterize the campus aquifer and assess normal fluctuations in groundwater levels at multiple points in the aquifer.

The campus wells are identified on page 3.10-20. Water Supply Well#1 (WSW#1) is located on a major fracture near the southern end of the aquifer. Monitoring Well 1A is located 54 feet northeast from the water supply well and Monitoring Well 1B is located 37 feet west from the water supply well. The only other well on campus is the Upper Quarry Well which is located near the northern end of the marble deposit. At the time the Quarry Well was constructed the static water level elevation was 619 feet which is about 200 feet higher than

O7-37

the static elevation within WSW#1 at the time it was drilled. There is no indication in the DEIR that water levels are routinely monitored in the Quarry Well.

The marble aquifer underlies approximately 1,000 acres. Springs inferred (but not proven) to receive most or all of their water supplies from the campus aquifer are at elevations between 110 feet and 540 feet above mean sea level. An adequately comprehensive network of monitoring wells for routinely measuring water level elevations is a key part of understanding and managing groundwater basins. Given the size of the aquifer, the large elevational range indicated by the springs, and the proposed massive-scale development, one would expect a good comprehensive network of monitoring wells with multiple years of records that had been used as critical data for the DEIR. Unfortunately, that is clearly not the case.

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Comment 7. UCSC conducted pumping tests of WSW#1 on two occasions and a test in 1989 indicated: that: "... the well is completed in a highly permeable karst aquifer, with the ability to provide a sustained pumping rate of 100 gpm without dewatering the well, or creating any pumping drawdown at identified spring locations over 2000 feet away". I disagree with the conclusions because they are contradicted by the data.

Although the well is located in a highly permeable *fracture zone* and did in fact maintain a pumping rate of 100 gpm for 7 days, this occurred when the flows from down gradient springs were 15 times greater than minimum measured flow rates from these springs for the period 1984-2019, indicating average rather than dry conditions. The data show that this is a highly permeable section of the karst aquifer. It is not true, however, that the *karst aquifer* as a whole, is highly permeable and that the pumping test shows aquifer resilience under dry weather conditions. This testing is not indicative of aquifer resilience during dry weather conditions, let alone over a large area, for four separate and independent reasons.

O7-38

First, this is not a highly permeable karst aquifer. Highly permeable karst aquifers routinely have very low groundwater gradients, frequently only a few vertical feet per thousand horizontal feet. The steeper the gradient, the lower the overall permeability of the aquifer. The straight-line distance between the Quarry Well and WSW#1 is approximately 5,300 feet. Based on well completion data in the DEIR the difference in water level elevation between the two wells is about 200 feet; this represents 37.7 feet per 1,000 feet. This is a steep gradient, indicating the presence of barriers to groundwater movement rather than "highly permeable" conditions. Both wells are on mapped major fractures, and a continuous system of mapped fractures exists between the two wells. This steep groundwater gradient is inconsistent with "a highly permeable karst aquifer".

Second, the karst aquifer underlying UCSC is not homogeneous and isotropic. The term isotropic means that the hydraulic conductivity is the same in all directions. Isotropic conditions have been clearly demonstrated in the DEIR to not be present within the karst

aquifer on the UCSC campus. Examples of data demonstrating the lack of isotropic conditions include Figure 3.10-4 illustrating the complex network of fractures and conduits and the location of a dry well drilled within 30 – 50 feet of a fracture zone. Most numerical solutions to pumping tests assume that the aquifers and aquitards under investigation are homogeneous and isotropic. If the assumptions of the equations are not reasonably well met, the equations are not valid and therefore a credible answer cannot be expected. That is the case here.

Third, the testing occurred during a period when flows from down gradient springs were 15 times greater than the minimum flows recorded over the last 35 years for those springs. These conditions are not representative of dry weather conditions when the flows in the down gradient springs are most vulnerable to interruption from pumping from the aquifer. The DEIR states that the 7-day pumping test conducted in 1989 occurred during a year of severe and prolonged drought. Still, the combined flow rates from the five springs monitored during the test were approximately 89% of the DEIR calculated combined average flow at the springs. It is the time of the 7 day test, rather than general conditions during the year, that are relevant to the test conditions. As a result, the test more appropriately characterized average rather than dry weather conditions. This is shown by the fact that the combined flow rates of the five springs during the pumping test were 15-fold greater than the minimum measured flow rates from these springs for the period 1984-2019.

A 72-hour pumping test was conducted at WSW#1 in November, 2007. Combined flow rates at measured springs were somewhat closer to low flow conditions. However, during the five day period when spring flows were monitored at three springs the total flow volume of the springs increased by 84% indicating that precipitation had occurred and resulted in significant recharge to the aquifer. The karst aquifer is clearly capable of rapid recharge. However, pumping tests conducted during appreciable recharge events do not enhance understanding of the storage component of the aquifer. While the results of the two pumping tests are similar, they do not demonstrate that sustained pumping of 113,700 gallons per day from the aquifer during dry weather periods would not have significant adverse impacts on spring flow or the aquifer.

The primary insights gleaned from the pumping tests relates to the transport ability of the karst aquifer within a few hundred feet of the extraction well under average flow conditions and not to the potential ability of this portion of the aquifer to yield water from storage under dry weather conditions. The DEIR data do not adequately characterize the storage component of the karst aquifer. Absent this information, the University lacks credible data for determining a sustainable volume of water that could be withdrawn from the karst aquifer without adverse impacts.

Fourth, the testing was limited to a small fraction of the total karst aquifer and the test results are unlikely to apply to the majority of the karst aquifer. As explained, the aquifer underlying the UCSC campus is neither homogeneous nor isotropic. Instead, it is highly fractured and contains both barriers to and conduits for groundwater movement. As noted

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above, examples of data demonstrating the lack of isotropic conditions include DEIS Figure 3.10-4 illustrating the complex network of fractures and conduits and the location of a dry well drilled within 30 – 50 feet of a fracture zone.

The DEIR states that the storage capacity within the saturated zone of the karst aquifer is estimated to be at least 3,000 acre-feet as demonstrated by aquifer pumping tests. The data do not support this conclusion. The pumping test data were collected from only 3 wells within a 60-foot radius (0.25 acres). The area sampled represents a minute fraction of the total area expected to be underlain by the marble aquifer. With this level of coverage, it is unreasonable to expect the data to be representative of the system. Furthermore, the matrix porosity of the marble is insignificant and does not produce water, indicating that all water storage is likely restricted to zones where fractures or conduits are present. Without an extended monitoring network across the karst aquifer to understand the lateral extent of the aquifer and the spatial and temporal variability of the groundwater table, a reasonable estimate of storage capacity cannot be made. Because such a monitoring network has not been created, the storage capacity of the aquifer is unknown.

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Comment 8. There is a steep groundwater gradient between the Quarry Well and WSW#1. In addition, 14 springs presumed to receive water from the marble aquifer are located west, south, and east of the marble aquifer and at a maximum elevational difference among the springs of 430 feet. These factors suggest that the karst aquifer is unlikely to function as a single aquifer and is likely divided into multiple compartments each of which is associated with one or more springs. If this is the case then it enhances the risk that groundwater extraction during dry weather periods will result in significant adverse environmental impacts.

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Determination of compartment boundaries in karst aquifers typically involves groundwater tracing with tracer dyes. Only limited tracing has been done at the University. Potentiometric head maps are also useful in this work.

Comment 9. The marble aquifer beneath the campus provides three beneficial environmental services and maintenance of these services necessitates very careful protection and management. These environmental services are:

- **Detains surface runoff by conveying it into and through the karst groundwater system.**
- **Supplies water to springs and watercourses that border the campus. Some of these apparently provide habitat for the federally threatened Red-legged Frog.**
- **Provides buoyant support for unconsolidated materials located above karst cavities.**

O7-40

Previous discussions have adequately covered the environmental services except the last one listed. The discussion in the DEIR of catastrophic sinkhole collapse and land subsidence in areas underlain by the marble aquifer fails to evaluate the risk of these events if limited

water availability were to result in pumping of the marble aquifer supplies. Under natural conditions the springs are the only points where water is extracted from the marble aquifer. When water levels in particular compartments of the aquifer become so low that associated springs cease flowing there will be no further lowering of the aquifer unless there is some component of deeper seepage. Pumping of wells has the potential to lower water levels substantially below those that ever naturally occurred.

Investigation of human-induced sinkholes (called collapse dolines in the DEIR) has been a substantial part of my practice and I have seen well over a thousand of them. Many are induced by pumping that substantially lowers groundwater levels. Important factors in collapses are groundwater levels declining to elevations lower than those that naturally occurred, the presence of open voids in the underlying bedrock, and a very irregular karst bedrock surface existing beneath overlying soils, alluvium, colluvium, or residuum.

Catastrophically formed sinkholes most commonly occur when groundwater levels that naturally supported overlying unconsolidated material decline to the point that the unconsolidated material has lost the buoyant support previously provided by groundwater. Heavy groundwater pumping by a marble quarry near Opelika, Alabama induced the formation of over 200 sinkholes at points up to about 7,000 feet from the quarry. Sinkholes formed in a county highway, beneath a bridge abutment, under an electric transmission tower, beneath a natural gas pipeline, and beneath a parked truck. Sinkhole depths can range from a few feet to depths somewhat below the top of the underlying soluble rock. At the University those depths can be over 100 feet.

Irregular bedrock surfaces above solutional features are favorable sites for sinkhole collapses because they make it relatively easy for pieces of undissolved rock to bridge underlying cavities. DEIR page 3.7-18 states: *“Boring data from prior investigations for the campus for the last decade show a variation in the elevation of the marble surface of more than 100 feet over a horizontal distance of 10 feet or less.”* These are the kinds of situations that can result in land subsidence or collapse.

Comment 10. There is insufficient information available on the marble aquifer to conclude that it is capable of providing a daily volume of 113,700 gallons of water to extraction wells that would serve the University during dry periods without causing significant environmental problems. Those environmental problems include cessation of flow from springs and an increased risk of land subsidence or sinkhole collapse on University property.

The hydrogeologic information that UCSC management has developed and supplied in their DEIR is woefully inadequate for characterizing the small and unquestionably complex karst aquifer at the University. Expansion of the University is clearly not a new idea for University management and it is concerning that University management has not funded investigations to gather hydrogeological information essential for this major project.

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Submitted by:

A handwritten signature in black ink, appearing to read "Thomas Aley". The signature is fluid and cursive, with the first name "Thomas" and last name "Aley" clearly distinguishable.

Thomas Aley, PHG & PG
Senior Hydrogeologist and President
Ozark Underground Laboratory, Inc.

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EXHIBIT 2

At the request of Habitat and Watershed Caretakers' President Don Stevens, I have reviewed the Draft Environmental Impact Report ("DEIR") for the University of California at Santa Cruz's 2021 Long Range Development Plan ("2021 LRDP") and prepared the following comments regarding the DEIR's discussion of the 2021 LRDP's impacts on population and housing demand.

I have more than 40 years of experience in the real estate industry and am widely recognized as one of the nation's leading real estate consultants, advising investors, lenders, builders, developers, and property owners. I provide expert analysis on local and regional market trends, identifying target buyers and tenants, recommending appropriate product designs, and projecting potential financial results. I have directed more real estate research on large-scale planned communities, golf resort communities, condominium communities and residential resorts than any other market analyst in the United States. In 2007, I was recognized by the Community Development Council of the Urban Land Institute as an "Industry Legend." I have written more than 1,500 articles for the trade, business associations, newspapers and magazines. I was the author of the highly acclaimed book, "When Real Estate and Home Building Becomes Big Business" that was selected by the Library Journal as one of the year's best business books for the year it written and which was the subject of a special addendum in the New York Times financial section. I served as past Chair of the South Florida Chapters of The Urban Land Institute and National Association of Business Economics and Counselors of Real Estate. I serve on the Real Estate Advisory Board of the University of Florida and the Advisory Board of the School of Design at the University of Florida. I was in national strategic alliances on residential development for both Arthur Andersen and Price Waterhouse. I am a designated member of the Institute of Residential Marketing, the Lambda Alpha International (an honorary land economics society), and a Life Member of the World Future Society. Prior to founding my current Goodkin Consulting firm, I was president of the California-based Sanford R. Goodkin Research Corporation (Peat Marwick/Goodkin Real Estate Consulting Group).

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In early 2020, at the request of Habitat and Watershed Caretakers, I conducted a study of the Santa Cruz housing market for the purpose of understanding the likely impacts and absorption rate of the multi-story high density housing units of the proposed UCSC Student Housing West Project (SHW) intended for upper division undergraduate students. My review included studying over 5 years of data available from the Campus Community Rentals Office, the April 2018 Student Housing Demand Analysis by Brailsford & Dunlavey, and the December 21, 2018 Brailsford & Dunlavey Memorandum (attached as Exhibits 1 and 2, respectively). I also conducted a site visit to Santa Cruz and the UCSC campus on February 21st, 2020 to view and compare student housing on campus with housing rented by students off-campus. My site visit included interviewing two property managers/owners with large student rental inventories. I found that the April 2018 Housing Demand Analysis had serious flaws and grossly over-estimated the potential demand for SHW units due in part to the rental price disparity between SHW units and off-campus housing. Nevertheless, the information contained in the above referenced documents should have been included and analyzed in the DEIR in order to facilitate

informed public review.

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The DEIR states that the 2021 LRDP will increase the UCSC campus student population by 9,482 students (defined as three-quarter average enrollment), and increase the UCSC campus faculty and staff population by 2,200 employees. DEIR p. 3.13-11, Table 3.13-9. To address this new housing demand, it states that it will provide new housing sufficient to provide 8,500 bed for these new students and 558 homes for these new employees. DEIR p. 3.13-12, Table 3.13-11. It then concludes that because “UC Santa Cruz is planning to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP,” “with incorporation of cumulative projects on and off campus, . . . it will be able to provide housing to all students projected under the LRDP and the impact associated with student housing demand is expected to be less than significant.” DEIR p. 3.13-14.

This conclusion of less-than-significant impact overlooks two salient facts that are never acknowledged, let alone analyzed.

First, the DEIR fails to address the fact that the price of student housing is so high relative to the price of off-campus housing that the occupancy of the new student housing units will fall far short of the DEIR projections, causing a large percentage of the new students to seek housing off-campus. Data available from the Campus Community Rentals Office (attached as Exhibit 3), which was part of and consistent with my own market investigation, show that average student rental rates off campus are between \$500 and \$1,000 per month. These existing rental rates for off-campus student housing are typically less than one-half of the rates the University will be charging for the new on-campus student housing based on comparisons with current dormitory rates and projected rates as of 2018 for SHW units. Examples of projected SHW unit rates include: \$5,580 per month for a 2 bedroom, 1 bath unit for four students with no kitchen; \$5,880 per month for a 2 bedroom, 2 bath unit for four students with a small kitchenette; and \$10,020 per month for a 5 bedroom, 2 bath unit for 6 students. The average per-student rate for these on-campus units thus ranges from \$1,395 to over \$1,670 per month.

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The new, unmet demand for off-campus housing will have several impacts that the DEIR fails to analyze, such as the much greater traffic, and the related parking demands and associated air emissions from this additional traffic, from new students who will commute to, rather than live on, campus. These direct and indirect impacts, and mitigation measures and alternatives to avoid or reduce them, must be fully addressed in the DEIR.

Second, the DEIR fails to address the fact that as an increasing number of new students are forced to find housing off campus because it is far less expensive, the resulting and growing unmet demand for off-campus housing will displace existing renters from the off-campus unit that the new students will be able to occupy due to their greater purchasing power compared to the average renter in Santa Cruz County. The DEIR never discloses and analyzes the resulting environmental and socio-economic impacts on the surrounding community as existing renters of off-campus residential units are displaced to other areas farther from their existing places of employment, the schools their children attend, and the other urban

O7-44

services such as stores they presently utilize. This displacement will have its own series of ripple and cumulative impacts in the more remote communities where the displaced renters will be forced to resettle.

These direct and indirect environmental and socio-economic impacts that will result from displacement of existing off-campus renters by new students seeking less expensive housing off campus must be fully analyzed, along with mitigation measures and alternatives that might avoid or reduce those impacts.

In the many years that I have done studies and consulting assignments for both the private and public sectors, I have never provided an analysis or reviewed one done by another firm where project and or unit cost wasn't a critical element in determining either market feasibility or, in the case of government or non-profits, subsidy requirements.

For these reasons, in my professional judgment the DEIR is substantially deficient.

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cont.

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Dated: March 8, 2021



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Lewis Goodkin

EXHIBIT 1

STUDENT HOUSING DEMAND ANALYSIS

UNIVERSITY OF CALIFORNIA, SANTA CRUZ

APRIL 2018

FINAL REPORT



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PREFACE

In January 2018, CHF-Santa Cruz I, L.L.C. (“CHF”) engaged Brailsford & Dunlavey (“B&D”) to conduct a student housing demand analysis for the Student Housing West Project (“SHW”) at the University of California, Santa Cruz (“UCSC” or “the University”). The Student Housing West project is a planned 3,073-bed project that builds upon previous planning initiatives at UCSC to develop new housing for undergraduate students, graduate students, and students with families. The SHW project is to be delivered by 2022 through a public-private-partnership with Capstone Development Partners (“CDP”). CHF will own the housing assets which will revert back to the University at the end of the development agreement. This project is part of the University of California’s student housing initiative to build 14,000 on-campus beds across the system to support student success and allow for growth within the system.

The objectives of this market analysis were to understand how the changes in enrollment and off-campus market have impacted demand for on-campus housing at UCSC, to quantify total demand for on-campus housing, to confirm demand for the SHW project, and to provide recommendations to the overall program.

B&D’s approach to the demand analysis included both quantitative and qualitative research. B&D examined existing UCSC student housing offerings, student demographic composition and enrollment trends, student housing preferences, and local real estate market conditions. The results of the analyses were instrumental in determining key housing market characteristics that inform the calculation of total housing demand. The methodologies employed in this study included:

- ◆ A **Demographic Analysis** to gain insight on the UCSC student demographic profile and how it supports demand for housing.
- ◆ An **Existing Conditions Analysis** to understand the existing supply of UCSC housing with respect to housing type, unit mix, and historical occupancy.
- ◆ An **Off-Campus Market Analysis** of comparable projects to understand the competitive nature of the local Santa Cruz real estate market.
- ◆ A **Student Survey** to gather data about students’ living situations, satisfaction with housing, and future housing preferences. The survey was distributed to the entire campus population and garnered a 17% response rate which allowed for a low two percent margin of error.
- ◆ A **Demand Analysis** to quantify the total demand for on-campus housing and to confirm that demand exists for the Student Housing West project without negatively impacting existing occupancy.

B&D would like to thank the following individuals who provided information and insight throughout the process:

- ◆ William Givhan, General Counsel and Chief Operating Officer, CHF
- ◆ Chad Izmirian, Senior Vice President and Development Manager, CDP
- ◆ Sue Matthews, Associate Vice Chancellor, Colleges, Housing and Educational Services, UCSC
- ◆ Traci Ferdolage, Associate Vice Chancellor, Physical Planning, Development & Operations, UCSC
- ◆ Adam Shaw, Lead Project Manager, Student Housing West, UCSC
- ◆ Shannon Percy, Project Director, Student Housing West, UCSC

The B&D team that produced the analysis comprised the following individuals:

- ◆ Matthew Bohannon, Regional Vice President
- ◆ Nicholas Gabel, Project Manager
- ◆ Javaneh Jabbariafaei, Project Analyst

This memorandum summarizes B&D's findings regarding various student housing market conditions. The findings contained herein represent the professional opinions of B&D's personnel and are based on assumptions and conditions detailed in this report. B&D has conducted research using both primary and secondary sources which were deemed reliable, but whose accuracy cannot be guaranteed.

TABLE OF CONTENTS

1. Executive Summary
2. Market Analysis
3. Demand Analysis

EXHIBITS

- A. Off-Campus Market Data
- B. Student Survey Data
- C. Student Survey Comments
- D. Key Findings Presentation

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SECTION 1

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EXECUTIVE SUMMARY

Established in 1965, The University of California, Santa Cruz is one of ten University of California System campuses. With an enrollment of over 19,000 students, the University is a major research institution offering 63 undergraduate majors and 33 graduate programs. The campus was designed around a residential college model to create smaller academic communities within a larger institution. This model has created a unique environment where each college has its own distinct experience, culture, and architectural style.

The campus has experienced significant enrollment growth in recent years which has increased the demand for on-campus housing. While the campus has the ability to accommodate 47% of the population, the demand far exceeds the current supply of housing. To satisfy demand, the campus has strategically added residential density to the existing halls. This added density has come at the expense of community spaces which have been converted to residential space and the forced tripling of double occupancy rooms. The loss of community space and additional density has resulted in low student satisfaction with the residential experience. The situation off-campus is also challenging for students. The local Santa Cruz market is very expensive due to a limited supply of affordable housing and lack of developable land and many properties do not have student friendly policies.

To help alleviate the housing challenges at UCSC, the University has embarked on the development of additional on-campus housing. The 3,073 bed Student Housing West project builds upon previous planning efforts to develop new housing for undergraduate students, graduate students, and students with families as well as meet the objectives of the University's Long Range Development Plan.

The objectives of this market analysis were to quantify the total demand for on-campus housing within the context of the student housing market, and to confirm that the proposed development program supports the ideal mix of housing unit types and amenities based on student preferences and sensitivities. B&D's analysis found that demand exists to support the 3,073 bed Student Housing West project without negatively impacting the existing housing operations. The demand exhibited for the proposed unit types exceeds the current program providing the University with multiple options to meet demand.

While significant demand exists for additional housing at the proposed rental rates, the total cost of housing is a significant concern to students. As the University proceeds with the development of Student Housing West, it must keep students' price sensitivity at the forefront of the decision-making process. The following section outlines the Project Team's key findings and conclusions.

MARKET ANALYSIS KEY FINDINGS

Each phase of B&D's market analysis resulted in key findings that ultimately shaped B&D's conclusions regarding demand for on-campus housing and the Student Housing West project. The following outlines the important outcomes of each aspect of the market analysis:

DEMOGRAPHIC CONTEXT

B&D examined demographic trends and patterns within UCSC's student population to identify a likely target market for on-campus housing. Analysis reveals that UCSC's enrollment, demographic, and academic profile are stable and support demand for additional housing with minimal risk to the University. The following outlines the key outcomes of the demographic analysis:

- ◆ UCSC's total enrollment has steadily increased by 13% since the fall of 2013 to 19,457. Undergraduate enrollment increased by 12% to 15,577 while graduate enrollment increased by 25% to 1,880.
- ◆ Between 2013 and 2017, the total number of first-time freshmen grew by 23% to 4,048. The total freshmen class is 4,360 which includes a small returning freshmen population. Transfer students increased by 22% to 1,231. Growth in these two sub-populations is essential as they are likely candidates to live in on-campus housing.
- ◆ Approximately 97% of all UCSC students are enrolled full-time, an increase of 12% since 2013.
- ◆ The freshman to sophomore retention rate averaged 90% between 2011 and 2016. UCSC's six-year graduation rate for the 2012 freshmen cohort was 71%, an increase of 2% from the 2006 cohort. The four-year graduation rate for the 2012 transfer student cohort was 82%, a 10% increase from 2006.
- ◆ Stable retention and increasing graduation rates strengthen UCSC's enrollment and support demand for on-campus housing.

Class Year	2013	2014	2015	2016	2017	5-Year Growth
Freshman	3,857	4,444	4,120	4,384	4,360	↑ 13%
Sophomore	3,251	2,938	3,295	3,417	3,623	↑ 11%
Junior	3,986	4,157	4,086	4,359	4,455	↑ 12%
Senior	4,597	4,736	4,729	4,800	5,139	↑ 12%
Graduate	1,508	1,589	1,673	1,821	1,880	↑ 25%
Total:	17,199	17,864	17,903	18,781	19,457	13%

FIGURE 1.1: Total Enrollment by Class Year, 2013-2017

ON CAMPUS HOUSING SUPPLY

An analysis of UCSC's housing portfolio was completed to understand the current supply of housing and demand. The Project Team also analyzed housing occupancy trends and student satisfaction with UCSC's on-campus housing offerings to identify potential opportunities to improve the residential experience with the development of the Student Housing West project. The analyses revealed that current demand for on-campus housing exceeds existing supply. To accommodate the abundant demand

for housing, the University has added additional residential density to the existing residence halls by converting double occupancy rooms into triples and converting many lounge and community spaces into residential units. The densification of the existing residence halls has precipitated a decline in overall housing satisfaction for on-campus residents. The following outlines the key findings from the on-campus supply analysis:

- ◆ UCSC currently has a capacity of 9,338 beds, with the ability to accommodate 48% of all enrolled students. Current occupancy in housing is 9,049 or 47% of the student body.
- ◆ UCSC's housing facilities were designed with a capacity of 7,060 beds but have added 2,278 beds of residential density to accommodate enrollment growth and housing demand.
- ◆ The five-year average housing occupancy is 97% of available beds (9,338). With the densification of existing residence halls, UCSC has operated at 127% of design capacity to accommodate demand.
- ◆ While UCSC does not have a live-on requirement, it does offer a housing guarantee to new freshmen and transfer students for two years and one year respectively.
- ◆ The development of the 3,073 bed Student Housing West project will allow the University to de-densify existing residence halls and replace the aging existing Family Student Housing. An estimated 773 beds will be de-densified from existing halls along with the 197 family housing units resulting in a net of approximately 2,100 new beds as part of the project.
- ◆ Survey results indicated that overall on-campus housing satisfaction decreased from 82% in 2014 to 64% in 2018. The decline is likely due to the increased density within the existing residence halls.

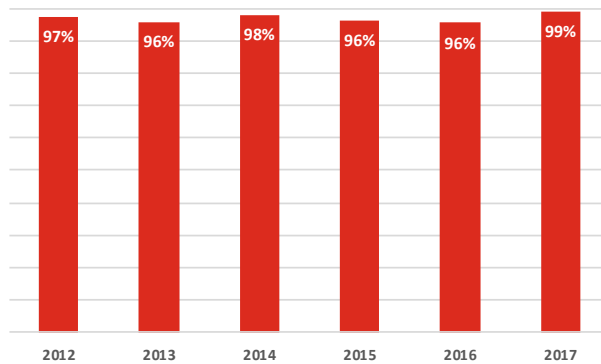


FIGURE 1.2: UCSC Housing Occupancy of Available Beds 2012-2017

OFF-CAMPUS MARKET ANALYSIS

B&D conducted an off-campus housing market analysis to understand the nature of the local housing market and how competitive it is with the Student Housing West project. The data set included information from REIS in Q1 of 2018 and focused on properties that are comparable in size and scale of SHW. B&D combined off-campus market data with the results of the student survey in order to comprehend students' living situations and primary housing decision drivers. Analysis revealed that the Santa Cruz market is very challenging for students due to a limited supply of housing, high rental rates,

leasing policies that are unfriendly to students, and town-gown issues. The key findings of this analysis include:

- ◆ The Santa Cruz market is student adverse because there are no purpose-built student housing properties and local landlords offer very few student-friendly housing policies.
- ◆ Average per person monthly rental rates (not including utilities) for all unit sizes is \$1,946. Analysis by unit size reveals that a studio, one-, and two-bedroom apartment unit in the comparable properties was \$1,839, \$2,467, and \$3,207, respectively. Limited to no inventory of comparable three- or four-bedroom units is present in the Santa Cruz market.
- ◆ The average vacancy rate at the surveyed properties is 3.1%, illustrating how few properties are available within the market.
- ◆ Approximately 54% of survey respondents indicated that they share a bedroom with one or more other person to lessen their financial burden.
- ◆ The average self-report monthly rent in the survey is \$853 plus an additional \$87 per month for utilities. This is significantly below the rental rates found in the off-campus market analysis and is likely due to the large number of students sharing a bedroom with one or more people and renting in single family homes in the Santa Cruz area.
- ◆ Off-campus housing satisfaction has also significantly decreased since the 2014 survey from 88% to 60%. The steepest decline in satisfaction among the tested factors was housing rates which declined by from 63% to 33%. The overall decline in satisfaction is also evident in the other factors tested indicating that students do not see the value in their off-campus housing situation.
- ◆ Overall, students' housing decisions are driven by the price, the desire for privacy, and independence.



FIGURE 1.3: Range of Average Per Unit Monthly Rental Rates by Unit Size

DEMAND ANALYSIS

Utilizing the results of the survey and market analysis to inform its demand model, B&D quantified unmet demand for new student housing at UCSC. Key findings include:

- ◆ Demand exists for 13,102 students to live on campus across the undergraduate, graduate, and student with family populations:

- 11,626 undergraduate beds,
- 1,166 graduate beds, and
- 310 family units.
- ◆ Current campus housing inventory includes 9,339 beds.
- ◆ With de-densification of 773 beds within the existing residence halls and replacement of 197 Family Student Housing units, the revised supply totals 8,369.
- ◆ The Student Housing West project includes 2,713 undergraduate beds, 220 graduate beds, and 140 family units. Combined with the revised existing supply, UCSC will provide housing for 11,442 students on campus.
- ◆ Unmet demand totals 1,660 with demand remaining across all student groups after SHW inventory is added to the existing revised supply.

Demand	Single Students		Family Student Housing ¹	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications ²	(773)	0	(197)	(970)
Revised Current Supply	8,289	80	0	8,369
Student Housing West	2,713	220	140	3,073
Current Supply + New Beds	11,002	300	140	11,442
Total Demand	11,626	1,166	310	13,102
Remaining Unmet Demand	624	866	170	1,660

Notes:

1. Family housing is in units.
2. Planned de-densification and replacement of Family Student Housing.

FIGURE 1.4: Demand and Supply Reconciliation**CONCLUSIONS**

Based on the outcomes of the student housing market analysis, demand exists to support the Student Housing West project and the existing UCSC housing portfolio. Demand for all proposed unit types and occupancies exceeds the current development program, providing a variety of options for the University to explore. De-densifying existing residence halls provides an opportunity to mitigate absorption risk with Student Housing West while improving the overall residential experience for students. While significant demand exists for new housing, keeping housing costs affordable to students is essential to long-term success of the project.

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SECTION 2

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MARKET ANALYSIS

Brailsford & Dunlavey conducted a student housing market analysis to determine how market conditions impact demand for on-campus housing. B&D examined multiple factors impacting student housing demand, including student demographic trends, UCSC's on-campus housing portfolio, characteristics of the Santa Cruz off-campus housing market, and housing-related sensitivities and preferences among UCSC students. These factors, combined with statistically-significant housing demand data derived from the student survey, allowed the Project Team to quantify on-campus student housing demand for the Student Housing West Project.

This section describes the key findings of the primary components of the market analysis:

- ◆ Demographic Analysis
- ◆ On-Campus Housing Supply Analysis
- ◆ Off-Campus Housing Market Analysis
- ◆ Student Survey Analysis

DEMOGRAPHIC ANALYSIS

For UCSC to effectively plan for additional on-campus housing, the University must identify enrollment and demographic trends that will impact demand, both now and in the foreseeable future. An analysis of enrollment and demographic trends allowed the Project Team to identify a likely target market for the Student Housing West Project. Using 3rd Week Fall Quarter data provided by UC Santa Cruz, B&D was able to analyze the following key demographic characteristics.

- ◆ Admissions
- ◆ Retention and graduation rates
- ◆ Total enrollment
- ◆ Enrollment by status
- ◆ Enrollment by gender

ADMISSIONS RATES

B&D examined trends in freshmen admissions in order to understand their impact on student enrollment. Between 2013 and 2017, the number of applications to UCSC increased by 37%. During the same time period, the number of freshmen admits increased by 36% for an admissions rate of 51% in 2017. The campus enrolled 4,048 students in 2017 for a yield of 15%. Between 2013 and 2017 the total number of freshmen enrollees increased by 23% while the overall yield decreased by 10%.

Freshmen	2013	2014	2015	2016	2017	5-Year Growth
Applications	38,636	40,727	45,532	49,180	52,969	37%
Admits	19,829	22,695	22,897	28,451	26,983	36%
Admissions Rate:	51%	56%	50%	58%	51%	-0.7%
Enrolled	3,301	4,035	3,620	4,221	4,048	23%
Yield	17%	18%	16%	15%	15%	-10%

FIGURE 2.1: Total Freshmen Admissions, 2013-2017

ENROLLMENT

Total Enrollment at UCSC has steadily increased since the fall of 2013. Total enrollment for the 2017 academic year was 19,457 students, an increase of 13% in the last five years. Undergraduate enrollment increased by 12% to 15,577 while graduate enrollment increased by 25% to 1,880. The overall enrollment growth supports additional demand for on-campus housing.

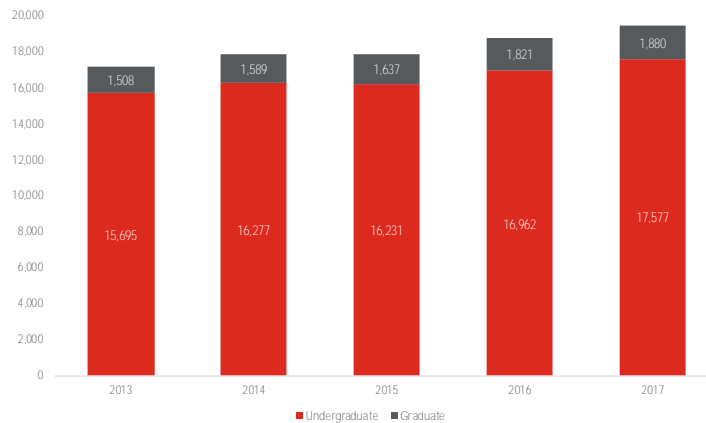


FIGURE 2.2: Total Enrollment, 2013-2017

Analysis of undergraduate enrollment by class level reveals that the distribution of students is generally evenly spread among the class levels ranging between 19% and 26%. Graduate enrollment accounts for 10% of all UCSC students. Undergraduate enrollment growth by class year is consistent among all class levels which indicates stability in UCSC's enrollment management process.

Class Year	2013	2014	2015	2016	2017	5-Year Growth
Freshman	3,857	4,444	4,120	4,384	4,360	↑ 13%
Sophomore	3,251	2,938	3,295	3,417	3,623	↑ 11%
Junior	3,986	4,157	4,086	4,359	4,455	↑ 12%
Senior	4,597	4,736	4,729	4,800	5,139	↑ 12%
Graduate	1,508	1,589	1,673	1,821	1,880	↑ 25%
Total:	17,199	17,864	17,903	18,781	19,457	13%

FIGURE 2.3: Total Enrollment by Class Year, 2013-2017

Analysis of new incoming students reveals significant growth of both first-time freshmen and transfer students. Between 2013 and 2017, the total number of first-time freshmen grew by 23% to 4,048.

Transfer students increased by 22% to 1,231. Growth in these two sub-populations is important to note as they are likely candidates to live in on-campus housing.

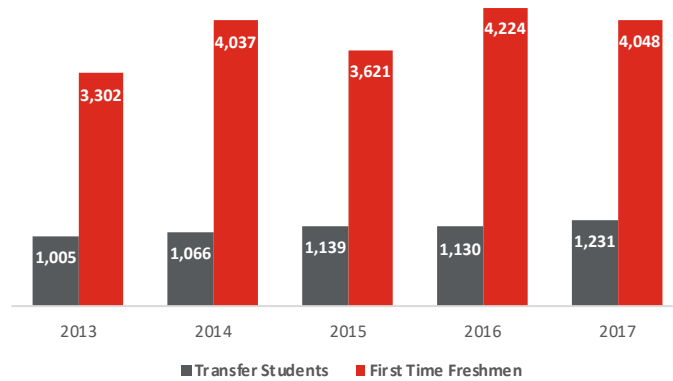


FIGURE 2.4: Total New Student Enrollment, 2013-2017

RETENTION AND GRADUATION RATES

Retention and graduation rates were also analyzed to understand their impact on enrollment. Analysis revealed that the freshman to sophomore retention rate averaged 90% between 2011 and 2016. In terms of graduation rates, UCSC’s six-year graduation rate for the 2012 freshmen cohort was 71%, an increase of 2% from the 2006 cohort. The four-year graduation rate for the 2012 transfer student cohort was 82%, a 10% increase from 2006. Stable retention and increasing graduation rates strengthen UCSC’s enrollment and support demand for on-campus housing.

Retention	2010	2011	2012	2013	2014	2015	2016	5 Year Growth
Freshmen to Sophomore	91%	91%	89%	89%	88%	90%	90%	0%
Grad Rate: Freshmen	2006	2007	2008	2009	2010	2011	2012	5 Year Growth
Four Year	2%	2%	3%	4%	2%	2%	1%	-48%
Five Year	51%	50%	55%	55%	52%	53%	49%	-4%
Six Year	70%	69%	74%	75%	74%	74%	71%	2%
Grad Rate: Transfer	2006	2007	2008	2009	2010	2011	2012	5 Year Growth
Four Year	75%	76%	77%	76%	78%	80%	82%	10%

FIGURE 2.5: Retention and Graduation Rates

ENROLLMENT BY STATUS

UCSC enrollment status was examined and students were found to be predominately enrolled full-time. In fall 2017, approximately 97% of all UCSC students are enrolled full-time, an increase of 12% since 2013. Interestingly, while a very small proportion of total enrollment, the number of part-time students has increased by 76% to 565 during that same time period. Understanding full-time student enrollment is important because they are the most likely to live in on-campus housing.

Enrollment Status	2013	2014	2015	2016	2017	5-Year Growth
Part time	321	512	477	534	565	↑
Full time	16,882	17,354	17,391	18,249	18,892	↑
Total:	17,203	17,866	17,868	18,783	19,457	↑

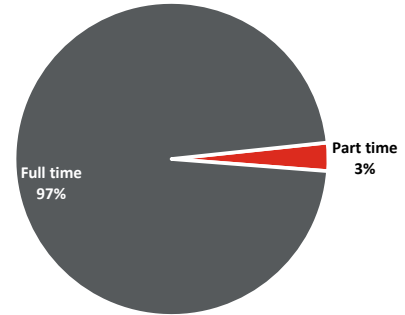


FIGURE 2.6 (Left): Total Enrollment by Status, 2013-2017

FIGURE 2.7 (Right): Percentage of Total Enrollment by Status, 2017

ENROLLMENT BY GENDER

The distribution of students by gender is nearly evenly split between males and females. Approximately 50% of students are male, 49% are female, and one percent of enrollment is unknown. Between 2013 and 2017, the total number of females increased by 6% and males by 20%.

Gender	2013	2014	2015	2016	2017	5-Year Growth
Female	9,043	9,301	9,224	9,395	9,614	↑ 6%
Male	8,098	8,492	8,527	9,209	9,686	↑ 20%
Unknown	62	73	117	179	157	↑ 153%
Total:	17,203	17,866	17,868	18,783	19,457	↑ 13%

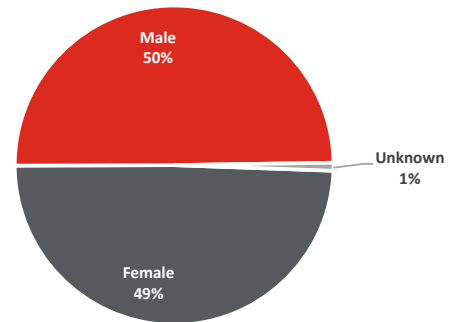


FIGURE 2.8 (Left): Total Enrollment by Gender, 2013-2017

FIGURE 2.9 (Right): Percentage of Total Enrollment by Gender, 2017

ON-CAMPUS STUDENT HOUSING SUPPLY

UCSC currently has 17 unique residential communities on campus or within Santa Cruz. With an operating capacity of 9,338 beds, UCSC has the ability to accommodate 48% of all enrolled students. UCSC housing facilities were designed with a capacity of 7,060 beds but due to growing enrollment and increased demand for on-campus housing, the University has added additional density of 2,431 beds. This increase in capacity is a result of tripling of students in rooms that were designed for two students and the conversion of lounge spaces to residential spaces. Approximately 59% of the residential capacity is in traditional residence halls while 41% is in apartments.

The development of the 3,073 bed Student Housing West project will allow the University to de-densify existing residence halls. An estimated 773 beds will be removed from USCS inventory through de-densification and replacement of Student Family Housing from existing halls resulting in a net of approximately 2,100 new beds as part of the Project.

College Facility	Capacity (Beds)	Additional Density (Beds)	Other Adjustments	Operating Capacity (Beds)
Cowell College	639	241	(6)	874
Stevenson College	597	305	(3)	899
Crown College	635	290	(91)	834
Merrill college	686	114	(2)	798
Porter College	705	134	(3)	836
Kresge college	385	135	(20)	500
Oakes College	565	216	(1)	780
Rachel Carson College	626	255	(12)	869
College Nine	698	340	(10)	1,028
College Ten	417	205	0	622
Transfer Community	408	131	0	539
The Village	153	0	0	153
Rewood Village	115	36	0	151
University Town Center	108	29	0	137
Graduate Student Housing	82	0	(2)	80
Camper Park	42	0	0	42
Family Student Housing	199	0	(3)	196
Subtotal	7,060	2,431	(153)	9,338

FIGURE 2.10: UCSC Housing Inventory

HOUSING OCCUPANCY

In fall 2017, UCSC's available on-campus beds were 99% occupied, with approximately 9,300 beds filled. This is slightly higher than the average fall occupancy rate over the last five years, which has been 97%. Due to the densification of residence halls, UCSC has operated at 127% of design capacity to accommodate demand.

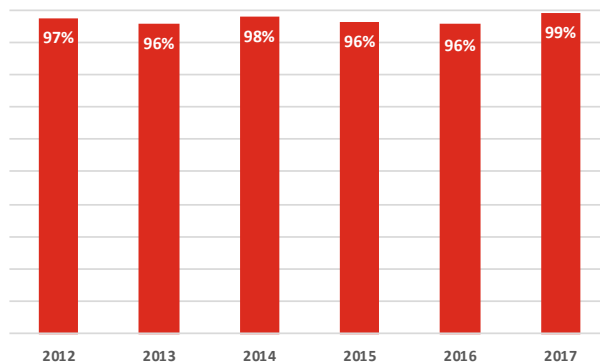


FIGURE 2.11: UCSC Housing Occupancy of Available Beds 2012-2017

HOUSING RATES

UCSC’s on-campus housing rental rate structure offers a variety of rates and options to students. Rental rates differ based on occupancy type and type of residence hall. In fall 2017, rental rates ranged from \$1,512 per month for a triple-occupancy residence hall to \$2,099 per month for a single occupancy apartment including a seven-day per week meal plan¹. Family Housing units are priced at \$1,658 per month on a 12-month lease. On average, single occupancy units are priced at an 11% premium over doubles and triples are priced at 17% less than doubles.

Term	Residence Halls				Apartments		Family Housing
	Single	Double	Triple	Quad	Single	Double	
Monthly	\$2,021	\$1,820	\$1,512	\$1,522	\$2,099	\$1,902	\$1,658
Quarterly	\$6,063	\$5,460	\$4,536	\$4,566	\$6,297	\$5,706	-
Academic Year	\$18,189	\$16,380	\$13,608	\$13,698	\$18,891	\$17,118	-

Notes

All rates assume a 7-day meal plan with the exception of Family Housing
 Family housing is only available on a 12-month lease.

FIGURE 2.12: UCSC 2017-2018 Rental Rates

HOUSING POLICIES

UCSC does not have a live-on requirement in place for any students. On-campus housing is available only to students enrolled in a degree-granting program, and priority is given to full-time students. The University does offer a housing guarantee to undergraduate students who indicate a preference for on-campus housing when they accept their offer to the institution. The guarantee for incoming freshmen is for two years and one year for transfer students. The policy guarantees a space on campus but does not specify what type of unit or what building will be available.

OFF-CAMPUS MARKET ANALYSIS

B&D examined the off-campus housing market in Santa Cruz to understand how competitive the proposed Student Housing West project is with the private rental market. To complete this analysis, B&D utilized student survey data, comparable property market data (REIS data set of comparable properties Q1 2018), and information from the City of Santa Cruz.

B&D’s analysis found that the Santa Cruz housing market is very challenging for students due to the limited supply of affordable rental housing, low vacancy rates, and difficult town-gown relationship. As such the market is considered student averse because there are few student-friendly housing policies. Student friendly policies such as academic year and individual leases, fully furnished units, and roommate matching, are key elements of a market that caters to students.

¹ Starting in academic year 2018-2019, apartment style units are not required to have a meal plan.

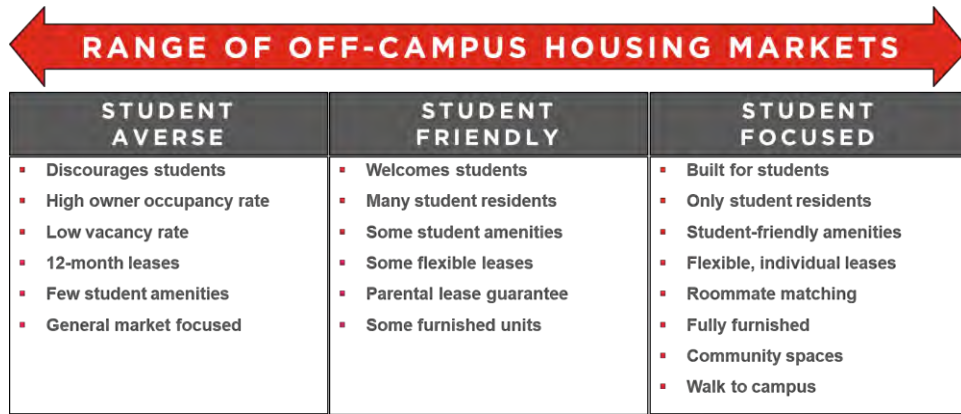


FIGURE 2.13: Student Housing Market Types

HOUSING MARKET OVERVIEW

Santa Cruz is a coastal community of nearly 63,000 people. Its location is geographically isolated between the Pacific Ocean and the Santa Cruz mountains. This presents many challenges for community as there are strict environmental regulations and a limited supply of land available for new development. Further complicating the issue is Santa Cruz’s proximity to Silicon Valley. Santa Cruz’s small-town coastal atmosphere and reasonable commute to Santa Clara County make the community very desirable for Silicon Valley employees. This has placed upward pressure on rental rates limiting the available supply of affordable housing for students. According to data from the US Census, Santa Cruz has 23,499 total housing units. Of those, 67% are single family homes and 33% are multi-unit properties. Only 44% of all units are owner occupied.

COMPARABLE PROPERTY RENTAL RATE ANALYSIS

To understand the local market, B&D utilized rental rate and occupancy data from seven comparable properties². The comparable properties are all multifamily rental properties located within the City of Santa Cruz. In total, there were 904 rental units within the seven properties with an average property size of 129 units. The average vacancy rate at the surveyed properties is 3.1% illustrating how few properties are available within the market.

² Data provided by REIS, Q1 2018.

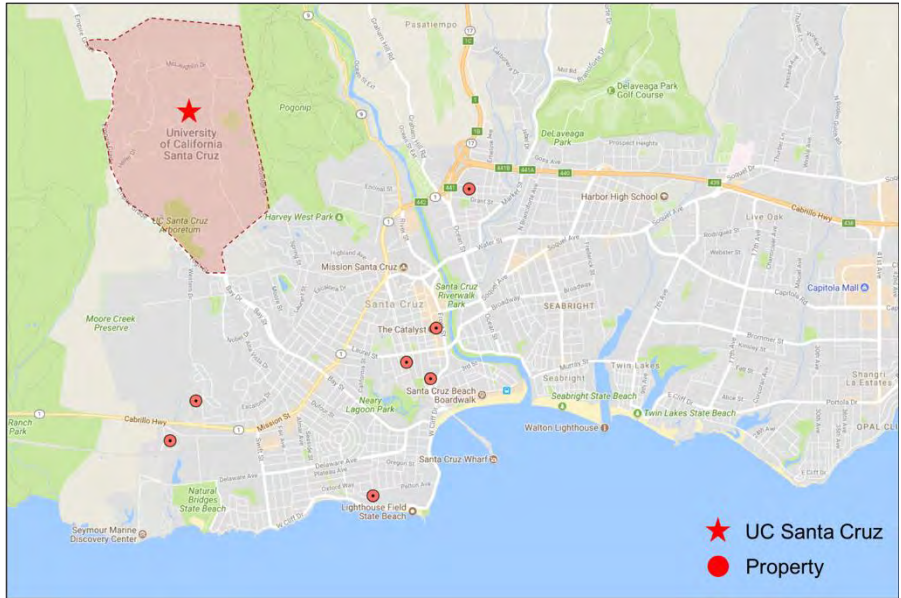


FIGURE 2.14: Location of Surveyed Rental Properties

The average per bedroom monthly rental rates (not including utilities) for all unit sizes is \$1,946. Analysis by unit size reveals that the average per unit rate for a studio, one-, and two-bedroom apartment unit in the comparable properties was \$1,839, \$2,467, and \$3,207, respectively. Only one property in the survey offered three-bedroom units which rented for \$4,079 per unit (\$1,360 per bedroom) per month.

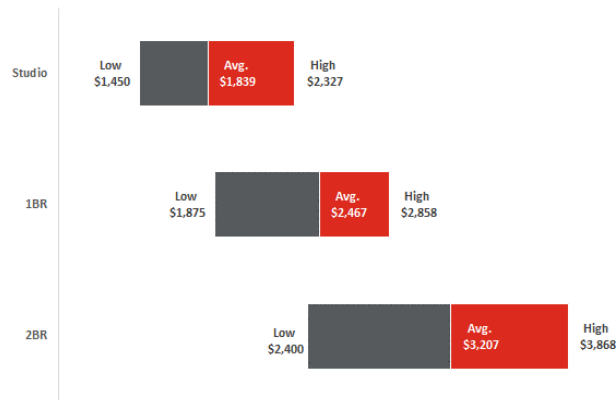


FIGURE 2.15: Range of Average Per Unit Monthly Rental Rates by Unit Size

According to survey data, approximately 54% of students indicated that they share a bedroom with one or more students to lessen their financial burden. The average rental rates per person for a private single bedroom and shared room can be significantly less.

RENTAL RATE COMPARISON

To better understand how competitive the Student Housing West Project's proposed rental rates are with the off-campus market, a comparison was made among similar unit types. The Student Housing West on-campus rental rates are based on per bedroom monthly rental rates inclusive of utilities, except where double occupancy is noted. Family housing is based on unit costs rather than per bedroom costs. A monthly utility rate of \$87 per person was added to the average off-campus rental rates, resulting in an "apples to apples" comparison.

Rental Rate Comparison ³	Undergraduate ¹				Graduate ¹		Family Housing ²
	A. 4BR/1BA (Single)	B. 2BR/2BA (Double) ⁴	C. 1BR/1BA (Triple)	D. 2BR/2BA (Triple)	A. Studio (Apartment)	B. 2BR/1BA (Suite)	2BR/1BA Family Unit
Average Off-Campus Rental Rate ⁵	\$1,690	\$889	-	-	\$1,926	-	\$3,381
On-Campus Rental Rates ⁶	\$1,621	\$1,424	\$1,143	\$1,084	\$1,249	\$986	\$1,658
Variance	(\$69)	\$536	-	-	(\$677)	-	(\$1,723)
% Variance	-4%	60%	-	-	-35%	-	-51%

Notes:

1. Rates are per person per month. Comparison is only shown for unit types that exist both on and off-campus.
2. Rates are per unit per month.
3. Source: REIS Q1 2018 data of comparable properties to the SHW Project.
4. Assumes a double occupancy bedroom off-campus in bedrooms that may not be designed for two people in a bedroom.
5. All off-campus rents include \$87 per month in utilities per bed. The \$87 figure is the self-reported monthly cost of amenities derived from the student survey.
6. The on-campus product does not readily compare to off-campus housing stock which is shared at levels well above design capacity. All units within SHW are designed for the appropriate occupancy (for example, a double occupancy bedroom is designed for two students to share) which is different compared to off-campus properties.
7. All rates are based on 2018 dollars and assume 3% annual escalation.

FIGURE 2.16: Comparison of Average Off-Campus Rental Rates and Student Housing West

The Student Housing West private apartment bedroom, studio, and family housing units are priced very competitively costing 4%, 35%, and 51% less than the off-campus average, respectively. Overall, the average rental rates for the Student Housing West Two-Bedroom / Two-Bathroom double occupancy apartments were 60% higher than a comparable unit in the off-campus market (including utilities); however, SHW units are designed to accommodate double occupancy within bedroom compared to most units in the off-campus market.

AMENITY ANALYSIS

B&D analyzed the amenities that are provided at the seven comparable properties. Overall, the amenity packages offered were fairly limited for multi-family properties within a market with a significant student presence. Typical amenities found within the comparable properties and within the market include fitness centers, outdoor patios with grills, limited off-street parking, picnic area, and in-unit washer/dryer.

FUTURE HOUSING DEVELOPMENT

According to data provided by the City of Santa Cruz, there are approximately 420 units of new housing that are proposed or under construction. The new projects are located all throughout Santa Cruz and include a mix of multi-unit apartments and townhomes. A review of the proposed unit mixes and potential price points reveals that the new units are not directly intended for UCSC students. Many projects are considered affordable which precludes students from eligibility due to restrictions with project financing.



FIGURE 2.17: Location of Future Housing Development in Santa Cruz

SURVEY ANALYSIS

B&D developed a web-based survey to assess UCSC students' housing situations, satisfaction with their housing experience, and future housing preferences and priorities with respect to the Student Housing West Project. B&D sent the survey invitation to all UCSC students and received responses from 17% of the student population, or about 3,352 people. The high response rate ensured a 95% confidence level in the survey results with a 2% margin of error. To analyze the survey results, B&D sorted responses by various student demographic characteristics and living situations to determine patterns of satisfaction and preference. In addition, B&D compared the survey results to those of the 2014 Student Housing Demand Analysis to understand changes over time.

IMPORTANCE OF ON-CAMPUS HOUSING

In order to determine the importance of on-campus housing to UCSC students, the survey asked students to report on the extent to which the availability of on-campus housing at UCSC’s housing impacted their decision to attend the university. There was a large discrepancy in response between undergraduate and graduate students: 89% of undergraduate students reported that on-campus housing played an “important” or “very important” role in their decision, compared to only 55% from graduate students.

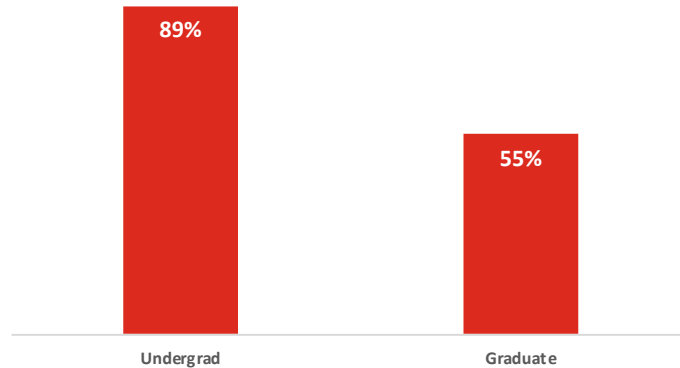


FIGURE 2.18: Importance of Housing in Students’ Decision to Attend UCSC

HOUSING SATISFACTION

Understanding housing satisfaction is essential to determining future housing preferences. Survey analysis reveals that overall satisfaction with housing has declined since the 2014 survey. Overall satisfaction from on-campus residents is 64%, down from 82%. The decline in satisfaction with on-campus housing is likely due to the addition of residential density which has placed a significant number of students in triple occupancy rooms and converted lounge space for residential uses. This is evident when looking at the decline in levels of satisfaction for a variety of housing factors including the physical condition of the unit, size of the unit, amenities, and housing rates.

Off-campus housing satisfaction is also down from 2014 for all factors, with the sharpest drop being in housing rates. The steep decline in satisfaction with off-campus housing rates suggests that students do not see the value in their housing situation as evidenced by the decline in all other factors.

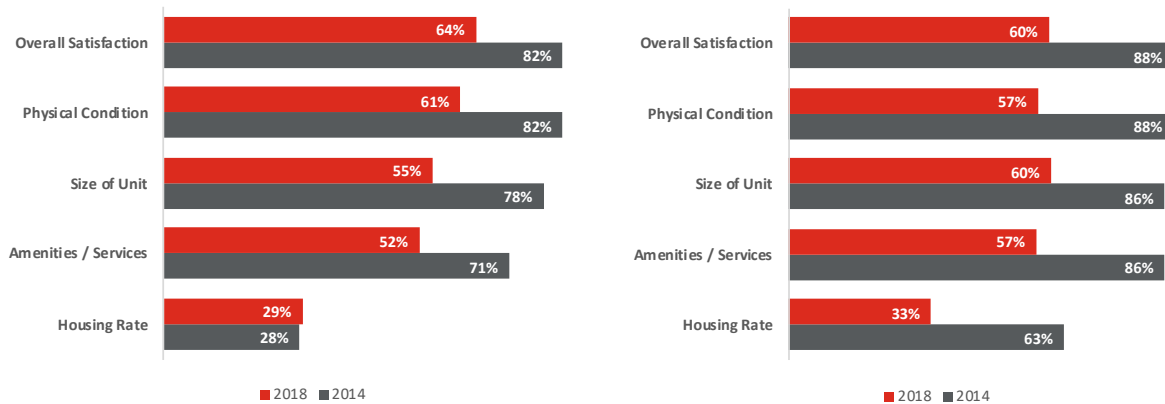


FIGURE 2.19 (Left): On-campus Housing Satisfaction, 2014 vs. 2018

FIGURE 2.20 (Right): Off-Campus Housing Satisfaction, 2014 vs. 2018

HOUSING DECISION DRIVERS

To understand what is important to students with respect to their housing situation, B&D asked survey respondents to identify what factors influenced their housing decision. Overall, the total cost of rent and utilities and proximity to classes are the most important drivers when it comes to choosing where to live. Further analysis by where students live revealed that on-campus residents are driven by proximity, cost, and the housing guarantee. Off-campus residents are driven by cost, availability of a kitchen, and the ability to choose their own roommates.

Top 10 Housing Decision Drivers		ALL	On-Campus	Off-Campus
1	Total cost of rent and utilities	65%	53%	89%
2	Proximity to classes	53%	65%	31%
3	Ability to choose my own roommate(s)	30%	26%	40%
4	Housing guarantee for on-campus residents	30%	45%	3%
5	Availability of a kitchen	28%	21%	41%
6	Availability of high-speed Internet	28%	32%	19%
7	Availability of a private (single) bedroom	22%	15%	34%
8	Proximity to, or availability of, convenient parking or public transportation	21%	14%	34%
9	Access to campus dining	21%	32%	1%
10	Availability of convenient laundry facilities	19%	18%	20%

■ > 10% of the average
■ < 10% of the average

FIGURE 2.21: Housing Decision Drivers

Survey respondents were then asked where they plan to live next year. Approximately 73% of rising sophomores and nearly a third of rising juniors and seniors stated they would live on campus. Forty-five percent (45%) of rising juniors and 49% of rising seniors indicated that they would live off campus. Only 14% of graduates plan to live on campus while 61% plan to live off campus.

MARKET ANALYSIS

Location	ALL	Rising SO	Rising JR	Rising SR	Graduate
On campus	37%	73%	29%	29%	14%
Off campus	33%	11%	45%	49%	61%
University Town Center	1%	1%	1%	1%	0%
Undecided on where to live	15%	14%	23%	18%	14%
Not applicable; I will not be attending UCSC next year.	14%	1%	1%	3%	11%

FIGURE 2.22: Where Students Plan to Live Next Year (2018-2019)

Students who indicated that they are planning to live off campus next year were asked to state the top reasons why they chose to do so. Approximately 73% of respondents stated their top reason was because it is more cost effective. Other top reasons include UCSC’s inability to guarantee them housing on campus, and access to a kitchen.

Top 10 Reasons to Live Off Campus Next Year	Percent
1 More cost effective	73%
2 UCSC is unable to guarantee housing for me on campus next year	40%
3 Access to my own kitchen	33%
4 Fewer rules and regulations	32%
5 More living space	30%
6 More privacy	29%
7 No meal plan requirement	22%
8 Ability to live with or near friends	19%
9 Better living unit amenities	18%
10 Ability to live with friends from different colleges	15%

FIGURE 2.23: Top 10 Reasons for Moving Off Campus Next Year

OFF-CAMPUS HOUSING

Students who live in the off-campus market were asked a series of questions about their living situation to understand what they are facing off campus. Survey data revealed that 84% of students are living alone or with other roommates. Approximately 44% of off-campus renters are living in a single-family home while a third are living in an apartment. On average, there are three bedrooms per unit and 54% of students are sharing a bedroom with one or more other people. The most common lease is a 12-month (56%) and the average security deposit is \$774 per month indicating a low financial barrier to entry for students.

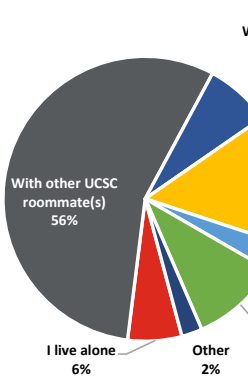


FIGURE 2.24 (Left): Who C

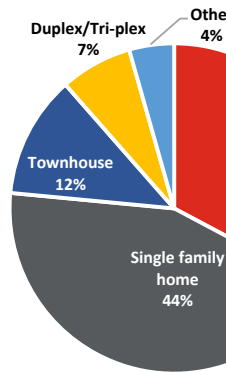


FIGURE 2.25 (Center): Housing Types Lived In

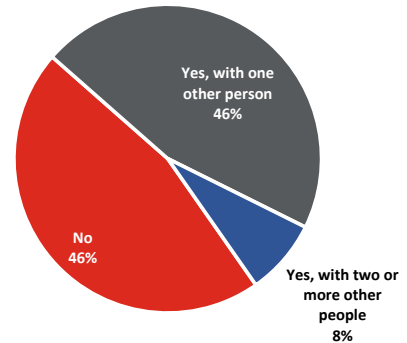


FIGURE 2.26 (Right): Percentage of Students Who Share a Bedroom

Survey analysis revealed that students living in the off-campus market are paying a weighted average of \$853 per month exclusive of utilities. Analysis by unit size reveals that the price per student decreases the more bedrooms there are in the unit. These figures are significantly below the rates found in the off-campus market analysis due to the large number of students sharing a bedroom with one or more people.



FIGURE 2.27: Weighted Average Per Bedroom Rental Rates by Unit Size Exclusive of Utilities

Students self-reported that they pay an average of \$87 per month in utilities in the off-campus market. The most common utilities that they are paying for are Internet, electricity, and water. The \$87 figure is much lower than what B&D typically sees due to many students who are sharing a bedroom.

Utilities Paid	Percent
Internet	86%
Electric	83%
Water	63%
Heat	57%
Trash	47%
Sewer	34%
Cable/satellite television	24%
Not applicable; I do not pay for any utilities	9%

FIGURE 2.28: Most Common Utilities Paid for in the Off-Campus Market

TRANSPORTATION

To understand how transportation to campus impacts students' living situation, B&D asked a series of questions about how students get to campus. Approximately 53% of respondents ride public transit to campus while 27% drive alone. The average one-way commute time is 30-minutes. Respondents indicated that the average time is only 24 minutes without traffic or full busses.

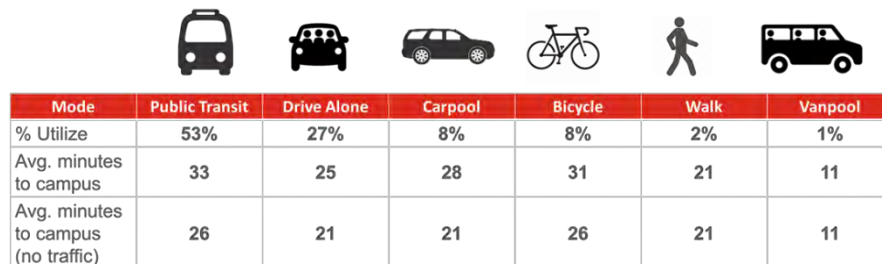


FIGURE 2.29: Mode of Travel to Campus and Average One-Way Commute Times

DINING

Students were asked questions about dining to understand how important it is to them and to gauge overall interest in a meal plan. When asked if respondents believe that a meal plan should be mandatory, 95% stated that it should not. This illustrates that students desire flexibility and independence when it comes to their dining options. Students were then asked to indicate how interested they would be in a meal plan that is targeted towards apartment residents. Analysis by student type reveals that on-campus residents would be the most interested followed by undergraduate students.

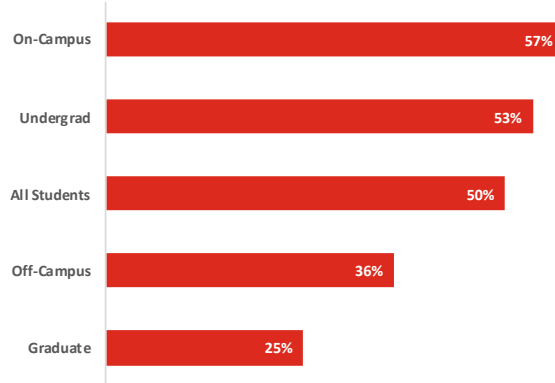


FIGURE 2.30: Interest in a Meal Plan for Apartment Residents by Student Type

FUTURE HOUSING CONSIDERATIONS

To understand what is important to students, the survey asked respondents to rank factors that UCSC should consider as it works to improve student housing. The highest ranked factors were to keep housing costs affordable, create more on-campus housing opportunities for current students, and provide modern and attractive living environments for students.

Rank	Factor	Weighted Average
1	Keep housing costs affordable	79%
2	Create more on-campus housing opportunities for currently enrolled students	69%
3	Provide modern and attractive living environments to students	59%
4	Expand existing residential dining programs	53%
5	Create more theme areas around academic programs / interests	46%
6	Create living areas specifically tied to college affiliation	45%

FIGURE 2.31: Most Important Factors to Consider as UCSC Improves On-Campus Housing

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DEMAND ANALYSIS

Using information gleaned from B&D's demographic analysis, on-campus supply analysis, and student survey, B&D was able to identify a likely target market consisting of students who would likely be interested in living on campus. B&D then developed a demand model to project demand by using student demographic data, enrollment figures, and the electronic survey responses. The following outlines B&D's findings with regard to demand for on-campus housing at UCSC and the Student Housing West Project.

DEMAND-BASED PROGRAM

B&D utilizes its proprietary demand-based programming model ("DBP") to determine unmet demand for on-campus housing. The DBP derives demand from the results of the student survey, which asks students to select their preferred unit type from a variety of housing options. The survey provides a floor plan and brief description of each unit type with estimated rental rates to ensure that students are aware of the full implications of their choice. Students are also allowed to select the option of "none; I would prefer to live off-campus." In addition, B&D divides the survey population into two distinct subgroups: high and low propensity to live in on-campus housing. Those in the high-propensity group are considered to be the "target market."

The DBP determines demand through the following process:

- ◆ Survey responses are filtered by the target market to determine a capture rate for the tested units.
- ◆ The capture rates are applied to enrollment figures provided by the college and demographically-representative weight factors are adjusted to ensure a balance between survey respondents and the entire target market population.

TARGET MARKET

The on-campus capture rate at UCSC is a function of the University's student population, on-campus housing policies and offerings, and the character of the off-campus housing market. B&D's analysis in these areas assisted in determining a primary target market. The following is a summary of key factors that formed the basis.

- ◆ UCSC currently has 19,457 enrolled students, an increase of 13% since 2013. Undergraduate enrollment is up 12% and graduate enrollment has increased 25% during that time frame.
- ◆ UCSC has the ability to house approximately 9,338 students or 48% of total enrollment on campus. Current occupancy in housing is 9,049 or 47% of the student body.
- ◆ To meet demand, the campus has increased the residential density of campus by 2,278 beds to accommodate additional students. The additional density is achieved through forced tripling of rooms and converting lounge spaces to residential units.
- ◆ Since 2012, the University has maintained an average 97% occupancy of available beds (9,338). However, with the added residential density, UCSC operated at 127% of design capacity within the existing residence halls.

- ◆ The University does not require students to live on campus. However, it does guarantee housing to new freshmen for two years and transfer students for one year if they indicate a preference for university housing when accepting their offer of admission.

Based on these factors, the Project Team has defined the likely target markets for the Student Housing West project:

Undergraduate Students

- ◆ Enrolled full-time
- ◆ Age 18-24
- ◆ Single without children
- ◆ Live on campus
- ◆ If off campus, currently rent and not living with family, partner, or dependents
- ◆ Paying \$700 per month or more in rent

Graduate Students

- ◆ Enrolled full-time
- ◆ Single or married without children
- ◆ Live on campus
- ◆ If off campus, currently rent and not living with family, partners, or dependents
- ◆ Paying \$700 per month or more in rent

Students with Families

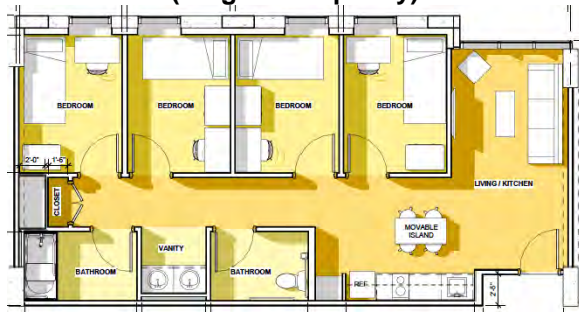
- ◆ Enrolled full-time
- ◆ Single or married with children
- ◆ Live on campus
- ◆ If off campus, currently rent and pay more than \$700 per month in rent

PROPOSED UNIT TYPES AND ESTIMATE RENTAL RATES

The survey presented students with a variety of unit type options to gauge their interest in on-campus housing. The following unit types and rental rates were tested in the survey.

Undergraduate Student Unit Types

Unit A: Four-Bedroom / One Bathroom (Single Occupancy)



Estimated Rent: \$1,621/ month / person

Unit B: Two-Bedroom / Two-Bathroom (Double Occupancy)



Estimated Rent: \$1,424/ month / person

**Unit C: Triple Occupancy Studio
(Triple Occupancy)**



Estimated Rent: \$1,143/ month / person

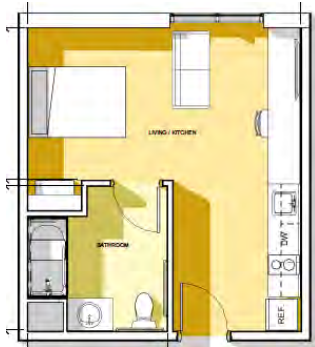
**Unit D: Undergraduate Converted Triple
(Triple Occupancy)**



Estimated Rent: \$1,084/ month / person

Graduate Student Unit Types

Unit A: Studio Apartment



Estimated Rent: \$1,143/ month / unit

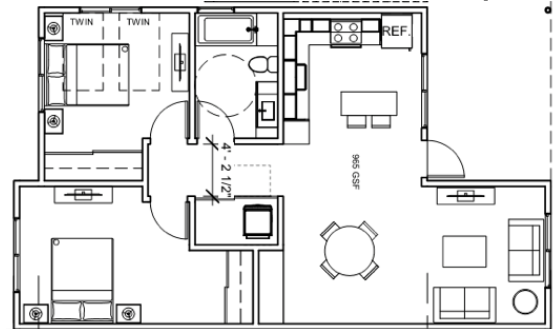
**Unit B: Two-Bedroom / One-Bathroom Suite
(With Shared Communal Kitchen)**



Estimated Rent: \$1,084/ month / person

Student Family Housing Unit Type

Unit A: Two-Bedroom / One-Bathroom Apartment



Estimated Rent: \$1,658/ month / unit

TOTAL DEMAND

Using survey data and fall 2017 enrollment figures, B&D’s demand model projected demand for 13,102 beds with 12,792 single student beds and 310 family units. A significant increase in capturing the junior, senior, and graduate populations is possible given the interest and demand for unit types in Student Housing West.

Class Year	Enrollment	Occupancy	Current Capture Rate	Projected Capture Rate	Single Student Demand (Beds)	Family Student Housing Demand (Units) ¹
Freshman	4,360	4,100	94%	95%	4,121	
Sophomore	3,623	2,374	66%	73%	2,656	
Junior	4,455	1,571	35%	56%	2,504	175
Senior / Other	5,139	927	18%	46%	2,344	
Graduate / Other	1,880	77	4%	62%	1,166	135
Total	19,457	9,049	47%	66%	12,792	310

Total Demand: 13,102

1: Family Student Housing occupants are graduate and undergraduate students.

FIGURE 3.1: Total On-Campus Housing Demand

Analysis by student type reveals that unmet demand for single undergraduate students exists for 624 beds, 866 beds of unmet demand for single graduate students, and 170 units of unmet demand for married and student families. The unmet demand totals include the existing housing supply at UCSC, de-densification of 773 beds within residence halls, replacement of the 197 existing family units, and the proposal Student Housing West program of 3,073 beds.

Demand	Single Students		Family Student Housing ¹	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications ²	(773)	0	(197)	(970)
Revised Current Supply	8,289	80	0	8,369
Student Housing West	2,713	220	140	3,073
Current Supply + New Beds	11,002	300	140	11,442
Total Demand	11,626	1,166	310	13,102
Remaining Unmet Demand	624	866	170	1,660

Notes:

1. Family housing is in units.
2. Planned de-densification and replacement of Family Student Housing.

FIGURE 3.2: Demand and Supply Reconciliation

Analysis of demand by unit type preference reveals that there is sufficient demand for all unit types that are proposed in the Student Housing West Project. Analysis by undergraduate single occupancy private units reveals demand for 3,353 beds and 6,733 beds in double or triple occupancy shared units. The demand for private and shared units is sufficient to support the proposed program at Student Housing West.

DEMAND ANALYSIS

	Undergraduate Beds				Graduate Beds		Family Housing
	4BR / 1BA Apt.	2BR / 2BA Apt.	Studio Triple	2BR / 2BA Apt. (Triple Conversion) ³	Studio Apartment	2BR Suite (W/ Comm. Kitch.)	2BR Apt.
	Single	Double	Triple	Triple	Single	Single	Family Unit
Total Demand ^{1,2}	2,268	1,466	930	1,766	523	590	310
Student Housing West Program	1,529	620	564	0	92	128	140
Unmet Demand²	739	846	366	1,766	431	462	170

Notes:

1. Total bed demand in this chart is only for unit types tested for Student Housing West. Undergraduate students were given the option of "Other on-campus housing". Those respondents are not accounted for in this chart.
2. Bed demand excludes freshmen population
3. Conversion of designed double occupancy 2BR/2BA bedrooms into triple occupancy. SHW Program is 0 as bed spaces are accounted for as designed doubles under 2BR/2BA.
4. Unmet demand does not account for existing on-campus housing supply

FIGURE 3.3: Total Demand by Tested Unit Types

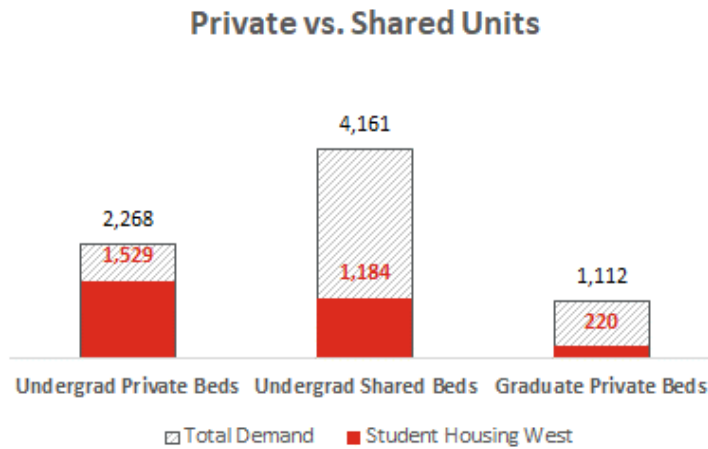


FIGURE 3.4: Total Demand by Private and Shared Unit Types

HOUSING AMENITY PREFERENCES

To understand what should be included in social spaces of Student Housing West, B&D asked a series of questions in the housing survey about housing amenity preferences. Students were asked to rank eight features from highest to lowest for the HUB community space in the Student Housing West Project. The top ranked features were foodservice, and study spaces. This indicates that students are primarily interested in standard residence hall amenities rather than more extravagant social spaces.

Rank	Features / Amenities in the HUB	Weighted Average
1	Foodservice	71%
2	Quiet study space	67%
3	Group study rooms	57%
4	Fitness: Cardio	57%
5	Social lounge	56%
6	Multipurpose space for community events	51%
7	Active gaming / recreation	48%
8	Fitness: Group Exercise	46%

FIGURE 3.5: Top Ranked Features / Amenities in the Hub Community Space

Graduate students who indicated interest in living in the shared two-bedroom suite with the communal kitchen and common area were also asked about what types of features they would like to see in that unit. Survey analysis reveals that the most popular unit amenities are a microwave, small refrigerator and a desk. The most popular amenities in the communal kitchen and living area are a fully equipped kitchen, individual food storage, and a communal dining table. Graduate students indicated that they would only want to share the communal kitchen with a maximum of nine other people.

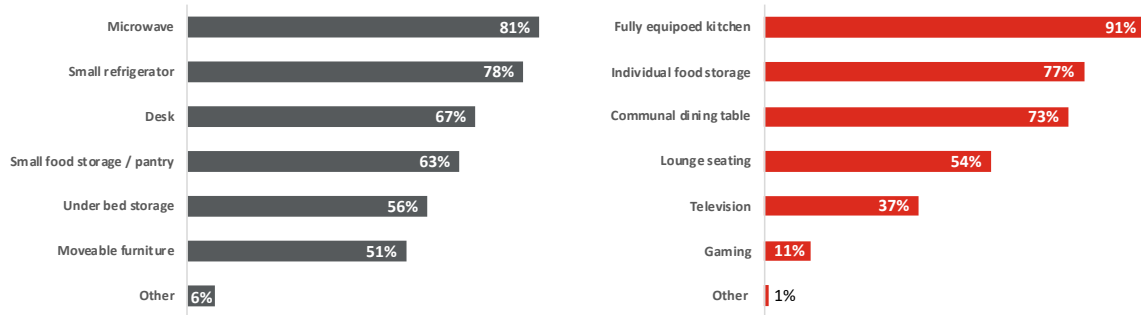


FIGURE 3.6 (Left): Most Desired Unit Amenities in the Shared Two-Bedroom Suite
FIGURE 3.7 (Right): Most Desired Features / Amenities in the Communal Kitchen and Common Area

SECTION 3


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EXHIBIT **A**

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Santa Cruz
Competitive Rent Survey
January 19, 2018

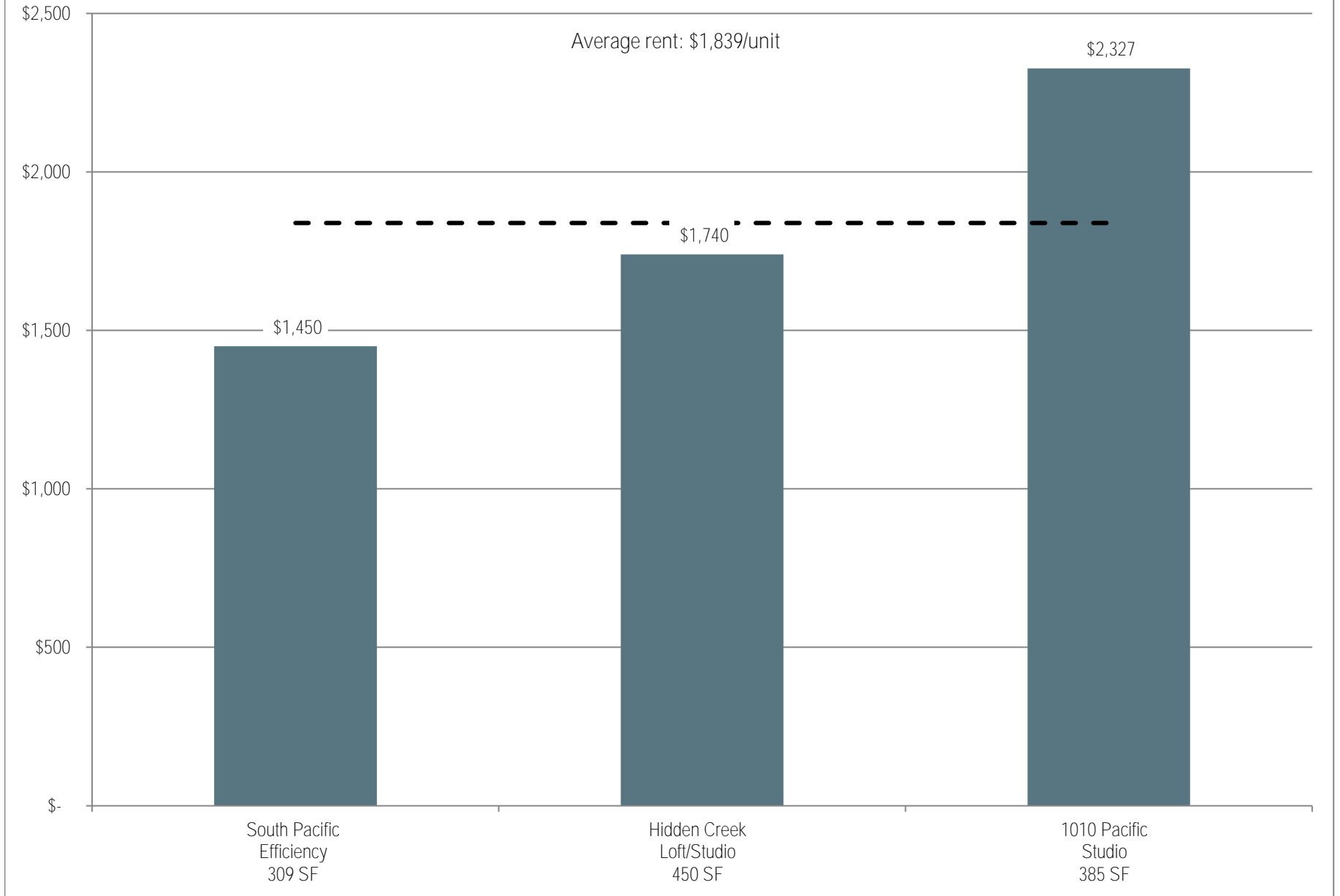
Rental Comparables			Unit Type	Number of Units	Avg. Sq. Ft.	Unit Rent			Unit Rent psf		
						Low	Hi	Avg	Low	Hi	Avg
South Pacific		Units	Efficiency	71	309	\$1,450	\$1,450	\$1,450	\$4.69	\$4.69	\$4.69
401 Pacific Avenue		71	Total	71	309	\$1,450	\$1,450	\$1,450	\$4.69	\$4.69	\$4.69
Santa Cruz, CA 95060		Built	Concessions: None.								
(831) 466-9467		2003									
Owner		Occupancy									
Barry Swenson Builder	99%										
Manager	Leased										
Santa Cruz Seaside Company	99%										
Note: month-to-month units in SRO Building - 350 SF or below with limited kitchenette and bathroom in units. Units are being remodeled to include 4-burner stove with bake oven and full-size refrigerator; no microwave.											
1010 Pacific		Units	Studio	2	385	\$1,898	\$2,755	\$2,327	\$4.93	\$7.16	\$6.04
1010 Pacific Avenue		113	1x1	72	611	\$2,233	\$3,483	\$2,858	\$3.65	\$5.70	\$4.68
Santa Cruz, CA 95060		Built	2x2	37	911	\$3,337	\$4,398	\$3,868	\$3.66	\$4.83	\$4.25
(831) 471-9900		2004	3x2	2	1,160	\$4,071	\$4,086	\$4,079	\$3.51	\$3.52	\$3.52
Owner		Occupancy	Total	113	715	\$2,621	\$3,780	\$3,201	\$3.67	\$5.29	\$4.48
Pacific Union Land Company	96%	Concessions:									
Manager	Leased										
Woodmont Real Estate Services	97%										
Oceanview		Units	1x1	81	680	\$2,695	\$2,970	\$2,833	\$3.96	\$4.37	\$4.17
222 Columbia Street		104	2x2	23	860	\$3,400	\$3,800	\$3,600	\$3.95	\$4.42	\$4.19
Santa Cruz, CA 95060		Built	Total	104	720	\$2,851	\$3,154	\$3,002	\$3.96	\$4.38	\$4.17
(831) 458-5042		1965/1970	Concessions: None.								
Owner		Occupancy									
Acclaim RE Investment	93%										
Manager	Leased										
Acclaim Companies	N/A										
Hidden Creek		Units	Loft/Studio	24	450	\$1,690	\$1,790	\$1,740	\$3.76	\$3.98	\$3.87
200 Button Street		146	1x1	76	525	\$1,850	\$1,900	\$1,875	\$3.52	\$3.62	\$3.57
Santa Cruz, CA 95060		Built	2x1	46	686	\$2,400	\$2,400	\$2,400	\$3.50	\$3.50	\$3.50
(831) 425-7000		1971	Total	146	563	\$1,997	\$2,039	\$2,018	\$3.54	\$3.62	\$3.58
Owner		Occupancy	Concessions: None.								
First Pacific Group	97%										
Manager	Leased										
First Pacific Group	99%										
Pacific Shores		Units	1x1	110	809	\$2,800	\$2,800	\$2,800	\$3.46	\$3.46	\$3.46
1240 Shaffer Road		206	2x2	96	1,024	\$3,376	\$3,983	\$3,680	\$3.30	\$3.89	\$3.59
Santa Cruz, CA 95060		Built	Total	206	909	\$3,068	\$3,351	\$3,210	\$3.37	\$3.69	\$3.53
(831) 427-1290		2004	Concessions: None.								
Owner		Occupancy									
Pacific Union Land Company	99%										
Manager	Leased										
Woodmont Real Estate Services	100%										
Chestnut Street		Units	1x1	30	650	\$2,100	\$2,250	\$2,175	\$3.23	\$3.46	\$3.35
143 Chestnut Street		96	2x1	18	900	\$2,800	\$2,800	\$2,800	\$3.11	\$3.11	\$3.11
Santa Cruz, CA 95060		Built	2x2	2	950	\$2,825	\$3,000	\$2,913	\$2.97	\$3.16	\$3.07
(831) 469-3620		2002	2x2 TH	46	1,040	\$3,443	\$3,443	\$3,443	\$3.31	\$3.31	\$3.31
Owner		Occupancy	Total	96	890	\$2,890	\$2,940	\$2,915	\$3.25	\$3.30	\$3.28
Essex Property Trust	99%	Concessions: None.									
Manager	Leased										
Essex Property Trust	100%										

Rental Comparables		Unit Type	Number of Units	Avg. Sq. Ft.	Low	Unit Rent Hi	Avg	Unit Rent psf				
								Low	Hi	Avg		
Outlook Garden		Units	1x1	88	657	\$2,200	\$2,250	\$2,225	\$3.35	\$3.42	\$3.39	
363 Western Drive		168	1x1 Loft	60	818	\$2,400	\$2,600	\$2,500	\$2.93	\$3.18	\$3.06	
Santa Cruz, CA 95060		Built	2x1	20	830	\$2,950	\$2,950	\$2,950	\$3.55	\$3.55	\$3.55	
(831) 426-6855		1978	Total		168	735	\$2,361	\$2,458	\$2,410	\$3.21	\$3.34	\$3.28
Owner		Occupancy	Concessions: None.									
James A. Scholz	95%											
Manager	Leased											
Owner Managed	N/A											

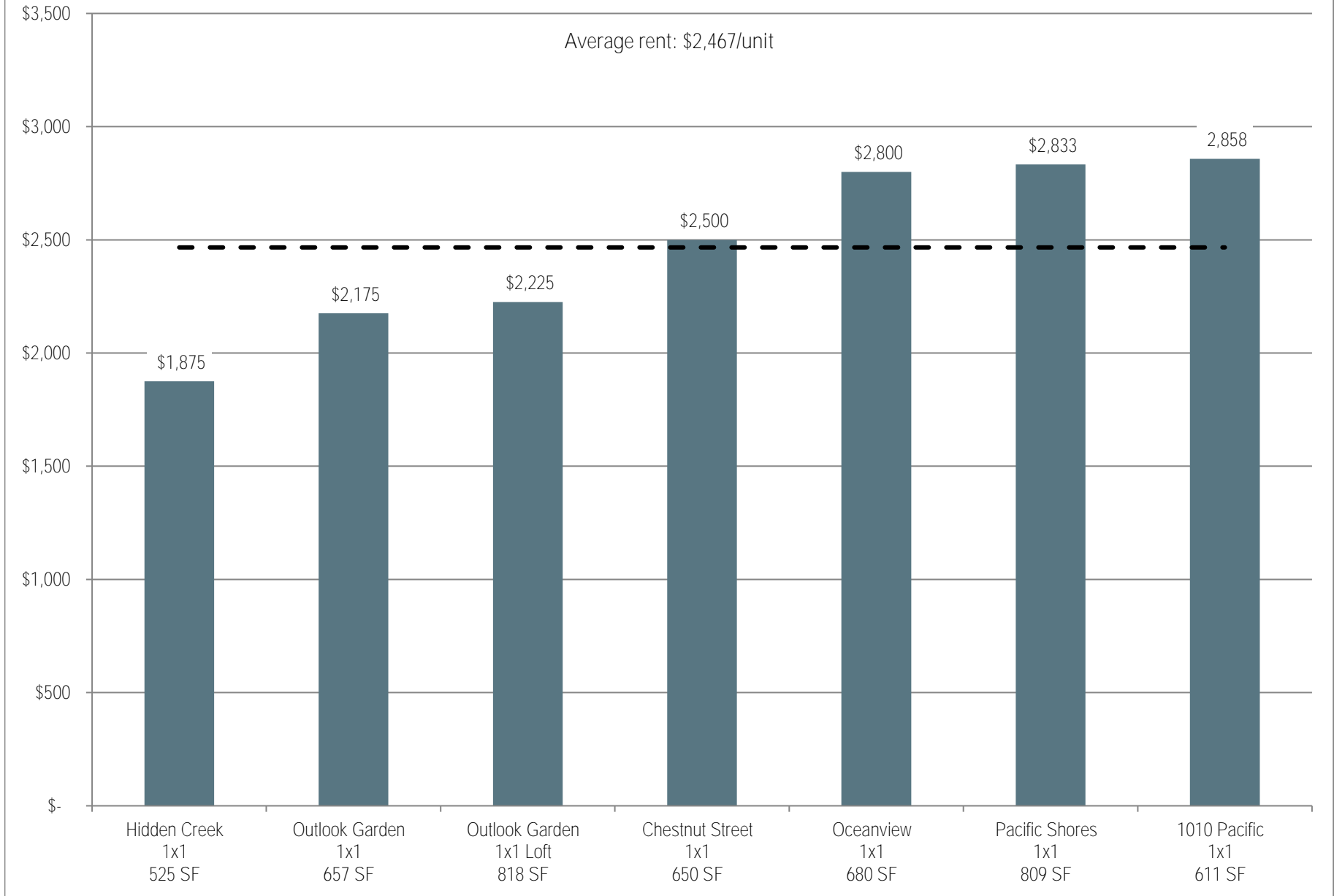
		Units	Avg s.f.	Low	High	Avg. Unit Rent	psf Low	psf High	Avg psf
96.7%	Total	904	726	\$2,537	\$2,811	\$2,674	\$3.50	\$3.87	\$3.68

Source: Survey of property managers, leasing agents and certain principals conducted by Jones Lang LaSalle.

Studio Apartment Rents



One Bedroom Apartment Rents



Two Bedroom Apartment Rents

Average rent: \$3,207/unit

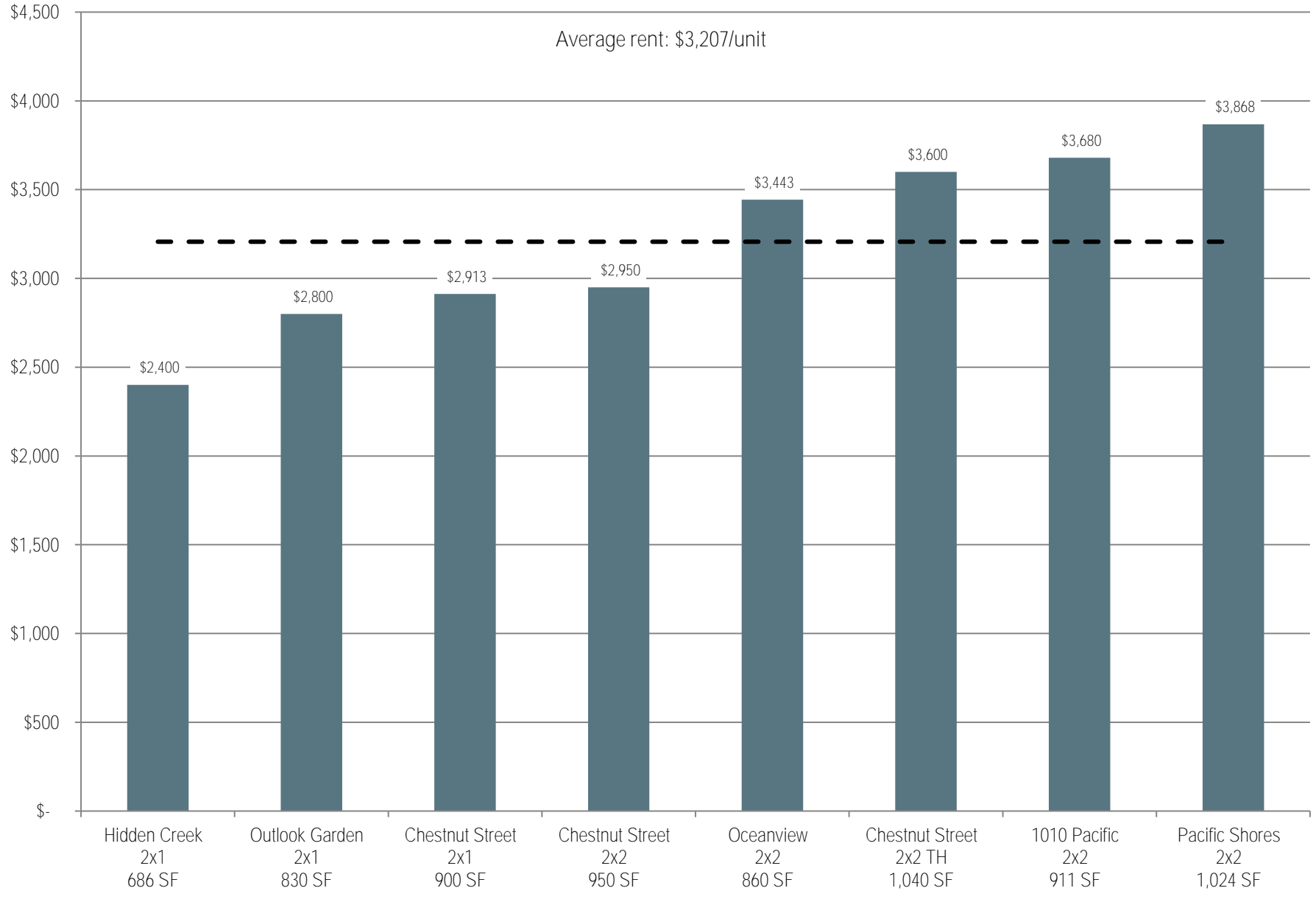


EXHIBIT **B**

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SURVEY RESULTS

Q1. What is your class standing?

Count	Percent	
1031	30.79%	First year
688	20.54%	Second year
632	18.87%	Third year
514	15.35%	Fourth year
80	2.39%	Fifth year and beyond
385	11.50%	Graduate/Professional
19	0.57%	Other (please specify)
3349		Respondents

Q2. What is your family status?

Count	Percent	
3019	90.25%	Single without child(ren)/dependent(s)
40	1.20%	Single with child(ren)/dependent(s)
135	4.04%	Married/partnered without child(ren)/dependent(s)
151	4.51%	Married/partnered with child(ren)/dependent(s)
3345		Respondents

Q3. Do you currently live in UCSC housing?

Count	Percent	
2197	65.54%	Yes
1155	34.46%	No
3352		Respondents

Q4. If currently living in UCSC student housing, in what location do you reside?

Count	Percent	
166	7.74%	Cowell College
179	8.35%	Stevenson College
212	9.89%	Crown College
192	8.96%	Merrill College
246	11.47%	Porter College
98	4.57%	Transfer Community at Porter College
127	5.92%	Kresge College
155	7.23%	Oakes College
196	9.14%	Rachel Carson College
197	9.19%	College Nine
197	9.19%	College Ten
35	1.63%	The Village
24	1.12%	Redwood Grove Apartments
27	1.26%	Graduate Student Housing
62	2.89%	Family Student Housing
10	0.47%	Camper Park
21	0.98%	University Town Center
2144		Respondents

Q5. How important was the availability of on-campus housing in your decision to attend UCSC?

Count	Percent	
1786	54.48%	Very important
1008	30.75%	Important
398	12.14%	Unimportant
86	2.62%	Very unimportant
3278		Respondents

Q6. Which years have you lived on campus in UCSC's student housing? SELECT ALL THAT APPLY, INCLUDING PARTIAL YEARS

Count	Respondent %	Response %	
370	11.29%	7.42%	None
2499	76.26%	50.10%	Frosh year
1195	36.47%	23.96%	Sophomore year
607	18.52%	12.17%	Junior year
226	6.90%	4.53%	Senior year (including fifth year and beyond)
91	2.78%	1.82%	Graduate/professional year(s)
3277			Respondents
4988			Responses

Q7. If on campus housing was available to you throughout your time as a student, at current housing rates, which year(s) would you choose to live on campus? SELECT ALL THAT APPLY, INCLUDING PARTIAL YEARS.

Count	Respondent %	Response %	
337	10.34%	4.80%	None
1928	59.14%	27.48%	Frosh year
1720	52.76%	24.51%	Sophomore year
1386	42.52%	19.75%	Junior year
1165	35.74%	16.60%	Senior year (including fifth year and beyond)
481	14.75%	6.85%	Graduate/professional year(s)
3260			Respondents
7017			Responses

Q8. Please rate how satisfied you are with each of the following factors with respect to your housing situation: SELECT ONE RESPONSE FOR EACH FACTOR - How satisfied are you with your current residence?

Count	Percent	
808	25.91%	Very satisfied
1369	43.91%	Satisfied
722	23.16%	Somewhat satisfied
219	7.02%	Unsatisfied
3118		Respondents

SURVEY RESULTS

Q9. Please rate how satisfied you are with each of the following factors with respect to your housing situation: SELECT ONE RESPONSE FOR EACH FACTOR - How satisfied are you with the physical condition of your current residence?

Count	Percent	
727	23.58%	Very satisfied
1309	42.46%	Satisfied
742	24.07%	Somewhat satisfied
305	9.89%	Unsatisfied
3083		Respondents

Q10. Please rate how satisfied you are with each of the following factors with respect to your housing situation: SELECT ONE RESPONSE FOR EACH FACTOR - How satisfied are you with the size of your current residence?

Count	Percent	
833	27.66%	Very satisfied
989	32.84%	Satisfied
701	23.27%	Somewhat satisfied
489	16.24%	Unsatisfied
3012		Respondents

Q11. Please rate how satisfied you are with each of the following factors with respect to your housing situation: SELECT ONE RESPONSE FOR EACH FACTOR - How satisfied are you with the amenities and services offered at your current residence?

Count	Percent	
550	18.02%	Very satisfied
1215	39.80%	Satisfied
891	29.18%	Somewhat satisfied
397	13.00%	Unsatisfied
3053		Respondents

Q12. Please rate how satisfied you are with each of the following factors with respect to your housing situation: SELECT ONE RESPONSE FOR EACH FACTOR - How satisfied are you with the housing rate you are paying for your current residence?

Count	Percent	
233	7.56%	Very satisfied
561	18.20%	Satisfied
972	31.53%	Somewhat satisfied
1317	42.72%	Unsatisfied
3083		Respondents

Q13. What were the FIVE MOST important factors in your decision on where to live this year? SELECT UP TO FIVE RESPONSES

Count	Respondent %	Response %	
2049	65.30%	13.75%	Total cost of rent and utilities
955	30.43%	6.41%	Ability to choose my own roommate(s)
1673	53.31%	11.23%	Proximity to classes
464	14.79%	3.11%	Proximity to other students

Q13. What were the FIVE MOST important factors in your decision on where to live this year? SELECT UP TO FIVE RESPONSES

Count	Respondent %	Response %	Response
665	21.19%	4.46%	Proximity to, or availability of, convenient parking or public transportation
387	12.33%	2.60%	Proximity to my work
158	5.04%	1.06%	Proximity to shopping, entertainment, or restaurants
865	27.57%	5.81%	Availability of high-speed Internet
323	10.29%	2.17%	Reliability of maintenance and custodial services
247	7.87%	1.66%	Flexible lease/rental terms
204	6.50%	1.37%	Availability of a good building manager or landlord
356	11.34%	2.39%	Less restrictive rules and supervision
952	30.34%	6.39%	Housing guarantee for on-campus residents
345	10.99%	2.32%	Ability to stay during breaks
554	17.65%	3.72%	Availability of a quiet place to study
534	17.02%	3.58%	Access to UCSC resources (computer labs, student services, administrative offices, etc.)
253	8.06%	1.70%	Opportunity to be involved in UCSC residential communities (living/learning programs, theme communities, etc.)
381	12.14%	2.56%	Safety and security features
681	21.70%	4.57%	Availability of a private (single) bedroom
333	10.61%	2.23%	Availability of a private bathroom
396	12.62%	2.66%	Availability of additional living space outside my bedroom but within my unit
886	28.23%	5.95%	Availability of a kitchen
581	18.51%	3.90%	Availability of convenient laundry facilities
658	20.97%	4.42%	Access to campus dining
3138	Respondents		
14900	Responses		

Q14. Where do you plan to live next year while attending UCSC?

Count	Percent	Response
1158	36.82%	On campus
1037	32.97%	Off campus
19	0.60%	University Town Center
481	15.29%	Undecided on where to live
450	14.31%	Not applicable; I will not be attending UCSC next year.
3145	Respondents	

Q15. If considering living OFF CAMPUS next year, why would you prefer to do so? SELECT UP TO FIVE RESPONSES

Count	Respondent %	Response %	Response
29	2.90%	0.68%	I may not be attending UCSC next year
21	2.10%	0.49%	I am ineligible to live in UCSC's student housing for conduct-related reasons
401	40.14%	9.36%	UCSC is unable to guarantee housing for me on campus next year
137	13.71%	3.20%	To live in a quieter environment
146	14.61%	3.41%	Ability to live with friends from different colleges
21	2.10%	0.49%	To satisfy my parent's/family's wishes
321	32.13%	7.49%	Fewer rules and regulations
99	9.91%	2.31%	More convenient location
142	14.21%	3.32%	More convenient parking or public transportation

SURVEY RESULTS

Q15. If considering living OFF CAMPUS next year, why would you prefer to do so? SELECT UP TO FIVE RESPONSES			
Count	Respondent %	Response %	
732	73.27%	17.09%	More cost effective
125	12.51%	2.92%	My preferred on-campus living accommodation may not be available
72	7.21%	1.68%	Better Internet access
182	18.22%	4.25%	Better living unit amenities
13	1.30%	0.30%	Better security/safety
187	18.72%	4.37%	Ability to live with or near friends
101	10.11%	2.36%	Ability to live with or near family or partner
293	29.33%	6.84%	More privacy
301	30.13%	7.03%	More living space
219	21.92%	5.11%	No meal plan requirement
328	32.83%	7.66%	Access to my own kitchen
72	7.21%	1.68%	More convenient laundry facilities
66	6.61%	1.54%	Better physical condition of the building
17	1.70%	0.40%	Better building management and staffing
14	1.40%	0.33%	Better maintenance and housekeeping services
8	0.80%	0.19%	Better accessibility for persons with disabilities
53	5.31%	1.24%	To live away from other students
139	13.91%	3.25%	To have a pet
44	4.40%	1.03%	Other (please specify)
999	Respondents		
4283	Responses		

Q16. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing: - Provide modern and attractive living environments to students			
Count	Percent		
249	8.41%	1	
410	13.85%	2	
907	30.63%	3	
748	25.26%	4	
349	11.79%	5	
298	10.06%	6	
2961	Respondents		

Q17. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing: - Create living areas specifically tied to college affiliation			
Count	Percent		
242	8.22%	1	
302	10.26%	2	
302	10.26%	3	
448	15.22%	4	
752	25.54%	5	
898	30.50%	6	
2944	Respondents		

**Q18. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing:
- Create more theme areas around academic programs/interests**

Count	Percent	
184	6.26%	1
270	9.19%	2
387	13.17%	3
545	18.54%	4
862	29.33%	5
691	23.51%	6
2939	Respondents	

**Q19. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing:
- Create more on-campus housing opportunities for currently enrolled students**

Count	Percent	
470	15.86%	1
1143	38.56%	2
454	15.32%	3
343	11.57%	4
376	12.69%	5
178	6.01%	6
2964	Respondents	

**Q20. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing:
- Keep housing costs affordable**

Count	Percent	
1699	56.96%	1
519	17.40%	2
85	2.85%	3
78	2.61%	4
168	5.63%	5
434	14.55%	6
2983	Respondents	

**Q21. Please rank the following factors in order of importance as UCSC considers improvements to on-campus housing:
- Expand existing residential dining programs**

Count	Percent	
135	4.58%	1
324	11.00%	2
826	28.04%	3
784	26.61%	4
437	14.83%	5
440	14.94%	6
2946	Respondents	

SURVEY RESULTS

Q22. Once you no longer had an on-campus housing guarantee and space was not available at UCSC, how easy was it for you to find off-campus housing?

Count	Percent	
34	3.36%	Very easy
133	13.14%	Easy
459	45.36%	Difficult
386	38.14%	Very difficult
1012		Respondents

Q23. With whom do you currently live?

Count	Percent	
63	6.16%	I live alone
571	55.87%	With other UCSC roommate(s)
77	7.53%	With other non-UCSC roommate(s)
150	14.68%	With both UCSC and non-UCSC roommate(s)
33	3.23%	With my parent(s) or other relative(s)
104	10.18%	With my spouse/partner and/or children
24	2.35%	Other (please specify)
1022		Respondents

Q24. Do you currently rent or own?

Count	Percent	
978	96.07%	Rent
24	2.36%	Own
16	1.57%	Other (please specify)
1018		Respondents

Q25. What type of unit do you live in off campus?

Count	Percent	
333	32.74%	Apartment/condo
445	43.76%	Single family home
122	12.00%	Townhouse
72	7.08%	Duplex/Tri-plex/Four-plex
45	4.42%	Other (please specify)
1017		Respondents

Q26. How many bedrooms are in your current housing unit?

Count	Percent	
59	5.79%	Studio / Efficiency
102	10.01%	1 bedroom
269	26.40%	2 bedrooms
311	30.52%	3 bedrooms
152	14.92%	4 bedrooms
126	12.37%	5 or more bedrooms

Q26. How many bedrooms are in your current housing unit?

Count	Percent
1019	Respondents

Q27. Do you share a bedroom?

Count	Percent	
471	46.18%	No
468	45.88%	Yes, with one other person
81	7.94%	Yes, with two or more other people
1020	Respondents	

Q28. What is your *personal* share of monthly rent/housing costs *excluding utilities*?

Count	Percent	
10	1.03%	Less than \$400
28	2.87%	\$400 - \$499
87	8.93%	\$500 - \$599
140	14.37%	\$600 - \$699
188	19.30%	\$700 - \$799
185	18.99%	\$800 - \$899
108	11.09%	\$900 - \$999
82	8.42%	\$1,000 - \$1,099
51	5.24%	\$1,100 \$1,199
29	2.98%	\$1,200 \$1,299
14	1.44%	\$1,300 \$1,399
10	1.03%	\$1,400 \$1,499
35	3.59%	\$1,500 or more
1	0.10%	I don't know
6	0.62%	I don't pay rent
974	Respondents	

Q29. In addition to your rent, for which of the following utilities do you currently pay? SELECT ALL THAT APPLY

Count	Respondent %	Response %	
91	9.38%	2.33%	Not applicable; I do not pay for any utilities
234	24.12%	5.99%	Cable/satellite television
551	56.80%	14.11%	Heat
834	85.98%	21.36%	Internet
804	82.89%	20.59%	Electric
610	62.89%	15.62%	Water
326	33.61%	8.35%	Sewer
455	46.91%	11.65%	Trash
970	Respondents		
3905	Responses		

SURVEY RESULTS

Q30. How much is your individual monthly cost for all the utilities selected in the previous question?

Count	Percent	
18	2.07%	Less than \$25
168	19.29%	\$25 - \$49
424	48.68%	\$50 - \$99
178	20.44%	\$100 - \$149
42	4.82%	\$150 - \$199
31	3.56%	\$200 or more
10	1.15%	Don't know
871	Respondents	

Q31. How long is your current lease?

Count	Percent	
71	7.33%	Not applicable; I have no lease
28	2.89%	More than 12 months
544	56.14%	12 months
137	14.14%	Academic year (approximately 9 months)
5	0.52%	Academic term (e.g., semester)
177	18.27%	Monthly
7	0.72%	Other (please specify)
969	Respondents	

Q32. What was your personal share of the security deposit required for your current lease?

Count	Percent	
58	5.98%	No deposit required
5	0.52%	Less than \$100
13	1.34%	\$100 - \$199
28	2.89%	\$200 - \$299
23	2.37%	\$300 - \$399
21	2.16%	\$400 - \$499
84	8.66%	\$500 - \$599
88	9.07%	\$600 - \$699
88	9.07%	\$700 - \$799
101	10.41%	\$800 - \$899
43	4.43%	\$900 - \$999
379	39.07%	\$1,000 or more
39	4.02%	Don't know
970	Respondents	

Q33. What is your primary mode of transportation between UCSC and your primary residence during the school year?

Count	Percent	
266	27.45%	Car, drive alone
76	7.84%	Carpool (with at least one other person)
2	0.21%	UCSC Vanpool
516	53.25%	Public transportation/bus
82	8.46%	Bicycle
10	1.03%	Motorcycle
15	1.55%	Walk

Q33. What is your primary mode of transportation between UCSC and your primary residence during the school year?

Count	Percent	
2	0.21%	Other
969		Respondents

Q34. Without traffic or already full busses, what is your typical one-way time in minutes from your residence to UCSC?

Count	Percent	
15	1.55%	Less than 5 minutes
300	30.93%	5 - 15 minutes
302	31.13%	16 - 25 minutes
197	20.31%	26 - 35 minutes
73	7.53%	36 - 45 minutes
36	3.71%	46 - 55 minutes
24	2.47%	56 minutes - 1 hour 5 minutes
8	0.82%	1 hour 6 minutes - 1 hour 15 minutes
9	0.93%	1 hour 16 minutes - 1 hour 30 minutes
6	0.62%	1 hour 31 minutes or more
970		Respondents

Q35. What is your typical one-way time in minutes from your residence to UCSC?

Count	Percent	
10	1.03%	Less than 5 minutes
146	15.07%	5 - 15 minutes
275	28.38%	16 - 25 minutes
265	27.35%	26 - 35 minutes
131	13.52%	36 - 45 minutes
64	6.60%	46 - 55 minutes
40	4.13%	56 minutes - 1 hour 5 minutes
12	1.24%	1 hour 6 minutes - 1 hour 15 minutes
16	1.65%	1 hour 16 minutes - 1 hour 30 minutes
10	1.03%	1 hour 31 minutes or more
969		Respondents

Q36. If all of the unit types described above were available on UCSC's campus at the rents outlined above, what would have been your living preference for this academic year (2017-2018)?

Count	Percent	
576	23.84%	Unit A: Four-Bedroom / One-Bath Single for approximately \$1,621/month/person
391	16.18%	Unit B: Two-Bedroom / Two-Bath Double for approximately \$1,424/month/person
268	11.09%	Unit C: Triple Occupancy Suite for approximately \$1,143/month/person
511	21.15%	Unit D: Undergraduate Triple (Converted double) for approximately \$1,084/month/person
508	21.03%	I would prefer to live off campus
162	6.71%	I would prefer to live in other housing currently available on campus
2416		Respondents

SURVEY RESULTS

Q37. If all of the unit types described above were available on UCSC's campus at the rents outlined above, what would have been your living preference for this academic year (2017-2018)?

Count	Percent	
85	27.69%	Unit A: Studio Apartment for approximately \$1,249/month/unit
84	27.36%	Unit B: Two-Bedroom / One-Bath Suite with communal shared kitchen and living room for approximately \$986/month/person
9	2.93%	I would prefer a 4-bedroom single occupancy room in Graduate Housing at \$1,136/month/person
129	42.02%	I would prefer to live off campus
307		Respondents

Q38. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Foodservice / Retail (market place kitchen, retail grab and go food, groceries, and sundaries)

Count	Percent	
954	36.38%	1
367	14.00%	2
299	11.40%	3
203	7.74%	4
187	7.13%	5
183	6.98%	6
140	5.34%	7
289	11.02%	8
2622		Respondents

Q39. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Fitness: cardio and fitness equipment

Count	Percent	
269	10.32%	1
453	17.38%	2
321	12.32%	3
284	10.90%	4
260	9.98%	5
328	12.59%	6
398	15.27%	7
293	11.24%	8
2606		Respondents

Q40. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Fitness: group fitness (yoga / Pilates / barre / motion studios)

Count	Percent	
145	5.60%	1
229	8.84%	2
317	12.23%	3
231	8.92%	4
301	11.62%	5
327	12.62%	6
522	20.15%	7
519	20.03%	8

Q40. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Fitness: group fitness (yoga / Pilates / barre / motion studios)

Count	Percent
2591	Respondents

Q41. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Multi-purpose open space for community events

Count	Percent	
116	4.48%	1
229	8.85%	2
307	11.86%	3
434	16.77%	4
389	15.03%	5
451	17.43%	6
361	13.95%	7
301	11.63%	8
2588	Respondents	

Q42. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Quiet study space

Count	Percent	
530	20.10%	1
452	17.14%	2
369	13.99%	3
370	14.03%	4
335	12.70%	5
221	8.38%	6
203	7.70%	7
157	5.95%	8
2637	Respondents	

Q43. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Group study rooms

Count	Percent	
139	5.33%	1
365	14.01%	2
426	16.35%	3
421	16.16%	4
422	16.19%	5
432	16.58%	6
247	9.48%	7
154	5.91%	8
2606	Respondents	

SURVEY RESULTS

Q44. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Social lounge

Count	Percent	
252	9.61%	1
311	11.86%	2
348	13.27%	3
388	14.80%	4
374	14.26%	5
351	13.39%	6
398	15.18%	7
200	7.63%	8
2622	Respondents	

Q45. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Active gaming / recreation (pool table, ping pong, foosball, etc.)

Count	Percent	
219	8.40%	1
231	8.86%	2
249	9.55%	3
299	11.46%	4
344	13.19%	5
323	12.38%	6
342	13.11%	7
601	23.04%	8
2608	Respondents	

Q46. Please rank the following features / amenities in order of importance that you would like to see in the community space at the HUB: - Other

Count	Percent	
38	22.49%	1
13	7.69%	2
10	5.92%	3
8	4.73%	4
15	8.88%	5
8	4.73%	6
10	5.92%	7
67	39.64%	8
169	Respondents	

Q47. Please specify "other" above, if applicable:

Count	Percent
164	100.00%
164	Respondents

Q48. What types of features/amenities would you like to see in the shared communal unit? (Select all that apply)

Count	Respondent %	Response %	Response
63	77.78%	19.38%	Small refrigerator
66	81.48%	20.31%	Microwave
51	62.96%	15.69%	Small food storage / pantry
45	55.56%	13.85%	Under bed storage
54	66.67%	16.62%	Desk
41	50.62%	12.62%	Moveable furniture
5	6.17%	1.54%	Other (please specify)
81	Respondents		
325	Responses		

Q49. What types of features/amenities would you like to see in the communal kitchen / common area? (Select all that apply)

Count	Respondent %	Response %	Response
74	91.36%	26.52%	Fully stocked kitchen (stove, oven, microwave, refrigerator, sink, garbage disposal, etc.)
62	76.54%	22.22%	Individual food storage (dry and refrigerated)
59	72.84%	21.15%	Communal dining table
44	54.32%	15.77%	Lounge seating
30	37.04%	10.75%	Television with streaming capabilities
9	11.11%	3.23%	Gaming
1	1.23%	0.36%	Other (please specify)
81	Respondents		
279	Responses		

Q50. What is the number of people you would be willing to share a communal kitchen / common area with at the price point described above?

Count	Percent	Response
49	61.25%	8 other students
6	7.50%	16 other students
0	0.00%	24 other students
0	0.00%	32 other students
25	31.25%	Other (please specify)
80	Respondents	

Q51. If the unit type described above were available on UCSC's campus at the rent outlined above, would you have chosen to live there for this academic year (2017-2018)?

Count	Percent	Response
204	69.39%	Yes
90	30.61%	I would prefer to live off campus
294	Respondents	

SURVEY RESULTS

Q52. Do you believe an on-campus meal plan should be mandatory requirement for all apartment residents, or optional?

Count	Percent	
158	5.49%	Yes, a meal plan should be required
2718	94.51%	No, a meal plan should be optional
2876	Respondents	

Q53. How interested would you be for a meal plan targeted towards apartment residents?

Count	Percent	
690	23.85%	Very interested
706	24.40%	Interested
837	28.93%	Somewhat interested
660	22.81%	Uninterested
2893	Respondents	

Q54. What is your current enrollment status?

Count	Percent	
2816	97.85%	Full time
62	2.15%	Part time
2878	Respondents	

Q55. What is your age?

Count	Percent	
1	0.03%	17 or under
1763	60.96%	18 - 20
758	26.21%	21 - 24
259	8.96%	25 - 30
111	3.84%	31 or over
2892	Respondents	

Q56. What is your gender?

Count	Percent	
1088	37.71%	Male
1688	58.51%	Female
50	1.73%	Other/Unknown
59	2.05%	Prefer not to answer
2885	Respondents	

Q57. What is your race/ethnic background?

Count	Percent	
17	0.59%	Nonresident alien
641	22.24%	Hispanic or Latino

Q57. What is your race/ethnic background?		
Count	Percent	
62	2.15%	African American or Black
1020	35.39%	White
10	0.35%	American Indian or Alaska Native
720	24.98%	Asian
15	0.52%	Native Hawaiian or Pacific Islander
313	10.86%	Two or more races
13	0.45%	Race/ethnicity unknown
71	2.46%	Other (please specify)
2882		Respondents

Q58. What is your current residency status?		
Count	Percent	
2656	91.87%	In state (California permanent resident)
106	3.67%	Out of state (U.S. citizen or permanent resident outside of California)
129	4.46%	International student
2891		Respondents

Q59. Please let us know if you have any other comments regarding UCSC's Housing program:		
Count	Percent	
906	100.00%	
906		Respondents

EXHIBIT C

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- \$1048 for a triple is still too high. Especially since it doesn't include food. A triple off campus, with no quiet hours and little oversight averages about \$600 or so. \$1048 is roughly what a single goes for off campus, and seeing those prices actively discourages many from even considering the on campus option, thereby not alleviating any of the housing concerns off campus.
- \$1259/Month is literally a joke. Seriously. You pay just above \$2000 a month and want us to pay back 5/8 of that to the University every month, with little to no financial support in the summer? How tone-deaf to the needs of graduate students are you? Also, YOU HIRED AN OUTSIDE FIRM TO DESIGN A SURVEY FOR UCSC STUDENTS!!!!!!??????? You realize that you have trained graduate students who would design a similar survey to meet your needs for way cheaper, right? What a ridiculous waste of money.
- "In order of importance" questions were answered as 1 the most important and 6/8 the least important. (Please clarify this in the question).
- *sigh*
- :)
- 53 questions for you guys to figure out what we want? I'm pretty sure we've been screaming it in your face for years.
- 55 day meals should roll over to the next quarter if students do not use them all. THEY PAID FOR IT SO THEY ARE ENTITLED TO THEM, WHENEVER!!!!
- A 3-person bedroom shouldn't be more than one thousand dollars....
- A complaint I have heard regarding the UCSC housing situation is that it fragments the student base making sociability among the students more difficult.
- a computer lab would be useful to print out assignments especially when it's late at night and the library is closed
- A few years back, there would be a designated study lounge on each floor. The student overpopulation got rid of these accessibilities and only kept one study lounge on the first floor. With an estimation of a building of 4 floors, 100 students per floor, and one study lounge available, this leads to a limited resource that should be accessible for everyone but there's clearly no room for that.
- A huge problem for most students is trying to find affordable housing, because no one has very much money here - it would be nice if there were options for people who don't get their tuition paid for yet don't have a lot of money. Since students are paying for so much, it's also very important that students get what they paid for: good infrastructure, enough space to live, no infestations, etc
- A library for some areas, and a quiet floor option for students under 21.
- A lot of the problems come from bus availability. I lived on eastside for 2 years before this year and the 12 route was cancelled. Eastside is much cheaper but there is no accessibility from eastside to campus. Can take an hour and a half one way!!!
- Accept less students to UCSC
- add more dining halls. they are beginning to fill up along with increasing freshman.
- adding air conditioning and dishwashers would be ideal for future housing especially for families. also dishwashers are much more environmentally friendly; something to think about!
- Adding more programs and benefits would be great.
- Affordability is by far the biggest issue, be it on campus or off

- Affordability is honestly the most important thing for me. Landlords off campus take advantage of students so it would be nice to have the option to live on campus and not feel cheated. Though many people don't live on campus due to how much UCSC asks for the rooms. The housing examples you included in this survey are too expensive. I don't think many people could afford to pay as much as you are asking for the single or even worse the doubles and triples are super expensive. It would honestly make more sense to move off-campus because the max you will pay for a single is like \$1200. If you guys want to make it easier for the students, then please make housing more affordable. And work provide parking for upper division undergraduate students. It sucks not being able to buy a permit as a senior. We should be able to get dibs on parking the higher in the grade you we are. Thank you
- Affordability is key
- affordability please
- AFFORDABILITY!!!!!!
- Affordable and more apartment style living is preferred.
- affordable housing is a problem in the greater santa cruz area. as an independent full time student who works 30+ hours a week, i still have great difficulty in finding affordable housing and would like to see the university offer more options to low income students like myself.
- Affordable housing is central
- Affordable housing should be essential when designing the new UCSC Housing program. It seems extremely unjust for UCSC to charge rent that would exceed 50% of the income that ucsc pays graduate students as TAs.
- Affordableness over everything but don't make it look like some basic ass building
- All proposed housing plans were outrageously expensive, and I would not opt for any of them. It is easier to find affordable off campus housing
- All the options I've seen are way too expensive compared to what is available off campus (with a little luck).
- All transfer students should decide on where to live on campus with any college affiliation.
- Allow housing on winter break
- Allow pets in graduate student housing.
- Although I live off campus, I have heard plenty of complaints about the current dorm situations in Crown. Low shower taps, broken washing machines, and nonfunctioning heaters are just a few. Since new housing is going to be built, please make sure everything works properly and is made for average-sized people.
- Anything that helps ease this critical housing crisis is a positive. This is much needed.
- Apartment style living is much preferred to dorm style living after freshmen year. Having a living room to hang out with friends and a kitchen to cook in is essential. The presence of computer labs and quiet and group/clean/non-dusty study spaces is also essential. Necessities like laundry rooms etc. would be ideal as well. A restaurant or store like Banana Joe's would be great too.
- As a fifth year student currently living in the dorms, who was a resident in the Oakes dorms as a freshmen beginning in the fall of 2013-2014, much has changed since then in terms of dorm life. Please bring back the lounges. Lounges not only provide a study space, or a social space for the means of leisure. The Lounges are a fundamental aid for

students to get out of their rooms and to connect with the NAs, rather than just running into them for a quick greeting in the hallway or in the bathroom. The connections I made with my fellow students and NAs in the lounge during my first year definitely helped shape a lot of the relationships I have now, as well as the person who I am today. Lounges are critical. Ultimately, lounges allow different floors to come together and they help to build a foundation for a familial environment, symbolizing solidarity which I think is somewhat absent from the dorms at the moment. It is absolutely unsettling and I hope the lounges are soon to return so that the experience of freshmen-living can return to what it could and should be.

- As a graduate student, I would be very interested in living on campus. My life and work would become much simpler. I also appreciate the opportunity to not need a car.
- As a third year RA, the lounge situation across campus and Stevenson in particular (people living in lounge spaces) is unacceptable, and it really hinders the ability of residents to feel comfortable and included in the community outside of organized events.
- As a transfer student, housing should be guaranteed for our senior year. Also a meal plan should not be required for apartment residents. A laundry room should be available in all buildings. A kitchen should also be available to dorms. Us dorm residents also don't like to wash our dirty dishes in the sink of our own bathroom. Group study rooms should be a mandatory staple in all residence halls. Porter study lounge should also be upgraded, us students don't appreciate the bad smell, old furniture, and bad lighting in there.
- As an RA at Rachel Carson College I work very closely with the students and have over time seen the progressive struggles of living on campus. The study spaces have been stripped away and people have been cramped into smaller spaces which makes it unbearable to live. I've had to deal with all-too-many situations of students who feel trapped here and can't find opportunities for them to be alone. The study rooms we used to have my freshman year are now gone and have been converted into bedrooms. When they used to be study rooms, they were hubs for conversation and for people to meet each other and work on homework together in a silent room. Now that that space is gone, there are only external study spaces on campus, which students do not want to go to in the late hours of the night. It feels unsafe to walk out around midnight to go study, so students would much rather have a space in their home to study. I think another thing that needs to be considered is how many students live on campus and how difficult it is in general to traverse around the campus. Buses are crowded as it is, so how will that be handled? Just some things to consider.
- as an RA, residents complain most about laundry machines and the general fact that the building is overall falling apart.
- As far as I'm concerned, UCSC Housing is a complete and total scam that gouges students by taking advantage of cheap student loan credit. The burden of paying to construct more housing sits firmly on our shoulders while overpaid administrators congratulate themselves for "improving the campus experience" without a trace of irony. There is absolutely no way to justify charging nearly \$1,200 to share a bedroom with three other people. Shame on you.
- Be good to the trees!

- Because I failed in applying a house last year, I think that it is important to tell the student can they successfully enroll or not. Finding house outside campus require a period of time.
- Being furnished is definitely key, because it was hard to move into FSH with absolutely nothing and being a college student.
- Better meal plan options. Maybe a 100 swipe plan?
- Better room options
- Better shower stalls and a more detailed roommate survey for better choosing roommates. Also possibly lowering the lofts beds so people who have low ceilings can be more comfortable.
- Better upkeep would be nice, as well as working elevators and other facilities.
- Better wifi system
- Both the quality of food and the quality of living have dropped drastically in UCSC housing.
- Bring prices down. It's ridiculous
- Bring the lounges back.
- build more houses, stop enrolling so many people
- Build more housing and lower or freeze rent.
- Building's walls are incredibly thin, so it is very hard to sleep at night with the neighbors we have. Also building is old, sometimes showers plug and floors creak, etc.
- Camper park housing that spans over multiple years would be nice
- Can y'all build it all before I graduate
- Can you sublet student housing in the summer if you need to go to the big city to make money, or if you get research funding to go abroad? I am not even sure.
- Charging students massively overpriced individual rates while they share an apartment should basically be illegal and is absolutely ridiculous.
- Cheap is the most important thing
- Cheaper like around ~\$1200 for the unit B housing plan
- Cheaper living costs
- Cheaper rent
- College Ten needs more lounges because they were taken up by quad rooms this year
- Community kitchens like the ones at UCSD would be extremely helpful, especially for people in the dorms.
- Compared to off campus housing, UCSC housing is much more expensive and can be much more crowded. However, if more housing were made available on campus, I believe it would greatly benefit the entire community.
- Convert the lounges back to lounges. They are a great way for students to interact with each other and get to know each other in a more intimate environment.
- Cost and availability of housing is a major concern for students. It seems as though there is a certain high barrier of entry for certain living arrangements.
- Cost and capacity to accommodate the influx of students should be prioritized, and quality of the living space should be next. University housing should not be so expensive that students prefer to live in garages off campus. My answers tend to positively reflect my experience with on-campus housing, but I receive a lot of financial aid to cover its cost and I was granted a 4-year housing guarantee so I'm privileged in regards to

housing in Santa Cruz. The housing program needs to take into account that there is a housing crisis in the city of Santa Cruz and that the University has a responsibility both to its students and to the wider Santa Cruz community to provide adequate housing and infrastructure to those it brings to the area because students cannot learn when they are not housed, and what is the purpose of the university otherwise? Please give future generations of UC students adequate housing so that they can thrive here.

- Costs are the number 1 priority!!!
- Crown desperately needs to be remodeled.
- Crown housing is cramped. I am most unhappy about how small my housing is considering that three people live here. I think serious changes need to be made for this to be comfortable.
- Crown housing should get updated. The living condition is so much worse than that of other colleges, and yet I still have to pay the same rates, which I find to be quite unfair.
- Crown needs lounges - spaces where people can hang out other than their rooms, where their roommates may be sleeping.
- CSOs™s should not be a thug on campus, they serve no purpose, and only harass students
- Current housing is too expensive. More doubles should be offered.
- Currently in the Porter B building there are no lounges because they have all been converted to dorm rooms. It would be very nice to have lounges on our dorm floors.
- Dining Hall +food very important
- Dismayed, again, to see the plans you™re working with. This is probably the 3rd time I™ve taken a similar survey. Graduate students want apartments like at UCI. Two separate bedrooms with a kitchen and living room area within the unit, at an affordable price. Maybe even a balcony. Who the hell wants a sink in their bedroom? No one. That™s disgusting. Treat us like adults, please.
- Do not admit any more students unless you build them housing, the city of Santa Cruz CAN NOT ACCOMMODATE THEM
- Do precise maintenance on the room
- Don't build singles! No one can afford now and things will only get worse with tuition increases!
- Don't bulldoze the food co-op. Stop converting lounges. Have a range of options available, not just expensive singles or cramped triples. Tell admissions to stop letting in more people than we can house. The housing situation needs to be affordable and sustainable before we start trying to bring in thousands of more people.
- Don't cut down the forest for new housing and try to keep the campus feeling like it coexists with the forests with trees and redwoods
- Don't devastate the landscape! The forests and meadows make UCSC great and is the MAIN REASON I (and a lot of other people) came here. Stop accepting more and more students if you have to. The spread out environment amongst the Redwoods is crucial to the school!
- Don't force kids to pay for and consume meals at these cafeterias. The cafeterias aren't being properly handled food safety wise and most food is carb and sugar sauce heavy. The consistency of both the food served and the schedule for food are poor. People are getting sick but business goes on as usual because we are forced to pay the cafeterias to serve us.

- Don't put trash cans right next to rooms, it wakes students up way too early when trash trucks come
- Don't raise the prices, we already have to pay more than enough for our entire college careers.
- Don't really like the idea of students being stuffed into dorms and apartments next year like we're sardines. Actually, firmly dislike it.
- Don't admit more people!!! There are too many people cramped into one room!!!
- Don't knock down Kresge. Keep the meadows green!
- Don't make us pay really high prices and then stick us in a shoebox. The bathrooms are disgusting with mold covering the curtains. Fix your shit.
- don't overcrowd resident halls/build more housing
- don't build more housing, just have enroll less students
- Don't just destroy nature, expand upon it.
- Double rooms being turned into triple rooms are too small and should be kept at double rooms. Before accepting new students we should make Porter less packed.
- Electric stoves are difficult to use and a hassle
- Elevator should be fixed in Porter B.
- Enrolling more students without the resources to house and provide resources for the ones you already have would be devastating to the university, all of its students, and the city of Santa Cruz. You should have rent options below \$1000 a month for students, more freedom in meal plan type of cost, and more study spaces. We give UCSC the majority of our money and times as young adults and entrust you with providing for us in return and assisting students in their journey to becoming productive and successful members of society. Everyone I know in my college has a low opinion of on campus housing and believe that university officials are greedy and don't care about the lives of students. Please prove us wrong. This new housing development is your chance to do so.
- Even these prices are pretty shockingly inaccessible. With the housing crisis as it is, students are often forced to live on campus despite the high cost of living on campus, so the university should actively consider the restricted options for students when setting prices far higher than what would be available in town, were more housing available.
- Even though it is convenient to live on campus, for those of us who do not receive any aid but still don't make enough money to pay \$1,500+ per month for living situations, it is not justifiable to pay for the on-campus living expenses. However, the off-campus housing situation for students is ridiculous since landlords take advantage of the competitive housing market for student renters by making them pay more than they should for unkempt living situations and/or pit students against each other for decent-at-best living situations. It's good that the university is finally planning to offer more student housing, but for the prices you are going to put them at, the housing crisis is still going to be an issue because students are still going to move off campus even if it means saving a couple hundred dollars per month for subpar living situations.
- Family Student Houses need renovation.
- Family student housing is exceptionally limited. When I applied before beginning my PhD, my partner and I assembled essentially a scrapbook of shared expenses and experiences to prove that we were in a committed relationship, and our application was rejected because we could not prove that we were together seriously. We are still

together 4 years into my program and now pay 2.1k to live off campus and have not reapplied to the UCSC family student housing service because we'd rather suck up the extra cash than be insulted again. Housing both on and off campus is in an unbearable situation. The first place we lived had unfinished concrete floors that would generate severe dust. I hope that UCSC can build some affordable housing soon.

- Family student housing is very big. Can you guys build something cheaper than the current rent? We don't need these much space.
- Family student housing should allow pets, maybe with an additional deposit or monthly fee. I have had a cat for 14 years; he is not an option when considering housing.
- Feels weird to know that y'all will be admitting more students than you can house. I don't know many details about all of this, but it's my main concern: students not being able to live in a comfortable space.
- Filing more students into a small room is unsanitary and is almost claustrophobic. provide for your current students before you provide for others.
- Find yourselves more credible contractors.
- First and second year students need access to a kitchen area, at the very least a microwave, without having to ask an RA for permission.
- Fit as many people as comfortably possible so that price per person is lower
- Fix it. It shouldn't be this hard.
- Food services should be opened later and on weekends for students
- for grad students who get funding through TAships--and probably this is the case mostly with humanities or social sciences grads versus science grads but rent in SC and on campus consumes more than half of our fellowship amount per month. After food, education, car, loan costs we are living on scraps each month and there is no way we can save cash for emergency expenses. It's actually frightening. Can any attention be put to the dynamic of low-paid TAships and the extremely expensive housing situation--SC is one of the most expensive cities but grad TA pay does not reflect the cost of living here. These solutions seem aimed at undergrads whose parents can front these expensive rates and it will be useful to some extent to lessen the pressure on the SC housing market and maybe get landlords to ease up on rising rents but I don't see a direct connection to better quality of life for many grad students, at least, who are living off of very low wages in a bubble rental market.
- For me, affordable housing is key. I do not care about any special amenities anything, just the basics, such as: simple housing (a hotplate, fridge, bathroom, bedroom, heating, wifi), communal laundry, communal storage for bikes inside a building (etc), and a communal space outside. Thank you for conducting this survey, it is so nice to have my opinion, as a graduate student, polled regarding the housing situation.
- For questions that asked us to rank things in order of importance, there wasn't a scale indicating what the numbers meant so for mine, #1 was most important, and numbers below were least important. I would have loved a meal plan dedicated to apartments when I was living in an on campus apartment. Also, I lived in a single that was converted into a double when I was living at the College 8 apartments 2 years ago. I felt extremely cramped and it was difficult to maneuver the room when I injured my knee. If we didn't have such a huge common space (living room), I would have felt claustrophobic and I believe it would have been damaging to my mental health to live in such a small space. Even though the blueprints you showed us were of apartment spaces that would also

have a common space, I implore you to keep this in mind while designing new housing for students.

- For student with child, please make sure there is enough child care program, currently our early education service is far out of space. Which will be a tough time for a student with children
- For the meal plans, an option between the 5 and 7 day meal plan should be in place. A meal plan that doesn't specify a day of the week in which you can use your swipes, but you can only use the swipes 5 out of the 7 days of the week. However, they can be any 5 days and don't have to be confined to just week days.
- For the warm nights, the dorms are in serious need of air-conditioning. Dorms are too insulated which causes the rooms to be very warm at night. Air-conditioning is the number one thing that I hear most students complaining about around my college community.
- Forcing three beds in a space built for two people is inhumane. These conditions are not worth the overpriced rent and extremely high tuition.
- Free Wifi should be provided to all on-campus housing. My apartment space had to buy a router because the wifi would not reach our bedrooms or living rooms.
- From what I hear from my peers, the top concern seems to be availability, followed by price, followed by having a place to park on campus.
- FSH is an extremely important and wonderful institution and community, I would hate to see it changed by including non-family residents as I believe this would alter the overall feel and security of the community.
- Give students housing advisers, especially first years before they explore their options for their second year at UCSC.
- Go back to wired internet connection, I hear the wifi is really bad. Most of my friends who live on campus are going to move out solely because of this reason.
- Good luck!
- Graduate student housing is way too expensive, more than half of a TA salary.
- Graduate students are paid about 18-19k a year. If I were to pay 40% of my salary as a grad student, I could not afford more than about \$600/month. None of the proposed housing comes close to this.
- Graduate students need affordable housing. Please create more graduate student affordable housing.
- Hated the bunkbeds, showers and how there were no locks on anything
- Have a bus to go there too though.
- Have a great day/night!
- Have more room and make it affordable.
- Hi, as a student who has lived on campus in the porter community, I do not support the new housing project that is planned to be built in the porter meadow area and the nature that makes up the outskirts of campus. I would love for there to be new housing at this school and all students deserve a place to live on campus, if they want one (I personally would like to live on campus again), however the new housing should be placed somewhere else. Students were not consulted in the development of this project (except for apartment style) and our opinions are the most important since we are the ones living in these communities. There should be a survey done with options for where this housing will be, as I know many students come to this university to have access to

natural outdoor spaces. This project is inconsiderate of students and the wildlife and nature that will be destroyed if this projects continues its trajectory. The world in general is destroying nature rapidly and this school is continuing that process. An alternate way to end the housing crisis is to accept less students so that UCSC can give its entire student body the option (that most students would prefer) to live on campus. I personally do not like living in the city of Santa Cruz as the rent is very high and I feel unsafe in downtown Santa Cruz. This campus feels very safe to me but Santa Cruz itself is an unsafe environment that has led me to consider transferring universities. Please respect students by giving us more space and limiting the number of new students accepted.

Thank you!

- Highly suggest having common rooms that students can use to get away from roommates.
- honestly, the housing system is quite messed up right now. you all are asking us to pay thousands of dollars for less than basic living standards. this is an atrocious way to treat students just trying to get an education. cut the salaries of admin and the UCOP people and use it to make sure your students aren't homeless, hungry, and emotionally unstable and tired. I mean COME ON you guys. we're suffering!
- Hope to live on campus asap!
- Hope y'all remember to stay hydrated. Have a nice day :)
- Hopefully the cost can come down more, but great services!
- House people with similar or somewhat -similar political views.
- Housing affordability is difficult and was the ONLY reason for my student loans
- Housing should definitely create more housing for students. The living rooms for dorm floors should be opened up as its the key to socialize with your floor. Also cost should be more affordable
- Housing at UCSC is wonderful but has to improve on its size to accommodate all of its students.
- Housing for enrolled students should be the priority.
- Housing guarantees could be re-offered to students who gave it up but would like to come back
- Housing here is over-crowded and uncomfortable. Packing students into small rooms and previously designated common spaces to make more money is wrong. Do better.
- Housing here sucks
- Housing in Santa Cruz is unsustainable. I pay \$3200 in rent for a 700 square ft 2 bedroom apartment. Housing on campus is terrible and unhealthy. Friends in family student housing often get sick from issues with mold and the like.
- Housing is extremely expensive, and this creates a tremendous barrier for students. These options, as with all on-campus options are very expensive for a very small amount of space. Lounge and social space in residential buildings is critical for community bonding. If meal plans are made optional for apartment residents, food security is a very serious concern. That said, the 55-meal plan is extremely overpriced per meal, relative to all other options (other meal plans, Slug Club, etc.).
- housing is fucked
- Housing is getting tight, especially with the predicted amount of students that will be enrolled in the coming years! Hopefully housing will accommodate before even freshmen don't even have guaranteed housing...

- Housing is great, affordable relative to the area and only improvements I have would be to please improve space/number of people per room.
- Housing is important, but destroying wildlife to accommodate more students is evil.
- Housing is NOT AFFORDABLE right now. This should be the UC's number one priority to change. So many people I know have to choose between paying rent and eating. We already pay so much to go to this school, housing needs to be more accessible.
- HOUSING IS SO EXXXXXXPAANSIVVVVEEEEEEEEEEEEEEE!!!!!!!!!!!!!!!!!!!!!!
- Housing is terrible! I did not receive anything I was promised when paying for housing. This place is not a college. It does not have study rooms, reliable wifi, the dining halls close too early and the rooms/bathrooms have mold. I am very disappointed coming to UCSC.
- Housing is too expensive.
- Housing is very expensive; off campus is already expensive as it is. Inclines more students to want to move off campus after first year here.
- Housing must be significantly more affordable if students are expected to stay on campus.
- Housing need to be more AFFORDABLE!! Nearly over \$1000/month is NOT an affordable option for a majority of students. The example rooms and rates are outrageous. These rooms should be used to expand the current student population's options and lower costs for students. It's obvious the UC intends to bring in even more students in the following years and keep the cost of living extremely high. This hurts the community and makes students' lives more stressful while they're here and also years later paying off debts due in part to high cost of living. You all should be embarrassed.
- Housing needs to be more affordable and maintained better. Kresge is falling apart.
- Housing off campus is just as expensive as on campus housing and on top of tuition fees, it's really hard on the students and families to afford attending UCSC
- Housing on campus is extremely expensive. It is a shame that UCSC charges that much for housing. Family Student Housing apartments are falling apart and the only thing you do is to increase rent price every year.
- Housing on campus is still very expensive and anything over \$1000 is prohibitive to a lot of students.
- Housing on campus is way too expensive. It is cheaper to live off campus. Both options (on and off-campus housing) are failing to address the fact that housing is unaffordable for students.
- Housing plan should still be refined. The rent is extremely high and the living spaces especially for the converted double to triple looks cramped. Where are students supposed to keep their clothes or work at a desk?
- Housing rates are absolutely astronomical compared to off-campus!
- Housing should be affordable and sustainable, not made to be an amenity that drives prices through the roof. While some students are fortunate enough to have families who can afford lavish housing prices many do not and the burden of expensive housing on top of a ridiculously overpriced education is an injustice. The university should prioritize basic student needs rather than giving unnecessary bonuses to those in positions of power. As an aside, "non-resident alien" is a) an offensive term and b) not a race or ethnicity. Citizenship and race/ethnicity are not mutually exclusive.

- Housing should be cheaper than \$1,000 per person. \$750-800 is the maximum I would be able to pay while being a full time student and working half-time.
- Housing should be guaranteed for all students. Cafeteria food is awful and should not be mandatory.
- Housing should be guaranteed for all underclassmen students (frosh and sophomores) - my main concern for next year's housing is that I won't find any on-campus. I'm glad the school is working on it, but am upset that past students have had to deal with this crisis.
- HOUSING SHOULD BE SO MUCH MORE AFFORDABLE AND HIGHER QUALITY E.G. BETTER PLUMBING, FURNITURE THAT ISN'T FALLING APART. EVERY STUDENT SHOULD HAVE THE RIGHT TO HAVE A SAFE AND AFFORDABLE PLACE TO LIVE.
- Housing shouldn't be over the top expensive for students. It's insane to me that in a town as expensive as Santa Cruz, my friends still try to find more affordable housing off campus, because they fear not being able to afford on campus housing.
- Housing wouldn't be too much of a problem if class size was smaller
- How about considering off campus housing vouchers?
- How affordable will it be? Who will be in control of the housing? What damages will be done to the land?
- I almost don't care about how the rooms are set up. The major annoyance to me and many others is the bathroom situation. I feel terrible for the maintenance workers who have to clean after 20 year olds who cannot wipe their own ass. I would love if there were small personal bathrooms shared between 2 rooms or so. These public pool showers are inconvenient, cold, wet, clammy and uncomfortable
- I am a practicing Muslim and I would really appreciate a designated space for myself and my fellow MSA students to pray in a safe and private area.
- i am broke
- I am concerned about the displacement or plan for the current families living in family student housing as well as for the future plan for the childcare center when construction begins.
- I am currently living in a Crown triple dorm that was once only meant for two people. I understand that the university needs to house more students but I don't know why I am paying the price for a room that is not even meant to have three people.
- I am currently living in Grad Student Housing. I would prefer a dish washer, washer, and dryer inside the apartment. And the living room area is way bigger than we actually need, while the bedroom area is way too small!!
- I am glad to see that the University is aiming to tackle the housing crisis in Santa Cruz. I think that for UCSC to truly be a "city on a hill" there needs to be not only more student housing but also food, activities and different amenities available for students of all levels not just freshman dorms.
- I am unwilling to pay an extra 500 a month for a desk inside my room, but it makes no sense to have triples with no desk space for people to study at. I would prefer affordable housing over a single, but should the other more cramped housing be built, there has to be 24/7 access to common rooms, social community rooms, and study spaces, otherwise people will go stir crazy. And those triples with desks underneath them are dangerous and claustrophobic.

- I am very concerned that the redwoods, native animals on campus and natural areas are being destroyed in order to build more buildings here like the hazardous waste holding facility. I chose this campus for its natural beauty, that is the number one reason I am here.
- I appreciate you seeking our input.
- I believe all rooms should include a desk!
- I believe it is important to address the rising cost of housing and how unaffordable it is. New housing projects should focus on creating affordable and decent housing. The high price of housing leaves students with little money to buy groceries and many students are homeless due to the fact they either can't afford housing or they can't find a place to live. The mandatory meal plan in the apartments doesn't work effectively it would be easier to have flexible meal plans like flexis that can be used anywhere or where you don't have to buy a set amount of \$8. Many students have to buy more than they want in order to not lose money but the system is just bad.
- I believe that campuses should explore subsidized housing for Graduate students, where the cost is reflected to no more than 30% of TA Salary.
- I believe that the biggest issue currently is accepting more students than we have space for. It's unfair to expect students to perform their best academically when there's overcrowding in every dorm room, apartment building, library, and dining hall.
- I believe that the main goal for housing is to ensure that continuing students who do live on campus currently should be able to live on campus again next year. As a transfer student I was relieved that I had housing guarantee but now that my senior year is approaching I am nervous about not having guaranteed housing. Especially with the housing crisis that Santa Cruz is under, students would be reassured if housing was accounted for for at least 2-3 years. Ideally all 4 years.
- I believe the current housing program is good for students however the campus is in great need of a housing expansion to accommodate the increasing amount of new students coming onto campus every year. Converting more rooms and lounges into triples and quadruples may not be an effective strategy as more students will be placed in more cluttered environments that may not bode well for their academic studies. Also, meal plans should not be mandatory for students living on campus because there are those who cannot afford the additional expenses and may prefer flexibility for their food budget allowances.
- I believe the housing program is a band aid for effect of issues needing to be addressed at the source.
- I believe UCSC housing should focus on accommodating all current students, years 1-4 if they want to live on campus before accepting more students than their are beds
- I believe UCSC should guarantee three years of on-campus housing for all students.
- I believe the rent for an individual has to be less than \$1000. I currently live in a 3 bedroom single family home with 3 other roommates. The people who live in the singles pay \$1175 without utilities and that is a very price. I would like the city to simply remove regulations so investors would be more inclined to create more houses off campus which will naturally drive down the cost. I'm pretty sure that option is not feasible at this time considering the city's culture.
- I came to UCSC thinking i would have 3 years of promised on campus housing, but only had two. Inconsistency made going to school here harder.

- I can barely afford to pay rent now, and next year my sister will also be starting college and money will be too tight to spend outside of the campus, not putting in anything to the Santa Cruz community.
- I can not afford to pay \$986/month for rent. And you want to tack on a meal plan? Will laundry be free or will those be paid for as well? What about parking? Am I going to also have to pay \$120/month for parking?
- I can't believe I pay this much for this little.
- I currently do not have a guaranteed housing for my senior year. I would like to attain an on campus housing if possible.
- I currently live in an apartment at Rachel Carson college. It's very nice but my room (a triple) seems like it used to be a double. It's too small for a triple and closet is an issue. It's an even bigger issue because mine and my roommates desks are in the living room. And when we want to study and my housemates wanna play music/watch tv/ mingle in the living room, it causes a problem. There should be desks in the room, not in the common area where it causes problems.
- I currently live in an apartment in Porter B and it has been the best experience. I know for some not as lucky, housing is a serious problem as we aren't guaranteed housing for long and the housing market makes it difficult to find off-campus housing.
- I currently reside in the international living center and I was very unsatisfied with being given a small double room in an apartment which was not my first choice. I felt that is was most appropriate to have a single room to ensure a smooth transition from community college. It is understandable to fit as many students as possible but clearly the over crowding at this school has become an issue that is not only seen in the living accommodations, but also within the classrooms. In terms of the features of the apartments I have been in, the kitchens have been designed well. But I think other things such as bathroom shelves or even shower organization should be considered. There is no place to put your clothes or other personal items in the shower spaces. Also at the international living center, we had a power outage this quarter. It seemed as if all of the buildings on campus had emergency generators except ours which was left in the dark throughout the night. This left many students without power and unable to make it to class the next day without an alarm. This is an unfortunate oversight or mistake that I think should be remedied.
- I disagree with the reconstruction of Kresge.
- I do like the resident layout and such, but getting groceries can become a pain since there are so few options and the only ones that are available are at college-level prices and thus are not affordable. The only way to get groceries is travel into town and take them back via bus.
- I do not approve of Student Housing West. UCSC should focus on accommodating current students first, not increasing enrollment.
- I do wish there was some way for Juniors and Seniors to have some sort of safety regarding whether or not they'd would get housing on campus
- I don't care about large-scale renovations of the apartments/dorms, but I would like to see updated appliances. The stoves are very poor quality, and the sinks clog very easily.
- I don't even think most students think the plan for increasing student enrollment is a good idea. Or the plan to build more apartments on campus, most people are upset

about the destruction of more of our beautiful campus lands. And I was quite upset about the mandatory meal plans when living on campus.

- I don't live at college nine. I live at the ILC. Also, I think there should be a special meal plan for RAs like a 3 swipes a day (Or like 235 swipes) option rather than only having the 7 day.
- I don't think that the new housing plans should be majority single rooms if the school is trying to accommodate for more students who are going to be admitted and need to live on campus.
- I don't want ANY meal requirements for apartments it was a waste of money/loans. Also all of the on-campus housing options are double, triple, or quadruple of what off campus is so where is the logic in this?? I am angry. This university should be working more with the city to build affordable housing.
- I don't like the meal plans
- I elected to never move in to the dorms because I could not afford to do so. Housing on campus is ridiculously cramped and horribly overpriced. The expansion of on campus housing is against the wishes of the greater student body and it is more than somewhat frustrating to watch our concerns be marched over at every turn.
- I feel like the conditions of the UCSC housing should be better. I have been in the UCSC housing program for two years now and I gotten top bunk twice which I do not prefer. What is bad about it is heat rises and it can get really stuffy which can affect the health of students. I noticed that there was never good air conditioning on UCSC housing for me so far. Top bunk also shouldn't be so close to the ceiling that I'd bump my head so often when I try to sit up.
- I feel like the pricing is way too high no one can afford to pay over 1,000 a month as a student while also paying tuition. This is ridiculous.
- I feel like we pay the same amount as students from other UC's but we get less in return. So many students in other colleges have better food, residencies, amenities, etc and we have nothing in comparison.
- I feel that living accommodations are made for a certain privileged group of demographics, those students who come from a background that is higher than working-class. This campus should be able to accommodate those who come from working-class backgrounds and lower...which is why a majority of students tend to go live off campus in houses with 8+housemates, living in poor conditions, and dealing with scandalous and unfair landlords. Housing should be drastically changed to be more flexible in accommodating all students...because ALL students help this institution keep running and functioning and beating.
- I feel that the decision to create with 4 or 5 students, while raising tuition was a deeply misinformed one. The increase in class sizes doesn't help the fact that the search for housing off-campus is hard enough as it is. One cannot simply apply to check out a house and get the housing they need anymore. Now, people have to rely on connections i.e. friends, clubs, fraternities, etc. in order to secure housing for themselves. While this does force us to interact with each other as students, there will always be some of us that will be left behind in the mess that I believe the Administration has created. If we are going to see a raise in tuition, we want to see an improvement in the Quality of Life on campus, especially with the presence of even more students than before.

- I feel that the housing is too expensive and that there needs to be more meal plan options.
- I felt like dorm-wide problems, (i.e. air conditioning) aren't necessarily dealt with the quickest response.
- I go to other UNIVERSITY OF CALIFORNIA schools and honestly get jealous of their cool things. Like large dining halls with much more variety, on campus bowling, video games, and multiple pool tables, LOUNGES THAT DIDNT GET TURNED INTO DORM ROOMS, and more eateries and cool cafes. Stop admitting students and take care of the ones you already have. Howâ€™s that? Sorry if this was mean I just donâ€™t understand why you have to admit students to the point that students already going to school here are negatively affected. A lot of people tell me they would have made more friends if lounges were still a thing INSIDE dorm buildings. Oh my god, and your gym. So many students use that gym. Expand it PLEASE. Otherwise we think about how itâ€™s overcrowded and decide not to work out. I know this costs a lot of money though, so I guess the situation is understandable
- I have a dog. That is the only thing keeping me from living on campus.
- I have been told by various sources that there will only be guaranteed housing for one year and from others you can get 4 years guaranteed housing for 4 years, clarification on this issue would be great.
- I have had an extremely hard time finding housing in Santa Cruz because I have two dogs, which I have had since long before I moved to Santa Cruz. I currently live in substandard housing that doesn't meet housing codes, but I worry if I try to get my landlord to fix anything they will choose not to renew my month-to-month lease. I want to leave but I can't find anywhere else to live that will allow me to keep my dogs without increasing my monthly rent by at least \$1000. I am constantly worried that my landlord will decide not to renew my lease and I will be unable to find anywhere else to live. Rent here is nearly impossible to afford, especially on a grad student stipend. Please, please provide affordable pet-friendly housing.
- I have no further comments
- I hope they make the bathroom with windows or a ventilation system. Also, please get more modern heaters because the ones in Stevenson Apt are loud and doesn't work sometimes. Also, make sure that there is space in the kitchen where the garbage cans have their own section. I'm not sure who designed Stevensonâ€™s Apts but we are forced to put the garbage in the living room.
- I hope students could live with mixed gender in one room if possible.
- I hope there will be enough parking for graduate students and families because as it is I couldn't get a parking pass because they sold out.
- I hope to have on campus housing more widely available for upper class undergraduates.
- I hope to see the new housing options!
- I just believe that there should be more housing locations available because I see that all of the freshmen are taking over the dorms and it's obvious that not all of them will be able to receive the on campus housing that they would like.
- I just would like to have the option of having on campus housing. Right now, even guaranteed students feel like they have to compete to have any housing. But if I do get on campus housing, I also don't want to feel like I am cramped in too!

- I know there isn't much of option left, but I am completely against privatization. Our rates are already too high for not the greatest options.
- I last lived on campus for fall 2011 and winter, spring and fall of 2012. I'm moving into FSH at the beginning of March. So I have very little recent experience with on campus housing.
- I left because its too expensive
- I like living off campus way more
- I live in a hotel. Improve this now, no joke. Unacceptable at a public ivy for this level of housing inaccessibility. This is entirely your fault. Read this at a meeting please for God's sake help us.
- I live in Merrill and the "Large Triples" are really small compared to other colleges. I think that If you're going to have students pay more, it should be the same across campus by square foot area.
- I live off campus because I cannot afford to pay for on campus housing. I live in a one bedroom apartment and still pay less than I did in a small dorm triple on campus my first year. You need to re-evaluate your prices in the interests of the students.
- I live with my girlfriend of 10 years and our dog, so finding housing in Santa Cruz was VERY VERY tough. Not only did Family Student Housing have a waitlist, we also heard it had very poor Internet which would not work for her job which is frequently remote, and would not work for me as I am a Computer Science major.
- I love it on campus
- I love on-campus housing !
- I love UCSCs housing program despite the fact that I wasn't given the college of my choice. Given Oakes was a blessing in disguise. But in regards to UCSC Housing Program, the only problem I have is the cost. PLEASE try and lower the cost of housing, it'll be much appreciated by many, many students. Thank you!
- I love where I currently live (off campus). I'd only consider moving on campus if I had a one-person apartment with my own kitchen, an affordable rent, and a place to keep my car safely parked.
- I really believe that the university is going against everything it said it stood for when it was first opened. Making education so expensive is a problem in itself, but ruining the land that was kept clear on purpose, and overfilling the campus with too many more students will be detrimental. It already is. There is not enough space in classes, the more students, the less space there is to accommodate students who are trying to graduate in a timely manner. FUCKED UP
- I really enjoy it, housing off campus is difficult to find
- I really feel that the University should not be letting in students if they do not have on campus space for them. Especially since off-campus housing is so expensive, it is essential for the university to provide living spaces for students. Also, the living spaces that should be provided should not have 6 people living in one room, and it should not convert previous amenities such as lounges to allow for additional housing space. These types of arrangements make living on campus very unappealing and stressful for students. I know this is a complex and tough decision you must make, but please do your best to think about the comfort and well-being of the students.

- I really hope this program focuses on affordability and availability. I'd prefer more triple and double options than single rooms, and a much more flexible meal plan as the one currently in place is expensive.
- I really like how this is progressing and am excited to see where this goes. One of the great things about Family Student Housing is the sense of community that is developed. For example, my son was very sick and had hives last night and so we sent out a help text to some friends in the community and in no time someone brought us some infant benadryl. We have also done the same for others. A community like this is rare and so I hope the next location is conducive to that same type of community.
- I really would have loved to live in an apartment, and I wish there were more available spaces in them.
- I strongly believe that there should be more attention and time put into placing students in housing areas and having space available to move if needed. I am having this issue because of a roommate I can not tolerate and makes me very uncomfortable but I can't move because there are no available spaces for me to do so. My entire apartment house mates do like like this person either and it seems very unfair that one or even all of us want to move out and would have to instead of her being removed and placed elsewhere. I must now struggle to feel comfortable in my own living space.
- I think affordability needs to be the main focus, because these options look amazing but I know I could not afford them at the rates listed.
- I think dining hall foods could be healthier, especially the quality of the meats. Also better inspection of food safety is needed at dining halls. I found bugs in the salad bar three times in one year. Also poorly washed greens and vegetables.
- I think expecting graduate students to live in shared spaces with shared kitchens, etc is unrealistic. We are adults, many of us don't want to live with random roommates and have to argue over chores when we are also writing dissertations. BUT the main barrier to me living on campus is the pet policy - housing that does not allow pets will never feel like a home to me.
- I think it is a terrible idea to knock down the current FSH units. By doing this you are actively removing livable housing in a city that is experiencing a housing crisis due to the unavailability of housing units.
- I think it should always be available for returning students.
- I think it would've been great if this survey included identity-based housing under 'Student Preferences' as a factor. I think it is important that identity communities that are usually discriminated when looking for off-campus housing could find guaranteed housing on-campus. (Providing a housing guarantee would be a good preemptive move to prevent another protest and occupation of Kerr Hall because of a lack of identity-based housing.) If there's going to be over 50% singles in the development, I think it would be great if financial aid could be applied for those singles, as price is an issue for most in-state students. Also, I believe your diagram for unit-type B is off. Although it is a double arrangement, it has three beds for each bedroom, which is the same diagram as unit-type D.
- I think it's a shame to have continuing development on this beautiful plot of forest. I think the over-admittance of students is gross.

- I think it's a good idea that UCSC is deciding to add housing. I'm just concerned with where the housing will be placed and if it'll cause any environmental issues.
- I think more questions for frogs would be beneficial on people getting more comparable roommates. Also I understand a lot of housing issues caused people's doubles to be turned into triples and such and maybe you guys could have a meeting to handle people's concerns etc.
- I think most students care about the cost of their living situation on campus the most and then the type of room/occupancy they have to choose from. Cost isn't really as important as the comfort of all amenities provided to students. I like living at the village where I have a single, don't have to buy any type of meal plan that I don't want to or can't afford (really important) and also have private bathrooms. The downsides living at the village is the proximity of the kitchen (it isn't inside by building) and also the distance from all the bus stops and classes. If only apartments were more affordable and meal plans aren't required, I would choose to live in apartments that are closer to transportation. Overall, the Village is a wonderful place. Maintenance takes care of cleaning common areas of each building, the kitchen and provides toilet paper (perks over apartments). Please keep housing rates down! It's really hard for students to afford on-campus housing if the rates keep increasing.
- I think private kitchens are very important, especially for grad students on limited income. Cooking is both healthier and cheaper than eating in a dining hall.
- I think something really important to bring up is to try to find a way to sound proof rooms in these new apartments. People including myself would pay extra money to have a room where we don't have to listen to neighbors being obnoxious or partying when all you want to do is study in your room. It is difficult to resolve the problem by just going to Mchenry because all the study rooms there are overcrowded during finals week. I even had strangers hop into my study room that I reserved because they couldn't find a place to sit at the library. I think if you advertised the apartments being sound proof people would want pay that extra money over just living somewhere cheaper off campus. A quiet environment is crucial at a university.
- I think that creating apartment housing is not what is needed for UCSC. The school is over crowded and is no longer maintaining a livable standard. I think that affordable housing with room for the already overcrowded rooms is necessary if the UC has any desire to be seen as a school with respect or care for their students.
- I think that gay guys should all room together or room with girls, but it is not fair for a straight male to have to live with a gay roommate that doesn't share any of the same interests as him
- I think that the housing program at Rachel Carson is very good but something that could be improved upon is the maintenance of restrooms and size of the rooms.
- I think that the rent is high for all of the soon to be floor plans. If the goal of this housing program is to provide more spaces for students, that should mean that these spaces are affordable. Also, if the prices listed for each floor plan included a 7-day meal plan, then yes it would be appropriate. However, if the floor plan prices are just for rent/utilities/amenities, it is too much.
- I think that the University should not make rooms that are meant to be doubles, into triples.

- I think that there should be free laundry service
- -i think that UCSC should prioritize AFFORDABLY housing their students who want to live on campus, students do not need to worry about scrambling to find housing off campus for incredibly high rent, we should be focusing on succeeding in school. Affordable housing should be a top concern of UCSC!
- I think that with parking being so expensive for students choosing to live on campus (and bike parking not always great), with a room costing >\$900 (not to mention, not being able to have pets), and being paid on a TA salary, living off-campus is much more of a draw... If costs could be taken down for students working on TA salaries (or parking made free), I would consider living on campus. Until then, no way.
- I think the initiative to build ~200 studio apartments for graduate students is a good start- but there are thousands of graduate students at UCSC. You need to build more.
- I think the new housing units should be cheaper because students like me have to take out loans and do not receive grants like other students
- I think the UCSC's housing problem is huge right now. Prices are skyrocketing and off campus housing is hard to find/not that available or extremely expensive. The two year housing guarantee, and now one year housing guarantee for incoming freshmen is terrible, considering housing is so difficult to find. Hopefully, this new plan will help future students.
- I think there needs to be higher standards of the conditions of the dorm rooms that UCSC rents. I realize there is a checklist to make sure UCSC gets paid for any damage upon move out. But when I moved into my dorm there was oil inside of the drawers and pubic hair inside the drawers and all over the room. It took me at least a day using my own cleaning supplies and gloves to get my room in livable and sanitary condition. If the health department were called they would have absolutely shut it down. I didn't complain formally because I was desperate for housing. I am grateful to live here on campus and would not trade it for anything, but these standards need to be raised.
- I think there should be a better system for apartment priority, and better access to cleaning supplies.
- I think there should be a restriction on how small a triple room can be because my double was turned into a triple and it is way too small for all three of us.
- I think there should be more affordable housing for students even for continuing students.
- I think these prices are way too expensive considering the size and how many people you are cramming in. Absolutely robbing these students
- I think this is ridiculous, since ucsc likes to claim their sustainability so much. How about focusing on environmentally friendly, affordable, simple housing options? or better yet, STOP ADMITTING SO MANY STUDENTS. We are having a housing crisis due to the fact that so many students are being admitted each year. Make cutbacks on that. I tried getting a housing guarantee/ on campus housing this summer due to a emergency situation. I was denied, and the process wasted 3 months of my time. I was almost told its impossible to get on campus housing without a agreement. I am extremely dissatisfied with the universities housing, and the way I was treated. Seriously, you guys should provide giftcards to people just for dealing with that insane situation.
- I think UCSC should have focused their money on improving their current housing situations before building an entirely new one.

- I think what you are doing is great. Please look for ways to create affordable housing and coops
- I think you should offer some more affordable housing options for UCSC students who don't want to go to the trouble of finding a place to live off-campus.
- I understand the push to build more housing here at UCSC to prepare for the increasing numbers of admittance per year, but I'd like to stress how important it is for the housing plans to honor this serene space of forest that we are so lucky to have around us. Ideally we wouldn't even have to discuss new building plans because this campus loses a little of its pristine vibe when new buildings replace forested areas. Also, Santa Cruz is not a Davis or a UCLA in the sense that we can't have 40 thousand students because we aren't in an urban area. I think that we should celebrate being the UC with the best ratio for land to students instead of adding more people to the already occasionally crowded student body. In short I, and many other students, will not be thrilled about student housing if it wastes valued forest space so please build it well and build it clean.
- I was already hesitant to consider on campus housing because I prefer freedom of roommate choice, less supervision, more diversity in the spaces I occupy everyday (I already go to school and work on campus). After seeing the prices I would DEFINITELY not be able to consider on campus housing. I currently pay an already exorbitant difficult amount (~\$1000/month for rent and utilities) and I have my own room and a kitchen. At these prices the housing project will not actually be helping struggling students except to take some of the pressure off the housing market from students who choose to live on campus. However, at 1100 for a triple not including utilities I would worry no one would choose to live on campus.
- I was denied housing at FSH in 2016.
- I wish it was easier to switch housing because my roommates suck and my RA is no where to be found/wouldn't help anyway.
- I wish motorcycling parking on campus was free. Space is underused even with far lower permit rates than for a car.
- I wish there were more options for graduate students. Slightly over 80 occupants in Graduate Student Housing makes housing very difficult.
- I would appreciate if the rooms were to be bigger for the amount of people living in them.
- I would appreciate it if I am given actual triple rooms, instead of makeshift triples which are essentially converted doubles.
- I would greatly appreciate the construction of an ice skating rink on campus or nearby, in Santa Cruz. Judging by similar actions taken by UC Santa Barbara and UC Irvine, it would be a popular, well-utilized choice, and would provide something to do in town on the weekends, and for those who live affiliated to the university, as many of us (including me) do not have the ability to drive to one.
- I would have chosen to live in graduate student housing this year if my partner didn't work in silicon valley, but more importantly if there were more units available to married couples without dependents. I definitely understand and agree with the decision to prioritize students with dependents, so I hope in the future there are enough units for other family situations.
- I would have loved to have guaranteed housing for 3 or 4 years!
- I would highly prefer a grocery store in the HUB above basically anything else

- I would like access to a kitchen while living in Porter Building B because the only kitchen supposedly available is blocked off to residents, which is not fair.
- I would like my rent to be cheaper.
- I would like to be kept on the loop about what are the final decisions of this project. The overall plan of this project. Through email since i cant make meetings. This should be publicly accessible without being present in meetings.
- I would like to see more affordable housing spaces for all students regardless of their years. I also think it is unfair that having a food meal plan is required when living on campus because some people with dietary or health restrictions and financial strife may not find it ideal.
- I would love to live in a condo or a one bedroom apartment with a rent under \$1300, because I need a kitchen and a large fridge to store groceries and cook everyday meal. Right now I live in GSH, which is pretty good, but with four people sharing one fridge, I simply cannot buy everything I need every time.
- I would not want a furnished apartment in Family Student Housing. I am not interested in modern conveniences like a dish washer or refrigerator with an ice maker or a trash disposal. I would appreciate very much a gas stove, electric stoves function poorly for the preparation of good food. Ideally, the square footage of an apartment in Family Student Housing should be 1000 sf. I would appreciate more lighting than is currently available in FSH apartments. I would appreciate very much to be far from undergraduates who chant "œdrink, drink, drink" in the woods between 10:00 P.M. and 4:00 A.M. I would appreciate is FSH is very close to both an odd number and even number Santa Cruz Metro bus stops. I would appreciate very much not have any carpet in my FSH apartment. I would appreciate very much a continued community-building program with Residential Assistance. I would very much appreciate functioning drinking fountains and functioning outdoor barbecues which have covers to assist cooking. In the case of taller apartment buildings, I would appreciate very much a small balcony area"provided there is no backyard available. I would also appreciate very much communal playgrounds for a variety of children ages. Due to the distance of the planned Family Student Housing, I would very much appreciate multiple indoor-outdoor study areas that could double as locations for community events. Thank you very much for your hard work on this project.
- I would prefer to live on campus next year, however i am forced to find off-campus due to not being guaranteed housing.
- I would really appreciate having eduroam and/or cruznet also reach out to the apartments because I believe that internet is essential for school.
- I would really like to be able to have on-campus housing (studio) with my boyfriend, who is not a UCSC student. It would make finding a place for the both of us way easier. It would be great to not have to worry about this anymore and to just focus on my PhD.
- I would really like to live on campus still in my junior and senior years, because I want to be close to my professor, msi, and TAs. I want to be able to visit them at any given time easily because I live on campus.
- I would want to live back on campus if it was more affordable
- I'd like to see new housing which is all electric (no natural gas) and has rooftop solar.
- I'd love to see studio apartments at a more affordable cost than those off campus. I personally can't afford more than \$800 a month which even then is too much for comfort,

hence why I moved off campus. I don't need a huge space and would prefer to live alone or with a roommate in a tiny studio, however off campus they typically only allow a single occupant and it's often well over \$1,000 a month. I get it's not likely as the housing project is already underway, however I'd love for this option to be considered in the future as it's affordable to low income students and allows for more rooms due to size.

- I'm concerned about long term water availability for the Santa Cruz area in regards to housing
- I'm truly very happy in a residence hall single, but feel like going in with other students to get an apartment together is the best chance I have at getting on-campus housing in the next academic year. The convenience of a meal plan also really frees up so much of my time and energy, I recommend it to others.
- I'm very happy with the UCSC Housing Program.
- I'm very pleased with the room I have and the proximity of my dorm building to my core classes!
- I'm strongly against having a new housing building built if it isn't geared for specific colleges and constructed from an environmental standpoint.
- I'm very satisfied with the apartment living in Crown. I've chosen to live there my past three years at UCSC, and have minimal to no complaints. My only request is that the single bedrooms should be able to be locked from the outside to prevent theft, as I have experienced that in the past (in the Crown apartments).
- If I were not to be an RA for 2 years, it would be difficult to afford my college expenses overall. I would definitely be in debt because on campus housing is really expensive.
- If it's gonna be in porter meadows, the internet is really bad in porter in general that should be worked on. Least amount of destruction of nature possible. Better maintenance, heaters that actually work. Don't use the window design of porter it reduces air flow gets hot in summer.
- If only this bureaucracy worked for the benefit of the students :^)
- If possible, make apartments with meal plan more affordable.
- If the University is going to create more singles, doubles, and triples, then keep it that way. The fact that rooms are being planned so its possible to fit another bed in is immoral.
- If there's an option to add more to the dining program, I'd suggest adding something that would still let you go to the cafes and restaurants like Banana Joes, but wasn't limited to only 55 swipes. So maybe you have three swipes per day that you can use similarly to the 55 day.
- If UCSC can't provide affordable, on-campus housing for a majority of incoming students then improving transportation services for students living off-campus will help tremendously.
- If UCSC is going to admit more students then the university can house, then their should be more housing options.
- If you are requiring dorm-living individuals to have some sort of meal plan, the dining hall should provide better food options. Furthermore the dorms would benefit from a dish washing/ water station other than the bathroom. It would also be nice to have access to a kitchen in the dorms as well.
- If you have to ask about Gender you should format it as a fill-in answer, so someone is not given options as to what they can identify as. The race question also, biracial

students exist! I should be able to select as many racial categories as I feel I identify with! Also the housing options on campus is ridiculous we need more housing ASAP!

- If you want people to live on campus, make the pricing similar to living off campus. \$600 more per person is not anywhere similar enough
- Improve dining quality and selection
- improve utilities - wifi is terrible
- In Merrill the rooms are very small and we pay more than the room is worth.
- In my opinion, the biggest dilemma students have faced this year, was the occurrence of units shared with more than 3 students total. Speaking with friends and students who had to live in rooms with more than 3 room mates, they would express how the lack of privacy and space was detrimental to their ability to get enough sleep, study in their room, and increased the amount of disputes between them and their room mates. I think that this should be a situation that the university does their best to remedy/address in the following years. As it is an issue that became more prominent this year as opposed to others.
- In speaking with other students about this issue, I have found affordability to be the number one concern. Developing a bunch of fancy, expensive singles is only going to attract a homogeneously wealthy demographic, which is harmful to our school's 'aims' toward cultural inclusivity and diversity. On-campus housing is great for students seeking convenience and community-- I would love to live on campus if I could ever afford it, but due to the financial cost it I am unable to consider the option of living on-campus. Please develop affordable housing so that low-income and working students can enjoy the privilege of living on-campus too!
- In the ranking questions it is unclear whether 1 represents the most or least important issue.
- Information for students without guaranteed housing should be widely available.
- Insensitivity to issues concerning Undocu Folk. Specially seen question 37.
- internet blows
- Invest in more resilient countertops and fixtures
- Is there a possibility to hold more informational meetings about the new UCSC Housing Project
- Is there any way that housing can be less expensive without students having to prioritize their privacy and space? A focus on food resources should also go along with this. Meal plans should not be mandatory, and if they continue to be, can they be less expensive? Also, who will be able to apply to this apartment complex? Graduate students should also be allowed to live on campus and affordability should be a key principle. We are students who are going into debt, prices are too high. Would a new parking complex be open for this new space? Will it only be A permits? Because those are the most expensive. We are not all wealthy people, some of us struggle with financial instability, please help us out to fulfill our education without having that weighing us down.
- It costs too much and it shouldn't be mandatory to have a dining plan. Also, the space is tiny. That is all.
- It could be more affordable for students.
- It is a big problem for students to live on campus to park their car... Hope their will be more place for students parking.

- It is bothersome that a same size occupancy dorm room in one college could be significantly larger in another college at the same cost. This is seen specifically with the size of certain triples in Stevenson in comparison to triples elsewhere- oftentimes even in other Stevenson houses.
- It is far too expensive and they don't deliver on any services to the extent that they should, it's a crime not to have 24 hour food access!
- It is imperative that we have better Internet access all throughout campus, it is not high speed and crashes constantly. I find this to be a HUGE issue as a student with four classes, a job, and a volunteer position. I need good access to Internet!
- It is just pretty expensive. I wish there was another option, maybe an off-campus residence area owned by the campus that would be more affordable and targeted towards enrolled students.
- It is just way too expensive when compared to off-campus living :(
- It is more expensive to live on campus with a meal plan than it is to live off campus without one. This is sad.
- It is ridiculously expensive to live on campus as a student, and it's frustrating to say that living off campus in Santa Cruz, an expensive city, is cheaper than on campus.
- It needs to be AFFORDABLE. These prices (in addition to the 3% increase per year) are not affordable. The plan for Student housing West is not practical. Make more room for CURRENT students rather than expanding the amount of students accepted. Create a competent plan for the housing crisis.
- It needs to provide better options, more space. The room I am currently in should NOT be a triple, it's hardly a double.
- It would be great to add additional housing. I wanted to live in the apartments on-campus my second year at UCSC, but ended up in the dorms for a second year. I personally was not a fan of the dorms, as becoming reliant on one source for food (the dining hall) eventually got very boring. My biggest recommendation would be to increase the ratio of apartments to dorms if new housing arrangements are built.
- It would be nice for more on-campus housing to be available to graduate students. I caution that since it is so coveted, that there not be a major price discrepancy (subsidized by graduate fees or elsewhere) between on-campus housing and off-campus rates. This will cause anger towards the university not providing more on-campus housing and the process by which grad students are selected.
- It would be nice if students had the option of another year of housing guarantee since it is so hard to look for off-campus housing.
- It would be nice if there were more choices regarding meal plans for both students in residential buildings and apartments. It is nice to have the three current options available, but everyone has very different diets and restrictions that a meal plan does not work with. It would be nice if there were more plans available. For example, 14 swipes a week or something. The unlimited swipes for the five-day and seven-day meal plans are unnecessary for some students and confounds them from exploring Santa Cruz.
- It would be nice to have a 4 year housing guarantee rather than only 2 years. Students should have that choice.
- It would be nice to have a central CSO office that is not inside a dorm but rather in a separate office so that non-residents have better access, ie. College Ten Ohlone residents have to access Angela Davis to notify CSOs

- It would be nice to keep the rates of on campus housing at the price they are now, if not cheaper.
- It would be so much easier for a lot of Grad students if UCSC would allow pets!
- It would nice for the doors in Cowell's housing to have car swiping access like Rachel Carson instead of using keys. Then the student only has to worry about their ID card, instead of two keys: one for room and building.
- It's a damn ripoff. Bonny Doon \$800/month is much better than on campus \$1600/month.
- It's cheaper for me to rent a studio a block from the beach on westside then it is to live on campus.
- It's just so expensive and it's cramped already. Amenities should be provided for the students already here. Why would I pay over \$1000 for a cramped converted triple?
Garbage
- It's so expensive
- It's time to upgrade the apartment. They look very old.
- It's too expensive
- It's very in-rational to make the housing guarantee to be not reversible.
- It's expensive.
- It's more expensive than off-campus but I preferred it to off campus living
- It's ridiculous to put it frankly. A housemate of mine literally had to move out into OFF CAMPUS housing because it was cheaper. Tell me how that makes sense. She struggled immensely with finding someone who would give her the time of day, let alone answer her questions. Then, she had issues downgrading meal plans. Our apartment has rats. It's expensive. The walls are thin and despite me specifying that I have insomnia and need a quiet area, they assigned me the first bedroom in the hallway directly adjacent to the living room which creates A LOT of noise considering it is a communal space and the walls are thin. Overall, incredibly disappointing and overpriced. No matter what you do, the housing will continue to be a disgrace. Good luck.
- It's too expensive (as you probably know), however my main reason for leaning towards off campus is due to the food options. Dining hall kinda really sucks. Also apartments need more freedom, dorms are at a good level controlled.
- Just make housing more available to undergrad students, I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you! I beg of you!
- Just make it affordable and realistic.
- Just please stop raising the prices. It's expensive off campus, yet it's somehow still more expensive to live in any on campus housing than in a single off campus. Stop charging more than you know is necessary.
- Keep costs down!!!
- Keep it affordable with inclusion of child care options. Maybe add more transit options in the busiest times.
- Keep Kresge, but update it. Kresge won't be the same if you change it. :(I love the community.

- Keep students in the loop and continue allowing them to help really shape the course of the Housing West project. You can't make everyone happy, but happy students make for a happy university, just sayin'.
- keep the laundry free please
- Keep the singles please
- Knowing that the housing you construct affects the rest of the campus, you(as the school) seek to maximize students preferences. In creating a survey you only rule out what is convenient for you(as a school) to survey, but if you truly wanted a students input(which I feel I could not input) you would offer more boxes for input, I only saw one(the one about activities to in the college that read"other").
- Lack of access to convenient free kitchens in some of the residence halls is ridiculous. Conversion of common areas to bedrooms is a bad solution for insufficient housing. Shoving more beds than should be able to fit in already tightly packed rooms is also ridiculous.
- Lack of small doubles as a bedroom option (like in the redwood grove) was part of the reason I moved off campus
- Last year, as a pregnant student, I moved five times. I didn't move into fsh for fear of not being able to afford it and waited until fall. However, I had to move within a months notice because of housing problems where I was living. If Ucsd housing was more accessible perhaps I would not have had this issue.
- Less singles. Way to expensive for most people
- Less strict rules
- LESS TRIPLES, HELP THE STUDENTS KN CAMPUS BEFORE U BUILD ALL THIS HOUSING FOR FUTURE STUDENTS AND RESORT TO OVER CROWDING
- Let us have pets. I have to chose between a pet I agreed to raise for its natural life and affordable housing. Its a sophie's choice.
- Like every other student has said, housing costs here do not equal their value. The school should be able to figure out a cheaper way to provide housing. Cut funding to programs nobody uses.
- Living is expensive.
- Living off campus is very difficult, but it is cheaper than options listed here. I, and everyone else I know, would never pay over \$1000 a month to be in a triple. Students do not have that much money. I am a full time student who also works 20 hours a week to afford rent and school costs.
- Lounges are a must
- Lounges should be designed so they can't be converted into rooms. Also a gym and study space would be needed as to not overcrowd the existing gym and library.
- low cost is always a nice thing
- Lower prices for rent!
- Lower the cost, more housing choices
- lower the costs
- Lower the fucking rent
- MAKE HOUSING AFFORDABLE - People decide whether or not they want a meal plan based on if they can afford it, PEOPLE WILL NOT GET A MEAL PLAN SO THEY CAN CUT COSTS because theyd starve themselves so they can afford housing.

- Make housing affordable and give us back our social rooms in the dorms
- Make housing cheaper.
- MAKE HOUSING MORE AFFORDABLE!
- Make housing more affordable!
- MAKE IT AFFORDABLE
- Make it affordable and available for continued housing, not just guaranteed housing. Having spaces be guaranteed-only prevents communities from developing.
- Make it affordable so people choose to live on campus and not off. That will help costs off campus for Santa Cruz residents.
- Make it affordable with good quality furniture and appliances. Many complaints about what the UC provides for students. In time someone will expose the unjust quality of accessibility and compare it to how much is taken from our lives because sadly, our money defines us in the eyes of the UC.
- MAKE IT AFFORDABLE, SERIOUSLY. WE CAN HARDLY LIVE. I'M FOOD INSECURE BECAUSE I CAN'T AFFORD TO BUY FOOD DUE TO THE COST OF LIVING. WE WANT TO GET AN EDUCATION, WHY DO WE NEED TO BE MISERABLE IN DOING SO?
- make it cheap. students cant afford housing , let alone the tuition. you should be working with the city of Santa Cruz to have cheaper housing off campus too. this campus was not built to have the amount of students that the school wants. there are benefits of having a small campus but now those benefits are ruined because the campus is over packed with students. i suggest expanding the library and library hours. UCSB's library is open 24/7 by the way.
- MAKE IT CHEAPER
- make it cheaper pls, iâ€™m very broke
- Make it cheaper. You canâ€™t expect University students to pay \$900+ a month. If you donâ€™t do something better to support the students the university will fail with the rest of the town. Itâ€™s not sustainable.
- Make it easier for people to move away from a bad living situation.
- Make it more affordable as off campus is 3 times cheaper with more living space and amenities
- Make it more affordable please!
- Make more housing available for students without increasing the price
- Make more housing available for upperclassmen.
- Make more housing available.
- Make pet friendly housing
- MAKE RENT AFFORDABLE. \$1000 a month for a college student is ridiculous.
- Make sure ceilings are tall enough for people sit up if there is double bunks.
- Make the Crown dining hall open on the weekends
- Make the dining call cheaper?
- make the meal plan optional
- Make the wifi accessible to everyone
- Make this affordable. We can't be living on 40% of our ta salaries to study in Santa Cruz and live on calls. This year has been hell. I spend two hours commuting just to be able to live in this place. I'm graduate student. 2 hours matter. If you can't accommodate

students fairly, don't admit them because once you do, their well being and success is in great part your responsibility. For the record, I spent 6 months looking for housing. In this coming academic year, I'm repeating the process. Noone told me it would be this difficult. I would have gone elsewhere had I known!

- Make walls not so thin, paper towels in bathroom at all times
- Making housing more affordable and comfortable for residents. Have access to lounges and common areas for people to hang out/socialize. Realistic sizes of rooms for the number of people in the room.
- Making it cost less than the average rent share off campus is a deciding factor
- Making sure that bathrooms are sanitary and not molding like the Crown residential halls (Galen). It makes it extremely uncomfortable when mold is noticeable and the shower curtains are old.
- Mandatory meal plans only make sense if it's cheaper and higher quality than cooking meals at home. There's no option given for family student housing this it seems strange to ask about preference. Housing at UCSC should be CHEAPER than renting in the community. This would decrease cost on students and may even reduce costs in the community.
- Meal plan not mandatory
- Meal plans absolutely should not be mandatory. It is an absolute disgrace that the university charges obscene amounts of money for food that is often mislabeled and therefore dangerous.
- Meal plans should not be required if the student has kitchen access. Singles should be more affordable, from a mental health point of view there is a high demand. Also, more disability accessible housing is needed.
- More accommodations towards pets and emotional support animals, places to walk. More access to food collectives like Kresge co-op. More studios for grad student couples.
- More affordable
- more affordable housing
- More affordable housing costs. I live in a single for \$1,800 a month, my housemates' who live in a triple's rent costs around \$1,1300 a month. On-campus housing is more expensive than it should be.
- More affordable housing in Santa Cruz is needed
- More affordable please!!
- more apartment options for people who want to live in singles and have no "groups" to move in with.
- More apartment style housing available to freshmen
- More apartments should be made than dorms! Not having a kitchen and most importantly a living space has made things a lot more unbearable. I am in dorms for a second year and we don't even have a lounge like MOST colleges.
- More community rooms in each residential building, aka Stevenson College!!! Also, meal plans should not be required for apartments because the dining hall does not offer healthy enough options at every meal to be required to pay an excessive amount of money for sub-par food. I don't need an "all you can eat buffet!"
- More convenient stores are needed.
- More graduate housing is a MUST, but I still think that \$986 per month per person is untenable. That is more than half of the maximum stipend that a graduate student may

receive per month. We receive the same amount of monthly stipend as students at other UC systems, but their graduate student housing is as inexpensive as \$500 per person per month on some campuses. UCSC either needs to pay us more for cost-of-living-adjustment or heavily subsidize graduate student housing. It is a jungle out there for grad students and we are getting screwed left and right.

- More grocery type food options on campus would be helpful
- More housing faster. That is the only thing you need to worry about.
- More housing in general, rates would ideally be cheaper of course, but housing everyone should be first priority instead of kicking them off campus.
- More housing options for students will be great
- More lounges would be nice and even though the first housing unit was nice, they are all very pricey per person. Getting these cost below \$1100 should be a goal.
- More on campus housing should be available specifically for upper class men. However, this should only be if UCSC is willing to allow more parking because it is crowded and over priced as it is.
- MORE ON CAMPUS HOUSING THIS IS AN INSTITUTION FOR GOD'S SAKE
- More on campus parking!
- More options for single rooms for people with anxiety/other mental health problems. Have options for people who do want to live in a studious/quiet space like an honors dorm kinda thing where you are expected to be respectful of others
- More people = more cars. There is so much land available, BUILD PARKING LOTS! \$ from parking spaces = more income for UCSC, BUILD MORE PARKING
- more queer/transgender housing please!
- More room for personal study area
- More singles and lower prices.
- More singles!
- More singles. Even if they're tiny!
- Most of these housing options look extremely expensive and greater emphasis should be placed on making on-campus housing affordable to students. In addition, meal-plans should not be mandatory as this places more unnecessary costs on students.
- My first priority is price. On campus housing is one of few affordable options in Santa Cruz. We can do ok on less space but unless TA stipends increase, GSH and FSH residents really have seemingly no options off campus that are affordable (<90% of income).
- My main problem with on campus housing is how expensive it is for what you're getting. Unfortunately off campus housing is also really expensive and hard to find decent places
- My particular room is large enough for my roommate and I, however, it is relatively small and is more expensive than most condos near a beach which usually have multiple bedrooms, a kitchen, living room, and garage. Please decrease housing costs. The housing market forces students to take advantage of the housing guarantee and the cost doesn't change demand significantly. The price just takes advantage of the housing market and that shouldn't be how UCSC functions. Besides that, I greatly appreciate the benefits of being on campus in regards to traveling to classes and the study spaces available to me. All the best, Wyatt
- My rankings were 1 = most important, low #'s = less important, if that wasn't clear.

- my roommate is a piece of shit
- n u t
- n/a
- N/a
- N/A
- n/a
- N/a.
- Na
- NA
- Nah
- Napkins for drying hands after washing them should be in every building.
- need cheaper places to live. No upper classmen in dorms
- Need more of everything. Literally everything. Start funding this School so that more students are willing to come to this school. People of Color do not feel as welcomed as they should be on this campus aswell. It should be Santa Cruz priority to ensure people of color feel represented and at home here at SC. From what I've discussed and heard, it doesn't seem that UC Santa Cruz is doing a good job.
- Need thicker walls and floors plus bigger rooms.
- Need to refurbish all old apartments and start implementing mold clean ups
- Needs a lot of work
- needs to be more affordable
- Needs to be more affordable and more humane. Converted small doubles to triples should not be allowed. Increasing incoming students without increasing dorm space, leaving students to live as cattle and at the same time increasing costs for students is cruel.
- Nicer bathroom and bigger laundry rooms. MORE WINDOWS
- No
- No comment
- No comments
- No other comments!
- No to housing west! Displacing families out of FSH is irresponsible and non-humane. Also, noone can afford it :/
- No, everything is great.
- No.
- none
- None
- NONE
- None :)
- None of the optional shown are affordable. That should be the first priority when building new housing: creating affordable living arrangements and bringing down the overall cost of living on campus at UCSC. Meal plans should be required for those that live on campus, otherwise, students with less money with have less access to food and choose to save money over eating--this contributes to food insecurity.
- none!
- None.

- Nonr
- Nonresident alien is NOT an ethnicity or race!
- nope
- Nope!
- Not enough housing for students. Santa cruz is extremely expensive for students, and forcing students off campus makes them choose between housing and food. Finding a home should be the least of a student's concern.
- Not having the option of being here during the break is a big disappointment. Comfortable desk space for each student in their dorm is very important, and big windows help bring up the mood when studying. Being a Junior transfer, being with other students my age is a blessing, I do not want to be with freshmen.
- not many people want to rent out to students so it makes finding off campus housing difficult and there's also a shortage of places for students to live off campus
- Not regarding the program itself, but on the survey under "race/ethnicity" section "non-resident alien" is an option that I believe does not belong there and i believe that the word "undocumented" would be a better word .
- Not requiring the students to have a meal plan would be nice. My friends and I all find ourselves not able to use up all of the meal swipes that we were required to pay for, which is a waste of money considering that living on campus is already expensive enough.
- Not sure if this counts as housing, but the state of the gym needs to be updated. Fitness should be extremely prevalent at a school like UCSC - it actually is for the most part; this is exactly why we need a far larger space to workout and do things. Or at least add another gym somewhere. OPERS alone is not cutting it. Also, keep laundry free. We pay a ton in tuition, free laundry makes us happy. I would probably charge the laundry fee in the cost of tuition. Wouldn't be too much for anyone to notice and everyone would love it.
- Nothing else
- Nothing much to say here. The housing experience is nice overall.
- Null
- Oakes has been given a disadvantage in the apartments since they are not updated, they are much smaller, and they are much more older and dirtier than the other apartments.
- Oakes is old and needs an update. Internet barely works. Constant pest problems. Smallest rooms and apartments on campus.
- Obviously there is not enough housing, to the point of reducing student lounge and study space, but any new housing added MUST be affordable. To my most recent knowledge, the housing west plan was 70% single room occupancy units. THAT'S NOT AFFORDABLE. It doesn't matter how many beds you add if you bankrupt or drown in loans the students who need it the most.
- Off campus housing is really expensive and lots of students have trouble finding housing that fits their needs and many have to resort to paying more than average for an average living space
- On campus preschool is very important as well as After school care. Facilities available like parks and community rooms are essential and parking for our guests is lacking currently.

- One of the main concerns people have here is how old the building is. The Crown building are probably the oldest and several lights have fallen down. The bathrooms are also very gross and we are missing a toilet. The building should be designed better as people can't use the middle shower because there is no area to put clothes or towels.
- Open Merrill dining hall on weekends or at least keep it open later on weekdays
- Our water fountain in Merrill Building A, floor 4, has been broken since the start of the year and possibly before that. Multiple fix-it tickets have been submitted and nothing is being done. Very frustrating.
- Out of state students need more affordable options for housing and more information on paths to residency.
- Overall, I just feel that it ends up being way too expensive, especially for those who don't get much financial aid. The housing plus required meal plans really add up and often times students will live out of their cars, or pay someone to crash on their couch.
- Overcrowding is becoming more of an issue in Santa Cruz, and off-campus housing is typically very expensive. On-campus housing would ideally be available and affordable for everyone, and could reasonably be controlled in a way to limit/reduce overcrowding.
- Overcrowding should be a factor in how many new freshmen you accept. I don't want the education and the quality of life of the students or the school to suffer because of overcrowding and the increased revenue from accepting a record amount of freshmen.
- Over-enrollment and AirB&B are the two primary reasons for the housing shortage. Addressing these issues should be a part of any comprehensive housing plan.
- Overpacking the rooms with students was a disgusting thing to do. Whether it was the school's fault or the UC system, I'm appalled that we were crammed into small spaces with not even lounge spaces to socialize in.
- Paper towels in bathroom would be nice. Partitions between beds too.
- Parking should be prioritized over excessive equipment.
- Paying \$1150 for a triple (especially excluding meal plans) is insane. Students are forced to move off campus to unsafe living conditions in order to afford a place to live. The university should be looking out for students and providing an affordable, safe place for students to live.
- People should not be doing it in the dorms/showers. Utterly disgusting.
- Perhaps a housing stipend for graduate student workers would benefit graduate students more than a \$1200 studio or \$1000 bedrooms. Our current rate, for TAs, is less than \$2000 per month. These housing options are over 50% of our income. While better than the rates off campus in Santa Cruz, it does not leave a lot of breathing room.
- Perhaps to add more space only have one restroom for all the different types of rooms.
- Pet-friendly options would be helpful for graduate students who arrive on campus with pets already.
- pets please
- please add air conditioning in the buildings and heaters just because my dorm can get between 10 - 20 degrees hotter than the outside temperature and having gone through that in the summer I wouldn't want anyone else going through it.
- Please allow students to transfer colleges to live in apartments with friends!
- Please also consider community kitchens in residence halls so that we can also cook and do dishes, especially since the apartments are primarily upperclassmen.

- Please also expand parking facilities and lower the cost
- Please avoid the destruction of heavy forestry on campus. There are plots of land with less biodiversity on campus which should be targeted.
- Please build affordable graduate housing!
- please build better and less cramped housing for CURRENT students instead of making more housing for new students that we don't have room for.
- please build more housing
- Please create more housing and more frequent buses.
- Please cut all the extra crap. Game rooms and community areas and meal plans are far far far less important than housing. Do not spend a single dollar on these, seriously. It's a total waste. Just build housing.
- Please do not convert lounges into dorms! Though it's great if you get put into one, but it's hectic for high school outreach programs, a burden for RAs, and the rest of the hall.
- Please do not make this expensive. Many adults cannot even afford \$1600 or so for housing.
- Please do not overextend the capacity of this beautiful campus. We need to accommodate the number of students we already have, not add new spaces for new incoming students. I am happy to see that there will be a new placement of housing. However, the administration needs to realize that our land has already been overextended and we need not admit more students than necessary.
- Please don't add more students :(((
- Please don't demolish the old Family Student Housing before the new project is finished! That would be cruel to those students with supplementary needs, and fodder for lawsuits. Thanks.
- Please don't destroy the meadows. Thank you!
- Please don't keep squishing us into uncomfortable living situations and providing places to study within the dorm area is a necessary amenity.
- please don't require meal plans! they are overpriced and don't fit everyones needs. There's no reason why it shouldn't be a choice.
- Please don't destroy too many trees. When you destroy land and take away natural land it rids UCSC of its mission statement and the reason it is special.
- Please don't expand for the sake of doing so. The campus is a natural environment that hosts a variety of endangered and precious species. Accessible education is important but further development to the degree intended will push already dwindling populations to the brink.
- Please don't get rid of the Kresge student lounge or other communal cooking spaces. Need areas for transfers to cook.
- Please don't overaccept students and cram Housing space. Looking forward to living in the apartments next year.
- Please don't tear down any nature spots to make more housing buildings
- please dont knock down trees or build on porter meadow. if we had project type structures we could fit in the most students in the most reduced spaces
- Please ensure that older colleges such as Crown get renovations/upgrades. Things are working, but a lot of the amenities are dirty or quite old. Sometimes the water that comes

out of a sink would be white before settling into a clear liquid. In expanding campus housing, please do not forget to better the living experience of existing housing.

- Please find more space for students at apartments
- Please find ways to make it more affordable for low income students.
- Please give Porter back at least one floor lounge for each building.
- please have better wifi, update inside structure of apartments such as plumbing or mirrors and floor borders.
- Please have guarantee housing for transfer students for an additional quarter.
- Please have the students'™ money go to things we need and want
- Please keep at least one lounge per housing in every college.
- Please keep cost as low as possible.
- Please keep first years' kitchens. It is a very important part of Kresge's identity and, personally, the main reason I chose to live in Kresge.
- Please keep housing affordable and give juniors/seniors priority housing because it's so hard to find housing in Santa cruz. I got lucky and moved in with a friend who lives here in Santa cruz but I almost guarantee I wouldn't have found off campus housing without them. Santa Cruz is super expensive and not meant for this many students and we need more affordable housing. I'm paying 2,400 for a 2 bedroom apartment with quarter laundry that is 5 bucks a load. Way too expensive
- Please keep on-campus easy availability for current on-campus students.
- Please keep the financial limitations that students are facing in mind when developing. Many students are struggling to pay rent and eat, and that simply should not be a struggle students have to face as they pursue their education.
- Please let us freshmen get housing next year...
- Please make affordable houses. The rent at Santa Cruz is too expensive
- Please make bigger rooms and more singles!!!
- Please make cleaning supplies available to students to use.
- PLEASE make housing affordable! This was the main reason I decided to move off campus. Also, I really wish meal plans weren't required because I cook for myself all the time and even the 55 day plan was too much.
- Please make housing cheaper for students, we already pay so much on tuition and it is so stressful.
- Please make housing cheaper.
- Please make housing more affordable to avoid unnecessary burdens on UCSC students.
- Please make housing more affordable!
- Please make it affordable
- Please make it affordable. Currently it is too expensive, I prefer to live off campus with those prices.
- Please make it cheaper and less cramped. If you have to admit more students please make more quiet study spaces available.
- Please make it easier and more affordable to get housing. Right now its an expensive and time consuming nightmare.
- Please make it easier. Stop accepting so many new incoming students if you can't guarantee them a space on campus. Maybe accept them, wait for the SIR and keep

track of how many rooms are available after? If students back out then accept off the waitlist but dont lose track of the number of rooms. If they say they plan off campus then dont assign them a space. Please. Just make it easier because im trying to graduate and I couldnt find any housing except in Bonny Doon where i cant even go out to buy groceries becuade I have class everyday until 5 and I dont wanna walk home in the dark at 8pm, when the last bus stops running. Having a car is expensive and unrealistic to expect undergrads like me to own one. I wake up tired and sleepy cuz the last morning bus runs at 8:30pm but I get up at 6am after coming home at 10pm. Thats not enough time to sleep and eat and do homework well. Please stop accepting so many students if you cant guarantee a space!

- Please make more affordable price. ~\$1300 for single studio is still too expensive for grad student! Remember, monthly income for TA is around \$2200 before tax.
- Please make more guarantees for transfer students, this school cannot accept more students when we cant even house the ones who are currently here.
- Please make more places to live and have more social events.
- Please make sure bathrooms, showers, and laundry machines work.
- Please make the laundry machines free. Some of us at oakes are low income students who do not have enough funds to pay for laundry.
- Please make the meal plan more flexiable
- Please make this affordable. Single bedroom are take too much space and are unaffordable.
- Please make this process transparent with the rest of the campus. Emails don't capture everything.
- Please more efficient with communicating with transfer students about housing options and opening up more single units.
- Please offer more housing and make the price affordable, thank you!
- Please plan accordingly to accommodate students for housing based on total enrollment of the school year. Itâ€™s unfortunate and frustrating to see students that applied to live in a triple or quad and instead getting an extra or 2 more students living in the same dorm. That spoils the studentsâ€™ living experience since theyâ€™re paying thousands and thousands of dollars to live and go to school here.
- Please please please do a better sound proof of the residential space for future generations. I have suffered more than enough of the god damn thin totally non sound proof wall. Right now even lowered voice can still be heard across the dorm wall. Not happy!!!!
- Please please please make sure that graduate students have affordable housing and ABUNDANT housing. Please. It is absolutely a crisis in SC to be living on such a small stipend with such outrageous rents. I loved that you showed a studio option! I would 1000% have rented that in a heartbeat if it was available on campus. I really hope that abundant and low-cost housing can be available for couples in the future at UCSC. Thanks for all the work you're doing!
- Please prioritize affordability. In addition, I would request that you look into how the different colleges are giving housing points. The colleges vary in this way and as a second year, our housing office at College Ten lied to us and told us we would get additional priority for being in student government, which did not appear to be the case. Consequently, although all my roommates and I were guaranteed, we did not have

housing until September, which induced a lot of stress on ourselves and our families. Transparency is lacking and crucial and must be addressed.

- Please prioritize affordable housing. Affordable needs to take into account that the monthly TA salary is less than \$2,000. Thank you for your work!
- Please prioritize affordable rent
- Please provide better kitchen sinks and stoves
- Please provide housing for grad students
- Please provide more close bus stops
- Please provide more housing and make it better and cheaper. Obviously not all three are possible or likely to happen anytime soon, but please do something about the overcrowding for the love of God.
- Please reduce the ridiculously high housing rates. These rates make it hard for students to find housing on and off campus.
- Please renovate all Oakes apartments and make them appealing to future Oakes affiliates, like done in other colleges. Thank you.
- Please revise your survey as it is not inclusive and it contains language that is very triggering for some folks (i.e. question 38). Thank you!
- Please slow down admittance rates.
- Please speed up the wireless internet.
- Please stop accepting more people than able to house
- Please stop trying to squish us into really small spaces and then charging us \$100,000. We are humans too. Thank you!
- Please use the space wisely and keep costs low. We want to maximize the number of students we can fit comfortably.
- Please, make it affordable
- Porter A and probably other halls have only one water fountain at one side of the hall. That is very inconvenient.
- Porter apartments are great! There should be more like these
- Prices are still really high even for a triple
- Pricing is a big deal, especially for older students who have no monetary help from parents and have limited hours allowed for work. More affordable options are very important.
- Pricing is ridiculous in general especially for the quality of living. For me Merrills housing was terrible, it had mold and the building was all kinds of messed up. 10/10 would recommend to not live on campus even if it's someone's first year.
- Priority should be more on-campus housing. Secondly, I attended UC Irvine and their Anteater Pub was a central location for all kinds of students to gather. They had great food, great beer and great wine all at amazing prices. It helped build community. It hosted various events. It brought in local breweries and showcased them. It celebrated UC Irvine's history. I think it would be a great addition to this campus if they added a top-notch pub and it would incentivize people (alumni) to visit and check it out. Maybe this pub could double as a food pantry or something in regards to solving food insecurity issues on campus.
- Provide as many on-campus housing opportunities as possible
- Rachel Carson College is awesome

- Really good. There should be more hours available for heating and the heater can automatically turn off after 12:00 when the heating is unavailable. Usually, the room is noisy and heater is not working.
- Regarding meal plans, it is no secret that it is cheaper to buy a Slug Card at the beginning of the quarter and load it with 55 meals than it is to buy a 55 meal plan. If meals plans were more economical, then it would be much more reasonable to require them. As is, let students buy a Slug Card if they will, and if they cannot afford it, then let them cook cheaply.
- Regarding q 5: I didn't know about the housing crisis before coming to Santa Cruz so I did not know to consider it. Regarding the q "if housing was available on campus would you choose to live there?" I would choose specifically not to live in privatized student housing, I don't want my living situation to make me feel like a customer receiving service (though much of campus housing feels like this already), I want to live somewhere where the purpose of the space is educational/community opportunity for students not financial gain for capstone or making the regents happy. I would like to live somewhere where students have decision-making power over their living situations. I want the people working to maintain the housing to be treated well with stable benefits, I want less of a financial gap between their salaries and the salaries of administrators. I don't care about UC admin jobs being "competitive" on the market, this is a school. I want to go to school in a public institution where the well-being of students and public workers is protected from the pressure of the market. I do not need more overpriced ucsc dining food service. It feels exploitative to be charged 8 bucks for a sandwich, 6 bucks for some cereal 12 bucks for a dining hall dinner. It is insulting that a dorm room at \$1000/month is the proposed affordable option. I'd rather live in a closet off-campus than take on more debt. It is important to me that places like the kresge food coop, a space where students govern the space, exist, because students will not try to exploit each other in that way, they will make an effort to have cheap healthy things like rice and beans and veggies available because they want other students to do well.
- Remove the \$8 million amphitheater in lue of more rooms.
- Rent is TOO expensive on campus and does not reflect off campus prices. To live on campus means MORE student debt and if on campus is too expensive and off campus is too impacted, many students end up homeless. FIX THIS.
- Ridiculous expense to share such a small space with other individuals with limited amenities.
- save the Trailer Park don't build on the Porter Meadow or in the forest/North Campus---- if building is absolutely necessary, please build on the lower fields (below music center, near east entrance, etc), which would cause less damage to the ecosystem and the beauty of campus.
- Section 8 or the like should be available for income limited students. The costs of rent are too high here. UCSC needs to provide 90% or more of its students a place to live and should suspend any more increases in the number of student enrollment. There are other UC in areas that can handle huge populations just no more in Santa Cruz.
- Should be cheaper
- Should have double rooms available in dorms. Also should allow freshman to have apartments
- Should offer a kind of housing priority for students from families of low income.

- Small bedrooms, meaning converted triples are not great and should be reconverted to doubles when possible.
- Some housing accommodations are in unequal standing depending on your location on campus. This has been a cause for dissatisfaction and anger among many students here. Specifically, the issues of dining halls being closed on weekends and early weekday closures, as well as the fact that some areas have late night or 24 hour rec lounges and others do not. The quality of our college experience should not be diminished because of a random assignment, especially if we are paying the same price.
- some of these questions did not display properly and therefore didn't make sense. Also, there was only one option shown for family student housing. it looked ok, but did you mean to show other options? hard to tell because you called it option A but there was no B.
- Something between the 55 meals meal plan and the 5 day/week plan would be great. Perhaps 2 meals a day or something similar.
- Something that is very important for me is parking for a reasonable fee!
- space for marginalized communities needs to be addressed within this development
- Stevenson apartments have a mold problem due to inadequate ventilation in the bathrooms. And Stevenson dorms are cramped and unsafe. There is a fire sprinkler directly above my bed, and if I don't slither on my stomach, I could break it. And cause a flooding situation like house 4 experienced this fall.
- Stop accepting a large portion of prospective students if the program cannot find them a place to live in, it is absurd and negligent.
- Stop accepting so many students, there isn't enough space and classes are very impacted, increasing housing doesn't necessarily increase our learning experience...
- Stop accepting students if there are not available affordable housing options. The housing crisis in Santa Cruz is out of hand and irresponsible on behalf of the university.
- Stop cramming people into tiny rooms. Triples are horrible. Don't force people into buying meal plans. Lower your prices
- Stop cramming us in here
- Stop cutting down trees and building stuff. Let in less people if you can't afford to house them.
- Stop fucking accepting too many students
- stop kicking people out for being queer and siding with homophobic roommates
- Stop making housing so expensive
- Stop making it so expensive please.
- Stop making students pay for laundry services.
- stop over enrolling, bring more buses back (bus cuts+ over enrollment not OK) don't build housing over the meadows, don't increase tuition (RIDICULOUS), people need to be housed they can't be forced to live off-campus for thousands of more dollar, start construction asap
- Stop overcrowding
- stop scaring us
- Stop turning rooms that should be singles into doubles.
- Student housing is bad here. Many applicants have to wait a while to know if they have housing or not. Also, many other things.

- Student housing should be cheaper than now. Actually we have paid so much on tuition, we shouldn't pay even more on housing.
- Student Housing West should house continuing students, and must not be used as a tool to increase the enrollment capacity of UC Santa Cruz. Enrolling more students because more housing is available does nothing to help the housing crisis. To alleviate the impacts of the unbelievable scarcity of housing for students (on and off campus), UCSC needs to house as large a portion as possible of total full-time enrolled students on campus. Doing anything else will only exacerbate the problems our community already is struggling to face.
- Students are worried about pricing and not ruining the forest
- Students in the dorms should be allowed to have 55 day meal plans if they are going to be off campus a lot of the time for academic purposes (like field quarters)
- Students leave campus as soon as they can because it's too expensive. Expanding and having more campus housing is pointless if the cost of that housing is still too high. Guaranteed housing is also pointless if the prices are too high.
- Students should be allowed to stay in their places of residence during the break. I do not want to be on the streets for three weeks because I cannot stay in my room
- Students should be guaranteed housing for every year that they are enrolled at UCSC.
- Students shouldn't be forced to have a meal plan in the apartments.
- Studio apartments for graduate students would be fantastic. Current grad student housing options are far too limited and not ideal -- grad students want to have their own bathroom! If such housing were available, I would gladly live on campus.
- Stupidly expensive for mediocre living experience
- summer housing should not require a meal plan. I choose to live off campus because of the meal plan. The meal plan should be optional.
- Sustainability is key!!
- System for choosing random housemates? Like finding people with similar living habits
- Target rent should be 1/3 of the salary of a TA. If it's more than that, then there are better social opportunities off campus.
- Thank you for reaching out to the students to get our input!
- Thank you so much for all the work those working in housing offices do! I know it must be difficult to place students in their living areas and constantly keep up with paperwork and much more.
- Thanks for asking for student input.
- That's it? Not sure what you hope to discover from such a short survey.
- The \$1,250 studio/1BR is a nice option, but it's still too expensive. I know most grad students are trying to keep rent under \$1,000. If you could get 2BR (2 occupancy) apartments for closer to \$1,000 - \$1,100 per bedroom, I think you would start to see a lot of demand.
- the 5 day meal plan seems pretty wack considering it's not that much of a price difference between that and the 7 day and you can't use eco-boxes on the weekends. at least make it cheaper
- The cost is prohibitive. I commute over an hour each way to UCSC five days a week. I live with my family because there is no way that I, as a student, could spend more money on tuition than rent.

- The cost is way too much and there's inequality in the room sizes. I wanted to live in a large triple but instead the room is the size of a double and they just squished three people here
- The cost of on-campus housing for graduate students is too high, and the availability is too low.
- The creation of more living space on campus is very important but I believe that the parking of cars should also be considered.
- The Crown Merrill Dining hall should be open on weekends. Also, Merrill constantly smells like a sewer. Overall however, I am satisfied with my housing situation.
- The Crown residence halls are severely underdeveloped in comparison to residence halls at say College 9 or 10. If students were to live in these buildings for the next academic year, the bathrooms should be renovated because the pipes are old and the faucets often have yellow or dirty water coming out of them/the water smells bad (this applies to the showers as well). The floors and staircases are old creaky and in general is a large nuisance when quiet hours come around and people are still walking around in the building and making noise (albeit unknowingly).
- The current housing rates are ridiculous, and I believe that increasing the number of students enrolled will only make the problem worse. There is already not enough study space and lounges for current residences, yet creating more housing in order to enroll more students while current students are homeless seems backwards. More housing needs to be built at an affordable rate without increasing attendance. Then, students do not need to be homeless or commute for 3 hours because they can not afford to live here.
- the current proposed pushing options outlined in this survey were absurdly expensive
- The current state of housing is incredibly disheartening. All of my close friends lose their guarantees this coming year and we can't apply to live together. I have severe panic disorder and need my support group. I may have to sacrifice my housing guarantee to live off campus with a safe, comfortable environment for me... it would be great if students could have three years on campus regardless of EOP status as the housing crisis in Santa Cruz will leave students homeless or in great debt
- The dorms get really cold and the WiFi isn't very good
- The fee for housing on campus is too much already and I am hoping it does not increase
- The fees can sometimes be ridiculous
- The graduate fellowships offered by UCSC are \$24,000 per year and the definition of severely rent-burdened is spending >50% of income on rent. This means that rents higher than \$1000 per month place a severe housing burden on graduate students. Such poor pay with such high housing costs makes graduate school at UCSC very unappealing to prospective students. Future recruitment and retention of graduate students will be strongly determined by how well students are paid and the cost of living in Santa Cruz, so please consider increasing pay or decreasing the cost of living on campus.
- The heater does not function from time to time. Also the bathroom needs to include a higher edge as the water makes puddles when leaving.
- The housing crisis in Santa Cruz disproportionately affects students of color and students from low-income backgrounds. The needs of those students most affected should be given priority. I would like to see more graduate housing that takes up less

than half of my stipend, but it is more important that undergraduate and graduate students of color are supported.

- The housing is really overpriced for people that do not receive enough financial aid. It should be much cheaper than \$1000 a month to live in a triple.
- The housing on campus is too expensive. I paid double what I pay now to share a cramped room with 2 people and never have any privacy. Not to mention how expensive the food on campus is and how difficult it is to get to town when you live on campus
- The housing options currently are not affordable and this is a serious problem. Also, there should be more options available and I believe that the affiliation point system as it stands now is unfair, considering that some colleges have more housing available than others.
- The housing options outlined for graduate students are too expensive for what we'd be getting. The studios are only a workable option for graduate couples or grads with income on top of the typical stipend a TA or GSR gets. The 2-bedroom is I wouldn't pay more rent than I'm paying now to share a kitchen with an unknown amount of people just to live on campus.
- The housing prices at the college is outrageous. \$1,600 is what a student could be expected to pay downtown for a one bedroom one bath apartment so to see that, that would be the price of a suit- style dorm on campus is infuriating. Singles are over priced and frankly a waste of space, and on this campus space is precious. Not to mention that the price only drops \$200 from a single to a triple room.
- The housing program should not prioritize single bedroom housing units that are almost \$2,000 a month. This is COMPLETELY outrageous. The fact that even a converted double to a triple is upwards of \$1,000 is outrageous. It makes absolutely no sense how ridiculously expensive it is to live on campus. Rent in Santa Cruz is already high enough; I pay about \$850 a month to live in a single bedroom, and it is immensely nicer than any facilities on campus, and I am very lucky for this. Students are already struggling with working and paying off loans, and building more inaccessible housing structure will only put more pressure on students, and this will only make going college less productive. The administration needs to seriously think about how this structure will financial affect students, and in a REALISTIC way. Prioritize student input over admin, we are the ones paying these outrageous fees and supplying the money for the growth of this institution. You all say are you the "original authority on questioning authority," so ACT LIKE IT.
- The housing rates are too expensive.
- The housing rates are way to high. They should be below market price. There not even a kitchen in every apartment. This is bad joke.
- The housing units that you offered as possibilities are unaffordable. At the very least, on campus housing should be comparable to off-campus housing. The absolute highest rent I have heard of for a single room off-campus is \$1,150. A triple off campus would be closer to \$300-\$400. The fact that you think these prices are affordable for students is absolutely disgusting.
- The housing website should be more up to date in order for students to find all off-campus housing options in one place. Personally I believe that the cost of living on campus is very unaffordable and inaccessible for many people. Off-campus housing can often be very vague .

- The internet at family student housing is downright shameful. I use my phones hotspot because it is so unreliable. Other than that I love the affordability and size of our apartment and am very grateful to have such a nice place to live and study in.
- The lack of family housing or single bedroom is the primary reason I chose to live off campus. Also the space provided in the triples was very minimal.
- The landlords are sapping us dry. It's tough to thrive in academic spaces when financial security is a constant concern. This seriously impacts graduate students (I am one), and undergrads (I have mentored some and taught many). Some of us work multiple jobs on top of going to school so we can make ends meet. Affordable, family friendly housing is so important. And please make units with kitchens because I save a lot of money by preparing meals at home. Thank you for your efforts.
- The laundry services in Merrill Building B should be expanded.
- The living expense for graduate housing in UCSC is way much higher than any other UC schools
- The main problem for graduate students is that we get paid ~ \$2,000 per month, but rent everywhere ends up at least \$1,000 per month. This leaves us with up to \$250 per week, which is the bare minimum to get by without ever saving any money or paying off any pervious student loans.
- The maintenance people who come in from the fix.it site once I make a request do a thorough job of fixing any problems with housing. Theyâ€™re fantastic.
- The more affordable, the better. Parking is a huge issue, too.
- The most important consideration should be safe, affordable housing options for students on campus. A single room should not cost \$1600 on campus when a studio can be rented for \$1200 or less off campus. Students are not as in much need of amenities as they are a housing option that is affordable.
- The most important things are 1) maintaining current rent prices (not to exceed \$1700) and amenities (laundry access, play space for children, parking spaces and loop bus/public bus access) and 2) proximity to childcare.
- The new apartments will be unaffordable. Graduate Teaching Assistants only make \$2000 a month. \$1,249 is 62% of our monthly salary and \$986 is 50%. The prices that you are proposing for the new unites are immoral.
- The new housing program should consider building a 24hr Computer Lab similar to the Cowell Computer lab.
- The new housing should not be managed by an outside company. That makes students feel unsafe. Please make more housing designed as those donâ€™t optimize the space for all of the students the school wants to house.
- The new proposed housing plans seem like a good idea but are unaffordable for a majority of students. Students cannot afford to live on campus because they would have to pay over 1,000 dollars for a space that is not even their own. Yes, it is convenient because it is on campus, but convenience is not worth hundreds of dollars.
- The number one priority is making housing affordable. Literally. That's it.
- The only two things I would change: More housing for upper-division students, make meal plans not required
- the option to substitute meal equivalencies for meals on the 5 day meal plan would be fantastic. Even just like once a week. The flexi dollars go so fast.

- The options in many of the questions in this survey are too limiting. One of the main most urgent planning needs of UCSC is to integrate with the Santa Cruz community, not to continue to build outward, generating more sprawl and disconnection with the city. It is essential, from both, an urbanistic and academic perspective, that UCSC works with the city of Santa Cruz to build higher density housing IN the city NOT in campus. Thank you.
- The parking at school sucks. Parking is too far from classes and I need to take the bus to class. The buses are always full. We need more loop buses. We need more parking lots for off campus students. We need a second gym in the west side of campus. The east gym is too crowded and the location is unconvient for students on west side of campus. The lighting of the school needs to be improved. It is scary to walk around campus at night. There needs to be more study spaces at the colleges. The library at school has become a hangout spot for people waiting in between classes and is very loud. It feels more like a lounge than a library. We need more lecture halls. The classes are all at max capacity. Hard to enroll in some classes.
- The places you are offering are too expensive. You know what we make a month and to claim that 50-65% of our take home pay is a reasonable price for housing is insulting and offensive. You are not offering enough units for graduate students and it's far from your previous commitment to housing graduate students. It's also ridiculous that parking is not included for graduate students who live on campus. Also, grad student housing is too expensive and graduate students should not be responsible for pay down the debt from undergrad housing. The way this campus treats graduate students is really terrible.
- The potential housing models that you gave are crap. They're another example of overloading people into too small of spaces that inherently cause tension, depression, anxiety, and high stress levels. Those models show a poor effort to truly finding a solution to this problem. The second model shown was wrongly described, y'all said it had double occupancy, when clearly both bedrooms were triple occupancy in the photo. This survey did not successfully ask for well rounded, genuine answers regarding the REAL experiences of students on this campus. This survey failed to ask enough questions THAT MATTER to the average student living on campus. Y'all need to change the way you are approaching these questions and format future surveys to be more inquisitive about the personal experiences and opinions on those models. Those models alone need to change to be more realistic. We are not living in an IKEA style apartments with rich white folk that can afford their space organizers and fancy ass baskets to hold everything. These are REAL students who have REAL LIFE ISSUES THAT CAN'T BE FORCED INTO A CROWDED ASS TINY SPACE FOR \$1600 A MONTH ARE YOU KIDDING?! That is TRIPLE the amount that I am spending off campus and I was forced off because of the conditions of on-campus housing.. Y'all need to get your shit together.
- The price of on-campus living is absurd as is the size and quality of the housing provided.
- The prices are totally unreasonable. You can live in a giant single with your own bathroom off campus for ~\$1,500 a month. The prices of on campus living should reflect that and should be decreased by at least a couple hundred dollars considering there is VERY limited space, shared bathrooms, and WAY too packed rooms. The continual downsizing of rooms by adding more people to rooms that were originally meant for 2 people is ridiculous. It seems that the university is taking advantage of the students. Also, adding new residences and increasing number of students at the school would be

incredibly disheartening as the busses already cannot fit the current student count, and neither can the rooms. The new residences should definitely be used to space out the living of current students, and not to fit an excess of students when they are finished.

- THE PRICES ARE WAY TOO HIGH. How do you expect low income students to afford on campus housing at these rates. Tuition and current costs are already high enough. Please do more to help low income students, which make up a large percentage of the campus population.
- The prices listed for proposed graduate student housing are unaffordable and ridiculous. I can only assume that the undergraduate dorm prices are the same. Shame on UCSC for forcing students into horrible living conditions simply to get an education. Shame on UCSC for burdening the Santa Cruz community and exacerbating the housing crisis.
- The prices listed in this survey are NOT affordable, so if you chooses to refer to this as "affordable housing" you need to speak to students.
- The prices offered for new graduate housing are TOO HIGH. A TA only makes about \$1800/month after campus fees are accounted for. Rent should never exceed 30% of income. The cheapest option offered at the new grad student housing, \$986/month, exceeds 50% of TA pay. UCSC needs to address the housing crisis in a meaningful way and stop putting the profits of private developers over students. Graduate students need a monthly housing stipend or a massive wage increase and we need it now, not slowly over the next four years. A TA should make at least \$2400/month, if we are serious about the cost of living here. We are crushed by low wages and high rent. I can hardly afford to live in this town anymore and am strongly considering dropping out before finishing my PhD. I pay 50% of my income in rent and am struggling financially. And so are many people I know. It just doesn't feel worth it anymore. UCSC needs to at least subsidize the new housing so grads can actually afford to live there.
- The primary reason I have had to rule out on-campus family student housing (and will continue living off-campus throughout my time at UCSC) is pet ownership. Most other graduate students I know also have a pet(s). I wish there were any degree of flexibility in that regard.
- The problem is really out of control rent prices, which outside of UCSC's housing program's specific responsibility but they should help advocate for students.
- The proposed prices for apartments are ridiculously expensive. This school is awful and takes advantage of its students lack of housing options and is now trying to charge students over \$1000 a month to live in a TRIPLE. That is an awful option for students. It is obvious to me that the university is doing this housing project not to provide even reasonably affordable housing for students, but to fill the housing quota that they are required to. Now that they have crammed as many students as possible into dorms they are creating unaffordable housing because the students won't have any other options but to live there. This university sucks and doesn't give a shit about it's students. I'm glad I'm almost done and can be out of this money grab.
- The proposed rents are much too high. For example, a grad student on a TA salary takes home \$1800-\$1900 per month. The rents are all half that much or more.
- The provided housing options are unacceptable. The university is aware of the graduate student stipend. The cost of rent should be 30% of the stipend. Anything above 30% is unacceptable and disrespectful.

- The rates are extremely high and I would be beyond happy to see them drop even slightly
- The reason that I didn't live on campus is because I didn't want to have to live with many other people and I wanted my own privacy. On top of that I found the on-campus housing cost unaffordable and ended up living out of my car for a long time.
- The rent is too expensive.
- The rental prices for graduate student on-campus housing are completely unaffordable given our salary. (All of the examples in this survey would cost well over 50% of typical grad student salary!)
- The selection program for apartments if you are NOT in a group is awful. Terrible decision to match random students with anonymous profiles. We had five 10 year old girls with two 25 year old men. Needless to say this resulted in a hostile and scary living environment.
- The set plans and rent per month seems expensive. Personally I think on-campus housing needs to do a better job at creating rent that is more affordable considering most students are already paying a lot of money through loans or out of pocket for tuition and all other fees.
- The size of the 2-bedroom FSH floorplan is clearly smaller than the units that are currently available. Especially for families with more than one child, this will definitely be a problem. Please consider making the new family units at least equal square footage to the old ones. Also, in the plan it was mentioned that there will actually be FEWER family units on campus after this program is implemented: this shows a clear lack of understanding of the current housing situation for students with families. There is a waitlist for the current family units that at any given time has dozens of families on it, and waitlist times are now over a year for many students. Just because families (are forced to) find housing off campus, doesn't mean that less family housing should be available. Similar to the size of the units, the number of family units should be maintained at the very least, if not increased.
- The transfer community needs water bottle refilling stations badly.
- The University is located on beautiful natural land and it is horrible that it is being implemented that more housing be built. Students are already struggling to get into their classes and to live comfortably on campus with the high amount of students. Rather than admitting more students, administration should be trying to lower off campus housing by developing there.
- The university will somehow have to cope with the fact that admissions are increasing far more rapidly than the housing availability -- on and off campus -- can keep up. Whatever ends up happening, I expect a complete and utter fiasco from the whole situation. I've given up hope that students will ever be able to live comfortably again with affordable rates while also getting a quality education in ever-growing class sizes. Luckily, I'll have graduated right before it gets really bad in 2-3 years. Good luck! You'll need it.
- The use of laundry machines should be free.
- The village needs more of a community. There are little activities held there.
- The walls are too hollow. It doesn't block out much noise

- The was very disappointed how there is no wifi in the apartments! It was even more strange how some of the study rooms do not even have wifi! How are we suppose to study.. Very very disappointed
- The wifi needs to be consistent. We have had way too many problems over the course of the school year.
- The wild space on campus is fragile, limited, and valuable. I urge UCSC to rebuild aging student housing and focus on building up rather than out to minimize development of undeveloped land. The proximity to wild spaces at this college is a place for students to reflect, connect, and an opportunity for countless students to develop their skills as naturalists and scientists. To destroy it would kill part of the soul of UC Santa Cruz. Also, the cost of housing on campus is completely unacceptable - few people will opt to live on campus when you pay as much for a triple with no kitchen on campus as you would for your own room in town. I understand that this perspective is at odds with opposition to development, but on-campus housing is unaffordable. The university should focus on working with the city to increase affordable student housing in town through rent control legislation, promotion of long-term rentals over vacation rentals, and changing city ordinance to encourage families to open rooms of their houses as rental units or to build backyard rental units. There are a lot of creative ways we can deal with the housing crisis while minimizing development of Santa Cruz's open spaces.
- The wireless internet could be better in the afternoon when everybody is using it.
- There are a lot of features in the CURRENT housing that could use improvement. Laundry payment services flat out do not work, the sinks reek of sulfur and every single floor is extremely loud and squeaky. Before you try to swindle students out of every penny you can get, at least make sure your facilities are worth it.
- There are definitely improvements to be made, and we urgently need more housing. The furniture provided is also very old and a little outdated. The vaccuums provided is ANCIENT and does not work very well. Also, RA's need to inpect the apartments before residents arrive (or after the end of the year). When I arrived at my apartment, the handlebar for the shower was broken and hazardous since sharp metal was sticking out.
- There are many people with ADUs, many retired or young families, who would benefit from the income and from having the extra eyes and ears around the property. UCSC could facilitate a program that helps pair students with high GPAs and no disciplinary records with locals who have extra rooms or ADUs. Santa Cruz has lots of empty guest houses and detached units and a growing population of homeless students.
- There are too few rooms for graduate student. Hope there'll be more.
- There is a crisis, and while more and more managerial positions are created to neoliberalize the university, most folks are struggling, especially students, especially people of color.
- There just isn't enough housing. I would have wanted to live off campus with my family but there's no housing in Santa Cruz at all. On campus family housing isn't an option bc I have 3 kids but the apartments are only 2 bedroom. So now I'm living alone on campus while they are still out of state. I know many people that are struggling with finding housing in the area.
- There needs to be more affordable apartment housing for second years and beyond. Right now I am struggling to decide whether to live on or off campus, and costs and ability to be guaranteed an apartment is very tricky to figure out. Even if I am guaranteed

housing on campus, I would not want to live in dorms again, so I have to gamble with getting an on campus apartment and if it doesn't work out, it's too late to find off campus housing as well.

- There needs to be more options (numbers of bedrooms, allowing pets, duplexes instead of apartment style) and it needs to be more affordable. The school gets a ridiculous amount of tuition and needs to use that to lower the cost of living for students. Most accepted students don't come to UCSC because it is one of the most unaffordable programs in all of California, and much more expensive than the rest of the country.
- There should be more communication between the students and housing office.
- There should be more housing for the students the school already has. At Stevenson college the lounges have become bedrooms and it causes for less socialization within colleges.
- there should be more housing options for continuing students because it is sad that students are scared of being here homeless when they're simply trying to get an education and housing shouldn't be another worry. So knowing that there is a plan for more housing is really good
- There should be some sort of deck or yard attached to all living facilities along with more storage.
- These housing prices are too costly which drives many students off campus into a community that doesn't want/ support this large influx of students. UCSC needs to do better, and fast.
- These survey should be open to public as the decision the university will act upon the result. The housing crisis in Santa Cruz and surrounding area needs to be changed and at least to be more affordable to not only students population, but also to others. Also if the university can not provide housing, student shouldn't have to wait over 3 months till the university begins advising them to find alternative housing. I have to find off campus housing less than a month prior to the school year begin. On top of that, the limiting housing and sky high rent in Santa Cruz creates a hostile situation to students.
- They should have more study lounges and bathrooms attached to rooms.
- This is a poorly designed survey. The unit B and unit D were the same unit (is that intentional or was that mistake?). Also some of the questions were confusing, and when there is a ranking question, always include what is best (ie: 1 being the top choice and 8 being your last choice).
- This is insane. Not only are the prices unreasonable, the availability of these amenities is not at all in line with the culture of this campus. This simply furthers the abolishment of the college system in the school, trying to keep up with the "modernized university" that, if they follow this plan, would result a mockery of our former university. if we want to be on the forefront, we need to implement changes that stay in line with the values of this school while looking forward. We are not a satellite campus of the UC system. We are one of the UC schools, but plans like this do not demonstrate that. Regardless of the problems with overcrowding, which I do understand the school has minimal, if any control over, we need to make this space for students, not gut the students for rent for substandard, dormitory accommodations, like this project entails. Additionally, if the lounges are not returned to the student usage, this project will still not alleviate the need for community space on campus- something that is then being pushed onto the library and other spaces that should not be intended for this.

- This survey is too late, since UCSC has already committed to building housing without adequate input from students, through an unrealistic P3 plan, and with a disreputable firm hired, again, without adequate input from students. Rates will rise every year, preventing low-income students from attending UCSC. The university could have used a bond issue instead of the P3 plan, but, like everything else, UCSC does what it wants regardless of whether it is right, moral, or realistic.
- This survey was awful. Consult IRAPS or SSERC before you distribute surveys in the future.
- Those options are still sooo expensive to live on campus :(
- Those prices are way too high for on campus housing. That is an absurd amount of money to pay for housing. It is way cheaper off campus. My parents are both doctors and I know my family is well off and I don't even know if they would pay that much for me to live on campus. That is very restrictive and made without thinking about how much people can afford.
- Though I have not lived on campus, I have heard really negative things about the UCSC Housing program. Students are extremely overcharged in a situation where they are already paying high expenses for tuition as well as living in an area where the cost of living is outrageous. They are stuffed into close quarters that statistically contribute to an increase in issues such as anxiety and domestic violence. Yet despite many students' complaints, their problems go unsolved and the university continues to seem uninterested in actually helping its students, and rather devises more ways to make money no matter the cost. It's unfair, it's disrespectful, and most of all, inhumane.
- To have 4 year guaranteed for all UCSC students if possible
- To not squish people into rooms.
- Too expensive :(
- Too expensive and seriously lacking space.
- Too expensive for the quality
- Too expensive to live with rats that never clean the shower and stink up the whole floor. I pay so much to not live in my room because it is inhabitable with the monsters that live there as well. The showers never warm up in this hypothermia weather try the far shower good luck with that one. You guys are keen on saving water but i have to wait 30 minutes to step in for it to warm up. Laundry you thought? not a chance. two washers and two dryers is just not right i have received over a million texts about the laundry but simplest fix of another machine would minimize this. My favorite night , the one that tops the construction at the break of dawn breaking the lights in our building putting on a so called roof yet our roof still leaked adding to the stench that these girls already bring, would be the fire alarm that went off for one second for no reason other than to hurt at 3 in the morning. overall not the best housing. why do we have a trash chute when we cant even open the door to get to it. I do appreciate the paper towels that were added back to the bathroom. thank you. I hope crown can improve please.
- too expensive, People from other countries laugh at how ridiculously expensive it is. Laundry should be free, like fuck me, after selling my soul to the devil for a massive loan with a fuck tonne of interest to go to UCSC, i find out i have to pay for laundry too. like fuck off, you money hungry assholes.
- Too expensive. Extremely disruptive to students and the city. Youâ€™ve already been sued once by the Santa Cruz City.

- Too expensive. I don't care if it's small, not modern, ugly. I'm here to learn and to stretch my dollar as thin as possible. The poorest students are always the one most affected by price increases
- Too many people, too many money.
- Too strict of code of conduct, not enough community gathering places in porter a, each floor should have a kitchen/hang out area
- Triple rooms create an emotional strain on students who are already in a stressful environment. I strongly believe they lead to the development of mental illnesses in our student body.
- Triples and above need to have enough space for every resident because the triple I am in feels cramped.
- Triples in Stevenson are far too small. Y'all are trying to fit three people in a two-person space and it doesn't work. It makes me, as well as other residents, not even want to spend time in my room because it's so cramped.
- Turning a double room into a triple room is very inconvenient for those who live in it.
- ucsc housing is a nightmare.
- UCSC housing is nice, but after the housing requirement the odds of getting housing sounds awfully terrible. A meal plan aimed specifically at apartment residents maybe having more to do with ingredients than precooked meals sounds like a good idea.
- UCSC housing program is absolutely terrible. Cramming students into rooms that are so small there is no space to study/or move. Paid a fortune freshman year just to live in a cardboard box on campus with a terrible roommate.
- UCSC housing should not cram people into the rooms that are currently built. The room space is a big problem, and the cleanliness factor is compromised when so many people live in on apartment/dorm.
- UCSC Housing should require a mandatory training program to teach students who have never lived by themselves the proper roommate etiquette. For example, how to do dishes, what to do if drying racks are full, or how to keep the space clean, etc.
- Ucsc housing struggles to compare with some of the benefits of off campus living. The campus is crowded and prices are steep.
- UCSC is overcrowded
- UCSC Merrill college has the worst housing situation that I know of for any college. Terrible lighting with one pathetic window, minimal space to optimize costs, no "commons". It is really rather depressing to be inside of the building at all, with all of the artificial light and cramped feeling. The housing is astonishingly overpriced for the terrible living quality provided. Should the cost of living be halved, I'd have no quarrel with the lack of quality.
- UCSC needs to stop thinking about how Housing can be profitable and how it can be more cost effective to provide. Housing should not be an issue that is deterred by price or space. If there isn't enough beds for your students you don't have room for more students. If you don't have STAFF willing to train responsible RA's you also don't have space for more students.
- UCSC should provide housing to students at below market rates that is subsidized by the numerous corporate partnerships that the school maintains or by reducing the salaries of administrators. Housing is a right and when the market rate of housing is so

high due to speculative real estate bubbles, it is the responsibility of a public institution like UCSC to make housing at low cost available to its students.

- UCSC's housing program is trash. There's no goddamn way I'm gonna pay an extra THOUSAND dollars to have my own goddamn room and not get pissed on by CSOs all goddamn the time for smoking weed. fuck you.
- UCSC's housing program should have a fitness facility because it is difficult for students who live on the west side of campus to fit the time to make it to the gym on the east side. It should still be affordable and it would be great for doubles and triples to be spacious!
- UCSC's top priority should be housing as many students as possible to alleviate the Santa Cruz housing crisis and bring rent costs down.
- UCSC's housing is very expensive for students, especially when combined with other costs of school and cause students to go into even more debt. I personally would hope for a reform in university housing rent, but I know this is unrealistic as it's only expected to increase
- Unless you plan to expand the city of Santa Cruz with new roads and infrastructure to support that many more people, this is an awful idea. The city is at capacity and locals are being forced out by over enrollment at UCSC. Even if more housing is built people will still want to live off campus, use the roads and highways, eat at the restaurants, and use the area which is already at capacity. More housing should be built on campus for the CURRENT amount of students.
- UTC has always been a really cool idea to me for a living space.
- Very expensive with small perks since there's a lot of sharing involved
- washer and dryer inside the unit would be preferred, especially with young children in the residence. Currently, the laundry rooms do not support the population housed at FSH.
- Water bottle refilling stations are super important
- water fountains should be available in all Garden buildings, AG, BG, CG, and DG.
- Way too expensive!
- way too expensive, unreasonable.
- We can only go up now (literally)
- We look forward to family student housing having more amenities such as dish washers and in-unit laundry.
- We need more housing availability while keeping it affordable. Too many students are left without a roof over their heads and are forced to choose radical alternatives.
- We need more housing to accommodate the increase population of students!
- We need more housing. Pretty disappointed things are thought of when we are in a crisis. At least you are doing something about it but y'all saw this coming.
- We need more on-campus housing!!!
- WE NEED MORE SPACE THANK YOU FOR ALL YOU ARE DOING TO TRY
- We need rent control- not just more on campus housing. The UC needs to fight for its students in the local politics and community!
- We should have community kitchen and more lounges for study spaces.
- We should not be paying for laundry if we're already spending thousands of dollars to live and attend the university.

- We spend most of our time on campus and spend on average 4-5 years in Santa Cruz so we are looking for a space to call home, not just sleep. This means privacy and space. The current biggest challenges with housing is space (there are no rooms to rent) and affordability, rent is high!
- we understand you're trying to find the best solutions, however it's really hard for existing students hearing their friends/peers struggle to find and afford a place to sleep.
- We want lounges/study rooms inside the buildings at crown please
- What about environmental issues, like water usage?
- What college offers which type of room such as; co-ed apartment, rooms/roommates option, and how big and affordable are the apartment.
- Whatever you guys do, be sure to keep in mind that the dining halls are already pretty much at capacity.
- When will Redwood get main building maintenance or reconstruction? Those buildings are too moldy.
- Where are the new housing units going to be built? Wouldn't it be easier to simply allow less students to enter the school and fix up existing house g structures?
- Where will this housing be situated? Will it only include the more expensive apartment type dwellings?
- why
- Why are we still over paying for a small room and low-quality food? We need to expand rooms and offer more apartments for a cheaper price or instead of expanding we can stop over accepting students and out the money towards the retention of people of color or fun programming.
- why are you so fucking expensive
- Why do rooms keep getting more expensive; however we keep being crammed into smaller locations.
- why do singles have to cost the most? Really asking why, when doubles and triples do not enrich others' lives, especially those who are going through tough times or do not want to sleep with others (however cannot really afford a lot of money for monthly rent when they work a part time job in a work study position).
- Why is housing so expensive? Why is it so hard to apply for housing? Why is it so difficult and expensive to rent off campus???
- Why is it soooooo expensive!
- Why is on campus living so expensive? In the proposed plans, the cost per person for a single bedroom was DOUBLE of what I pay for my own room (that is also larger) in a house 20 minutes away from campus. And that \$1600 does not include meal plan? I never lived on campus because the prices are so outrageous. Your main focus should be not making modern or themed housing, but one students can afford without cramming 10 people into a closet sized space.
- why was the previous question ommitting undocumented students? nor where there any gestions about accessability and accommodations for these buildings throughout the survey. the new UCSC housing program should be inclusive of those with physical disabilities and mental disabilities as well as there should be gender neutral restrooms for any space created such as the MPR/lounge in the survey and those restrooms should be accessible.

- Wide variety of options and prices. Some students will pay a lot more for better conditions. And the school will make more money.
- wish dorms didn't require a dining hall meal plan
- Without expanding the educational capacity (increasing lecturers, maintaining smaller class sizes etc), adding more students degrades the quality of education. The capacity of students should not be determined by how well we can simulate city dorm residences, it should be determined by how much extra space we have in our classrooms after establishing an unwavering quality of education that will not continue to be impacted with over scaling student admittance rates
- Working on upgrading what we already have before starting a new project would be more helpful in my opinion.
- would like to give guaranteed housing to students who live far from santa cruz. i live 6 hours away and would like to not worry about finding a place to live every year
- y r u ripping off so many poor kids :/ we know u can, but morally....why.
- y'all shouldn't add more students to the campus until you meet the needs of current students (which you are not even close to doing). UCSC is over capacity as it is. There is not a simple cause and effect equation between adding more students and increasing accessibility as the administration insists; students see through that and understand that you are adding more students (more and more international/out of state students) and raising tuition dues to market/financial reasons due to business logics, not because you are providing quality education to more people. If it does end up being the case that more housing is built in the near future, the best scenario (the way to serve students the best in the context of not serving their and public interests i.e. a privatized and corporatized university). Is to reduce the cost of housing well below market rate without sacrificing personal and communal space.
- Yeah so, I have quite a few opinions on the new housing projects. So first, I understand why the university is expanding and building new housing. Almost all my friends are in converted double into a triple, and they mostly complain about the limited space they have in their rooms. Personally, I would say I've been a victim of this, my roommate and I wanted a double, but when I started school, there it is! A new person we didn't ask for. And no, we're not antisocial or anything, we love to meet new people, it's just that we don't like to be crammed into fucking like....5 square feet. Second, I'm quite concerned of the environmental impacts that will come from the new housing West projects. As you and I both know, UCSC is a very progressive campus that strives in sustainability compared to any other public UC's. And obviously, I (as a student) don't really have a say in the production in the housing projects, so I just wanna instill the idea that please keep in mind that the original architects of the campus, including Thomas Church, created this campus so that the developed areas are intertwined with the redwoods and the trees so that not all the surrounding environments would be destroyed as a result of development. And I think that is extremely relevant in our society that if we can demonstrate, as a campus, that we are committed towards sustainability, then we can inspire others to preserve the environment. And you, the probably old person who is reading this in whatever department, is probably thinking: "blah blah blah, you hippies are so annoying with your environmental bullshit." Well think about it, you, the old person who will probably be dead in 20 years will not have the concern to protect the earth, because well...

you're dead. But college students like me, will have our whole future spent on this earth, so if we don't do something now..... Lastly, I hope that the new housing projects INTENDS to improve the current living conditions of CURRENT students and not a new way to bring in new students. Like, just please stabilize living conditions of current students BEFORE you try to bring in more students. There are so many existing problems right now, and I hope that the school is still focusing on those specific issues instead of just overlooking them and trying to increase attendance to make more money (or some corporate bullshit reason like that). Thanks for reading this, if someone actually read it. And no, it's not a rant, but a passionate opinionated speech. Bye

- yeah stop admitting more students than you can house? i lived in a quad last year and there was virtually no privacy, and now apparently you guys converted it to a sextuplet and that SUCKS!!!! if a homicide happened in one of those rooms i would not be surprised.
- You didn't mention the view, which matters a great deal. You didn't mention sun or shade, bus traffic or woods. If it is not quiet, forget it. You didn't say if the unit would house only two people or could house three or four, which would be cheaper. Cost is probably the most important thing for most students. Next is view, location, state of the unit (new, well insulated, sunny, quiet).
- You guys need a lot more housing.
- You guys need to lower the cost and make more buildings!
- You know how much you pay the international students and how much is the rent. Moreover, they are not permitted to work outside to afford their livings. Please please maintain a balance between them. Or else what do you expect them to do? Focus 80% on how would they survive rather than study/research?? Thank you.
- You need more housing and it needs to be more affordable. On a grad student salary, housing shouldn't reasonably be much over \$800/month (which is half of our salary).
- You NEED to make it affordable. According to Federal Government standards, and common knowledge, it is not right for us to pay more than 30% of our income on housing. As a graduate student, with you wage you pay us, that would mean that our rent should not be more than \$570 per month. The pricing you are currently offering are ALL above that. Do you want your graduate students to live in poverty? Do you want to be known as the university that has graduate students (the people who do the most face to face teaching at this institution) to be living out of their cars, sleeping on couches, going to soup kitchens and food, not bombs? The university ought to be helping the community, but if its own workers need to rely on social services to get by, the UC seems a lot more like Wal-Mart than a center for higher learning. STOP making students take on more debt! START advocating harder to obtain state funds. STOP the shady financial practices that undermine the state's trust in you. START caring about your student workers and actually showing it by offering them livable wages and healthy, dignified, lives here at UCSC.
- You should give disabled people a discount. I have to be on Medi-Cal even WITH tuition and UCSHIP insurance because TA pay is terrible here, and your rent is over 50% of that pay each month. I am really struggling and it's all because of your rent. Meanwhile, I literally could not find any housing other than on campus that was accessible to me, and your units aren't even up to ADA standards, which is a huge liability given you just

remodeled them and therefore your units are not grandfathered in. I am very happy I do not need a wheelchair yet otherwise I'd be in a bad way.

- You should provide studios.
- Your ranking order should have more information. I put 1 as least desirable and 8 as most desirable, but you should specify to avoid confusion.

EXHIBIT **D**

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University of California, Santa Cruz

Student Housing Demand Analysis Findings

 BRAILSFORD & DUNLAVEY

STUDENT HOUSING
WEST 

Agenda

Student Housing West

1. Project Overview
2. Objectives
3. Key Findings
4. Market Analysis Detailed Findings
5. Survey Analysis
6. Demand Analysis
7. Next Steps



Project Overview



Student Housing West

Project Overview

- Public-Private Partnership
 - Capstone Development Partners, LLC
- Project is based upon demand findings from B&D's 2014 Student Housing Market Study
- 3,073 beds to be delivered by 2022
 - Undergraduate housing (2,713 beds)
 - Graduate housing (220 beds)
 - Family housing (140 Units)
- Project allows UCSC to de-densify existing residence halls (773 beds due to overcrowding)
- This study has been commissioned by Collegiate Housing Foundation for the purposes of project financing.



Hagar Site

Heller Site

Objectives



Objectives

Student Housing Demand Analysis

- Update the 2014 Student Housing Market Study to secure project.
- Confirm demand for campus housing at the proposed rental rates.
- Understand demand by housing type to refine the overall project program.
- Assess the nature of the off-campus market and compare rental rates to those proposed for Student Housing West.
- Confirm that the proposed project will not negatively impact existing housing.



Key Findings



Key Findings

Student Housing Demand Analysis

- Enrollment continues to increase while housing supply has remained constant placing significant pressure on the UCSC community.
- UCSC has added more than 2,400 beds of residential density within existing halls, which impacts the available community space and the overall student residential experience.
- Overall on- and off-campus housing satisfaction is low and has declined since 2014 – illustrating the challenges the UCSC community experiences living in Santa Cruz.
- Demand exists for 13,102 students to live on campus:
 - 11,626 undergraduate beds
 - 1,066 graduate beds
 - 310 family units
- Unmet demand totals 1,660 after new Student Housing West beds and de-densification are factored.
- De-densification of existing residence halls can be used to mitigate occupancy risk during the Student Housing West absorption period.
- The proposed single occupancy Student Housing West rental rates are very competitive with the off-campus market.
- UCSC students are very price sensitive – all decisions should be made to minimize the impact on rent.

Market Analysis Detailed Findings



Market Analysis Findings

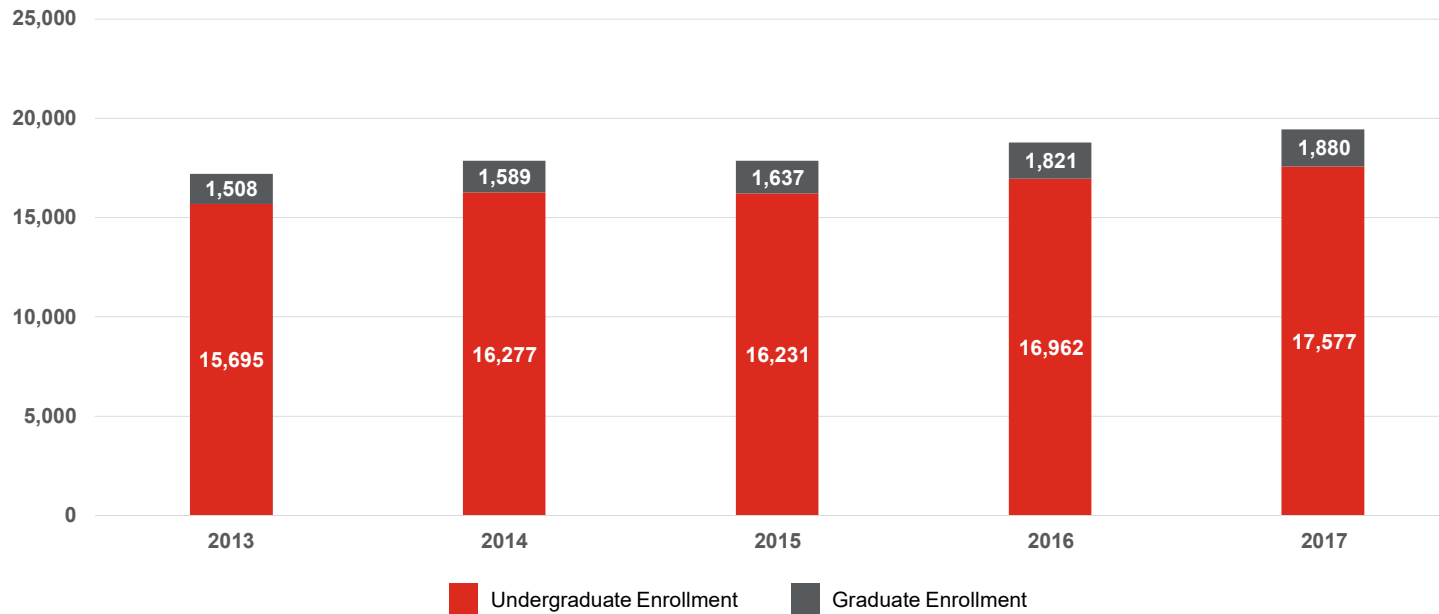
Market Analysis

- Enrollment continues to grow, placing significant pressure on the University, its housing system, and the Santa Cruz community.
- Housing occupancy has remained strong, operating at an average of 97% of all available housing beds since 2012.
- The Santa Cruz off-campus housing market is challenging due to poor quality and quantity of housing stock, high rents, and policies that are not student tenant friendly.
- UCSC has increased housing capacity by densifying existing residence halls through the use of triple occupancy units and converted lounge spaces. Densification has created an operational challenge and impacted the student experience.



Total Enrollment

Market Analysis



+12%
Undergrad Enrollment
Since 2013

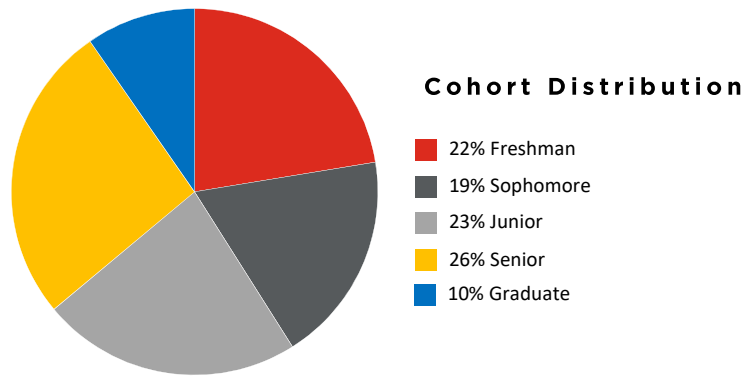
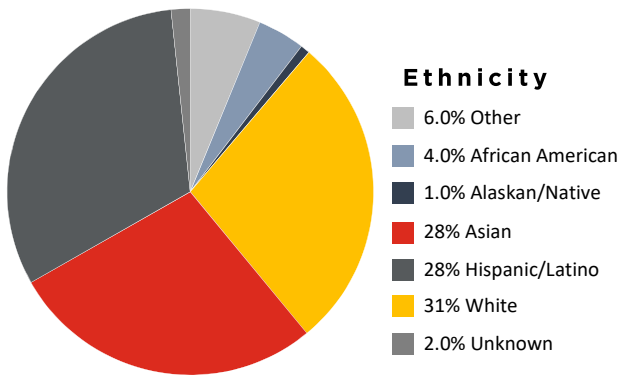
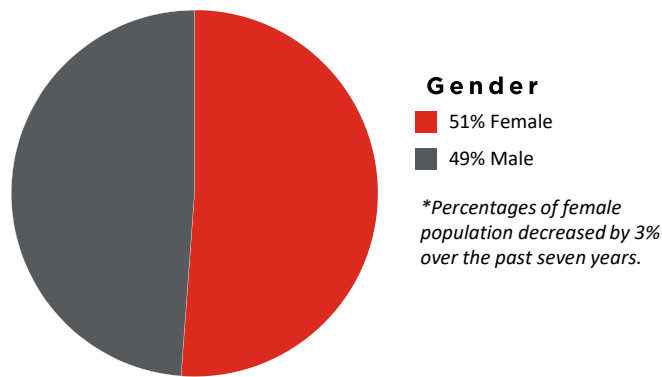
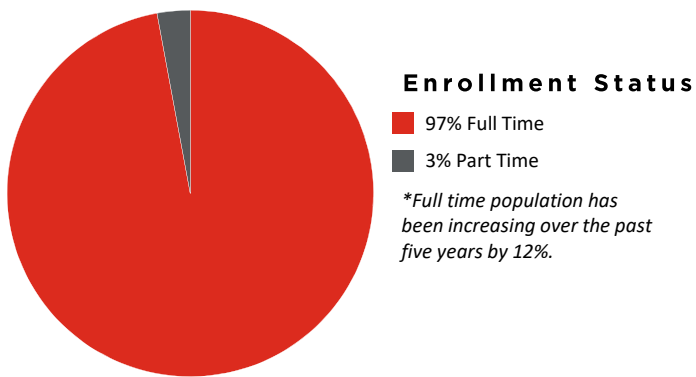
+25%
Graduate Enrollment
Since 2013

Enrollment growth without corresponding housing supply growth is placing significant pressure on UCSC

Source: UCSC Common Data Sets Available from UCSC Institutional Research, Assessment, and Policy Studies

Demographic Profile

Market Analysis



3.75
Avg. High School GPA
(Up 3% from 2013)

90%
First to Second-Year
Retention Rate

71%
6-Year Graduation Rate
(up 2% from 2006 cohort)

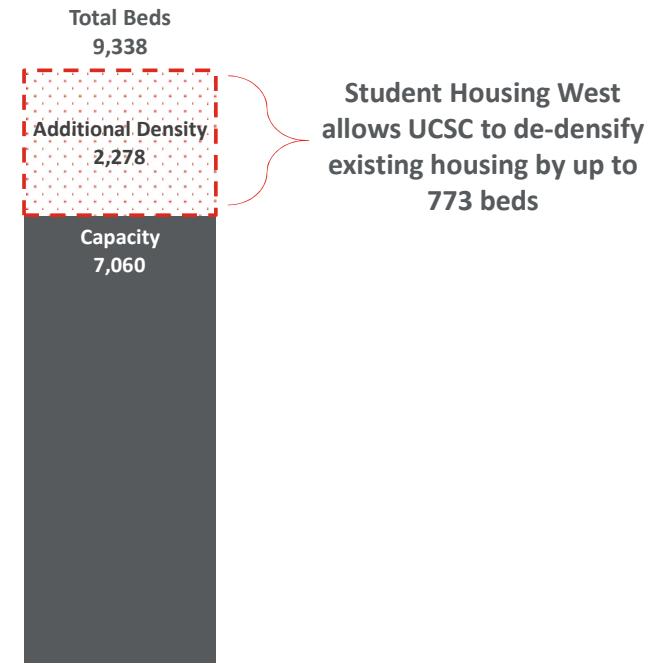
UCSC's student academic and demographic profile are consistent with those who would likely live on campus

Source: UCSC Institutional Research, Assessment, and Policy Studies

On-Campus Housing Supply

Market Analysis

College Facility	Capacity (Beds)	Additional Density (Beds)	Other Adjustments	Operating Capacity (Beds)
Cowell College	639	241	(6)	874
Stevenson College	597	305	(3)	899
Crown College	635	290	(91)	834
Merrill college	686	114	(2)	798
Porter College	705	134	(3)	836
Kresge college	385	135	(20)	500
Oakes College	565	216	(1)	780
Rachel Carson College	626	255	(12)	869
College Nine	698	340	(10)	1,028
College Ten	417	205	0	622
Transfer Community	408	131	0	539
The Village	153	0	0	153
Rewood Village	115	36	0	151
University Town Center	108	29	0	137
Graduate Student Housing	82	0	(2)	80
Camper Park	42	0	0	42
Family Student Housing	199	0	(3)	196
Subtotal	7,060	2,431	(153)	9,338

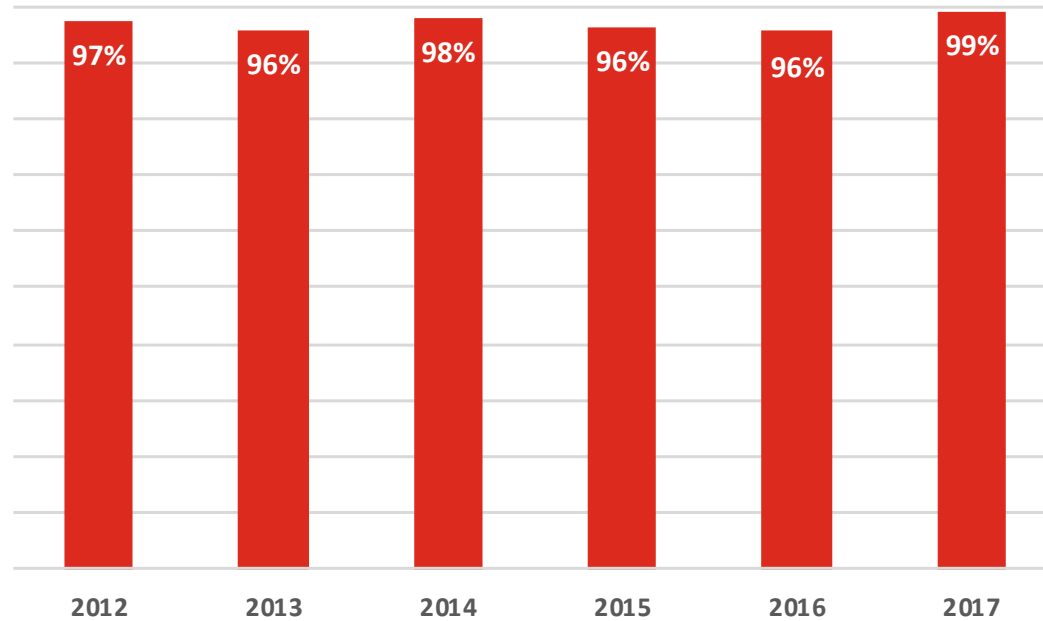


The additional residential density impacts the student residential experience and creates logistical challenges for UCSC

On-Campus Housing Occupancy

Market Analysis

Housing Occupancy of Available Beds



With added residential density, UCSC operated at 127% of original design capacity within the existing residence halls.

Santa Cruz Market Overview

Market Analysis

SANTA CRUZ CITY, CA

Population	62,752
Median Age	28.7
Non-Family Households	40%
Total Housing Units	23,499
Owner Occupied	44%
% Multi-Unit Structures	33%

Source: 2015 5-year census at censusreporter.org



Santa Cruz is considered a student-averse market because landlords do not have student-friendly lease terms, the limited supply of housing, high rental rates, and a challenging town-gown relationship.

Market Area Comparable Properties

Market Analysis



- Survey of 7 comparable multi-family properties
- 904 units
- Average property is 129 units
- 3.1% vacancy
- Multi-family properties generally have limited amenities:
 - Fitness Centers
 - Outdoor patios with grill areas
 - Fenced picnic area
 - Washer / dryer in unit
 - Trash removal
 - Limited off-street parking

Rent By Unit Size

Rental Rate Per Unit Per Month

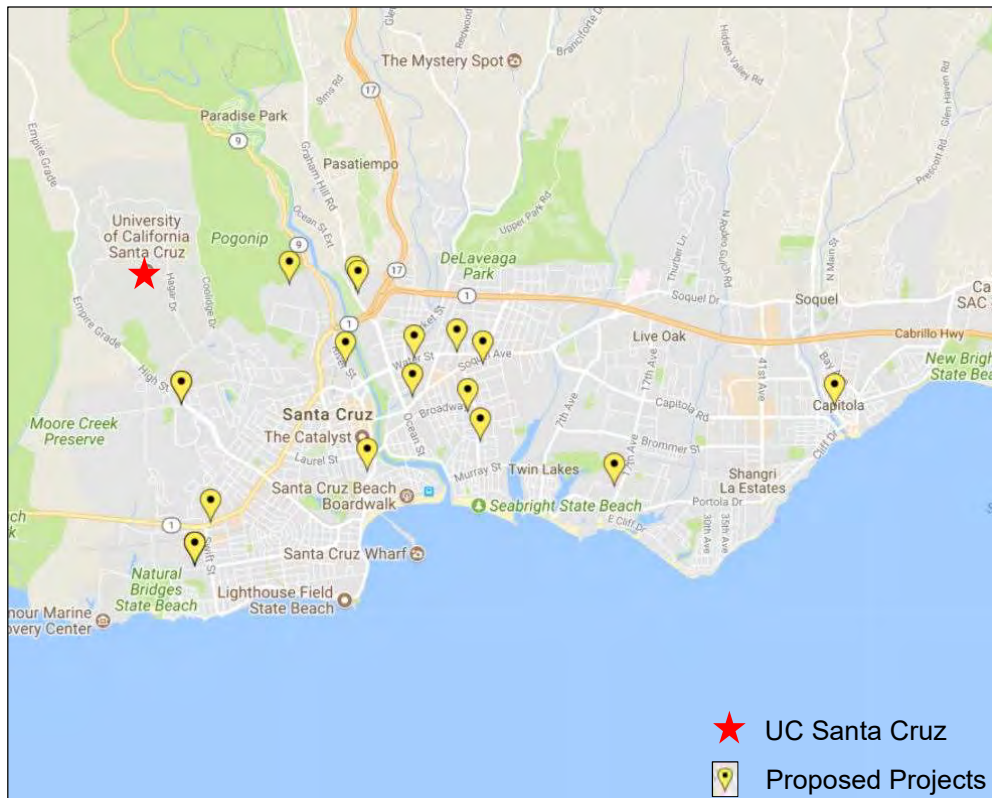


There is a scarcity of three and four-bedroom units within the market. Larger units are attractive to students because they can spread the cost of rent among more people.

Source: REIS Q1 2018 data of comparable properties to the SHW Project

Projects in the Pipeline

Market Analysis



- 420 proposed / under construction units in Santa Cruz
- Mix of multi-unit apartments and townhouses under permit / review
- New units are not directly intended for UCSC students

Projects in the Pipeline

Market Analysis



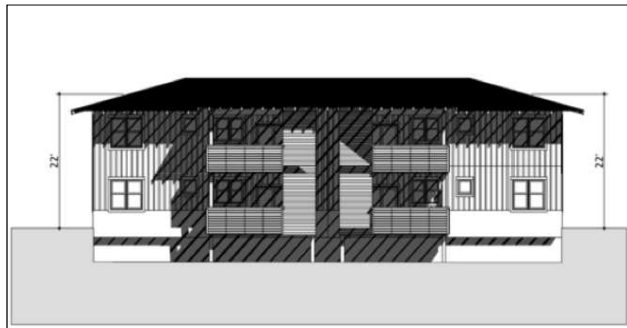
Upper Crust Apartments

- Address: 2415 Mission St
- (8) 1BR, (4) 3BR, and (2) 2BR units
- Status: Under review
- Delivery: TBD



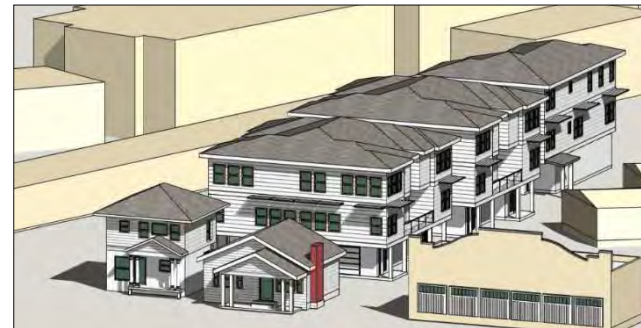
716 Darwin Street

- Address: 716 Darwin St
- 15-unit apartment building
- Status: Permits approved
- Delivery: 2018



230 Grandville Street

- Address: 350 Ocean Street
- 12 3BR apartments
- Status: Under construction
- Delivery: TBD



River Street Townhomes

- Address: 232 River St
- 12-unit residential development
- Status: Permits approved
- Delivery: TBD

Students are generally not the target market for new housing development in Santa Cruz.

Source: City of Santa Cruz, Planning and Community Development Market

Rental Rate Comparison

Market Analysis

Rental Rate Comparison ³	Undergraduate ¹				Graduate ¹		Family Housing ²
	A. 4BR/1BA (Single)	B. 2BR/2BA (Double) ⁴	C. 1BR/1BA (Triple)	D. 2BR/2BA (Triple)	A. Studio (Apartment)	B. 2BR/1BA (Suite)	2BR/1BA Family Unit
Average Off-Campus Rental Rate ⁵	\$1,690	\$889	-	-	\$1,926	-	\$3,381
On-Campus Rental Rates ⁵	\$1,621	\$1,424	\$1,143	\$1,084	\$1,249	\$986	\$1,658
Variance	(\$69)	\$536	-	-	(\$677)	-	(\$1,723)
% Variance	-4%	60%	-	-	-35%	-	-51%

Notes:

1. Rates are per person per month. Comparison is only shown for unit types that exist both on and off-campus.
2. Rates are per unit per month.
3. Source: REIS Q1 2018 data of comparable properties to the SHW Project.
4. Assumes a double occupancy bedroom off-campus in bedrooms that may not be designed for two people in a bedroom.
5. All off-campus rents include \$87 per month in utilities per bed. The \$87 figure is the self-reported monthly cost of amenities derived from the student survey.
6. The on-campus product does not readily compare to off-campus housing stock which is shared at levels well above design capacity. All units within SHW are designed for the appropriate occupancy (for example, a double occupancy bedroom is designed for two students to share) which is different compared to off-campus properties.
7. All rates are based on 2018 dollars and assume 3% annual escalation.

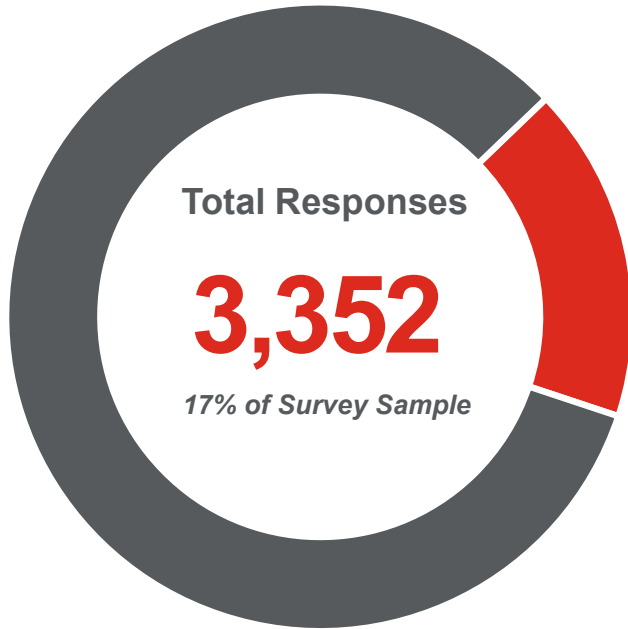
Proposed Graduate and Family units at Student Housing West are priced competitively with the average off-campus rental rates.

Survey Analysis

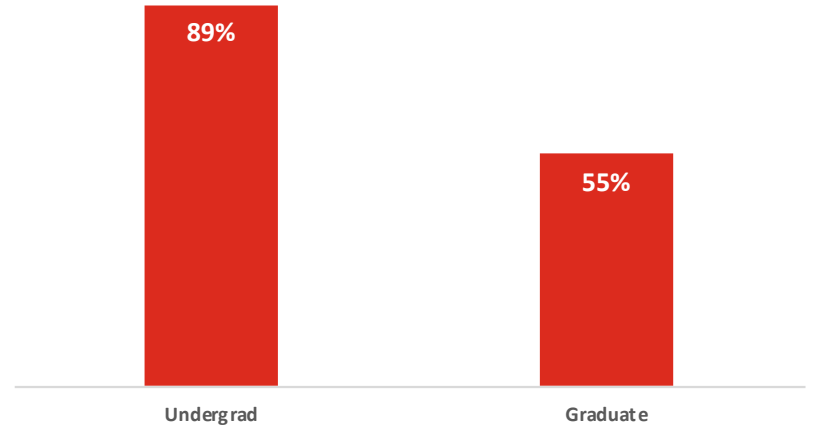


Overview

Survey Analysis



Importance of the availability of housing in decision to attend UCSC



Percent Complete	86%
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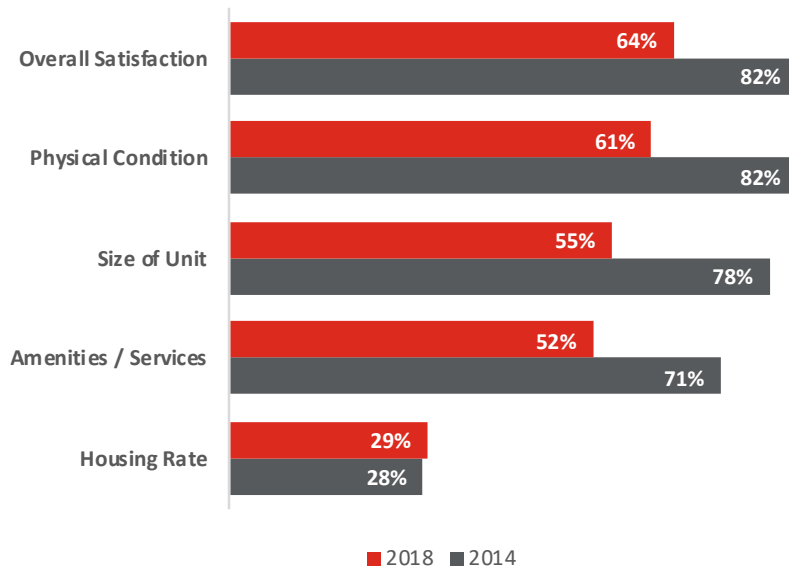
Confidence Level	95%
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Margin of Error	2%
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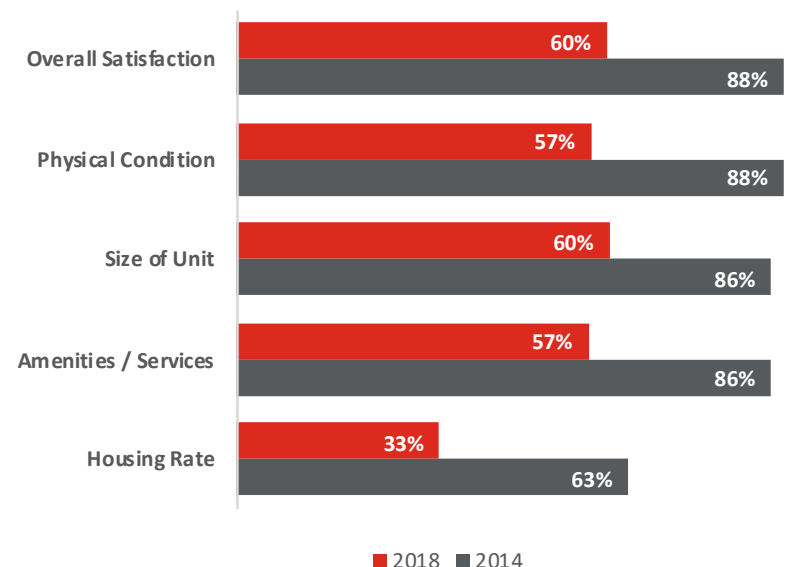
Current Satisfaction

Survey Analysis

On-Campus Residents



Off-Campus Residents



The steep decline in off-campus housing rate satisfaction suggests that students do not see the value in their housing situation as evidenced by the decline in all other factors.

Housing Decision Drivers

Survey Analysis

Decision Driver		ALL	On-Campus	Off-Campus
1	Total cost of rent and utilities	65%	53%	89%
2	Proximity to classes	53%	65%	31%
3	Ability to choose my own roommate(s)	30%	26%	40%
4	Housing guarantee for on-campus residents	30%	45%	3%
5	Availability of a kitchen	28%	21%	41%
6	Availability of high-speed Internet	28%	32%	19%
7	Availability of a private (single) bedroom	22%	15%	34%
8	Proximity to, or availability of, convenient parking or public transportation	21%	14%	34%
9	Access to campus dining	21%	32%	1%
10	Availability of convenient laundry facilities	19%	18%	20%

> 10% of the average

< 10% of the average

On-campus residents are driven by convenience, cost, and the housing guarantee

Off-campus residents are driven by cost, privacy and independence, and transportation to campus

Factors for UCSC to Consider

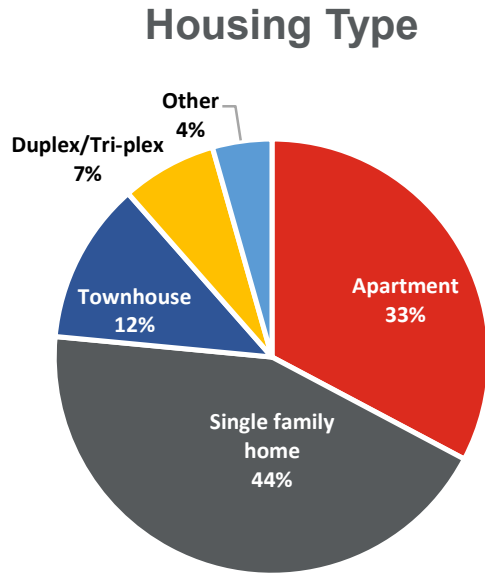
Survey Analysis

Rank	Factor	Weighted Average
1	Keep housing costs affordable	79%
2	Create more on-campus housing opportunities for currently enrolled students	69%
3	Provide modern and attractive living environments to students	59%
4	Expand existing residential dining programs	53%
5	Create more theme areas around academic programs / interests	46%
6	Create living areas specifically tied to college affiliation	45%

Affordable housing costs and additional housing options are essential elements to a successful Student Housing West project

Off-Campus Housing Situation

Survey Analysis



84%

Live alone or with roommates

54%

Share a bedroom

3

Avg. Bedrooms per unit

\$774

Self-reported avg. security deposit per person

\$853

Self-reported avg. rent per person per month across all unit types

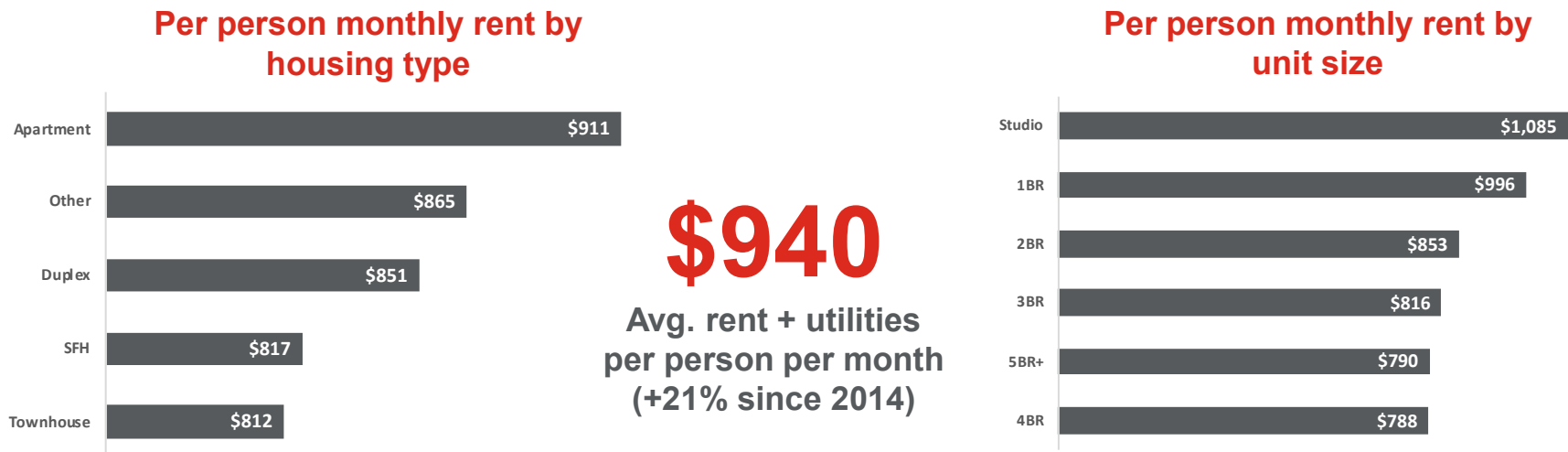
\$87

Self-reported avg. utilities per person per month*

* Self reported utilities include internet, electricity, water, gas, and sewer.

Self-Reported Cost of Rent & Utilities

Survey Analysis



Self reported rental rates are below the off-campus analysis due to the large number of students sharing a bedroom and wide range of units in the market

Transportation

Survey Analysis











Mode	Public Transit	Drive Alone	Carpool	Bicycle	Walk	Vanpool
% Utilize	53%	27%	8%	8%	2%	1%
Avg. minutes to campus	33	25	28	31	21	11
Avg. minutes to campus (no traffic)	26	21	21	26	21	11

Transportation to and from campus is a significant barrier for off-campus students

HUB Amenities

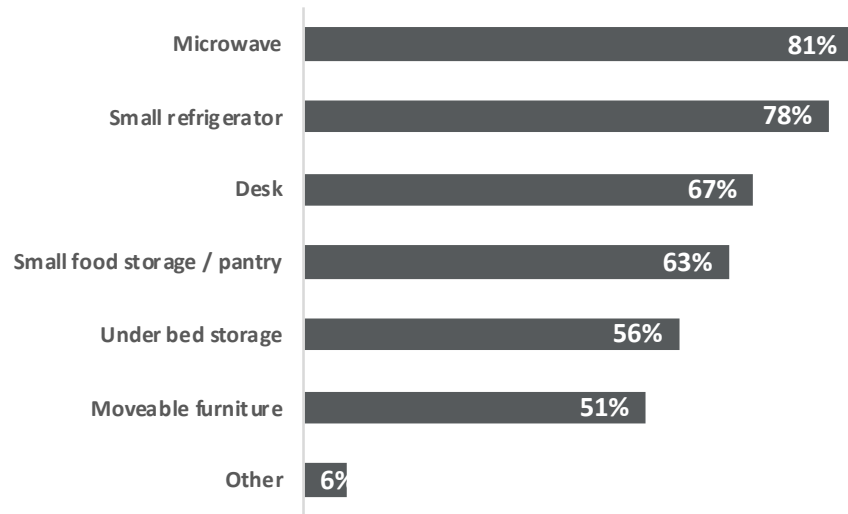
Survey Analysis

	Rank	Feature / Amenity	Composite Score
	1	Foodservice	71%
	2	Quiet study space	67%
	3	Group study rooms	57%
	4	Cardio	57%
	5	Social lounge	56%
	6	Multipurpose space for community events	51%
	7	Active gaming / recreation	48%
	8	Group fitness	48%

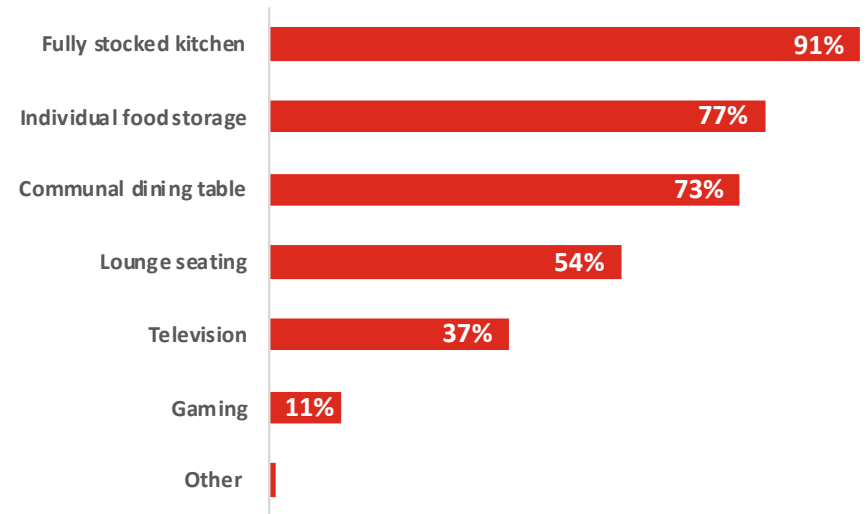
Graduate Communal Unit Preferences

Survey Analysis

Unit Amenities



Communal Kitchen / Common Area Amenities



Graduate students indicated that they would want to share the common area with no more than nine other people

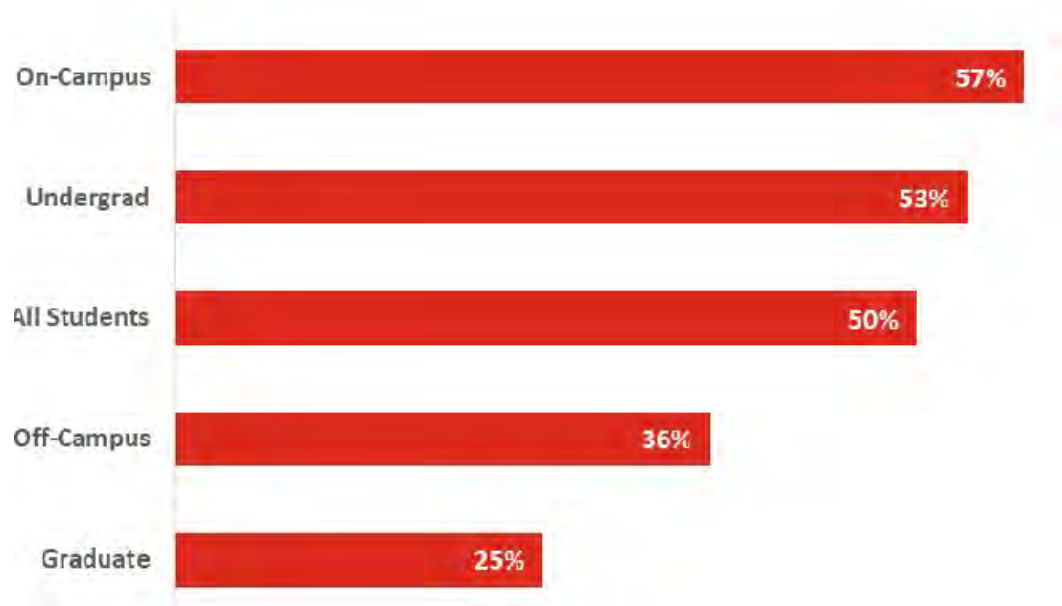
Dining

Survey Analysis

95%

Of respondents do not believe meal plans should be mandatory

Interest in a meal plan by student type



Aversion to a mandatory meal plan is reflective of students' desire for flexibility and independence

Demand Analysis



Methodology

Demand Analysis

- Demand analysis is a combination of ***qualitative and quantitative methods*** that are used to inform B&D's demand model.
- Model projects ***demand*** through the extrapolation of survey unit type preferences to the ***likely target market*** of UCSC's student population.

Tested Unit Types - Undergraduate

Demand Analysis

**A. 4BR / 1BA
(Single)**



\$1,621 / person / month

**B. 2BR / 2BA
(Double)**



\$1,424 / person / month

**C. 1BR / 1BA Studio
(Triple)**



\$1,143 / person / month

**D. 2BR / 2BA
(Triple Conversion)**



\$1,084 / person / month

**Tested unit types provided by Capstone and are reflective of the proposed program and representative of 2018 dollars.*

Tested Unit Types - Graduate / Family

Demand Analysis

**A. Studio Apartment
(Graduate)**



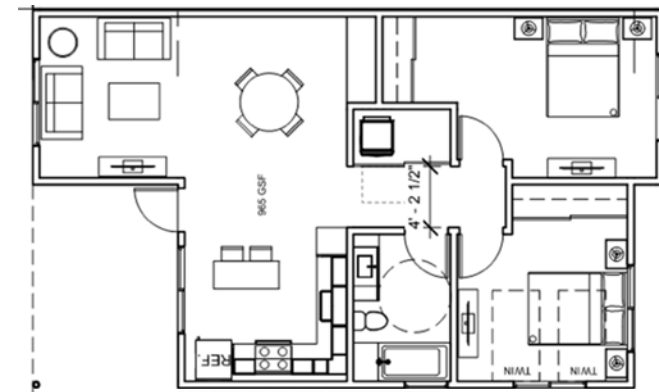
\$1,249 / unit / month

**B. 2BR / 1 BA Suite
(Graduate)**



\$986 / unit / month

**A. 2BR / 1BA Apartment
(Family)**



\$1,658 / unit / month

*Tested unit types provided by Capstone and are reflective of the proposed program

Likely Target Market

Demand Analysis

Undergraduates

- Demographic Filters
 - Enrollment full-time
 - Age 18-24
 - Single, no children
- Housing Filters
 - All on-campus residents
 - If off campus, students who do not live with parents
 - Currently rent and pay more than \$700/month

Graduates / Families

- Demographic Filters
 - Enrollment full-time
- Housing Filters
 - All on-campus residents
 - If off campus, currently rent and pay more than \$700/month



Total Housing Demand

Demand Analysis

Class Year	Enrollment	Occupancy	Current Capture Rate	Projected Capture Rate	Single Student Demand (Beds)	Family Student Housing Demand (Units) ¹
Freshman	4,360	4,100	94%	95%	4,121	
Sophomore	3,623	2,374	66%	73%	2,656	
Junior	4,455	1,571	35%	56%	2,504	175
Senior / Other	5,139	927	18%	46%	2,344	
Graduate / Other	1,880	77	4%	62%	1,166	135
Total	19,457	9,049	47%	66%	12,792	310

Total Demand: 13,102

¹: Family Student Housing occupants are graduate and undergraduate students.

Significant increase in potential capture rate of junior, senior, and graduate students.

Demand & Supply Reconciliation

Demand Analysis

Demand	Single Students		Family Student Housing ¹	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications ²	(773)	0	(197)	(970)
Revised Current Supply	8,289	80	0	8,369
Student Housing West	2,713	220	140	3,073
Current Supply + New Beds	11,002	300	140	11,442
Total Demand	11,626	1,166	310	13,102
Remaining Unmet Demand	624	866	170	1,660

Notes:

1. Family housing is in units.
2. Planned de-densification and replacement of Family Student Housing.

Student Housing West

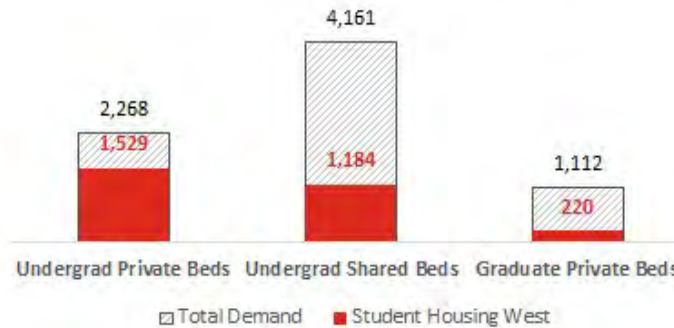
Demand Analysis

	Undergraduate Beds				Graduate Beds		Family Housing
	4BR / 1BA Apt.	2BR / 2BA Apt.	Studio Triple	2BR / 2BA Apt. (Triple Conversion) ³	Studio Apartment	2BR Suite (W/ Comm. Kitch.)	2BR Apt.
	Single	Double	Triple	Triple	Single	Single	Family Unit
Total Demand ^{1,2}	2,268	1,466	930	1,766	523	590	310
Student Housing West Program	1,529	620	564	0	92	128	140
Unmet Demand²	739	846	366	1,766	431	462	170

Notes:

1. Total bed demand in this chart is only for unit types tested for Student Housing West. Undergraduate students were given the option of "Other on-campus housing". Those respondents are not accounted for in this chart.
2. Bed demand excludes freshmen population
3. Conversion of designed double occupancy 2BR/2BA bedrooms into triple occupancy. SHW Program is 0 as bed spaces are accounted for as designed doubles under 2BR/2BA.
4. Unmet demand does not account for existing on-campus housing supply

Private vs. Shared Units



Sufficient demand by unit type exists to support the proposed program at Student Housing West.

EXHIBIT 2

MEMORANDUM

DATE: December 21, 2018

TO: William B. Givhan, Esq.
General Counsel and Chief Operating Officer
CHF-Santa Cruz I, L.L.C.

FROM: Matthew Bohannon – Vice President
Brailsford & Dunlavey, Inc.

RE: Summary of Demand from the Winter and Fall 2018 Student Housing Analyses

INTRODUCTION

In January 2018, CHF-Santa Cruz I, L.L.C. (“CHF”) engaged Brailsford & Dunlavey (“B&D”) to conduct a student housing demand analysis for the Student Housing West Project (“SHW”) at the University of California, Santa Cruz (“UCSC” or “the University”). The Student Housing West project is a planned 3,073-bed project that builds upon previous planning initiatives at UCSC to develop new housing for undergraduate students, graduate students, and students with families. The SHW project is to be delivered by 2022 through a public-private-partnership with Capstone Development Partners (“CDP”). CHF will own the housing assets which will revert back to the University at the end of the development agreement. This project is part of the University of California’s student housing initiative to build 14,000 on-campus beds across the system to support student success and allow for growth within the system. In October 2018, B&D was again engaged to analyze undergraduate student demand to address changes within the proposed SHW Project. Detailed findings of each analysis and methodologies can be found in the following documents:

- ◆ “Student Housing Demand Analysis” report dated April 2018
- ◆ “Findings of Fall 2018 Housing Demand Analysis” memorandum dated December 21, 2018, an addendum to the above report.

This memorandum is only a summary of the demand analysis from both analyses and is an addendum to the original “Student Housing Demand Analysis” report dated April 2018. Information in this memorandum relating to graduate students and family students is from the report dated April 2018 while information pertaining to the undergraduate population is from the December 21, 2018 memorandum.

SUMMARY OF STUDENT HOUSING DEMAND

Tested Unit Types

The two surveys provided students with a variety of options available for on-campus living that either currently exists at UCSC or would be a component of the SHW project. Unit types ranged from co-living units to apartments in a variety of sizes and occupancy configurations. Students were also provided additional information on the amenities and total cost for each unit type (Figure 1 – Undergraduates, Figure 2 – Graduates and Family Student Housing).

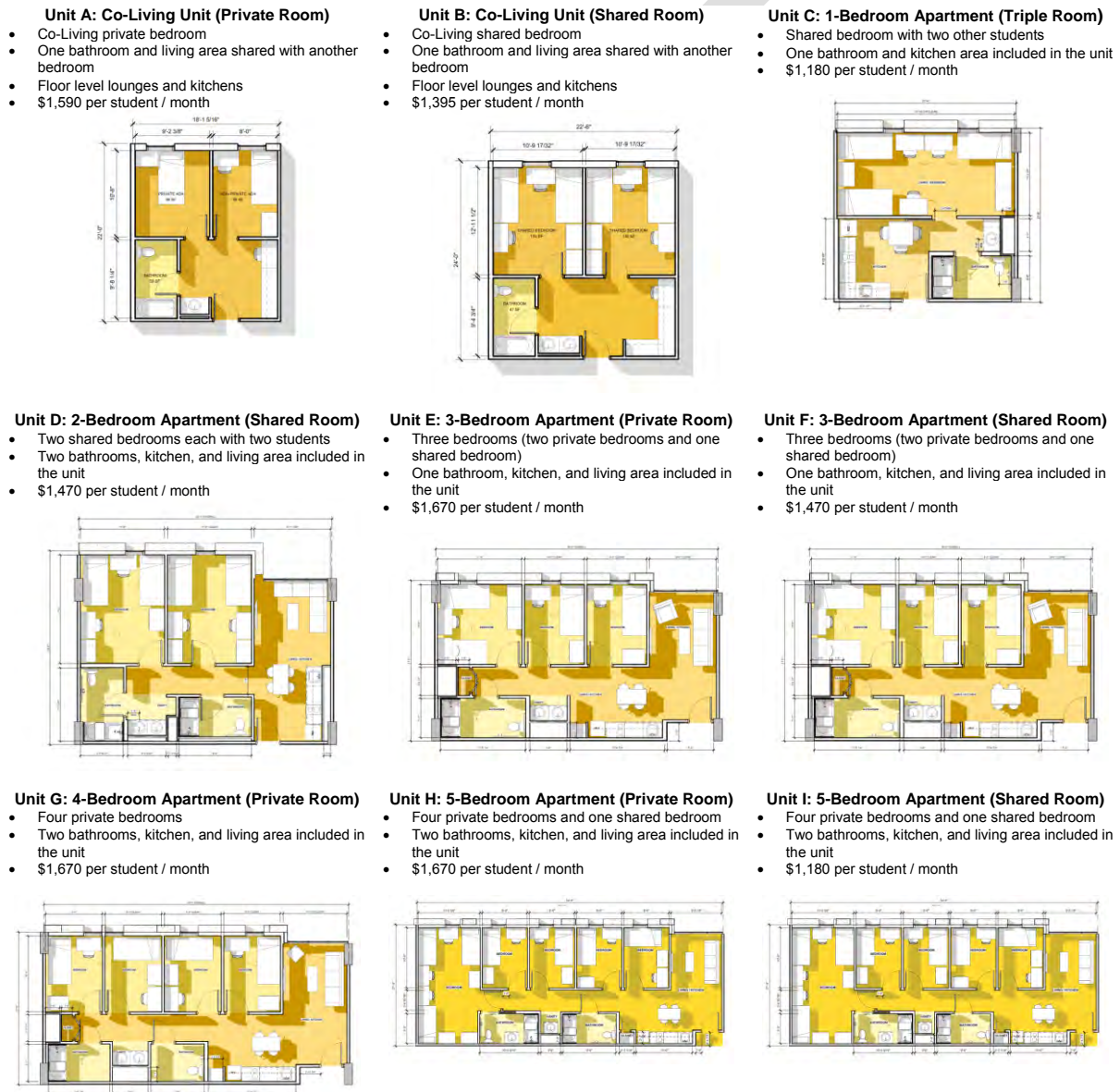


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students

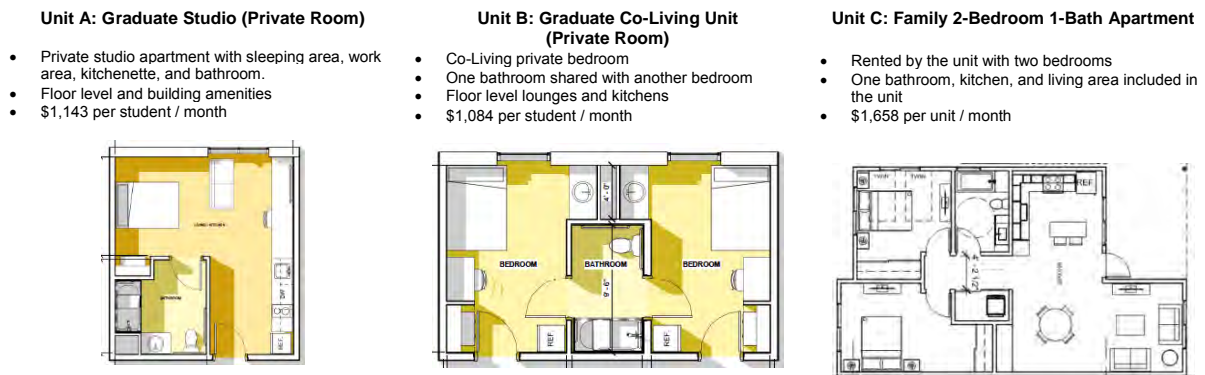


Figure 2: Unit Type Descriptions Shown to Single Graduate Students or Students with Families

Projected On-Campus Housing Inventory Changes

UCSC is proceeding with a number of improvements to campus housing in addition to Student Housing West. The University is renovating / expanding Stevenson College, Crown Leonardo, and Kresge College housing facilities which will adjust capacity for housing over the next eight years (Figure 3). Additionally, the University will be de-densifying existing housing by returning triple occupancy rooms to double occupancy and return lounge spaces to their original use. The projected maximum amount of single undergraduate beds available on-campus during the next eight years is 11,375 (8,643 in existing housing and 2,732 in SHW). The projected total of single graduate beds available by fall of 2023 totals 308 (82 beds in existing housing and 226 in SHW). The projected total of Family Student Housing units is 139, all within SHW.

Project	Capacity Changes as of Fall										Total
	2018 (Current)	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Single Student Undergrad	8,916										8,916
Family Student Housing	196		-196								0
Graduate Housing	82										82
UCSC @ UCDC	22										22
Guest Housing	25	-9									16
Camper Park	42										42
Crown Leonardo Residence Hall Renovation		170									170
Stevenson Renovation		4									4
Kresge College Additions		-23		35		165					177
De-Densification of Housing					-588	-78	-78	-78	-78		-900
Student Housing West FSH			139								139
Student Housing West Undergrad					1,754	978					2,732
Student Housing West Grad					226						226
Total Existing:	9,283										
Net Change:	0	142	-57	35	1,392	1,065	-78	-78	-78	0	
Total Available Beds (Existing + Net Change):	9,283	9,425	9,368	9,403	10,795	11,860	11,782	11,704	11,626	11,626	11,626
Total On-Campus Single Undergraduate Beds:	8,958	9,109	9,109	9,144	10,310	11,375	11,297	11,219	11,141	11,141	
Total On-Campus Single Graduate Beds:	82	82	82	82	308	308	308	308	308	308	
Total On-Campus Family Student Housing Units:	196	196	139	139	139	139	139	139	139	139	

Note: Totals by population exclude Guest Housing and UCSC @ UCDC

Figure 3: Projected UCSC Housing Supply

Projected On-Campus Housing Inventory Changes

Demand Analysis

Based on these factors, the Project Team has defined the likely target markets for the Student Housing West project and existing campus housing:

<u>Undergraduate Students</u>	<u>Graduate Students</u>	<u>Students with Families</u>
◆ Enrolled full-time	◆ Enrolled full-time	◆ Enrolled full-time
◆ Age 18-24	◆ Single without children	◆ Single or married with children
◆ Single without children	◆ Live on campus	◆ Live on campus
◆ Live on campus	◆ If off campus, currently rent and not living with family, partners, or dependents	◆ If off campus, currently rent and pay more than \$700 per month is rent
◆ If off campus, currently rent and not living with family, partner, or dependents	◆ Paying \$700 per month or more in rent	
◆ Paying \$700 per month or more in rent		

Using survey data and fall 2018 enrollment figures, B&D’s demand model projected demand for 11,477 single undergraduate beds, 1,116 beds of graduate student beds, and 310 units of family student housing (Figure 4). A significant increase in capturing the sophomore, junior, and senior populations is possible given the interest and demand for unit types in Student Housing West. Demand for graduate housing sees the greatest increase in potential capture rates.

Class Year	Enrollment	Occupancy	Current Capture Rate	Projected Capture Rate	Single Student Demand (Beds)	Family Student Housing Demand (Units)
Freshman	4,775	4,145	87%	87%	4,167	
Sophomore	3,533	2,364	67%	79%	2,792	
Junior	4,312	1,471	34%	42%	1,803	175
Senior / Other	5,308	926	17%	51%	2,715	
Graduate / Other	1,880	77	4%	62%	1,166	135
Total	17,928	8,906	50%	71%	12,643	310

Total Demand: 12,953

Figure 4: Projected Capture Rate of Students

The modifications to existing housing inventory and the addition of new beds in Student Housing West will not exceed the demand present from the UCSC student body (Figure 5). Based on the analysis of demand for single undergraduate students, B&D projects an unmet demand of 102 beds given fall 2018 enrollment and the maximum single undergraduate beds on campus projected for fall 2023. This unmet demand total includes the demand of 11,477 minus the existing single undergraduate housing supply at UCSC of 8,958, supply modifications dropping 315 beds (de-densification of 666 beds within residence halls, and 351 beds in additions and renovations), and the proposal Student Housing West undergraduate program of 2,732 beds. The University plans future de-densification of student housing by an additional 234 beds increasing unmet demand to 336. Unmet demand from graduate students remains high with 858 beds after the new housing is built as a part of SHW. The total demand of 310 units of family housing leaves 171 units of unmet demand for this student group.

Single Undergraduate Students		Demand (Beds)	Single Graduate Students		Demand (Beds)	Family Student Housing		Demand (Units)
Current Supply (Fall 2018)		8,958	Current Supply (Fall 2018)		82	Current Supply (Fall 2018)		196
Supply Modifications ¹		(315)	Supply Modifications ¹		0	Supply Modifications ¹		(196)
Revised Current Supply		8,643	Revised Current Supply		82	Revised Current Supply		0
Student Housing West		2,732	Student Housing West		226	Student Housing West		139
Current Supply + New Beds		11,375	Current Supply + New Beds		308	Current Supply + New Beds		139
Total Demand		11,477	Total Demand		1,166	Total Demand		310
Remaining Unmet Demand		102	Remaining Unmet Demand		858	Remaining Unmet Demand		171

Notes:

1. Planned renovation / expansion of existing housing and de-densification of residence halls through Fall '23.

Figure 5: Unmet Housing Demand

Analysis of demand by unit type preference reveals that there is sufficient demand for all unit types that are proposed in the Student Housing West Project. While still demonstrating ample demand, the 4-bedroom apartment unit represents 26% of the SHW inventory but only shows an 11% buffer between projected supply and demand compared to other units like the shared co-living unit types which have a 124% buffer.

DRAFT

EXHIBIT 3

Weighted Average Rental Costs and Percentage Increase/Decrease 2015 through 2019 University of California, Santa Cruz

Rental Type	2015	2016	Comparison to prior year	2017	Comparison to prior year	2018	Comparison to prior year	2019	Comparison to prior year
Room in Shared Housing	\$ 888	\$ 900	1.4%	\$ 942	4.7%	\$ 1,017	8.0%	\$ 1,060	4.2%
Studios/Efficiencies	\$ 1,124	\$ 1,173	4.4%	\$ 1,186	1.1%	\$ 1,428	20.4%	\$ 1,471	3.0%
1 BR House/Duplex	\$ 1,719	\$ 1,662	-3.3%	\$ 1,744	4.9%	\$ 1,995	14.4%	\$ 2,013	0.9%
1 BR Apt/Condo	\$ 1,520	\$ 1,581	4.0%	\$ 1,697	7.3%	\$ 2,079	22.5%	\$ 1,939	-6.7%
2 BR House/Duplex	\$ 2,592	\$ 2,620	1.1%	\$ 2,674	2.1%	\$ 2,977	11.3%	\$ 2,919	-1.9%
2 BR Apt/Condo	\$ 2,301	\$ 2,360	2.6%	\$ 2,444	3.6%	\$ 2,775	13.5%	\$ 2,688	-3.1%
3 BR House/Duplex	\$ 3,327	\$ 3,403	2.3%	\$ 3,488	2.5%	\$ 3,852	10.4%	\$ 3,792	-1.6%
3 BR Apt/Condo	\$ 3,107	\$ 3,132	0.8%	\$ 3,135	0.1%	\$ 3,276	4.5%	\$ 3,520	7.4%
4 BR House/Apt/Condo	\$ 4,112	\$ 4,149	0.9%	\$ 4,169	0.5%	\$ 4,688	12.4%	\$ 5,040	7.5%
5-8 BR House/Apt/Condo	\$ 5,520	\$ 5,708	3.4%	\$ 5,420	-5.0%	\$ 5,645	4.2%	\$ 6,415	13.6%



Note: Rental Cost statistics are calculated based on advertised listings through the UCSC Community Rentals Office. Figures include both furnished and unfurnished rentals. Advertised rates may include allowing 2 or 3 people per room, cost of utilities and/or other amenities. Locations vary, with the majority being in Santa Cruz. For statistical purposes, some zero rent or excessively priced listings omitted from calculations.



Erika Carpenter <escarpent@ucsc.edu>

Letter
08

[eircomment] Comments on DEIR for Proposed 2021 LRDP For UCSC

'Gary Patton' via eircomment@ucsc.edu <eircomment@ucsc.edu>
Reply-To: Gary Patton <gapatton@me.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 10:34 AM

Dear Erika Carpenter,

Here are comments submitted on behalf of the Coalition for Limiting University Expansion (CLUE). I would appreciate it if you would acknowledge receipt.

Thank you,

Gary A. Patton, Attorney at Law
P.O. Box 1038
Santa Cruz, CA 95061
Telephone: 831-332-8546
Email: gapatton@mac.com
Website / Blog: www.gapatton.net
Facebook: <https://www.facebook.com/gapatton>

[eircomment mailing list](mailto:eircomment@ucsc.edu)
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **CLUE Letter on DEIR.pdf**
149K

Gary A. Patton, Attorney At Law
Post Office Box 1038, Santa Cruz, California 95061
Telephone: 831-332-8546 / Email: gapatton@mac.com

March 8, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

Sent By Email: eircomment@ucsc.edu

RE: Comments on UCSC 2021 LRDP Draft EIR

Dear Erika Carpenter:

I am writing on behalf of the Coalition For Limiting University Expansion (CLUE), and to make comments on the Draft Environmental Impact Report (DEIR) which the University has prepared on its proposed 2021 Long Range Development Plan (LRDP) for its Santa Cruz campus. CLUE strongly believes that the University must make significant changes to the LRDP, and to the Draft EIR, and must then recirculate the DEIR for additional public review and comment.

We are aware of and endorse a number of very significant comments filed by others, including but not limited to comments filed by individual CLUE members, by the Advocate for the Santa Cruz City-County Task Force on UCSC Growth, and by the individual members of an advisory committee established by the Task Force. CLUE representatives sit on that advisory committee, and CLUE has been deeply engaged in reviewing the University's plans for expansion of the UCSC campus. We endorse the comments made by the Advocate, and others, and submit the following comments, in addition:

1. Because CLUE represents local residents directly impacted by the off-campus effects of what UCSC does on-campus, and because the proposed enrollment growth on campus will clearly have major impacts in and on the community, it is absolutely required that the University redesign its proposed project to incorporate effective mitigation measures into the project, minimizing, and eliminating where feasible, the expected off-campus impacts of the proposed on-campus project.
2. CLUE wishes to highlight the inadequacy of the DEIR with respect to the off-campus housing impacts of the proposed plan. The University plans to add something like 8,500 new students to the UCSC campus (and with 5,000 additional staff and faculty members to be added, as well). The

08-1

08-2

08-3

University’s plan and the DEIR states that it will be the University’s “objective” to house, on campus, 100% of the new student enrollment, and up to 25% of new faculty and staff. Unfortunately, no evidence has been supplied to indicate that this is anything more than what it says it is, an “objective.” Though not adequately addressed in the DEIR, the housing impacts in the community – which have physical consequences even beyond the economic impacts – would be extreme. Thus, in order for the DEIR to comply with CEQA, the University must design its project to ensure that the just-identified “objective” is attained in fact. Otherwise, this “objective” counts as nothing more than a pious wish. Transforming the stated objective into an enforceable condition governing the project (which is what CEQA requires) can be accomplished by making the proposed on-campus housing goals an actual condition precedent to any enrollment growth allowed. In other words, the LRDP and the Final EIR must make clear that any new enrollment growth that is proposed can take place only after the required amount of on-campus housing for students, faculty, and staff is actually constructed and is actually available for occupancy prior to or concurrently with any enrollment increase.

08-3
cont.

3. Fire Danger is an extreme threat in the so-called “North Campus” area – and wildfires in the adjacent Bonny Doon area, last year, were devastating. Yet, the LRDP proposes to locate housing for 3,700 students in this area of extreme wildfire danger. The impact analysis contained within the DEIR is inadequate, and the impacts are inaccurately characterized as “less than significant.” Any development proposed for the “North Campus” area must be mitigated by effective measures to eliminate wildfire dangers, and if this cannot be accomplished then the extensive development proposed in that area should be relocated.

08-4

4. The DEIR fails properly to recognize the role that the Santa Cruz County Local Agency Formation Commission (LAFCO) is required to play in any development beyond the City’s current water service area, which does not include the “North Campus” area. By state law, water service may not be extended beyond the current boundaries of the City’s water service area without LAFCO approval, and LAFCO is a responsible agency for the purposes of CEQA.

08-5

5. CLUE was a participant in a “Community Advisory Group” established by the University, as the University prepared to develop the 2021 LRDP. The DEIR should explicitly consider the proposed “Guiding Principles” adopted by the Community Advisory Group and analyze them as alternatives to the current LRDP proposal. (A copy is attached to this letter as Appendix A).

08-6

6. The DEIR dismisses a possible alternative, the “Main Residential Campus Infill” alternative, and cites, among other reasons for dismissing this alternative, that the Main Residential Campus Infill alternative would, “by developing existing meadows ... have significant impacts with regard to

08-7

research, aesthetics and recreation.” This statement is disingenuous (as is the similar dismissal of the “High Rise Development” alternative) in that the University has already approved a Student Housing West project that makes major incursions into the scenic East Meadow area and that proposes high-rise construction in connection with this student housing proposal. Both the “Main Residential Campus Infill” alternative, and the “High Rise Development” alternative should be considered as possible alternatives in a rewritten and recirculated DEIR.

O8-7
cont.

7. The DEIR also fails properly to consider alternatives that would direct some or all of the proposed new student growth at UCSC (8,500 students) to other locations and to other campuses controlled by the University of California. It is not correct to state that the “project” must be restricted solely to a consideration of how proposed new student growth might best be accommodated at the UCSC campus. Alternatives that would reduce future enrollment at UCSC while directing such student growth elsewhere within the University of California system must be considered as potentially feasible alternatives.

O8-8

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the proposed 2021 University of California Long Range Development Plan. CLUE looks forward to a revised DEIR, and will welcome the opportunity to comment on such a revised and recirculated DEIR.

Very truly yours,



Gary A. Patton, Attorney

APPENDIX A – Community Advisory Group Adopted Guiding Principles (Reflecting CAG Action On 4-22-19)

The following serve as Long Range Development Plan (LRDP) guiding principles that are shared by UC Santa Cruz campus leadership and the Community Advisory Group (CAG). These are not intended to be legally binding, and instead serve as principles to guide plan development as it relates to physical resources. They cover planning for the main campus and 2300 Delaware.

We believe that:

1. Providing on-campus housing is beneficial for student success and removes some of the pressure on the local rental housing market; therefore, the Long Range Development Plan (LRDP) will include a binding commitment to provide housing for 100% of net new on-campus student enrollment (i.e., the three quarter average enrollment).
2. Some new employees will prefer on-campus housing and others will want to enjoy living within the communities of Santa Cruz County; therefore, the Long Range Development Plan (LRDP) will include a binding commitment to provide housing for 100% of net new on-campus employee demand.
3. Providing infrastructure in advance of additional growth is necessary for the campus to function in an acceptable manner; however, recognizing the constraints of requirements by the Legislature, Regents, and UCOP, we know that this is not entirely within our control. We will commit consistently to advocate with Legislators, the Regents, and the Office of the President to secure resources needed to provide the infrastructure required to support any new growth, ideally prior to that growth occurring, and the local campus will not support additional enrollment growth when the needed infrastructure is not provided.
4. Having the campus Capital Financial Plan utilize the LRDP as the guiding document to identify facilities needed (in a ten year planning horizon) will give clarity and transparency to the needed facilities and their timing, and we commit to including provisions in the LRDP identifying the timing of needed infrastructure related to enrollment growth levels as well as cost estimates for this infrastructure for at least the first ten years of the Plan.
5. The campus's leadership in reducing water consumption is a strength to be developed further; therefore, we commit to continuing to reduce campus water use per capita.
6. The campus's leadership in reducing traffic impacts is a strength to be developed further; therefore, we commit to a set of continuing, comprehensive, and aggressive efforts to promote and pursue alternative

forms of transportation, in order to reduce adjusted trip levels by 10% or more.

7. 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.

The statement above was adopted by a unanimous vote of the community representatives present at a meeting of the University's Community Advisory Group (CAG) held on April 22, 2019. *

This statement should be understood as an expression of principles that these representatives believe should guide the development of the LRDP, with the understanding that this expression of the community's views represents a step in what will be an ongoing and iterative process, as conversations continue between the community and the University during the preparation (and ultimate adoption) of a new Long Range Development Plan for the University of California, Santa Cruz.

*Ryan Coonerty, Cynthia Mathews, Chris Krohn, Lee Butler, Ceil Cirillo, Don Lane, Ted Benhari, John Aird, Bill Tysseling, Robert Orrizzi, Gary Patton. Andrew Schiffrin, an Administrative Assistant to County Supervisor Ryan Coonerty, was also present and participated in the discussion.



Erika Carpenter <escarpent@ucsc.edu>

Letter
09

[eircomment] LRDP EIR COMMENT

Nadia Peralta <nadia.peralta@santacruzwaldorf.org>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 3:02 PM

To whom it may concern:

I sent this comment from both my personal and school/work email.

Best,
Nadia

Santa Cruz Waldorf School
2190 Empire Grade
Santa Cruz, CA 95060

March 8, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

To Whom It May Concern:

My name is Nadia Peralta and I am commenting on behalf of the Santa Cruz Waldorf School located at [2190 Empire Grade](#).

I bring this comment in today on behalf of the independent Waldorf School located Northwest of the proposed Northwest Housing and College Expansion Area. SCWS has been a long-time neighbor to UCSC opening its own doors over 20 years ago. The campus trails in Upper Campus connect directly to our school lands serving as a gateway of wonder and joy for students who attend our school to explore the forest.

09-1

The proposed Northwest housing and College Expansion Area and the new roads through the Cave Gulch Community put our community at significant higher risk of danger and disaster for both traffic on Empire Grade on normal days and possible disaster in the event of ever-increasing wild fires we are now yearly experiencing in California. Already if there was a rapidly-spreading fire, the Bonny Doon and Cave Gulch community would be using Empire Grade as an escape route, this is also our proposed escape route to get our 166 student population of K-8th grade-aged students to safety. Adding more cars and people to the evacuation route could potentially result in a disastrous outcome we have already witnessed like during the Camp Fire of 2018 that destroyed the town of Paradise and killed 86 people many of whom were escaping in their cars. There is no mention of SCWS as your neighbor and what impact this new East-West Rd. may have during an active wildfire. We deem this as unacceptable and not well explored.

09-2

Further, adding student housing and colleges in this proposed area of relatively flat mixed chaparral and old-growth Douglas Fir forests poses a significant threat to what we understand to be culturally valuable sites for the Amah Mutsun Tribal Band whom we are unequivocally in support of through our anti-racist alliance-building we are forming at our school. We are aware that the legacies of white supremacy in the United States have had significant impact on CA Native Tribes. The

09-3

disenfranchisement of CA Native Tribes from their ancestral lands pose a significant threat to all people if tribal people are not able to tend to their cultural and sacred sites. The land upon which UCSC was built is one of those lands for the Amah Mutsun. We understand that the Amah Mutsun Tribal Band are now culturally responsible for the protection of ecological lands that we are living on, and we are aware through our study of this DEIR that the University of California Santa Cruz will make significant impact on tribal cultural resources if this development plan is embraced by the UC Regents. We stand with the tribe in a stance of solidarity, love, and compassion as an example to our students of what an anti-racist and collaborative world can look like. We recommend that no development be approved in the land that exists between SCWS and UCSC.

O9-3
cont.

Thank you for your time,

Nadia Peralta
For SCWS
nadialuciaperalta@gmail.com

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



EIR COMMENT SCWS_final.docx

Santa Cruz Waldorf School
2190 Empire Grade
Santa Cruz, CA 95060

March 8, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

To Whom It May Concern:

My name is Nadia Peralta and I am commenting on behalf of the Santa Cruz Waldorf School located at 2190 Empire Grade.

I bring this comment in today on behalf of the independent Waldorf School located Northwest of the proposed Northwest Housing and College Expansion Area. SCWS has been a long-time neighbor to UCSC opening its own doors over 20 years ago. The campus trails in Upper Campus connect directly to our school lands serving as a gateway of wonder and joy for students who attend our school to explore the forest.

O9-4

The proposed Northwest housing and College Expansion Area and the new roads through the Cave Gulch Community put our community at significant higher risk of danger and disaster for both traffic on Empire Grade on normal days and possible disaster in the event of ever-increasing wild fires we are now yearly experiencing in California. Already if there was a rapidly-spreading fire, the Bonny Doon and Cave Gulch community would be using Empire Grade as an escape route, this is also our proposed escape route to get our 166 student population of K-8th grade-aged students to safety. Adding more cars and people to the evacuation route could potentially result in a disasterous outcome we have already witnessed like during the Camp Fire of 2018 that destroyed the town of Paradise and killed 86 people many of whom were escaping in their cars. There is no mention of SCWS as your neighbor and what impact this new East-West Rd. may have during an active wildfire. We deem this as unacceptable and not well explored.

O9-5

Further, adding student housing and colleges in this proposed area of relatively flat mixed chaparral and old-growth Douglas Fir forests poses a significant threat to what we understand to be culturally valuable sites for the Amah Mutsun Tribal Band whom we are unequivocally in support of through our anti-racist alliance-building we are forming at our school. We are aware that the legacies of white supremacy in the United States have had significant impact on CA Native Tribes. The disenfranchisement of CA Native Tribes from their ancestral lands pose a significant threat to all people if tribal people are not able to tend to their cultural and sacred sites. The land upon which UCSC was built is one of those lands for the Amah Mutsun. We understand that the Amah Mutsun Tribal Band are now culturally responsible for the protection of ecological lands that we are living on, and we are aware through our study of this DEIR that the University of California Santa Cruz will make significant impact on tribal cultural resources if this development plan is embraced by the UC Regents. We stand with the tribe in a stance of solidarity, love, and compassion as an example to our students of what an anti-racist and collaborative world can look like. We recommend that no development be approved in the land that exists between SCWS and UCSC.

09-6

Thank you for your time,

Nadia Peralta

For SCWS

nadialuciaperalta@gmail.com



Amah Mutsun Tribal Band of Costanoan/Ohlone Indians
Historically known as "San Juan Bautista Band and San Juan Band" Indians of California
PO Box 5272 | Galt, CA 95622

REDACTED COPY OF COMMENT LETTER FOR PUBLICATION

March 8, 2021

Erika Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064

Greetings,

Please find the following comments and requests submitted by the Amah Mutsun Tribal Band (AMTB) regarding the Draft Environmental Impact Report for the 2021 UCSC Long Range Development Plan. These comments are also intended as an addendum within our Tribe’s ongoing AB52 consultation process concerning the 2021 Long Range Development Plan.

O10-1

Thank you for your consideration,

Valentin Lopez
Chairman, Amah Mutsun Tribal Band

Introduction and General Comments

The Amah Mutsun Tribal Band is comprised of descendants of the Indigenous peoples taken to Mission Santa Cruz and Mission San Juan Bautista during the Spanish colonization of the Central Coast region. Today, the Amah Mutsun Tribal Band is

O10-2

carrying the cultural responsibilities of stewarding and protecting Mutsun and Awaswas ancestral lands including those of the Awaswas-speaking Uypi tribe on which UC Santa Cruz is situated. Our tribe's Creation Story tells us that it is our sacred obligation to take care of Mother Earth and all living things. We honor our ancestors by working to protect and restore these sacred lands and by restoring and renewing the knowledge and cultural practices of our ancestors.

The UC Santa Cruz campus is located on the southern end of Ben Lomond Mountain, where ancient marine terraces form a promontory overlooking the Monterey Bay. The campus area is defined by its scenic geography, freshwater springs and streams, unique geological features including karst caves, and strikingly rich diversity of native habitats and species. The land now known as UC Santa Cruz campus was a significant location for the precontact Indigenous peoples of the area including the Awaswas-speaking people of the Uypi Tribe. This is demonstrated by the presence of significant prehistoric habitation and cultural sites on campus and in adjacent areas such as the Westlake neighborhood of Santa Cruz.

O10-2
cont.

While acknowledging and appreciating the positive steps that representatives of UC Santa Cruz have taken in recent years to respectfully engage in consultation and collaboration with the Amah Mutsun Tribal Band, we also recognize that for most of the history of UC Santa Cruz since construction of campus facilities begin in the 1960's, no meaningful consultation or engagement took place. As a result, there is a long legacy of construction-related impacts to campus lands, in which impacts to the cultural heritage of Indigenous peoples were not formally acknowledged or mitigated. The cumulative impacts of that legacy must be taken into account, when additional impacts to the native soils and cultural and biological resources of campus lands are being contemplated.

O10-3

A general direction towards respecting Indigenous sovereignty is provided by the framework of *co-management*, in which agencies such as the University of California partner with tribes through mechanisms such as memorandums of understanding (MOU's) and cultural conservation easements, to facilitate stewardship, protection and tribal access to lands and cultural resources.

In considering matters of co-management with tribal partners, guidance is offered by the California Office of the Governor's September 25, 2020 *Statement of Administration Policy Native American Ancestral Lands*. This policy statement is

accessible online at [<https://www.gov.ca.gov/wp-content/uploads/2020/09/9.25.20-Native-Ancestral-Lands-Policy.pdf>]. This policy statement directs state entities to “partner with California tribes to facilitate tribal access, use, and co-management of State-owned or controlled natural lands and to work cooperatively with California tribes that are interested in acquiring natural lands in excess of State needs.” The stated goals of this policy include “facilitating the access of California Native Americans to sacred sites and cultural resources, improving the ability of California Native Americans to engage in traditional and sustenance gathering, hunting and fishing, and partnering with California tribes on land management and stewardship utilizing Traditional Ecological Knowledges.”

O10-3
cont.

In regard to cultural resource preservation at UC Santa Cruz, we note the significant amount of resources that have been dedicated over time to the stewardship, preservation and interpretation of historic era cultural resources associated with the Cowell Ranch and other settler activities. The Cowell Historic District of UC Santa Cruz enjoys notoriety and is regarded as a defining aspect of the unique character of the campus. By contrast, the rich cultural heritage of Indigenous peoples on campus lands, including precontact village and cultural sites and the legacy of Indigenous environmental stewardship that shaped the natural landscapes of campus, have received little recognition or visibility.

O10-4

The campus community remains largely unaware of the rich prehistory of Indigenous stewardship and presence on campus lands, and our tribe would like to see that remedied. Co-management, MOU’s and cultural conservation easements provide avenues by which the Amah Mutsun Tribal Band can bring Indigenous stewardship, culture and history to light in a culturally appropriate manner. We look forward to further discussing and developing meaningful partnerships and co-management agreements with UC Santa Cruz.

Tribal Cultural Resources on UC Santa Cruz Campus

The UC Santa Cruz main residential campus is the location of Tribal Cultural Resources (TCR’s) of significance to the Amah Mutsun Tribal Band, including ancestral village sites, burial sites, tool and bead manufacture locations, shellmounds, ceremonial sites

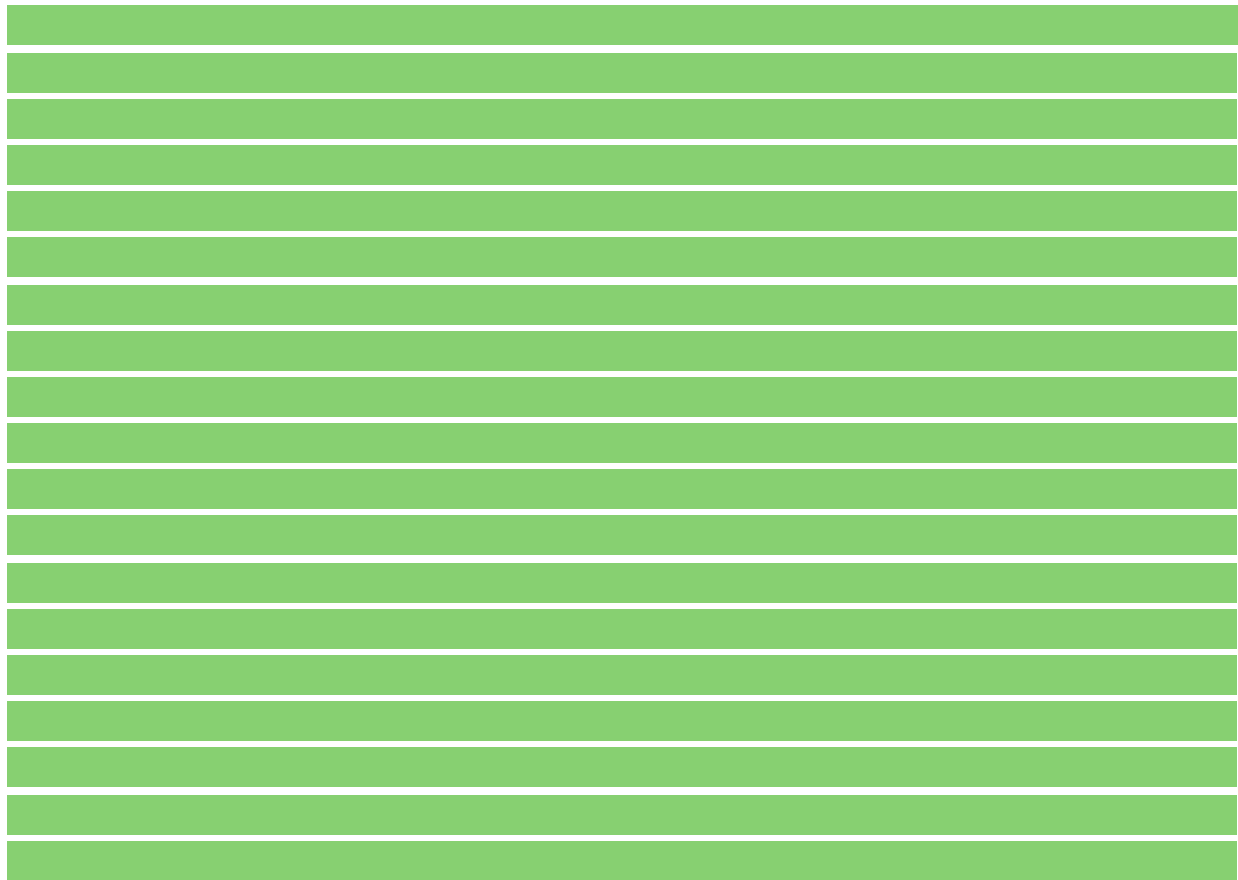
O10-5

and sacred landscapes/viewsheds, as well as biological and abiotic natural resources that have traditionally be utilized for cultural purposes. While many significant cultural resources have been identified on campus lands, we emphasize that the majority of campus lands have never been surveyed by archaeologists or tribal members. An Integrative Cultural Resources Survey program (discussed below), would allow the tribe, in partnership with professional archaeologists and UCSC research partners, to systematically identify and assess the significance of tribal cultural resources on campus lands.

O10-5
cont.

Specific Tribal Cultural Resources identified by the Amah Mutsun Tribal Band on the UC Santa Cruz main campus include prehistoric Native American archaeological sites identified in the DEIR. The Amah Mutsun Tribal Band considers all precontact Native American sites on campus where artifacts and specific evidence of the presence and activities of ancestors have been encountered to be Tribal Cultural Resources of interest and concern to our Tribe.

Discussion of specific Tribal Cultural Resources



O10-6



O10-6
cont.

Disturbance of native soils

The Amah Mutsun Tribal Band is concerned with the scale of proposed ground disturbance in native soils that is outlined in the 2021 Long Range Development Plan, and the potential of this activity to disturb previously undiscovered precontact archeological resources. Significant ground disturbance would result not only from building and facility construction activities, but also from the construction of two major new east-west roads on campus lands, as well as the subsurface installation of new electrical, water, and sewer lines and other infrastructure.

O10-7

The scale of ground disturbance that would be required to install such infrastructure, which would require trenching or boring in sensitive, undisturbed locations such as the North Campus, represents a significant potential impact that we believe merits further

quantification and analysis in the DEIR. Development on campus lands should be designed so as to minimize the disturbance of native soils. The Amah Mutsun Tribal Band requests consultation, beginning in the early planning stages, regarding all projects that will result in significant disturbance of native soils on campus including new roads, electrical, water, and sewer line infrastructure.

O10-7
cont.

Specific infrastructure impacts to Tribal Cultural Resources



O10-8

Westside Research Park Site



O10-9

Please note that all statements and requests made in this comment letter regarding tribal consultation, surveying, monitoring, and treatment of Tribal Cultural Resources on the UCSC main campus also apply to the Westside Research Park Site. Prior to any significant disturbance of native soils at the Westside Research Park Site, AMTB requests tribal consultation.

O10-10

Request for establishment of an Integrative Cultural Resource Survey program

Identification and testing of known prehistoric archaeological sites on the main UCSC residential campus occurred primarily in the 1960's, 70's and 80's. As a result, these assessments are largely outdated in light of advances in modern archaeological science and because they failed to include tribal perspectives.

O10-11

In order to truly understand the boundaries and significance of these sites and to protect them, they must be systematically surveyed and defined by tribal members, professional archaeologists and other research partners. To this end, the Amah Mutsun Tribal Band and Amah Mutsun Land Trust (AMLT) advocates a proactive and integrative approach to the identification and protection of tribal cultural resources such as archaeological sites, sacred sites, ethnobotanical resources, and other culturally significant features through a well-developed systematic Integrative Cultural Resource Survey (ICRS) program. Such a program would be conducted by tribal members and professional archaeologists selected by the Amah Mutsun Tribal Band and its subsidiary organization, the Amah Mutsun Land Trust, in coordination with UC Santa Cruz and in association with UCSC research partners (e.g., archaeology faculty members) with relevant expertise.

O10-11
cont.

The Amah Mutsun Tribal Band and Amah Mutsun Land Trust requests consultation and collaboration with the University to support and fund an ICRS program to define and protect culturally significant sites and resources.

The Amah Mutsun Tribal Band also requests notification in advance of any activities that will significantly disturb native soils on the UC Santa Cruz campus, so that appropriate cultural resource surveying and monitoring by representatives of the Amah Mutsun Tribal Band may be arranged. Monitoring and surveying activities will be coordinated by the Amah Mutsun Land Trust, a subsidiary organization of the Amah Mutsun Tribal Band which manages the Tribe's archaeological monitoring work.

Request for the creation of cultural conservation easements to formalize co-management of significant Tribal Cultural Resources.

Based on the results of a tribal-led Integrative Cultural Resource Survey (ICRS) program, the Amah Mutsun Tribal Band requests that culturally significant sites and landscapes on campus be **protected in perpetuity** by means of cultural conservation easements, or other legally equivalent mechanisms, with provisions that formally allow for tribal access and stewardship of culturally significant landscapes and sites. Stewardship activities may include ceremony, management and harvest of ethno-botanically significant species, and restoration activities including the removal of invasive species and enhancement of specific patches of native plants.

O10-12

DEIR Section 3.4—Archaeological, Historical, and Tribal Cultural Resources

Impact 3.4-2: Substantial Adverse Change in the Significance of a Tribal Cultural Resource states that *“Although no specific tribal cultural resources have been identified, there are eight prehistoric archaeological sites that currently exist on the main residential campus...”* and that *“no tribal cultural resources, as defined in PRC Section 21074, have been documented on the main residential campus.”*

In fact, the Amah Mutsun Tribal Band identifies many significant Tribal Cultural Resources on the UC Santa Cruz main campus, including sites defined as prehistoric archaeological sites in the DEIR. Please correct statements throughout the DEIR that incorrectly indicate the absence of known Tribal Cultural Resources on campus lands, including on page 4-23 (Cumulative Impacts).

O10-13

CRHR Eligibility: On pages 3.4-12 and 3.4-18 of the DEIR, it is stated that three precontact cultural sites at UCSC campus “may be eligible for listing in the CRHR,” none having been formally evaluated for listing. We recommend instead stating that these sites are “presumed eligible for listing in the CRHR,” which is the language that was utilized in the 2005 LRDP EIR.

As part of an Integrated Cultural Resource Survey program, the Amah Mutsun Tribal Band would like to engage in comprehensive studies of prehistoric archaeological sites and tribal cultural resources on campus lands, which would allow for eligibility for CRHR nomination to be evaluated. Following evaluation, the Amah Mutsun Tribal Band may choose to formally nominate eligible TCR’s on campus lands to the California Register of Historic Resources and/or the National Register of Historic Places, as appropriate.

O10-14

Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources

Section 3.4-1.1 of the DEIR states,

“For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive

O10-15

surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior’s Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities.”

Consistent with AMTB’s request for the adoption of an Integrative Cultural Resource Survey (ICRS) program, as delineated earlier in this comment letter, AMTB recommends the addition of the following provisions to Mitigation Measure 3.4-1.

If the subject location on UC Santa Cruz campus where ground disturbance activities are planned has not previously been surveyed by a professional archaeologist and tribal member of the Amah Mutsun Tribal Band as part of an Integrative Cultural Resource Survey (ICRS) program, AMTB requests to be provided the opportunity to conduct a survey of the subject area prior to the initiation of ground disturbance activities. A complete intensive surface survey should be conducted by a qualified archeologist in addition to a tribal representative, in consultation with the Amah Mutsun Tribal Band.

O10-15
cont.

Inclusion of a tribal representative in the surveying of areas of planned ground disturbance is essential for reducing the risks posed by construction-related activities to Tribal Cultural Resources, including significant ethno-botanical resources and landscape features of cultural significance that non-tribal members may not properly identify.

DEIR Section 3.5—Biological Resources

For the Amah Mutsun Tribal Band and many other Native American tribes, biological and abiotic natural resources that were used traditionally for cultural purposes are essential for contemporary cultural practitioners and for tribal cultural revitalization efforts. These resources frequently occur in association with prehistoric archeological sites and other tribal cultural resources, as a key component of tribal cultural landscapes. Documenting and stewarding such natural resources in the traditional territory of the Amah Mutsun Tribal Band is an integral part of the mission of the tribe and Amah Mutsun Land Trust.

O10-16

The Amah Mutsun Tribal Band, through the Amah Mutsun Land Trust and its stewardship and cultural monitoring programs, has gained extensive field experience in surveying, mapping, and managing biological and cultural resources at sites across Santa Cruz, San Benito, Monterey, and Santa Clara counties. Through AMTB’s relationship with UC Santa Cruz and the Amah Mutsun Relearning Program—an ongoing partnership with the UCSC Arboretum—tribal members have developed relationships with the lands of UCSC campus, including the rich native habitats of the UCSC campus at large. Amah Mutsun tribal members frequent the Arboretum to manage and harvest ethno-botanical resources from the California Conservation Gardens and related gardens and habitat areas.

O10-16
cont.

The coastal prairie ecosystem is of particular cultural significance to the Amah Mutsun Tribal Band. Combining traditional ecological knowledge with ongoing collaborative scientific research, the Amah Mutsun Land Trust engages in coastal prairie restoration on a landscape scale, most notably at the State Parks Quiroste Valley Cultural Preserve in San Mateo County. Coastal prairie ecosystems are rich in many of the native plant species that tribal cultural practitioners utilize for food, medicine, basketry, etc.

Vegetation communities on campus lands

Section 3.5.2 of the DEIR provides a table of the approximate distribution by acreage of vegetation communities on the UC Santa Cruz campus. We found this data to be highly coarse and speculative, and also inconsistent with habitat typing data provided in the UCSC’s previous (2005) LRDP EIR. For example, the treatment of “redwood forest” as a monolithic forest type spanning 860.4 acres of campus lands is notably out of touch with the diverse range of habitat associations that are present in the North Campus and other forested areas of campus.

O10-17

The vegetation communities table in Section 3.5.2 states that UCSC campus lands contain 399 acres of grassland and only 107.9 acres of coastal prairie. Coastal prairie is considered a sensitive natural community, while grassland is regarded as less sensitive. The DEIR defines coastal prairie habitat as

“similar to other grassland habitat within the LRDP area, but with greater incidence of native grass species, including California oat grass and western panic grass (Panicum acuminatum). Coastal prairie habitat also supports a

diverse assemblage of native forbs, including coyote thistle (Eryngium armatum), wild hyacinth (Triteleia hyacinthina), dwarf brodiaea (Brodiaea terrestris), and yampah (Perideridia kelloggii).”

We note that the distinction made in the DEIR between coastal prairie and grassland ecosystems is a very arbitrary and subjective one. Over time, as a result of poor management of coastal prairie ecosystems and cumulative habitat degradation, loss of species diversity occurs, and native forbs become more sparse. Rather than downgrading historic/former coastal prairie ecosystems as grasslands, we recommend viewing these as **degraded coastal prairie with significant restoration potential**.

O10-17
cont.

As highlighted in the DEIR, the Marshall Field complex and the “Mima Meadow” in the far SW corner of the main UCSC campus both contain a rich assemblage of coastal prairie species including special-status plant species and the federally endangered Ohlone Tiger Beetle. These are immensely valuable sites for coastal prairie research which, in addition to their biological richness, are regarded by the Amah Mutsun as important cultural heritage areas. We believe the Marshall Field complex and Mima Meadow are worthy of the highest level of protection in perpetuity. The Amah Mutsun Tribal Band is interested in exploring avenues towards co-management and preservation in perpetuity of these important cultural and ecological landscapes.

Impacts to the North Campus seep zone

A defining feature of the North Campus is the “seep zone,” a sensitive habitat type. These pocket wetlands formed by perennial seeps support distinct assemblages of native plant species, including giant chain ferns, azaleas, rushes and large concentrations of sedges. The unique concentration of ethno-botanically significant plant species found in the seep zone area is valued by Amah Mutsun cultural practitioners for specific cultural uses, including sedges (*Carex* sp.) and rushes (*Juncus* sp.). Each of the three projected development areas in the North Campus as outlined in the 2021 LRDP overlaps with the North Campus seep zone, however, potential impacts to the seep zone are not properly analyzed in the DEIR.

O10-18

Impact 3.5-4: Please map and quantify the extent of seep zone wetlands relative to proposed development areas in North Campus. The DEIR should also provide a specific figure of how many acres of the seep zone could be impacted by proposed

O10-19

development in the North Campus, and discuss how development within the seep zone area could alter drainage patterns, leading to additional impacts.

O10-19
cont.

Figure 3.5-3, Aquatic Habitat Mapped by the County of Santa Cruz and USFWS in the LRDP Area fails to identify any portions of the North Campus seep zone. Impact 3.5-4 incorrectly states that seeps on campus have not been previously mapped. Please contact the UCSC Campus Natural Reserve and the Kenneth S. Norris Center for Natural History to request maps and documentation regarding the seep zone and other wetland areas on campus. Note that a poorly scanned map of the seep zone areas was submitted as a public comment to the 2005 LRDP EIR.

O10-20

O10-21

Northwest Housing and College Expansion area

The Amah Mutsun Tribal Band is concerned with potential impacts to biological and ethno-botanical resources in the area identified in the 2021 LRDP as the Northwest Housing and College Expansion area, located roughly north of Kresge College and W/SW of the North Remote Parking Lot. This area, and in particular the relatively flat section roughly in the center of it and west of the UCSC camper park, is of a unique character, defined by the presence of a grove of old growth douglas fir trees with a relatively open understory, bordered on the southeast by a distinctive stand of dwarf redwood trees.

As noted in a UCSC-commissioned June 25, 1996 Biotic Study of this site by the distinguished late Santa Cruz County naturalist Randall Morgan, “the large Douglas-firs noted above are mostly concentrated within a one-acre area in the center of the site. Such a stand of large, old growth firs is unusual if not unique on the campus. The stand is certainly worthy of protection; it provides valuable bird habitat in addition to its obvious aesthetic value.”

O10-22

Douglas fir, known as *rappak* in the Mutsun language, is a culturally significant tree to the Amah Mutsun Tribal Band, and old growth stands of such grandeur are uncommon, and rarely so easily accessible—which is a relevant matter for our tribal elders. A number of understory plant species within the Northwest Housing and College Expansion Area are of ethno-botanical value, including *sirak* (California hazel), western anemone (*Anemone oregano*), and *mamawkwa* (California rose).

Morgan also notes that “another specialized native plant assemblage is located in a roughly triangular area at the southern end of the study area...the area is characterized by an overstory of madrones and an unusually rich herbaceous understory containing woodland aster, western anemone, pussy ears, milkmaids, California hazel, trail plant, and western fescue. The assemblage is small, but botanically significant in the context of the campus. Three of the species (trail plant, hazel, and oniongrass) are considered ‘significant’ in the 1987 Buck report. One additional species, western anemone, is relatively rare in Santa Cruz County.”

O10-22
cont.

Although not observed by Randall Morgan in his 1996 observations, we note from field experience the presence of multiple patches of western rattlesnake plantain (*Goodyera oblongifolia*) within the proposed Northwest Housing and College Expansion Area. This occurrence of western rattlesnake plantain (denoted as a locally rare species on the [UCSC Plant List](#)) may represent the very southern end of this species’ distribution in the California Coast Ranges.

LRDP impacts to special-status species and locally significant populations

Amah Mutsun tribal members consider ourselves to be culturally obligated to be vocal advocates for our plant and animal relatives. We are concerned about the potential impacts of development projects outlined in the 2021 LRDP to native habitats and species of UCSC campus lands. Many of the species of special status identified as potentially being adversely affected by proposed campus development projects are of cultural significance to the Amah Mutsun, including *weecici* (burrowing owl), *siirih* (golden eagle), *wakracmin* (red-legged frog), *tikwiS* (American badger), *Simtikla* (bats), *hireh* (woodrat) and *peyay* (loggerhead shrike).

O10-23

The mosaic of native habitats and soil types encompassed by the UCSC main campus supports an extraordinary level of biodiversity, with over [500 recorded species](#) of plants, about 500 recorded species of mushrooms (Haff, et al. 2008), and [50 species](#) of mammals known to occur on campus. Over 70 invertebrate species have been identified within the karst cavern system found in UCSC’s Cave Gulch (Ubick 2001), including narrow endemic species such as the Empire Cave Pseudoscorpion (*Fissilicreagris imperialis*) that have been found nowhere else on earth.

Multiple species new to science have been discovered on UCSC campus lands, including the federally-endangered Ohlone Tiger Beetle (named by naturalist Randall

Morgan for the proximity of the species type locality to a shellmound cultural site), the Dolloff cave spider (discovered in UCSC’s Cave Gulch, considered one of the rarest spiders of North America), and a unique purple agaric mushroom species, *Pseudobaeospora deckeri*, discovered north of the Engineering 2 building on the North Campus in 2012. It must be noted that the 2021 LRDP **slates the portion of North Campus north of the Engineering 2 building for development.**

O10-23
cont.

Many plant species that are locally rare in Santa Cruz County are found within UCSC’s unique assemblage of habitats. Some of these species, which are characteristic of the northern coastal ranges of California, appear to reach their southern distribution limit in UCSC’s North Campus (eg. *Calypso bulbosa*, *Vaccinium parvifolium*). The deceiving sedge (*Carex saliniformis*, 1B.2) was believed to be extirpated from Santa Cruz County, but was re-discovered in 2000 in the North Campus of UCSC.

Although CEQA does not require analysis of impacts to populations of plants or other species that are not listed as threatened, endangered or special-status, it must be understood that further development on campus lands is likely to significantly impact distinct populations of rare plants which are regionally significant from a biological standpoint, and in some cases are also culturally significant to the Amah Mutsun Tribal Band. These impacts should be assessed through project-level surveys by botanists and UCSC researchers familiar with campus lands, and through University support and funding for a campus-wide survey program and natural biodiversity database for recording observations of plant species on campus lands, with an emphasis on species identified as uncommon on campus and uncommon within Santa Cruz County.

O10-24

We note that mitigation measures for special-status species are frequently ineffective or misleading. Habitat “creation” for listed species, such as was attempted at UCSC’s Inclusion Area A (IAA) preserve, is often unsuccessful, as the DEIR acknowledges in the case of the IAA. Removal and relocation of species and nests or roosts is also commonly unsuccessful and detrimental. The designation of “compensatory habitat” to offset the impacts of destroying known, occupied habitat is often only effective on paper, ultimately resulting in net habitat loss, and local species absence.

O10-25

The failure of surveys to detect species at a project site does not necessarily indicate the absence of that species. Some species, such as the burrowing owl, may be present some years at a given site and absent on some years—but once a habitat is destroyed, the species can never return.

O10-26

As part of the DEIR’s discussion of cumulative impacts and biological resources, we recommend that the DEIR provide an accounting of species, such as the coast horned lizard, that were formerly recorded on the UCSC campus and are now considered to be extirpated on campus. The disappearance of species from campus lands serves as a sobering indicator of the health of campus ecosystems that reflects factors including the cumulative impacts associated with the scale of existing campus development as well as the adequacy of current land management practices.

Native plant species reported as extirpated from campus lands [by the UCSC Campus Natural Reserve](#) (derived from Haff, et al. 2008) include *Allium unifolium* (one-leaved onion—locally rare), *Sisyrinchium californicum* (yellow-eyed grass—locally rare), *Muilla maritima* (sea mullia—a coastal prairie species), *Schoenoplectus acutus* (hardstem bulrush), *Pyrola picta* (white-veined wintergreen—locally rare), *Vaccinium parvifolium* (red huckleberry—the only recorded SC County occurrence outside of Big Basin), *Lupinus polyphyllus* (bigleaf lupine), *Quercus chrysolepis* (canyon oak), *Castilleja ambigua ssp. ambigua* (johnny nip—locally rare), and *Plantago subnuda* (Mexican plantain—locally rare). Per local botanist and restoration ecologist Dr. Grey Hayes (2011), additional native plant species now extirpated from campus lands include *Isoetes nuttallii* (Nuttall’s quillwort—locally rare), *Limnanthes douglasii* (meadowfoam—locally rare), *Heterocodon rariflorum* (rareflower heterocodon), and *Spiranthes romanzoffiana* (hooded lady’s tresses).

O10-27

The scenic UCSC campus is often described as a “living laboratory,” owing to its exceptional levels of biodiversity. It must be understood that the native ecosystems of campus are delicate and finite, and have already experienced significant degradation as a result of the cumulative impacts of the existing level of UCSC campus development. The best policy to reduce impacts on native species, including special status species, is to avoid the destruction and further fragmentation of intact native habitats whenever possible. For this reason we recommend LRDP alternatives that result in a reduced development footprint on the main UCSC residential campus.

O10-28

Please refer to the passage in “Tribal Cultural Resources” section of this comment letter for a discussion of the cultural significance of springs to the Amah Mutsun Tribal Band and specific requests regarding tribal consultation and the preservation of these resources.

O10-29
cont.

The Amah Mutsun Tribal Band is concerned about the potential impacts of well development and groundwater pumping as well as the development of additional impervious surfaces (roads, buildings, parking lots, etc) on subsurface aquifers that are the source of freshwater springs. We are additionally concerned about the potential for an increase in urban pollutants entering these aquifers as a result of increased parking lot and roadway runoff during rain events.

O10-30

O10-31

DEIR Section 3.15—Recreation; Section 3.16—Transportation

DEIR Figure 3.15-1, “Trail Network On the Main Residential Campus” depicts the fire roads and a very small number of official trails maintained by the University, which is not reflective of the large number of unofficial trails that criss-cross campus lands.

O10-32

In DEIR Figure Figure 3.16-1, “Existing Circulation Roadway Network,” a maze-like network of unsanctioned single-track mountain bike trails and footpaths in the North Campus appear to be incorrectly depicted as “local streets.”

O10-33

The ever-increasing number of unsanctioned recreational trails in the forest and coastal prairie of the North/Upper Campus has caused significant degradation to habitats and has also impacted Tribal Cultural Resources including prehistoric archaeological sites. Recreational mountain biking on unsanctioned, single track trails—many constructed and maintained by mountain bikers themselves—has been allowed to continue expanding unchecked for decades, with many damaging effects. Although campus regulations prohibit mountain bike use in the North Campus outside of fire roads, mountain bikers widely disregard these regulations because they are not enforced by the University in any apparent manner.

O10-34

The DEIR should evaluate the impacts that a significant increase in the campus population would likely have on unsanctioned trail use and the continued degradation of campus habitats due to over-visitation and high-impact recreation. In order to

mitigate this significant existing problem and its probable intensification with an increase in campus population, we recommend that the University allocate resources to provide for proper stewardship of the habitats and natural areas of the campus, especially those areas that are not designated as Campus Natural Reserve lands.

O10-34
cont.

DEIR Section 4—Cumulative Impacts

Table 4-1 Geographic Scope of Cumulative Impacts

While other resource issues evaluated for cumulatively considerable impacts in Table 4-1 such as Biological Resources, Hydrology and Air Quality are evaluated within a *regional* geographic area, “Archaeological, Historical, and Tribal Cultural Resources” are instead noted as being evaluated within the *local (LDRP) area*.

The Amah Mutsun Tribal Band objects to this view of the Tribal Cultural Resources of campus lands in isolation from surrounding regional impacts of Tribal Cultural Resources such as sacred sites, burial sites, and village sites. The cultural impact of adverse changes to tribal cultural resources and landscapes at UC Santa Cruz campus is not experienced by the Amah Mutsun Tribal Band and our members as separate or isolated from the severe impacts our tribe has experienced as a result of the desecration of the majority of our cultural and sacred sites in the region. Please also note that the destruction of sacred sites and TCR’s represents a distinct form of cumulative impact from the scientific impact of the loss of archaeological deposits and sources of data. The destruction and diminishment of TCR’s may be understood as a form of cultural violence connected to the devaluation of Indigenous history and places in western science.

O10-35

We believe the cumulative impacts of the destruction and fragmentation of cultural heritage sites by means of residential construction, road construction, historic quarry development, and other forms of development must be taken into account when evaluating the local impacts of potentially disrupting or desecrating our Tribal Cultural Resources at UCSC campus.

In addition, we believe that the cumulative effects of the desecration of existing prehistoric archaeological sites and Tribal Cultural Resources within UCSC campus

O10-36

lands merit consideration. This includes the removal of ancestral remains from UCSC lands by University-sanctioned archaeologists, trails and roads that bisect or adjoin prehistoric archeological sites, and past campus development projects that have resulted in impacts to Tribal Cultural Resources and culturally significant landscape features. This also should include consideration of the untold number of cultural sites and artifacts that were looted and destroyed on UCSC campus lands without ever being recorded or documented, in the historic period— possibly including earlier chapters of UCSC development before cultural or archaeological resource protection laws meaningfully existed.

O10-36
cont.

4.3.4 Cumulative Impacts: Archaeological, Historical, and Tribal Cultural Resources

4.3.4.4—Historical Resources:

“...It is possible that a historic building would need to be demolished or altered in such a way that it would no longer convey its historic significance. Therefore, the project’s contribution to cumulative historic resource impacts would be potentially cumulatively considerable. No additional mitigation, beyond that identified in Section 3.4, “Archaeological, Historical, and Tribal Cultural Resources,” is available to reduce the 2021 LRDP’s contribution.”

This appears to represent a double standard in regard to how impacts to cultural resources are evaluated in the DEIR. In reference to cumulative impacts to Tribal Cultural Resources, Section 4.3.4 of Cumulative Impacts states that

“With compliance with existing regulations and implementation of Mitigation Measure 3.1-2 [note: this is a typo in the DEIR, it should say 3.4-2], development under the 2021 LRDP would not contribute to a cumulative loss of tribal cultural resources in the area, and as a result would not be cumulatively considerable.”

However, just as “it is possible that a historic building would need to be demolished or altered in such a way that it would no longer convey its historic significance,” the DEIR states in Cultural Resources Impact 3.4-2 that “future development associated with the 2021 LRDP would involve land development activities that could cause a substantial adverse change in the significance of a tribal cultural resource... this impact would be potentially significant.” and that “if avoidance or preservation is not possible, potential

O10-37

curation or reinterment (either on-site or at an appropriate off-site location)... of the encountered tribal cultural resources would be coordinated and approved by the tribe.”

Just as demolishing or altering a historic building could alter it in such a way that it “would no longer convey its historical significance,” demolishing or altering part of an Indigenous cultural heritage site, sacred site, burial site or other Traditional Cultural Resource could also alter it in such a way that it would no longer convey its historical (and more importantly for tribal members, spiritual) significance.

In regard to historic period resources, the DEIR states that the University cannot alter, relocate or demolish a historic building without potentially impacting its cultural and historical significance in a manner that cannot be mitigated. Yet in regard to prehistoric Tribal Cultural Resources, the DEIR acknowledges that the University can alter, relocate or demolish a Traditional Cultural Resource if deemed necessary in order to complete a development plan— while stating that the resulting impacts after relocation of (all or portions of) the resource would be “less than significant” and, inexplicably, “would not contribute to a cumulative loss of tribal cultural resources in the area.”

We view this as a double standard which appears to reflect a cultural bias. This can be understood as a form of discrimination, because it results in disparate impacts to Native American tribes. It is not possible, from our Indigenous viewpoint, to disrupt and relocate portions of a sacred site, burial site, or ancient village site without causing substantial harmful disruption of that site. We believe the significance of these potential and largely unmitigable impacts should be fully acknowledged within the analysis of Cultural Resources impacts as well as Cumulative Impacts—not minimized.

O10-37
cont.

DEIR Section 6.0—Alternatives

In consideration of the scale of potential impacts to cultural and biological resources that would result from the 2021 LRDP land use plan and enrollment growth targets, we recommend the adoption of Alternative 3, “Reduced Development Footprint.”

Although the DEIR concludes that impacts to native species and habitats as well as potential impacts to Tribal Cultural Resources can be mitigated to a less than significant level, in our view, it is probable that the risks and impacts posed by the

O10-38

scale of proposed development would remain significant, despite the implementation of mitigation measures.

O10-38
cont.

While the State of California requires the UC system as a whole to grow in order to accommodate an increasing population of California high school graduates, it is up to UC Santa Cruz and other individual campuses to determine their actual capacity to accommodate increased enrollment growth. We encourage the further exploration of solutions to address the UC system-wide need for enrollment growth that would not require the destruction of the sensitive native ecosystems of UCSC campus and would decrease the risk of disturbing Tribal Cultural Resources.

O10-39

Request for consultation on future projects

The Amah Mutsun Tribal Band requests consultation and collaboration on any future projects that may impact tribal cultural resources as well as continued consultation and collaboration to facilitate the protection of known resources and tribal access to these resources in perpetuity.

O10-40

Individual Comment Letters



Erika Carpenter <escarpent@ucsc.edu>

Letter
11

Campus LRDP: A blueprint for our future

Sukie Arnold <sarnold@ucsc.edu>
To: eircomment@ucsc.edu
Cc: UCSC Chancellor <chancellor@ucsc.edu>

Thu, Jan 7, 2021 at 10:25 AM

Greetings,

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) winter 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.

I1-1

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

Sincerely,

Susan Arnold
-Biology Teaching Labs
-Santa Cruz City resident
-Alumna: Class of 1992

[Quoted text hidden]

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I2

Campus LRDP: A blueprint for our future

Jesse Brennan <brennan@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Jan 7, 2021 at 10:27 AM

I support the dense development and the encouragement of a walkable/bikable 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 car-dependent sprawl.

I2-1

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.

I2-2

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.

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

I2-3

Great job everyone on the plan!

Good luck!

On Thu, Jan 7, 2021 at 9:51 AM Chancellor Cynthia Larive <chancelloroffice@ucsc.edu> wrote:

[Quoted text hidden]

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
13

[eircomment] Timber use?

Benjamin Garner <bhgarnermsg@gmail.com>
To: eircomment@ucsc.edu

Thu, Jan 7, 2021 at 1:00 PM

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. --
Benjamin H. Garner (He/him/his)

I3-1

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
14

[eircomment] Natural open space & 100% student housing are great goals

Craig Hunter <chunter@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Jan 7, 2021 at 9:55 PM

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.
-Craig

I4-1

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Erika Carpenter <escarpent@ucsc.edu>

Letter
15

Campus LRDP: A blueprint for our future

Cliff Nelson <cllnelso@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Jan 7, 2021 at 1:00 PM

Erika Carpenter:

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.

I-15-1

Thank you for receiving my feedback.

Cliff

----- Forwarded message -----

From: **Chancellor Cynthia Larive** <chancelloroffice@ucsc.edu>

Date: Thu, Jan 7, 2021 at 9:50 AM

[Quoted text hidden]

[Quoted text hidden]

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

From: "David kk" <davidkk9897@gmail.com>
To: alinajack45@gmail.com
Date: 1/8/2021 4:19:15 AM
Subject: [eircomment] Loretta Ford Centennial Nursing Scholarships

Hello there,

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.

Thank you
David
College Financial Aid Advisor

I6-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
17

[eircomment] 2021 LRDP

'matty lums' via eircomment@ucsc.edu <eircomment@ucsc.edu>
Reply-To: matty lums <lumsemail@yahoo.com>
To: eircomment@ucsc.edu

Sat, Jan 9, 2021 at 5:16 PM

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. - Matt Lumadue 222 Highview Dr.

I
17-1

Sent from my iPhone

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Erika Carpenter <escarpent@ucsc.edu>

Letter
18

[eircomment] Leave the Great Meadow Alone!

Dianne Brumbach <dbrumbac@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Jan 10, 2021 at 9:01 AM

Regarding the "Family Student Housing Project":

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.

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

I
I8-1
I8-2

--
Dianne Brumbach
Molecular, Cell and Developmental Biology
Undergraduate Adviser

Thimann Room 303
University of California Santa Cruz
1156 High Street
Santa Cruz, CA 95064
Website: mcd.ucsc.edu
(831) 502-7549

"A reader lives a thousand lives before he dies... The man who never reads lives only one" Page 452 of A Dance with Dragons by George R.R. Martin

Making a World of Difference: <http://www.ucsc.edu/about/achievements/>



Go Banana Slugs!

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
19

[eircomment] Long Range Development Plan concerns

Marisa Herzog <mcherzog@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Jan 13, 2021 at 3:52 PM

Hello UCSC,

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.

Sincerely,

Marisa Herzog

Marisa Herzog

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I9-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I10

[eircomment] UCSC 2012 Student Expansion Plans

James Lee Jones Jr <james.lee.jones.jr@gmail.com>
To: eircomment@ucsc.edu

Mon, Jan 18, 2021 at 7:01 PM

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.

I10-1

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Erika Carpenter <escarpent@ucsc.edu>

Letter
111

[eircomment] Revised notice of availability environmental impact report good

Amber Yale <ambernbianca@gmail.com>
To: eircomment@ucsc.edu

Wed, Jan 20, 2021 at 2:53 PM

Aloha Erika Carpenter,

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 Algal 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.

I11-1

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.

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.

I11-2

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.

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.

I11-3

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.

3/9/2021

UC Santa Cruz Mail - [eircomment] Revised notice of availability environmental impact report good

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.

I11-3
cont.

Thank you kindly,
Amber Yale

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I12

[eircomment] LRDP EIR Comments

'matty lums' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Sat, Jan 23, 2021 at 6:23 PM

Reply-To: matty lums <lumsemail@yahoo.com>

To: eircomment@ucsc.edu

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. - Matt Lumadue 222 Highview Dr.

I12-1

Sent from my iPhone

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Erika Carpenter <escarpent@ucsc.edu>

Letter
I13

[eircomment] UCSC EIR Comment

Michael Riepe <mike.riepe@gmail.com>
To: eircomment@ucsc.edu

Mon, Jan 25, 2021 at 10:03 PM

To : Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

Dear Ms. Carpenter,

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!

I13-1

Sincerely,

--mike

Michael A Riepe, Ph.D.
Oakes '91
Achronix Semiconductor Corp
Past President, UC Santa Cruz Alumni Council

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
114

[eircomment] UCSC LRDP DEIR review notes

Geoff Lightfoot <lightfoot.geoff@gmail.com>
To: eircomment@ucsc.edu

Wed, Jan 27, 2021 at 4:37 PM

Ms. Carpenter,
See attached review comments for your consideration.

Regards,
Geoff Lightfoot

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **LRDP comments.docx**
15K

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064

Re: LRDP DEIR Comments

Ms. Carpenter,

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. I14-1
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’. I14-2
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? I14-3
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. I14-4
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. I14-5
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. I14-6
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. I14-7
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. I14-8
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, I14-9

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.

I14-9
cont.

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.

I14-10

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

I14-11



Erika Carpenter <escarpent@ucsc.edu>

Letter I15

[eircomment] Important

Sabra <peaceforyou@sbcglobal.net>
Reply-To: Sabra <peaceforyou@sbcglobal.net>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Tue, Feb 2, 2021 at 8:49 PM

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.

I15-1

There is respectfully a better solution with the State of California's money which would better ai 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.

I15-2

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.

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter I16

[eircomment] LRDP EIR Comments

Tsim Schneider <tdschnei@ucsc.edu>
To: eircomment@ucsc.edu

Tue, Feb 2, 2021 at 4:38 PM

My comment:

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.

I16-1

-Tsim Schneider

Tsim D. Schneider,
Assistant Professor
Department of Anthropology
University of California, Santa Cruz

My pronouns are: he/him/his

UC Santa Cruz occupies the unceded lands of the Uypi Tribe of the Awaswas Nation. Part of a larger Indigenous homeland known as Popelouchum, this land is cared for today by the Amah Mutsun Tribal Band.

eircomment mailing list
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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Search Faye Crosby

Letter I17



250

[Irdp] questions for the open discussion

Inbox x LRDP Test x

Faye Crosby <fjcrosby@ucsc.edu>

to Irdp, Faye

Hello

Thanks for taking questions. I have two:

1. What is the process by which the administration evaluates the costs and benefits of constructing facilities considered including East Campus infill, Ranch View Terrace, and the East Meadow? I17-1

2. In a complex multistage question: Does the current administration agree that true education goes beyond an appreciation for the awesome sweep of nature as part of a true education; and if so, does the current community of learning? I17-2



Thanks

faye crosby

Faye Crosby, Ph.D.
Distinguished Professor of Psychology Emerita
Gary D. Licker Memorial Chair, 2018-2021
831.297.7223

No re
ch:
Start :
or



Erika Carpenter <escarpent

Letter
I18

[eircomment] LRDP EIR Comments

Alex Krohn <arkrohn@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Feb 3, 2021 at 9:29 AM

Hi there,

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. I I18-1

Thank you,

Alex

--

Alex Krohn
Assistant Director
Kenneth S. Norris Center for Natural History
Office: 239 Nat Sci II
he/him/his

Mailstop: ENVS
University of California, Santa Cruz
1156 High St, Santa Cruz, CA, 95064

[Norris Center for Natural History](#)

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <esc...>

Letter I19

[Irdp] Fwd: UC Santa Cruz 2021 Long Range Development Plan DEIR Public Hearing Confirmation

Wed, Feb 3, 2021 at 8:55 /

Janelle Maguire <jmag@ucsc.edu>
Reply-To: Irdp+managers@ucsc.edu
To: Irdp@ucsc.edu

Hello,

- 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? I I19-1
- 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? I I19-2
- The pandemic has shown that remote work is just as effective as in-person, for many different jobs. I I19-3
- 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!

--
Janelle Maguire

----- Forwarded message -----
From: UC Santa Cruz Long Range Development Plan <no-reply@zoom.us>
Date: Tue, Feb 2, 2021 at 8:15 PM
Subject: UC Santa Cruz 2021 Long Range Development Plan DEIR Public Hearing Confirmation
To: <jmag@ucsc.edu>



Hi Janelle Maguire,
Thank you for registering for "UC Santa Cruz 2021 Long Range Development Plan DEIR Public Hearing".
Please submit any questions to: irdp@ucsc.edu
Date Time: Feb 3, 2021 05:00 PM Pacific Time (US and Canada)



Erika Carpenter <escarpent@ucsc.edu>

Letter
I20

[eircomment] Fwd: Housing Question

Mary McMillan <marymac1918@gmail.com>
To: eircomment@ucsc.edu

Fri, Feb 5, 2021 at 7:56 AM

EIR Team,
Sorry, sent email questions to wrong address. I don't have a comment, just questions. Regards,

Mary McMillan
[143 C Southampton Lane](#)
[Santa Cruz, CA95062](#)

Sent from my iPad

Begin forwarded message:

From: Mary McMillan <marymac1918@gmail.com>
Date: February 4, 2021 at 6:17:39 PM PST
To: info@actonucscgrowth.org
Subject: Housing Question

Watched your webinar this evening. Nicely done.

Questions:

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?

9. What is current number of California taxpaying resident students?
10. What is the total annual amount of student fees "tuition" for full-time resident students?
10. What is the current number of out-of-state students?
11. What is annual amount of student fees "tuition" for full-time out-of-state students?
12. Does UCSC provide on campus children care? If so, how many slots?

I20-1

I I20-2

I I20-3

I I20-4

I I20-5

I I20-6

Thank you in advance for your attention to these questions.

Regards,
Mary McMillan
[143 C Southampton Lane](#)
[Santa Cruz, CA 95062](#)
Marymac1918@gmail.com

Sent from my iPad

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

3/9/2021

UC Santa Cruz Mail - [eircomment] Fwd: Housing Question

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpenc@ucsc.edu>

Letter
I21

[eircomment] support protection for the CNR

Jarmila Pittermann <jpitterm@ucsc.edu>
To: eircomment@ucsc.edu

Fri, Feb 5, 2021 at 5:30 PM

Hi there,

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.

Sincerely,

Jarmila

Jarmila Pittermann
Associate Professor
Department of Ecology and Evolutionary Biology

pronouns: she/her/hers
office: 831-459-1782
<https://pittermann.eeb.ucsc.edu/>

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I21-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
122

[eircomment] LRDP EIR Comments

Leonna Heavens <leonnaheavens@comcast.net>
To: eircomment@ucsc.edu

Mon, Feb 8, 2021 at 8:31 PM

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

I 122-1

Warm Regards,
Leonna Heavens, MSN, RN, PHN, CSN

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I23

[eircomment] LRDP EIR Comments

Lisa Segnitz <lisasegnitz@hotmail.com>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Fri, Feb 12, 2021 at 8:34 AM

Hello,

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.

Heartfelt thanks for your consideration,

Lisa Segnitz, MD and family

I23-1

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
124

[eircomment] How does pandemic affect enrollment projections and beyond?

Linda Rosewood <lindarosewood@gmail.com>

Mon, Feb 15, 2021 at 5:57 AM

To: eircomment@ucsc.edu

Dear LRDP team,

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.

all the best,

I24-1

3/9/2021

UC Santa Cruz Mail - [eircomment] How does pandemic affect enrollment projections and beyond?

Linda Rosewood

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I25

[eircomment] LRDP EIR Comments

Christopher Gentry <tryrule62@gmail.com>
To: eircomment@ucsc.edu

Sat, Feb 20, 2021 at 1:48 PM

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.

Sincerely,

C.J. Gentry

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I25-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I26

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

I26-1

'matty lums' via eircomment@ucsc.edu <eircomment@ucsc.edu>
Reply-To: matty lums <lumsemail@yahoo.com>
To: eircomment@ucsc.edu

Tue, Feb 23, 2021 at 9:51 PM

Sent from my iPhone

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



image0.jpeg
108K

I26-1
cont.



Erika Carpenter <escarpent@ucsc.edu>

Letter
127

[Irdp] Comments on Draft Long Range Development Plan

Adam Millard-Ball <adammb@ucla.edu>

Sun, Feb 28, 2021 at 4:43 PM

Reply-To: Irdp+managers@ucsc.edu

To: Irdp@ucsc.edu

Cc: Teresa Buika <tabuika@ucsc.edu>

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.

I27-1

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:

I27-2

<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.

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.

I27-3

Thank you for your consideration.

Adam Millard-Ball

Adam Millard-Ball
Associate Professor of Environmental Studies (on leave)
(831) 459-1838 | people.ucsc.edu/~adammb/



Erika Carpenter <escarpent@ucsc.edu>

Letter
128

[eircomment] Public Comment on Draft EIR at UCSC

Maria Borges <mariakinonagare@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 1, 2021 at 5:30 PM

My name is Maria Borges. I am a UCSC Alumni and resident and tax payer 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 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.

I28-1

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, vireos, 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 through 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

I28-1
cont.

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/2011/05/26/why-we-must-reconnect-with-nature/>

<https://www.psychreg.org/connection-nature-matters/>

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

<https://www.youtube.com/watch?v=af1kB89pIsw>

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 red-legged 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.

Thank you,

Maria Borges

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I28-1
cont.



Erika Carpenter <escarpenc

Letter
129

[eircomment] Comments on the UCSC EIR

Joanne Brown <joannevbrown@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 1, 2021 at 9:48 PM

I'm attaching my comments as a pdf. Please acknowledge that you received my email and you're able to open the pdf.

Thank you,

Joanne Brown

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **COMMENTS on the UCSC LRDP EIR .pdf**
285K

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 [CNDDDB] 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 (CNDDDB 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.

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.*

I29-1

I29-2

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.***

I29-3

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.

--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.

I29-4

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.

--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/>

I29-5

--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.

I29-6

--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".

I29-7

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 LRDP. 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.

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>

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.

I29-8

I29-9

I29-10

-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.**

I29-10
cont.

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.**

I29-11

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/>

I29-12

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.”

I29-13

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.

I29-14

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.**

Permanent loss of habitat for these species within the LRDP could result in "take".

I29-14
cont.

T I29-15

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.**

I29-15
cont.

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.**

I29-16

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.

I29-17

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.**

I29-18

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.*

I29-19

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).**

I29-19
cont.

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.

I29-19
cont.

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?

I29-20

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.

I29-20
cont.

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.*

I29-21

How is “substantial” quantified?

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.***

I29-22

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!

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

I29-23

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*

I29-24

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.

I29-24
cont.

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 cinereoargenteus]). 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.

I29-25

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...

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](#)

I29-25
cont.

I29-26

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.

I29-26
cont.

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.

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.*

I29-27

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

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***

I29-28

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.**

I29-28
cont.

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.

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...*

I29-29

From:

https://www.usgs.gov/centers/werc/science/bat-research-california?qt-science_center_objects=0#qt-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 conducive to the survival of bat species be protected within the LRDP boundaries.

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:

I29-30

...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**

I29-30
cont.

change become more severe, it will be essential to incorporate the role of riparian habitats.

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cont.

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](#)

I29-31

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).

I29-31
cont.

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.

I29-31
cont.

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***

I29-32

*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*

I29-32
cont.

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.

I29-32
cont.

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.

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***

I29-32
cont.

I29-33

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 LRDP should not be disturbed and should be permanently protected.

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?

3.5.1 Regulatory Setting

Proposed Mitigations for the LRDP 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.

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:

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I29-36

After reviewing the specifics of the 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 LRDP 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.

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?**

Redwood

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I29-37

T I29-38

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.

I29-38
cont.

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.

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.

I29-39

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.

I29-40

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.

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.*

I29-41

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.

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cont.

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.

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).***

I29-42

*...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**”!

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.

I29-43

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.

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

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cont.

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-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 CNDDDB; however, no new occurrences have been added to the CNDDDB **since the mid-1990s** when funding was cut for this portion of the CNDDDB 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.

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?

Additional Questions:

- Why is protection of the environment not included as one of the overarching LRDP 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”.
- 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

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environment for the next 20 years be realistic unless it is based on current data collected in the field?

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- 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?

I29-48



Erika Carpenter <escarpent@ucsc.edu>

Letter
I30

[Irdp] Draft Public LRDP comments

Mark F Massoud <mfmassoud@ucsc.edu>
Reply-To: Irdp+managers@ucsc.edu
To: Irdp@ucsc.edu
Cc: Teresa Buika <tabuika@ucsc.edu>

Mon, Mar 1, 2021 at 1:00 PM

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.

I30-1

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.

I30-2

Mark Fathi Massoud
Professor of Politics and Legal Studies
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Erika Carpenter <escarpent@ucsc.edu>

Letter
I31

[eircomment] comments on 2021 LRDP & EIR

Karen Holl <kholl@ucsc.edu>
To: eircomment@ucsc.edu

Fri, Mar 5, 2021 at 9:15 AM


Please find my comments on the 2021 LRDP & EIR attached.

--

Karen Holl
Professor of Environmental Studies
University of California, Santa Cruz
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[Learn more about my new "Primer of Ecological Restoration" and use the "PRIMER" discount code to save 20%](#)

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 **Holl - LRDP 2021 & EIR comments.pdf**
385K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Karen Holl, Professor of Environmental Studies

Date: 2 March 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I31-1

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://lrpd.ucsc.edu/final-lrpd.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 constructed ¹	Percent additional space needed for 2021 LRDP ²
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	5,628,824	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.

I31-1
cont.

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.

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.

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

I31-1
cont.

I31-2

I31-3

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.

I31-3
cont.

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.

I31-4

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.

I31-5

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.

I31-6

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

I31-7

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

I31-8

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.

I31-8
cont.

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

I31-9

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.

I31-10

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.

I31-11

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.

I31-12

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

I31-13

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

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.

I31-13
cont.

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.

I31-14

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.

I31-15



Erika Carpenter <escarpent@ucsc.edu>

Letter
132

[eircomment] LRDP EIR Comments

Daniel Schmelter <dschmelt@ucsc.edu>
To: eircomment@ucsc.edu

Tue, Mar 2, 2021 at 5:13 PM

Hi UCSC EIR folks,

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 advocates and researchers. Please include it in your plan and safeguard it for the long-term.

I 132-1

Thank you for your time,
Daniel Schmelter
UCSC Staff

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Erika Carpenter <escarpent

Letter
I33

[eircomment] LRDP EIR Comments

Karen Stout <krstout@ucsc.edu>
To: eircomment@ucsc.edu

Tue, Mar 2, 2021 at 7:42 PM

Hello LRDP EIR team,

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.

I33-1

Thank you for your time.

Sincerely,
Karen Stout

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I34

[eircomment] LRDP EIR Comments

Chris Wilmers <cwilmers@ucsc.edu>
To: eircomment@ucsc.edu

Tue, Mar 2, 2021 at 11:58 AM

Dear LRDP Committee,

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.

I34-1

Best,
Chris Wilmers

Chris Wilmers
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Erika Carpenter <escarpent@ucsc.edu>

Letter
I35

[eircomment] LRDP EIR Comments

Haley Burrill <haleymorganb@gmail.com>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 9:13 AM

To whom it may concern,

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.

All the best,
Haley

PhD aspirant, KU [EEB Bever/Schultz lab](#)
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I35-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I36

[eircomment] LRDP EIR Comments

Greg Gilbert <ggilbert@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 9:59 AM

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.

I36-1

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Erika Carpenter <escarpent@ucsc.edu>

Letter
137

[eircomment] LRDP EIR Comments

Alex Krohn <arkrohn@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 7:16 AM

Hi there,

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.

I 137-1

Thank you,

Alex

--
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Erika Carpenter <escarpent@ucsc.edu>

Letter
I38

[eircomment] Comments on the LRDP Plan

Andrew Mathews <amathews@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 9:10 AM

I am submitting the following comments to the LRDP.

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.

I38-1

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 traffica at a busy road. Many alternatives have been proposed, and these options should be incorporated into the LRDP.

I38-2

Sincerely,
Andrew Mathews

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Book Published November 18, 2011 "Instituting Nature: Authority, Expertise, and Power in Mexican Forests", MIT Press, 2011.

<http://www.amazon.com/Instituting-Nature-Authority-Expertise-Environment/dp/0262516446>

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Erika Carpenter <escarpent@ucsc.edu>

Letter
139

[eircomment] Permanent Protection for the Campus Natural Reserve

Ingrid Parker <imparker@ucsc.edu>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 11:14 AM

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.**

Sincerely,

Ingrid Parker

Ingrid M. Parker
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Faculty Director of the UCSC Greenhouses
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I39-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I40

[eircomment] LRDP EIR Comments

Kelly Pettit <kellymariepettit@gmail.com>
To: eircomment@ucsc.edu

Wed, Mar 3, 2021 at 5:43 AM

To whom it may concern:

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.

I40-1

~Kelly Marie Pettit

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Erika Carpenter <escarpent@ucsc.edu>

Letter
141

[eircomment] LRDP EIR Comments

Ronnie Lipschutz <r Lipschutz@ucsc.edu>
To: eircomment@ucsc.edu
Cc: Ted Benhari <tbenhari@sbcglobal.net>

Thu, Mar 4, 2021 at 9:18 AM

To Whom It May Concern,

Please find attached comments on the LRDP Wildfire section from Ronnie Lipschutz & Ted Benhari.

Yours,
Ronnie Lipschutz

--

"Do not let moose lick your car." It makes the car soggy and hard to drive.
-Road sign in Jasper Nat'l Park, Alberta, Canada-

Ronnie D. Lipschutz, President & Co-director, [Sustainable Systems Research Foundation](#); Emeritus Professor of Politics, UC Santa Cruz

e-mail: r Lipschutz@ucsc.edu; web site: <http://tinyurl.com/zeatctr>

Host, "Sustainability Now!" every other Sunday on KSQD 90.7FM & KSQD.org. (Shows archived at: <https://ksqd.org/sustainabilitynow/>)

Read my latest book: [Unhappy in Its Own Way--An Institutional Biography of UC Santa Cruz](#)

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 **Lipschutz & Benhari comments on UCSC DEIR wildfire section.pdf**
239K

Comments on the Wildfire Risk Section (Ch. 3.18) of UCSC’s LRDP DEIR

Ronnie D. Lipschutz & Ted Benhari

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.

I41-1

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.

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:

I41-2

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).)

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.”])

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 critical 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 factors 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

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.](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.”).

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).

I41-2
cont.

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.

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.

I41-3

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.

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, subs. 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*

I41-4

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 do 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.

I41-4
cont.

⁸ Note 1, op cit.

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

“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.

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

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>

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

I41-4
cont.

I41-5

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).

I41-5
cont.

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.

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.

I41-6

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

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



Erika Carpenter <escarpent@ucsc.edu>

Letter
142

[eircomment] LRDP EIR Comments

Ronnie Lipschutz <r Lipschutz@ucsc.edu>
To: eircomment@ucsc.edu
Cc: Morgan Bostic <advocate.morganbostic@gmail.com>

Thu, Mar 4, 2021 at 9:49 AM

To Whom it May Concern,

Please find attached my Comments on the omission of financial estimates in the LRDP DEIR, and the implications of paying for proposed expansion.

Yours,
Ronnie Lipschutz

--

"Do not let moose lick your car." It makes the car soggy and hard to drive.
-Road sign in Jasper Nat'l Park, Alberta, Canada-

Ronnie D. Lipschutz, President & Co-director, [Sustainable Systems Research Foundation](#); Emeritus Professor of Politics, UC Santa Cruz

e-mail: r Lipschutz@ucsc.edu; web site: <http://tinyurl.com/zeatctr>

Host, "Sustainability Now!" every other Sunday on KSQD 90.7FM & KSQD.org. (Shows archived at: <https://ksqd.org/sustainabilitynow/>)

Read my latest book: *Unhappy in Its Own Way--An Institutional Biography of UC Santa Cruz*

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 **Comments on the omission of financial estimates in the LRDP DEIR.pdf**
53K

Comments on the omission of financial estimates in the LRDP DEIR

Ronnie D. Lipschutz

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

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.

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 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.

I42-1
cont.



Erika Carpenter <escarpent@ucsc.edu>

Letter
I43

[eircomment] LRDP EIR Comments

Michael Loik <mloik@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Mar 4, 2021 at 7:12 PM

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). <https://doi.org/10.1007/s00382-020-05535-5>

I
I43-1

Respectfully,
Michael E. Loik

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Erika Carpenter <escarpent@ucsc.edu>

Letter
144

[eircomment] objection to LRDP

cnoyes98 <cenparis99@gmail.com>
 To: eircomment@ucsc.edu
 Cc: Jenny Talusan <jtalusan@ucsc.edu>

Thu, Mar 4, 2021 at 9:39 PM

Dear LRDP Planning Committee,

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.

Sincerely,

Chad Noyes

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I44-1



Erika Carpenter <escarpent@ucsc.edu>

Letter I45

[eircomment] LRDP EIR Comments

Janet <snikrap@telus.net>
To: eircomment@ucsc.edu

Thu, Mar 4, 2021 at 12:05 AM

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.

I45-1

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.

I45-2

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 USCS would suffer.

I45-3

Thank you for your consideration of my comments.

Janet Parkins

https://lists.ucsc.edu/mailman/listinfo/eircomment

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Erika Carpenter <escarpent@ucsc.edu>

Letter
I46

[eircomment] LRDP EIR Comments

Tsim Schneider <tdschnei@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Mar 4, 2021 at 5:15 PM

My second comment:

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.
- Tsim Schneider

I46-1

Tsim D. Schneider,
Assistant Professor
Department of Anthropology
University of California, Santa Cruz

My pronouns are: he/him/his

UC Santa Cruz occupies the unceded lands of the Uypi Tribe of the Awaswas Nation. Part of a larger Indigenous homeland known as Popelouchum, this land is cared for today by the Amah Mutsun Tribal Band.

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Erika Carpenter <escarpent

Letter
147

[eircomment] LRDP EIR Comments

Elaine Sullivan <easulliv@ucsc.edu>
To: eircomment@ucsc.edu

Thu, Mar 4, 2021 at 1:35 PM

Please see my comments in the PDF attached.

Elaine Sullivan

--
Elaine A. Sullivan, Ph.D.
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Associate Professor, History
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 **Sullivan_Aesthetics.pdf**
1067K

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz

March 2, 2021

Dear Ms. Carpenter,

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.

I47-1

1. The LRDP (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 LRDP, and planned to "be maintained in their natural state to serve as long-term reserve lands for future use": [https://lr dp.ucsc.edu/final2005lr dp/2005lr dp\(lr dp\).pdf](https://lr dp.ucsc.edu/final2005lr dp/2005lr dp(lr dp).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.

I47-2

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.

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.

Sincerely,

Elaine Sullivan
UC Santa Cruz faculty member
Resident of Santa Cruz

I47-3



Image 1: Photo by the author of the view from the base of the East Meadow in the south-bound public bike lane on Coolidge Dr. up to the (strategically hidden) Cowell and Stevenson colleges area with the uninterrupted view of the forest behind them; this is one of the iconic views of the campus that visitors see upon entering and driving up or down Coolidge Dr.; this view would be completely interrupted by proposed student housing in the East Meadow; it is currently interrupted only by the temporary construction structures erected near the East Remote parking lot (circled in white in photo), otherwise this landscape would be entirely unimpeded



Image 2: Photo by the author of the view from the public sidewalk on Hagar Dr. of the Monterey Bay across the East Meadow; this view would be blocked by proposed student housing



Erika Carpenter <escarpent@ucsc.edu>

Letter
I48

[eircomment] LRDP EIR Comments

tiffany theden <ttheden@ucsc.edu>
To: eircomment@ucsc.edu

Fri, Mar 5, 2021 at 8:04 PM

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.

Thank you.
Tiffany Theden

I48-1

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
149**[eircomment] LRDP EIR comments**

Martha Brown <mtbrown@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 2:20 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Martha Brown, UCSC alumna (1982), Principal Editor (retired June 2019)

RE: Notice of Preparation for Environmental Impact Report for the 2020 LRDP

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).

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
150

[eircomment] LRDP EIR Comments

Mark Carr <mhcarr@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 3:11 PM

Erika- On behalf of the faculty of the Department of Ecology and Evolutionary Biology please find the attached letter in support of the permanent protection of the UCSC campus reserve. Thank you for the opportunity to convey our thoughts. Take care, Mark

Mark H. Carr
Professor and Chair
Department of Ecology and Evolutionary Biology
[115 McAllister Way](#)
University of California
Santa Cruz, California 95060
Office: 831-459-3958
E-mail: mhcarr@ucsc.edu
<https://research.pbsci.ucsc.edu/eeb/rclab/>

~ It is sometimes convenient for me to send email on evenings and weekends. Please do not feel obligated to respond outside of your normal working hours. ~

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC EEB Letter in Support Campus Reserve.pdf**
109K



DEPARTMENT OF ECOLOGY AND EVOLUTIONARY BIOLOGY
115 McALLISTER WAY
UNIVERSITY OF CALIFORNIA
SANTA CRUZ, CALIFORNIA 95064

7 March 2021

Dear Chancellor Larive and Environmental Planner Carpenter,

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.

Sincerely,

Mark Carr
Professor and Chair, EE Biology



Erika Carpenter <escarpent@ucsc.edu>

Letter
151**[eircomment] Campus Reserve and the LRDP****Daniel Costa** <costa@ucsc.edu>

Sun, Mar 7, 2021 at 10:48 PM

To: eircomment@ucsc.edu, Cindy Larive <clarive@ucsc.edu>

Cc: Chancellor's Office <chancellor@ucsc.edu>

Dear Chancellor Larive and Environmental Planner Carpenter,

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 unequalled 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.

Sincerely,
Dan Costa

Daniel P Costa
Director Institute of Marine Science
Distinguished Professor Ecology and Evolutionary Biology
University of California
Santa Cruz, CA 95060

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I51-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I52

[eircomment] Comments...

Jennifer Gonzalez <jag@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 7:11 PM

Dear LRDP,

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:

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.

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.

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](#)

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.

Sincerely yours,
Jennifer Gonzalez

Jennifer A. González
Professor and Chair, History of Art and Visual Culture
Faculty Co-Director, Institute of the Arts and Sciences

University of California, Santa Cruz
1156 High Street
Santa Cruz, CA 95064
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I52-1
I52-2
I52-3
I52-4
I52-5



Erika Carpenter <escarpent@ucsc.edu>

Letter
153

[eircomment] LRDP EIR Comments

1 message

Kathleen Kay <kmkay@ucsc.edu>
To: eircomment@ucsc.edu

Sun, Mar 7, 2021 at 11:51 AM

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.

I53-1

Sincerely,
Kathleen M Kay

--
Kathleen Kay
Associate Professor
Jean H. Langenheim Chair in Plant Ecology and Evolution
Ecology and Evolutionary Biology
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[130 McAllister Way](#)
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Erika Carpenter <escarpent@ucsc.edu>

Letter
154

[eircomment] UCSC LRDP EIR

1 message

'bb caughtery' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Sun, Mar 7, 2021 at 1:30 AM

Reply-To: bb caughtery <bonnieinholland@yahoo.com>

To: eircomment@ucsc.edu

Dear UCSC,

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 accomodate development, you are absolutely destroying the intent of learning in a special and protected environment. It is extremely disappointing.

I54-1

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

Academic Planning: physical plan not motivated by education

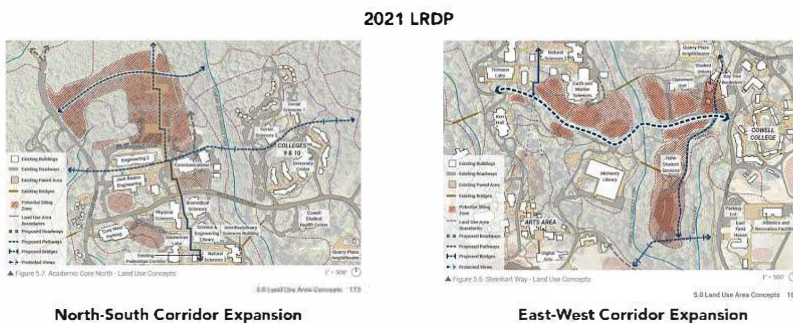
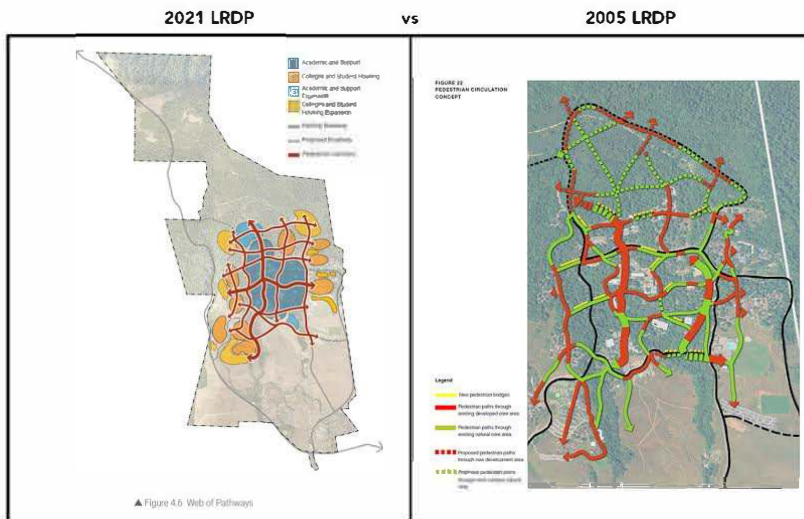
- While the prior 2005 LRDP had a special faculty-driven process integrated with its physical plan that proposed three enrollment scenarios based on faculty and student academic needs, the 2021 LRDP had no such academic process despite a misleading reference to former EVC Tromp's 2018 academic plan.
- 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.

I54-2

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.

I54-3



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).

I54-4

I sincerely hope that you will seriously reconsider your development plans of the UCSC campus. Sincerely,

Bonnie Stibbe, UCSC Graduate 1976, Earth Sciences
 'T Fortpad 3

6821JX Arnhem, the Netherlands

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
155

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

raichele raichele <raichele@ucsc.edu>

Mon, Mar 8, 2021 at 4:48 PM

To: eircomment@ucsc.edu

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations
From: Rachel Aichele
Date: March 8th, 2021

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.

I55-1

Thank you,
Rachel Aichele

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
156

[eircomment] Letter to Erika Carpenter on UCSC 2021 LRDP and DEIR

John Aird <johnaird@earthlink.net>
Reply-To: John Aird <johnaird@earthlink.net>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 2:56 PM

Dear Erika -

Correction: I just noticed a small typo in my earlier submission sent this morning at 10:57 AM. on behalf of myself and Ted Benhari.

Please consider the Attached our corrected version and confirm its receipt.

Thanks -

John

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **Letter to Erika Carpenter on UCSC 2021 LRDP and DEIR - Final.docx**
28K

To: Erika Carpenter, Senior Environmental Planner

From: John Aird and Ted Benhari

Re. UCSC's 2021 LRDP and Draft EIR

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.

I56-1

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.

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

I56-2

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.

I56-2
cont.

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:

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.

I56-3

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.

I56-4

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.

I56-5



Erika Carpenter <escarpent

Letter 157

[eircomment] LRDP EIR Public Comment Submission

Bijan Ashtiani-Eisemann <bashtian@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:24 PM

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.

I57-1

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.

I57-2

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.

I57-3

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.

I57-4

Bijan Ashtiani-Eisemann
RCC Council Co-Chair
SEC Organizer
UCSC Undergraduate in EEB & Envs/Earth Sci.
(760)-685-6564
bashtian@ucsc.edu

eircomment mailing list
eircomment@ucsc.edu
https://lists.ucsc.edu/mailman/listinfo/eircomment



Erika Carpenter <escarpent@ucsc.edu>

Letter
158

[eircomment] LRDP EIR comments

John Balawejder <aljobala@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 2:53 PM

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.

John Balawejder

I58-1

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
159

[eircomment] LRDP EIR Comments

Sandra Baron <sandybar3@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 10:00 AM

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064
eircomment@ucsc.edu

LRDP EIR Comments

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 wont 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).

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.

Thank you for your consideration of my concerns,

Sandra Baron
Santa Cruz County

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I59-1
I59-2



Erika Carpenter <escarpent@ucsc.edu>

Letter
160

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

Sarah Bennett <sarahruth8309@gmail.com>

Mon, Mar 8, 2021 at 2:14 PM

To: eircomment@ucsc.edu

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Sarah Bennett

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I60-1

Thank you,

Sarah Bennett

Theater Arts alumni of 2018

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I61

[eircomment] LRDP EIR Comments

'Fay Bohn' via eircomment@ucsc.edu <eircomment@ucsc.edu>
Reply-To: Fay Bohn <maestrafay@yahoo.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 1:26 PM

Thank you for the opportunity to comment on the draft LRDP 2021.

My concerns are principally about housing, water and transportation.

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-existent. 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.

I61-1

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.

"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."

I61-2

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 year-round 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?

I61-3

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

I61-4

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 pick-ups, 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.

I61-4
cont.

"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.

I61-5

Thank you,
Fay Bohn
Santa Cruz

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
162

[eircomment] Student Housing West project comments

Mark Boolootian <mark.boolootian@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:12 PM

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 bono 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.

respectfully,
Mark Boolootian

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



I62-1



Erika Carpenter <escarpent@ucsc.edu>

Letter
I63

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

Amanda Cameron <amanda.cameron103@gmail.com>

Mon, Mar 8, 2021 at 10:58 AM

To: eircomment@ucsc.edu

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.



I63-1

Thank you,
Amanda Cameron
Environmental Studies and Marine Biology '16

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
164

[eircomment] comment on UCSC 2021 Long Range Development Plan and Environmental Impact Report

Ryan Carle <rcarle@ucsc.edu>

Mon, Mar 8, 2021 at 10:31 AM

To: eircomment@ucsc.edu

Dear Erika,
Please find attached my comment on the UCSC draft LRDP and EIR.

Thank you,
Ryan Carle
Lecturer, ENVS department, UCSC

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC LRDP comment letter.pdf**
73K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Ryan Carle, Lecturer, Environmental Studies Department, UCSC

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I64-1
cont.

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.

I64-2

Thank you,
Ryan Carle
Lecturer, UC Santa Cruz Environmental Studies Department
760-709-1179



Erika Carpenter <escarpent@ucsc.edu>

Letter
I65

[eircomment] LRDP EIR Comments

Jennifer Chebahtah <jchebaht@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 2:52 PM

Hello!

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!

I65-1

Thank you,

Jennifer R. Chebahtah

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I66

[eircomment] UCSC LRDP Comment

Christian Cormier <christian.j.cormier@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:20 AM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Christian Cormier, UCSC Alumnus 2017, ENVS Department

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I66-1

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.

Best,

Christian Cormier

UCSC 2017, ENVS

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eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

mailing

list



Erika Carpenter <escarpent@ucsc.edu>

Letter
167

[eircomment] UCSC growth

eduardo izquierdo <chateauedo@cruzio.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 1:58 PM

As A resident of Santa Cruz since 1975 I an 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.

I
167-1

Eduardo Izquierdo
326 Van Ness Ave SC 95060

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
168

[eircomment] My Feedback on the LRDP EIR

Kiran Favre <kfavre@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:49 PM

Hello,

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 ust 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.

I68-1

Thanks,
Kiran Favre

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
169

[eircomment] LRDP EIR Comments

David Fierstein <studio@daviadiad.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:23 PM

Regarding the draft 2021 LRDP EIR:

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.

I69-1

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.

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 criss-crossing 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.

I69-2

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.

I69-3

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.

I69-4

Thank you,

David Fierstein
831.459.9227
Felton, CA

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
170

[eircomment] UCSC natural reserve

'Jacob Ferrall' via eircomment@ucsc.edu <eircomment@ucsc.edu>
Reply-To: Jacob Ferrall <jferrall@ucsd.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:30 PM

[eircomment mailing list](mailto:eircomment@ucsc.edu)
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **Letter to UCSC concerning the natural reserve.docx**
15K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Jacob Ferrall

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I70-1

Thank you,



Erika Carpenter <escarpent

Letter
171

[eircomment] Please read my petition

Litzia Galvan <liigalva@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:51 PM

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC LRDP comment letter template (1).docx**
8K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Litzia Galvan

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I71-1

Thank you,



Erika Carpenter <escarpent@ucsc.edu>

Letter
172

[eircomment] LRDP EIR Comments — Light Pollution Mitigation, Hunter Gieseeman

hgiesema <hgiesema@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:59 PM

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.

I
172-1

— **Hunter M. Gieseeman**
Business Management Economics

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

An aerial night photograph of the UC Santa Cruz campus. The image shows a dense forest of trees, illuminated by warm yellow and orange lights from buildings and streetlights. Several large, multi-story buildings with red roofs are visible, along with a large, modern building with a curved facade. The overall scene is a mix of natural greenery and urban infrastructure.

EIR Proposal: Light Pollution in UC Santa Cruz

By: Hunter M. Giese
UCSC Email: hgiese@ucsc.edu

About Me

3rd Year Transfer — UCSC dream university!

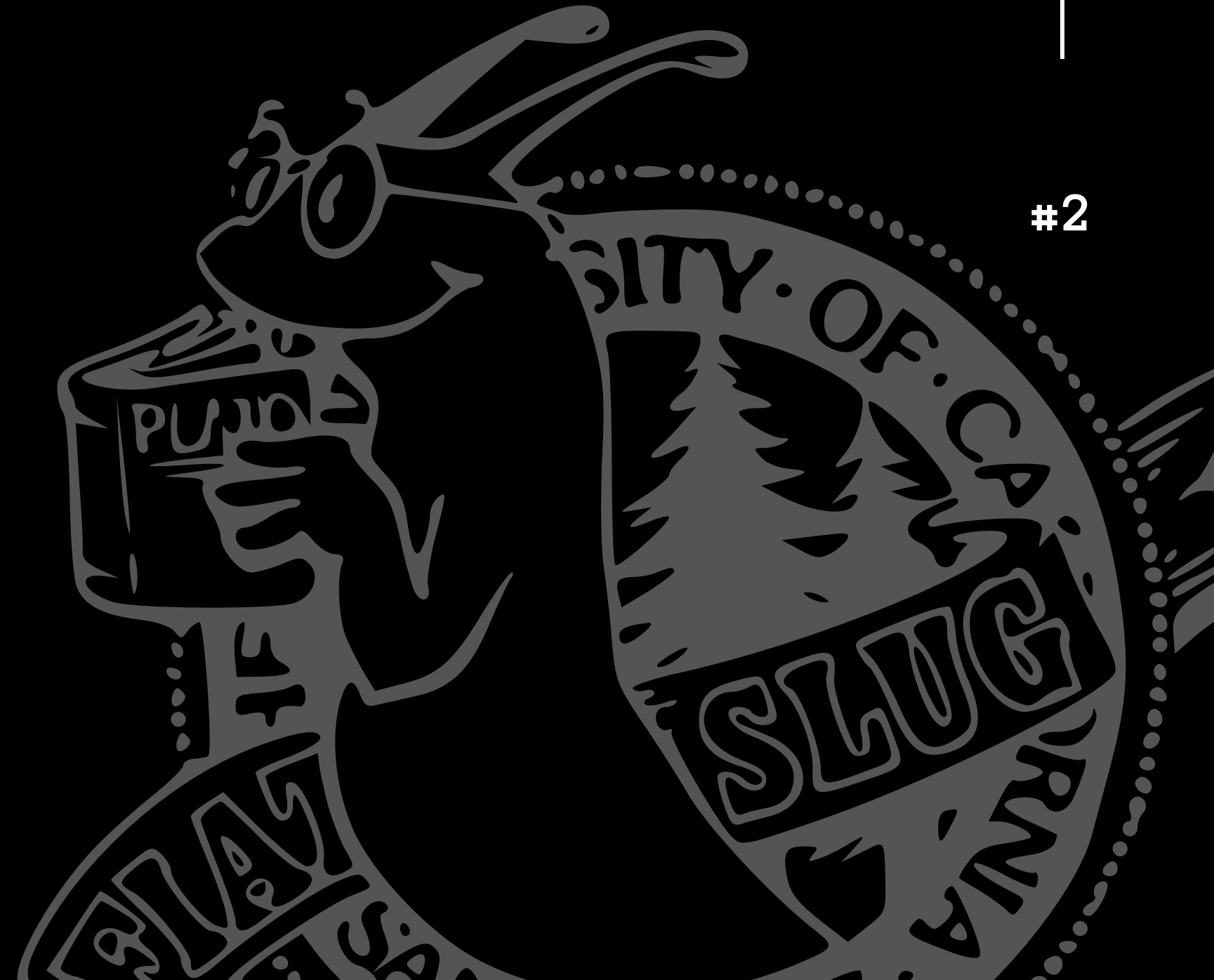
BME and likely going into Environmental Studies PhD

Photography for over 8 Years & Graphic Design

General interest in light pollution

Chronic physical disability sparked my EIR public comment,
accidents & falling on campus underneath inefficient campus lighting.

Please contact me,
I'd love to help!
Email: hgiesema@ucsc.edu



Current EIR vs. Proposal

Exterior Lighting Standards

"Provide lighting along paths to adequately illuminate the pathway. Site lighting with non-glare, downlighting characteristics is ~~preferred~~ for all areas around buildings, especially at housing areas. Forest areas should be illuminated with ~~non-directional~~ fixtures that provide light throughout the ~~surrounding~~ area."

In my proposed: Change "preferred" to "required."

Page 137 of PDF or 3.1-3

In my proposed: Change "surrounding" to "intended."

#3



Proposed Additions

Exterior Lighting Standards

1. All new installed outdoor lighting must be 2700 Kelvin or below (can go as lower near conservation areas) and above 90+ CRI for visibility.

- This includes every new bulb replaced by maintenance, starting now.

2. Retrofitting all current outdoor lights on campus with shielding to directional "intended area" to meet requirements.

*This needs to go into effect immediately & as soon as possible, so that every new replacement by maintenance reduces current light pollution. #5

High Kelvin



Low Kelvin



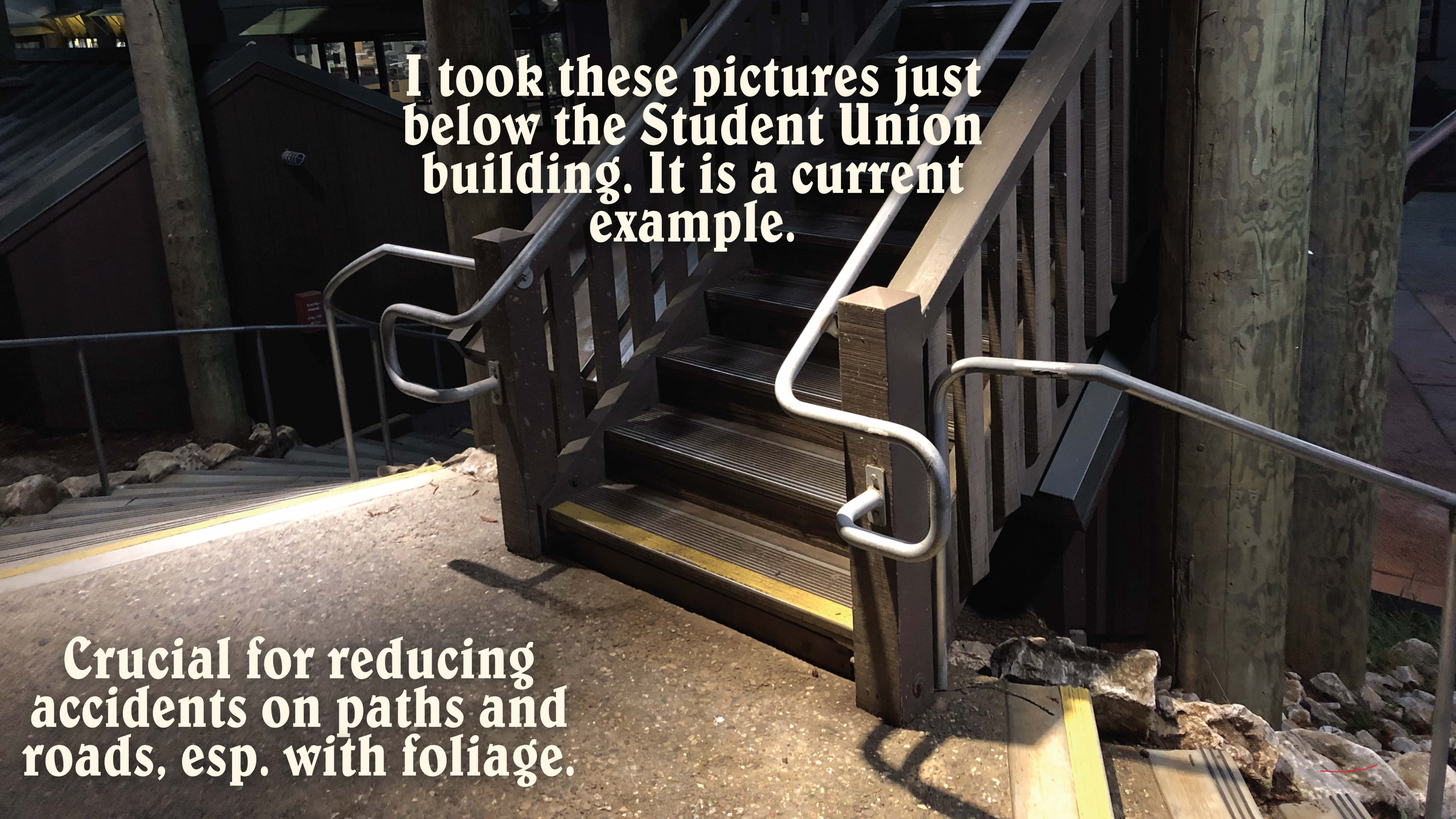
Here's an Example on Campus

**Lower Kelvin
(likely 2700k)**

**Higher Kelvin
(likely 3000k+)**

**improved visibility on
ground, with less glare
from blue light.**

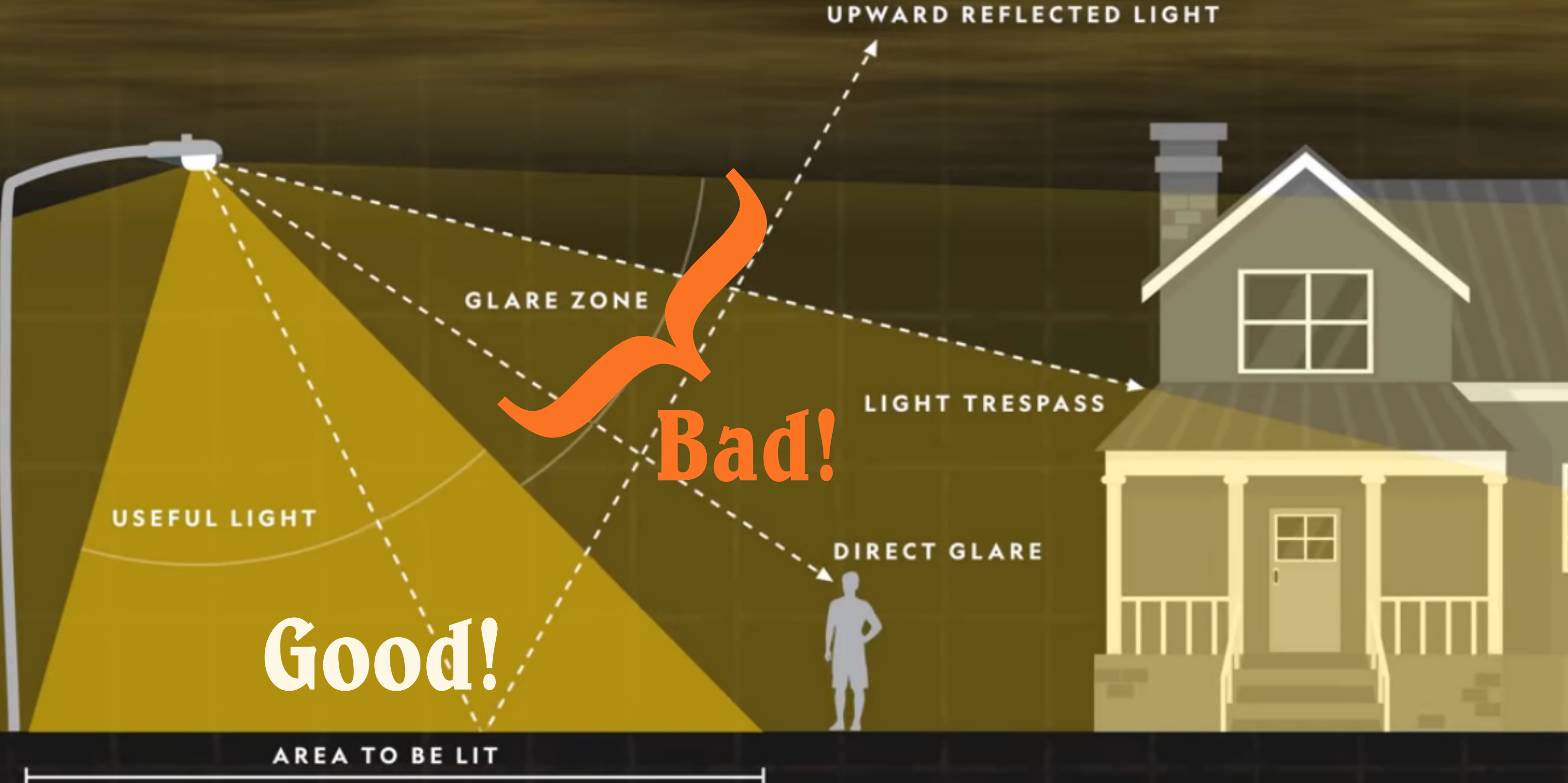




I took these pictures just below the Student Union building. It is a current example.

Crucial for reducing accidents on paths and roads, esp. with foliage.

SKY GLOW



Good!

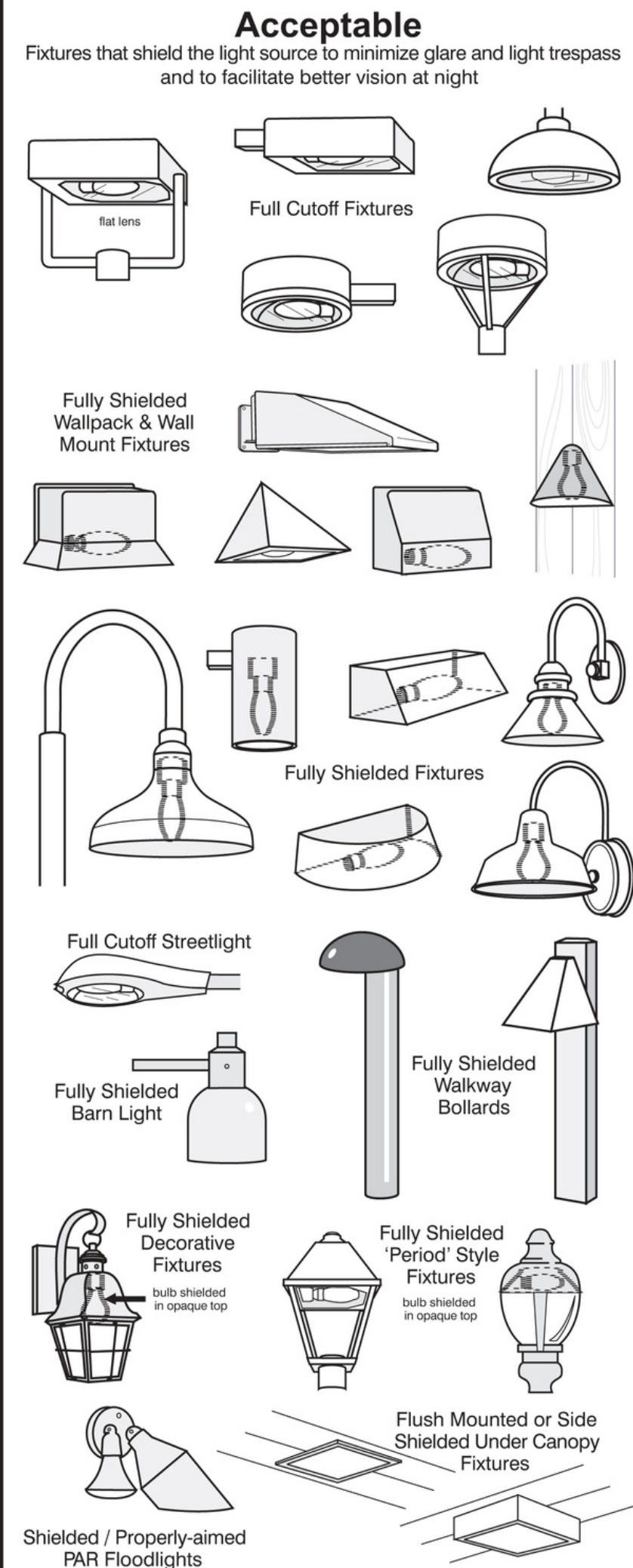
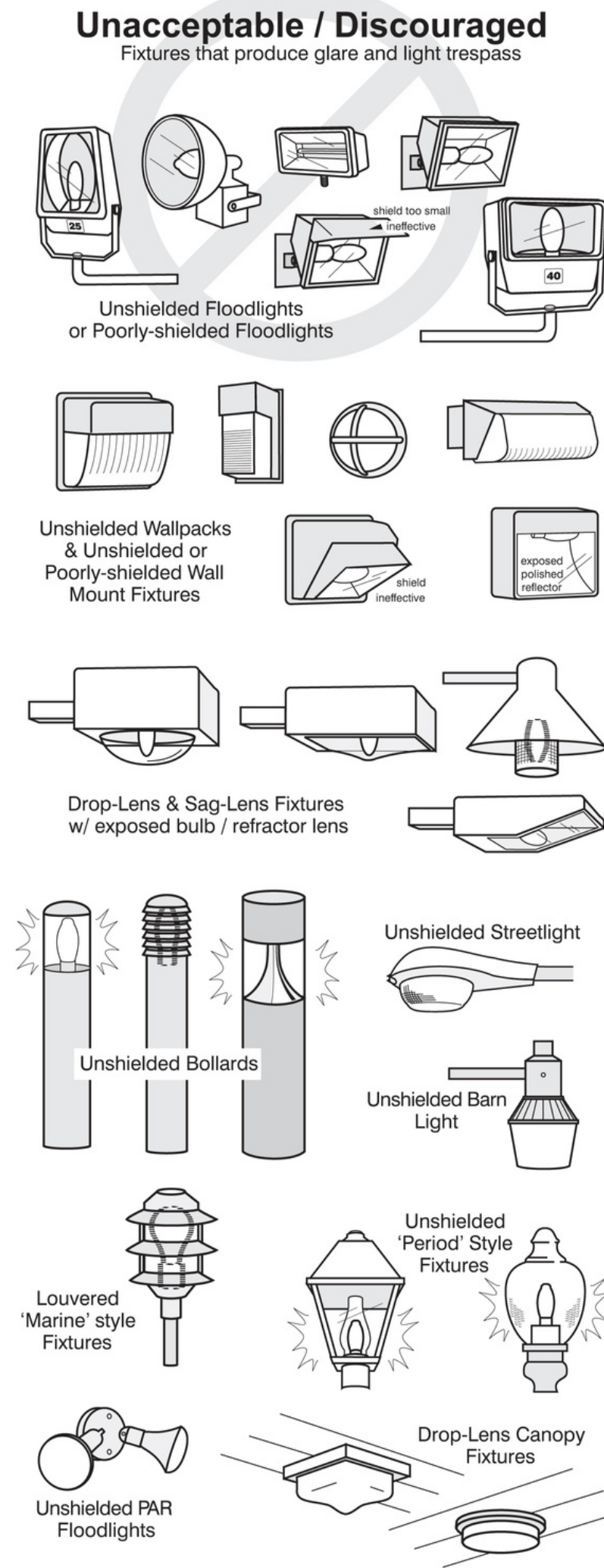
Bad!

AREA TO BE LIT

Examples of Acceptable Shielding

Exterior Lighting Standards

1. Modeled from the International Dark Sky Association's "Sky Friendly" lighting standards for shielding.
2. In combination with 2700K or lower.
3. Reduce current lighting to only the necessary lumen to reduce disability glare (when brightness causes reduced visual accessibility).
4. Reduce the amount of light fixtures in unnecessary areas.



Example of Current Lighting Violations

Exterior Lighting Standards

Even under the current lighting guide, there are many violations on campus – for ex: the sphere lights at OPERS Field.

1. There is no foliage surrounding them, thus no reason to be non-directional, they pollute directly into sky.
2. Highly inefficient use of lighting, the walkways (intended area) are the least illuminated region of lighting.
3. There are around 8 of these lights here alone.



#3

Many Benefits

Exterior Lighting Standards

1. Circadian rhythm in humans & nature.
2. Better illumination without brighter bulbs.
3. Safer lighting everyone, esp. disabilities.
4. More efficient use of energy from LED's.
5. Direct lower, recurring cost to campus.
6. Conservation science, ecology, astronomy.
7. Cultural & Spiritual preservation of universal human heritage night sky.



Great Scientific & Conservation Interest

Many departments on campus that could benefit from better EIR.

Environmental Sciences

Environmental Studies

Biology & Conservation

Ecology & Evolutionary Bio

Astronomy & Astrophysics

Earth & Planetary Sciences

Social Sciences



**All of my citations
are available for
view here:**

[https://docs.google.com/document/d/
1v_kniUWs7mC_L1W3zLZd_wPsmq79U2ufgl
y42QPYapY/edit?usp=sharing](https://docs.google.com/document/d/1v_kniUWs7mC_L1W3zLZd_wPsmq79U2ufgl_y42QPYapY/edit?usp=sharing)

**Please contact me,
I'd love to help!
Email: hgiesema@ucsc.edu**



Erika Carpenter <escarpent@ucsc.edu>

Letter
173

[eircomment] LRDP Comment

Maria Gitin <msgitin@mariagitin.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 10:35 AM

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.

I73-1

I'm in favor of the plan.

Maria Gitin Torres
PO Box 216
Capitola, CA 95010

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
174

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

Courtney Golts <cgolts@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:14 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Courtney Golts

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

174-1

Thank you,

Courtney Golts

eircomment
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

mailing

list



Erika Carpenter <escarpenc

Letter
175

[eircomment] LRDP EIR Comments

Gillian Greensite <gilliangreensite@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:27 AM

Erika,

Please find attached my comments on the draft EIR for the Long Range Development Plan. It is 4 pages. If you have time, a quick email that you received it would be appreciated.

Regards,

Gillian

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **DEIR LRDP Comments.pdf**
697K

Erika Carpenter
 Senior Environmental Planner
 Physical Planning, Development, and Operations
 University of California, Santa Cruz 1156 High Street
 Santa Cruz, CA 95064
 Email: eircomment@ucsc.edu

RE: COMMENTS ON UCSC 2021 LRDP DRAFT EIR

Dear Erika Carpenter:

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.

I75-1

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.

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.

Thank you for your review of these comments. I look forward to the response.

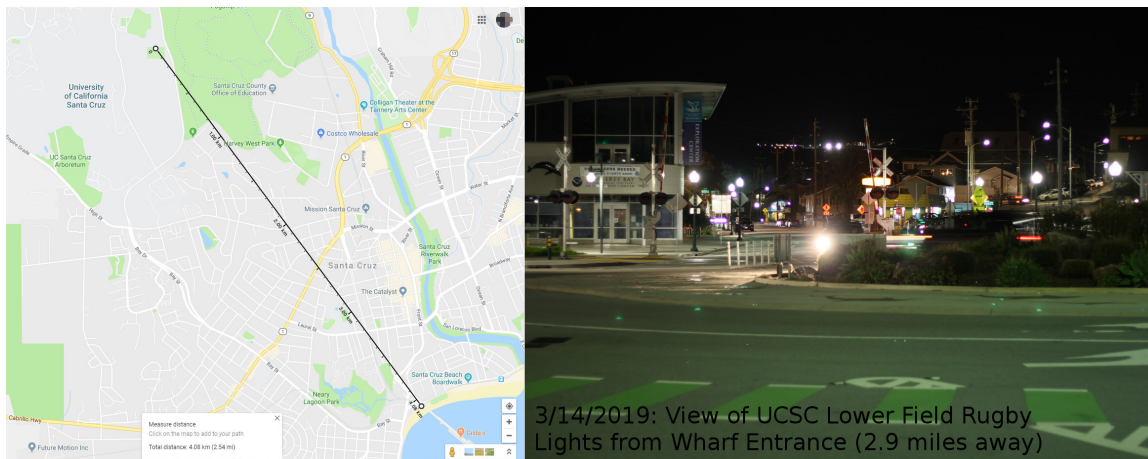
Gillian Greensite
gilliangreensite@gmail.com

I75-2

I75-3



UCSC East Field lights from Highway 1



UCSC East Field lights from Wharf entrance



Erika Carpenter <escarpent@ucsc.edu>

Letter
176

LRDP EIR Comments

eric grodberg <ericgrodberg@yahoo.com>

Mon, Mar 8, 2021 at 10:11 AM

To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>, "escarpent@ucsc.edu" <escarpent@ucsc.edu>

Cc: Donna Meyers <dmeyers@cityofsantacruz.com>, Lee Butler <lbutler@cityofsantacruz.com>, Ryan Coonerty <ryan.coonerty@santacruzcounty.us>

Dear Ms. Carpenter,

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

I76-1

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.

Regards,

Eric Grodberg

3 attachments

 **LRDP DEIR Comment 2021.doc**
324K

 **Larive email SHW.doc**
21K

 **UCSC-Housing-Demand-Analysis-Memo-Dec-2018 (1).pdf**
764K

Eric Grodberg
Santa Cruz, CA
ericgrodberg@yahoo.com

March 7, 2021

Erika Carpenter
UCSC Physical Planning, Development and Operations
2021 LRDP – DEIR Comment
Population and Housing

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.

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

I76-2

I76-3

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.

I76-3
cont.

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.

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/>

I76-4

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.

I76-5

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.

I76-6

9. Chancellor Larive acknowledges that UCSC students create housing pressure off campus T I76-7

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.

I76-7
cont.

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.

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.

I76-8

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

I76-9

- 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.

Sincerely,

Eric Grodberg

Appended and Attached

1. 1/13/20 letter to City Council and UCSC documentation on Rental Housing Pricing
2. 3/5/21 Larive email regarding Student Housing West
3. 12/21/18 Brailsford Housing Demand Study Summary (full study available by request)

Eric Grodberg
Santa Cruz, CA

January 13, 2020

Santa Cruz City Council
Re: UCSC growth and housing
\$9,528/mo – 4BR apartment
Item 8: 12:45 Consent Agenda

Dear Mayor Cummings and Council Members,

I am a named party to the 2008 Comprehensive Settlement Agreement that ended litigation over the UCSC 2005 LRDP.

I fully support the City and County's joint efforts to limit UCSC's growth and/or advocate for true mitigation. However, I do not believe that the public or most Council Members understand the magnitude of the problem – UCSC charges **unconscionable rates** for undergraduate housing, pushing students off campus. UCSC is by far the primary driver of high demand and high rents for in town housing.

UCSC Housing Rates are Exorbitant: UCSC charges **\$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 single and two double (i.e., shared) rooms. I personally know students who lived in this configuration last academic year. This year they 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.”

There is no world in which these rates are acceptable.

Campus Housing West: Pricing is projected to be similar to the rest of campus housing. At an early scoping meeting campus officials told me that it would be priced identically to the rest of campus housing. Please see the attached UCSC documentation contained in the specious Demand Analysis Study.

UCSC growth plans as presented are BAIT and SWITCH: UCSC claims that in the upcoming 2020 LRDP, it will agree to house all of the 8,500 additional students in the projected enrollment growth. This is either a lie or a fantasy. **UCSC has no concrete plan to lower its housing rates.**

During a recent public community outreach meeting, I asked UCSC Executive Vice Chancellor Kletzer how UCSC planned to lower housing pricing in order to meet the stated goals of “inclusion,” “social equity,” and housing all 8,500 additional students. EVC Kletzer told me that I was right to ask her that question, that she didn't have an answer, but UCSC would figure it out.

More than an decade ago I had a conversation with a now retired high ranking UCSC Planning Official. He told me that UCSC's plan for housing more students on campus was to hope that off campus rental housing costs would increase to make on campus housing price competitive. That's its plan.

Without a plan to significantly lower on campus housing prices, **UCSC will be unable to house all projected 8,500 additional students.** Students will reasonably seek much less expensive housing in town.

Currently, off campus housing is between 2 and 3X cheaper than on campus housing. This is borne out by UCSC's own Community Rentals Office. The increased demand of an additional 8,500 students and associated faculty and staff will further exacerbate this price difference and put even more pressure on the in town housing market.

In order to fight this you, as a body, must demand that UCSC reform its broken development and housing system to drastically reduce its pricing. I realize that this is no easy task and will require State level pressure and engagement with the Regents and our local state representatives.

Finally, though I support hiring an advocate, I am troubled that the list of community groups to engage with is dominated by Measure M proponents. This is an issue of great concern for the entire community and I hope that outreach is more inclusive.

Sincerely,

-Eric Grodberg

Apartments 2019-20 Rates

Room rates are per person. No meal plan required; however, [dining options are available](#).

Room Type	Per Month	Per Quarter	Per Year
Single	\$1,728	\$5,184	\$15,552
Double	\$1,518	\$4,554	\$13,662
Small Double	\$1,176	\$3,528	\$10,584
Large Triple	\$1,218	\$3,654	\$10,962
Triple	\$1,155	\$3,465	\$10,395
Quad	\$1,178	\$3,534	\$10,602

<https://housing.ucsc.edu/rates/index.html#apartment>

UCSC Community Rentals - **Off Campus Prices:**

Rental Cost Statistics

January 1, 2018 - December 31, 2018

Rental Type	Rent Range	Average	Number of Listings
Room and/or double room in Household	\$500-\$1,600	\$1,017	880
Studios/Efficiencies	\$800-\$2,500	\$1,428	189
1 Bedroom House/Duplex	\$1,500-\$2,800	\$1,995	53
1 Bedroom Apartment/Condo	\$1,350-\$3,000	\$2,079	130
2 Bedroom House/Duplex	\$2,000-\$4,000	\$2,977	76
2 Bedroom Apartment/Condo	\$1,800-\$3,744	\$2,775	149
3 Bedroom House/Duplex	\$2,650-\$5,300	\$3,852	148
3 Bedroom Apartment/Condo	\$2,900-\$3,600	\$3,276	16
4 Bedroom House/Apartment	\$3,250-\$5,800	\$4,688	61
5 - 8 Bedroom House/Apartment	\$4,400-\$7,500	\$5,645	25

<https://communityrentals.ucsc.edu/cost/index.html>

Below from the specious UCSC commissioned Brailsford and Dunlavy's Housing Demand Study p. 2. Projected exorbitant pricing for the Student Housing West (SHW, aka Campus Housing West) in fine print.

The two surveys provided students with a variety of options available for on-campus living that either currently exists at UCSC or would be a component of the SHW project. Unit types ranged from co-living units to apartments in a variety of sizes and occupancy configurations. Students were also provided additional information on the amenities and total cost for each unit type (Figure 1 – Undergraduates, Figure 2 – Graduates and Family Student Housing).

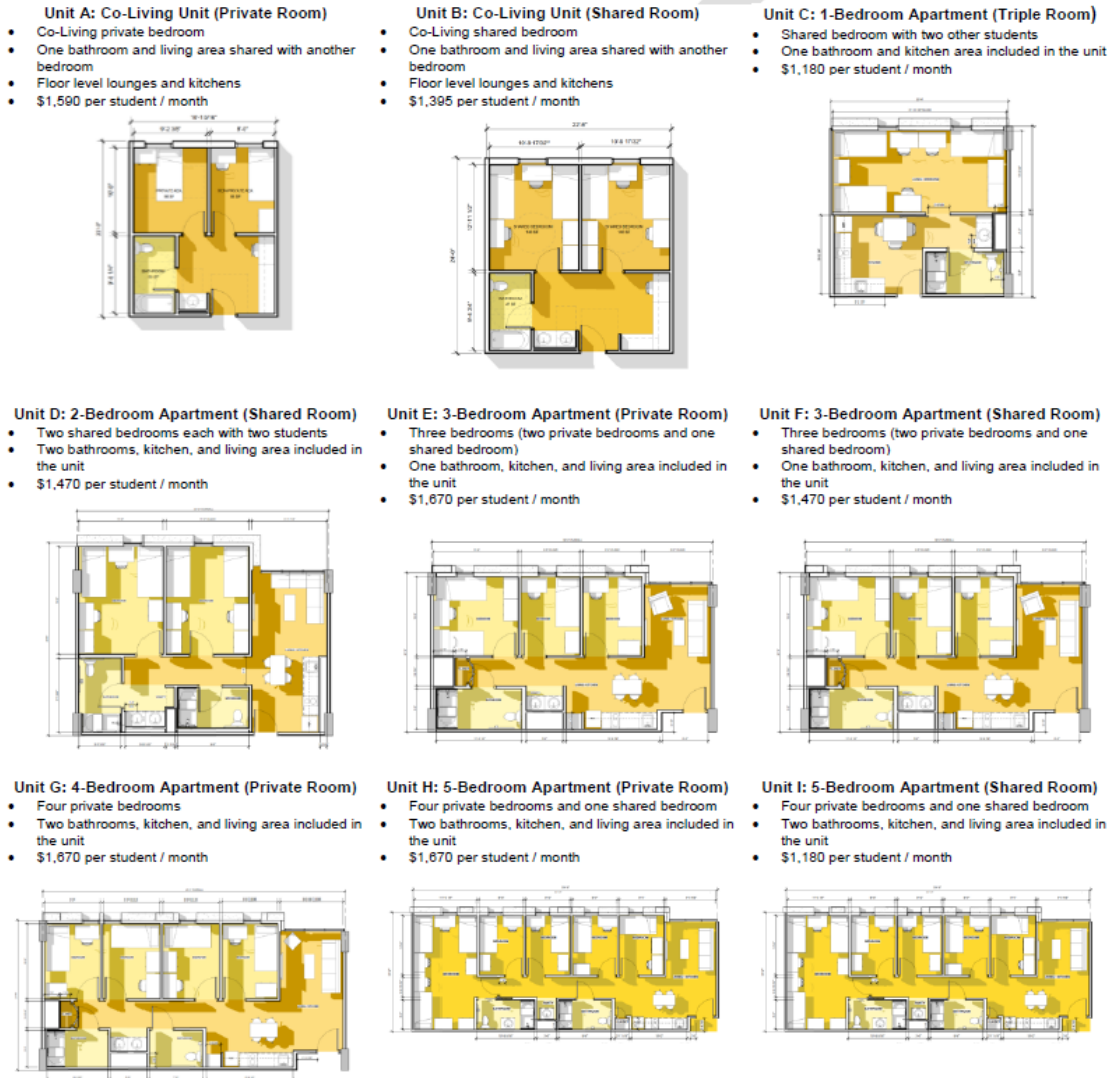


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students

From: **Chancellor Cynthia Larive** <chancelloroffice@ucsc.edu>
Date: Fri, Mar 5, 2021 at 4:04 PM
Subject: More housing for our students, child care for employees
To:

March 5, 2021

Dear campus community,

Later this month, I will seek reapproval from the Board of Regents for a vitally important campus housing and child-care project. Student Housing West, with more than 3,000 beds, a new complex for students with families, and a child-care facility that will be open to all employees, is the largest stand-alone housing project our campus has ever proposed, and would provide more desperately needed on-campus housing for our students. The project was approved by Regents two years ago but then challenged in court. We prevailed on many issues, but the court concluded errors were made in the process the Regents used when they approved the project, requiring us to return to the board.

We already house 50 percent of our students, more than any other University of California campus, because we know that access to a UC Santa Cruz education requires access to secure and affordable housing. There just isn't enough of that in and around Santa Cruz and there certainly aren't enough housing options for our students from low-income backgrounds. Student Housing West is the best course for us to secure the most beds to serve our current students. We haven't built a significant amount of housing on the UC Santa Cruz campus in nearly 20 years. It's time.

The benefits of Student Housing West will be many. Studies show that students who live on campus have a greater chance of matriculating through to graduation. This project 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. The project will allow us to reduce overcrowding in existing dorms and restore some of the lounge space we have converted to sleeping space in recent years to meet the steep housing demand. It will create a new residential community for students with families, situated within walking distance of the local elementary school and near the residential communities where we house our staff and faculty. It will aid our campus community in other ways, too, finally enabling us to offer faculty and staff child-care support that is currently available only to students with children.

I encourage you to visit the [Student Housing West website](#), which details the project. There is [an FAQ section](#) for those new to campus who might have questions.

The Student Housing West project does not enjoy unanimous support. Some of our strongest campus supporters have opposed the project, particularly the portion proposed for the base of the East Meadow, arguing that the area should remain untouched. I have welcomed, valued and considered their opinions.

I was not chancellor when Student Housing West was proposed. That has granted me the opportunity to look at the project with fresh eyes. Over the past 18 months I have studied it and listened to and asked questions of many in our community — project supporters and critics — with an eye toward meeting the project objectives while also satisfying the concerns of all of our stakeholders. There is no simple answer, but the proposed project fulfills our shared values: to support our students and to be a good partner to our community.

I have come to understand that building anywhere on our campus is a tightrope walk. We live, work

and learn in a stunning natural setting. Regardless of where we build, there will be impacts and opposition. I believe strongly that Student Housing West, as approved by the Regents in March 2019, is the best path for us to deliver more desperately needed quality housing for our students as quickly as possible and at the lowest possible price. The price tag is important because the cost of a more expensive project would be borne largely by students. Housing is an auxiliary unit that cannot be funded centrally through state funds or tuition.

The housing crisis in our community is not going away. It has only worsened since the Regents first gave this project their stamp of approval. In August of this past year, the CZU Lightning Complex fires destroyed nearly 1,000 homes in Santa Cruz County. Exacerbating the problem, we're now seeing Silicon Valley employees who are working remotely buying up homes on this side of the hill, deciding working from home here is much preferred to settling down in the Santa Clara Valley. Many UC Santa Cruz students and their families, meanwhile, have been hit hard economically by the pandemic, and many will return to campus in an even more difficult financial position.

We cannot just talk about our values. We must live them. The proposed Student Housing West project exemplifies our values as well as the values of our community and our founders. It is a project that honors our past, addresses our present student housing needs, and will serve the needs of our students and our employees well into our future.

Sincerely,
Chancellor Cynthia Larive

MEMORANDUM

DATE: December 21, 2018

TO: William B. Givhan, Esq.
General Counsel and Chief Operating Officer
CHF-Santa Cruz I, L.L.C.

FROM: Matthew Bohannon – Vice President
Brailsford & Dunlavey, Inc.

RE: Summary of Demand from the Winter and Fall 2018 Student Housing Analyses

INTRODUCTION

In January 2018, CHF-Santa Cruz I, L.L.C. (“CHF”) engaged Brailsford & Dunlavey (“B&D”) to conduct a student housing demand analysis for the Student Housing West Project (“SHW”) at the University of California, Santa Cruz (“UCSC” or “the University”). The Student Housing West project is a planned 3,073-bed project that builds upon previous planning initiatives at UCSC to develop new housing for undergraduate students, graduate students, and students with families. The SHW project is to be delivered by 2022 through a public-private-partnership with Capstone Development Partners (“CDP”). CHF will own the housing assets which will revert back to the University at the end of the development agreement. This project is part of the University of California’s student housing initiative to build 14,000 on-campus beds across the system to support student success and allow for growth within the system. In October 2018, B&D was again engaged to analyze undergraduate student demand to address changes within the proposed SHW Project. Detailed findings of each analysis and methodologies can be found in the following documents:

- ◆ “Student Housing Demand Analysis” report dated April 2018
- ◆ “Findings of Fall 2018 Housing Demand Analysis” memorandum dated December 21, 2018, an addendum to the above report.

This memorandum is only a summary of the demand analysis from both analyses and is an addendum to the original “Student Housing Demand Analysis” report dated April 2018. Information in this memorandum relating to graduate students and family students is from the report dated April 2018 while information pertaining to the undergraduate population is from the December 21, 2018 memorandum.

SUMMARY OF STUDENT HOUSING DEMAND

Tested Unit Types

The two surveys provided students with a variety of options available for on-campus living that either currently exists at UCSC or would be a component of the SHW project. Unit types ranged from co-living units to apartments in a variety of sizes and occupancy configurations. Students were also provided additional information on the amenities and total cost for each unit type (Figure 1 – Undergraduates, Figure 2 – Graduates and Family Student Housing).

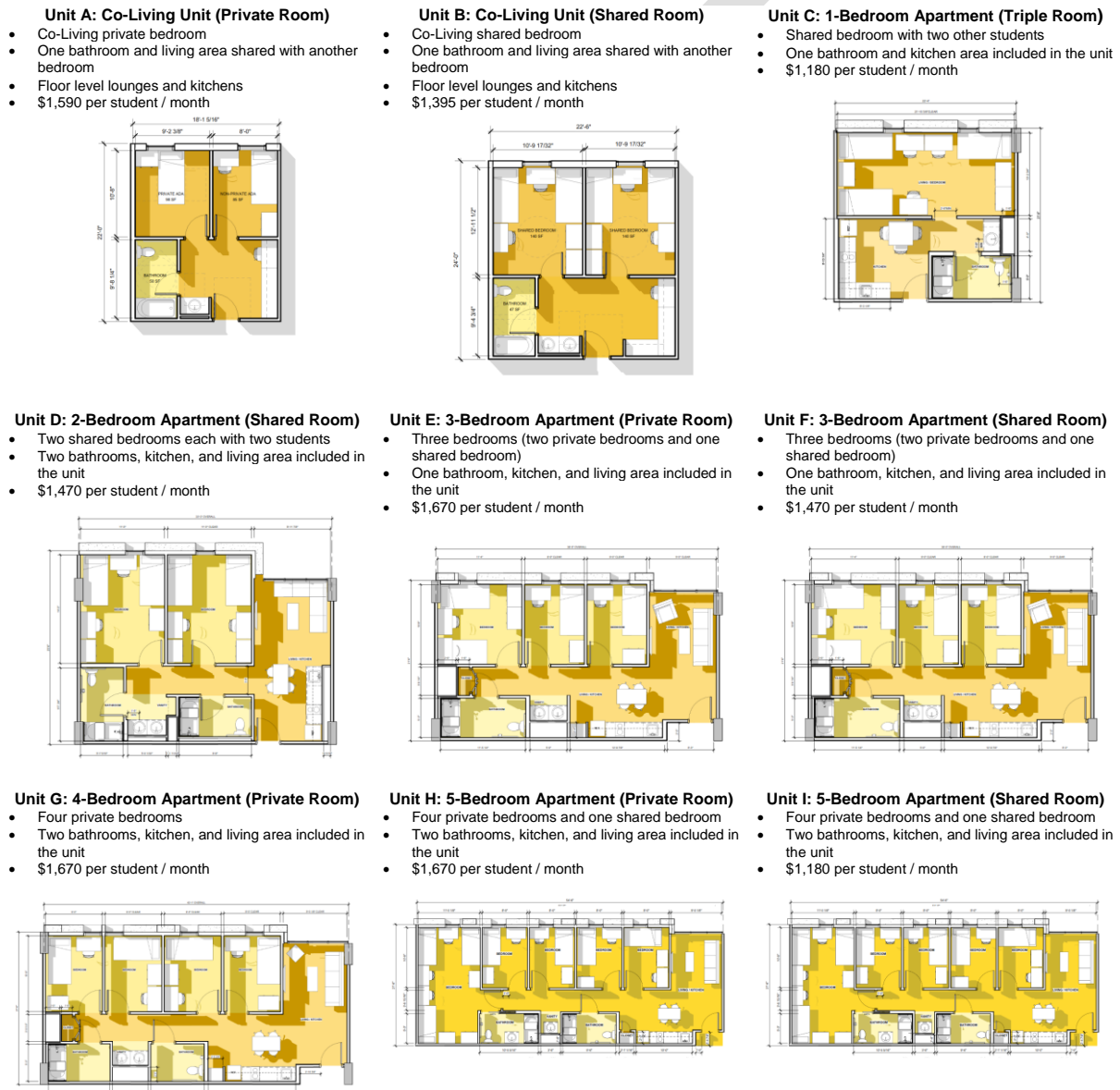


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students

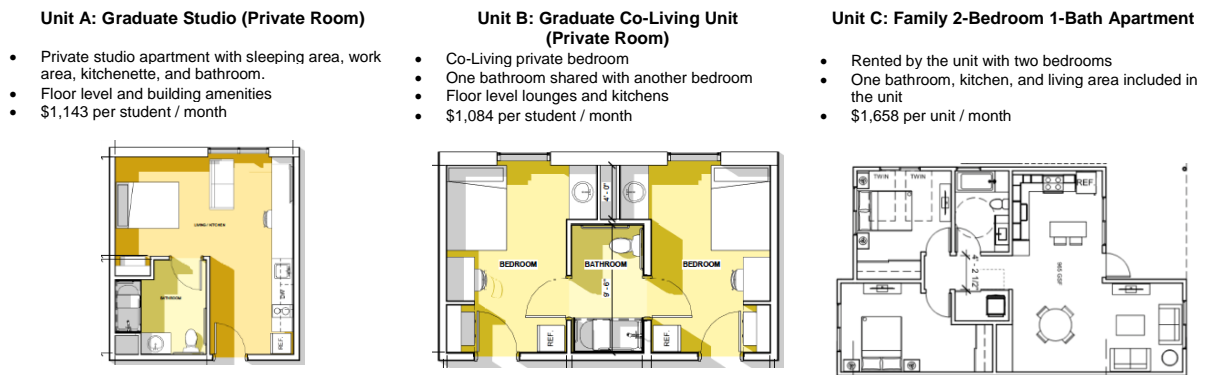


Figure 2: Unit Type Descriptions Shown to Single Graduate Students or Students with Families

Projected On-Campus Housing Inventory Changes

UCSC is proceeding with a number of improvements to campus housing in addition to Student Housing West. The University is renovating / expanding Stevenson College, Crown Leonardo, and Kresge College housing facilities which will adjust capacity for housing over the next eight years (Figure 3). Additionally, the University will be de-densifying existing housing by returning triple occupancy rooms to double occupancy and return lounge spaces to their original use. The projected maximum amount of single undergraduate beds available on-campus during the next eight years is 11,375 (8,643 in existing housing and 2,732 in SHW). The projected total of single graduate beds available by fall of 2023 totals 308 (82 beds in existing housing and 226 in SHW). The projected total of Family Student Housing units is 139, all within SHW.

Project	Capacity Changes as of Fall										Total
	2018 (Current)	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Single Student Undergrad	8,916										8,916
Family Student Housing	196		-196								0
Graduate Housing	82										82
UCSC @ UCDC	22										22
Guest Housing	25	-9									16
Camper Park	42										42
Crown Leonardo Residence Hall Renovation		170									170
Stevenson Renovation		4									4
Kresge College Additions		-23		35		165					177
De-Densification of Housing					-588	-78	-78	-78	-78		-900
Student Housing West FSH			139								139
Student Housing West Undergrad					1,754	978					2,732
Student Housing West Grad					226						226
Total Existing:	9,283										
Net Change:	0	142	-57	35	1,392	1,065	-78	-78	-78	0	
Total Available Beds (Existing + Net Change):	9,283	9,425	9,368	9,403	10,795	11,860	11,782	11,704	11,626	11,626	11,626
Total On-Campus Single Undergraduate Beds:	8,958	9,109	9,109	9,144	10,310	11,375	11,297	11,219	11,141	11,141	
Total On-Campus Single Graduate Beds:	82	82	82	82	308	308	308	308	308	308	
Total On-Campus Family Student Housing Units:	196	196	139	139	139	139	139	139	139	139	

Note: Totals by population exclude Guest Housing and UCSC @ UCDC

Figure 3: Projected UCSC Housing Supply

Projected On-Campus Housing Inventory Changes

Demand Analysis

Based on these factors, the Project Team has defined the likely target markets for the Student Housing West project and existing campus housing:

<u>Undergraduate Students</u>	<u>Graduate Students</u>	<u>Students with Families</u>
◆ Enrolled full-time	◆ Enrolled full-time	◆ Enrolled full-time
◆ Age 18-24	◆ Single without children	◆ Single or married with children
◆ Single without children	◆ Live on campus	◆ Live on campus
◆ Live on campus	◆ If off campus, currently rent and not living with family, partners, or dependents	◆ If off campus, currently rent and pay more than \$700 per month is rent
◆ If off campus, currently rent and not living with family, partner, or dependents	◆ Paying \$700 per month or more in rent	
◆ Paying \$700 per month or more in rent		

Using survey data and fall 2018 enrollment figures, B&D's demand model projected demand for 11,477 single undergraduate beds, 1,116 beds of graduate student beds, and 310 units of family student housing (Figure 4). A significant increase in capturing the sophomore, junior, and senior populations is possible given the interest and demand for unit types in Student Housing West. Demand for graduate housing sees the greatest increase in potential capture rates.

Class Year	Enrollment	Occupancy	Current Capture Rate	Projected Capture Rate	Single Student Demand (Beds)	Family Student Housing Demand (Units)
Freshman	4,775	4,145	87%	87%	4,167	
Sophomore	3,533	2,364	67%	79%	2,792	
Junior	4,312	1,471	34%	42%	1,803	175
Senior / Other	5,308	926	17%	51%	2,715	
Graduate / Other	1,880	77	4%	62%	1,166	135
Total	17,928	8,906	50%	71%	12,643	310

Total Demand: 12,953

Figure 4: Projected Capture Rate of Students

The modifications to existing housing inventory and the addition of new beds in Student Housing West will not exceed the demand present from the UCSC student body (Figure 5). Based on the analysis of demand for single undergraduate students, B&D projects an unmet demand of 102 beds given fall 2018 enrollment and the maximum single undergraduate beds on campus projected for fall 2023. This unmet demand total includes the demand of 11,477 minus the existing single undergraduate housing supply at UCSC of 8,958, supply modifications dropping 315 beds (de-densification of 666 beds within residence halls, and 351 beds in additions and renovations), and the proposal Student Housing West undergraduate program of 2,732 beds. The University plans future de-densification of student housing by an additional 234 beds increasing unmet demand to 336. Unmet demand from graduate students remains high with 858 beds after the new housing is built as a part of SHW. The total demand of 310 units of family housing leaves 171 units of unmet demand for this student group.

Single Undergraduate Students		Demand (Beds)	Single Graduate Students		Demand (Beds)	Family Student Housing		Demand (Units)
Current Supply (Fall 2018)		8,958	Current Supply (Fall 2018)		82	Current Supply (Fall 2018)		196
Supply Modifications ¹		(315)	Supply Modifications ¹		0	Supply Modifications ¹		(196)
Revised Current Supply		8,643	Revised Current Supply		82	Revised Current Supply		0
Student Housing West		2,732	Student Housing West		226	Student Housing West		139
Current Supply + New Beds		11,375	Current Supply + New Beds		308	Current Supply + New Beds		139
Total Demand		11,477	Total Demand		1,166	Total Demand		310
Remaining Unmet Demand		102	Remaining Unmet Demand		858	Remaining Unmet Demand		171

Notes:

1. Planned renovation / expansion of existing housing and de-densification of residence halls through Fall '23.

Figure 5: Unmet Housing Demand

Analysis of demand by unit type preference reveals that there is sufficient demand for all unit types that are proposed in the Student Housing West Project. While still demonstrating ample demand, the 4-bedroom apartment unit represents 26% of the SHW inventory but only shows an 11% buffer between projected supply and demand compared to other units like the shared co-living unit types which have a 124% buffer.

DRAFT



Erika Carpenter <escarpent@ucsc.edu>

Letter
177

[eircomment] LRDP EIR Comments

Brett Hall <brett@ucsc.edu>

Mon, Mar 8, 2021 at 3:28 PM

To: eircomment@ucsc.edu

Cc: Gage Dayton <ghdayton@ucsc.edu>, Martin Quigley <maquigle@ucsc.edu>

Dear LRDP Planning Group,

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.

Respectfully,

Brett Hall

[Brett Hall](#)

[California Native Plant Program Director](#)

[UC Santa Cruz Arboretum](#)

831-212-4853, brett@ucsc.edu

<http://arboretum.ucsc.edu/visit/garden/native-plant-program/wild-life-corridor.html>



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I77-1



Erika Carpenter <escarpent@ucsc.edu>

Letter 178

[eircomment] LRDP EIR Comments

Virginia Jansen <goth@ucsc.edu>
To: eircomment@ucsc.edu
Cc: Virginia Jansen <goth@ucsc.edu>

Mon, Mar 8, 2021 at 4:37 PM

March 8, 2021

Erica Carpenter, Senior Environmental Planner
Physical Planning, Development, and Operations
UCSC

LRDP EIR Comments

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.

I78-1

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?

I78-2

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?

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 upper-level 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.)

I78-3

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.

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.

I78-4

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.

I78-5

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.

I78-6

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.

I78-7

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.

I78-8

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).

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.

I78-9

Yours most sincerely,

Virginia Jansen
Professor Emerita of History of Art & Visual Culture (retired 2006)

Member, Design Advisory Board, 1993-2006
Member, Campus Physical Planning Advisory Board, 1986-1996
Member, various Architect Selection Committees for new buildings, 1994-2002

Instructor of several courses on the UCSC campus plan and American Campus Planning and Architecture, 1985 -2006

Virginia Jansen, FSA
Professor Emerita of History of Art & Visual Culture
University of California, Santa Cruz
goth@ucsc.edu



Erika Carpenter <escarpent@ucsc.edu>

Letter
179

[eircomment] UCSC LRDP

Jazmine Jensen <jarjense@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:33 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Jazmine Jensen

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I79-1

Thank you,

Jazmine Jensen

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list



Erika Carpenter <escarpent@ucsc.edu>

Letter
180

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

bjohns13 bjohns13 <bjohns13@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:51 PM

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.

I80-1

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.

Thank you,

Brian Johnson
Bjohns13@ucsc.edu

NHFQ 2018
Webster's fellow 2019

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Erika Carpenter <escarpent@ucsc.edu>

Letter
181

[eircomment] LRDP EIR comments

Elise Knittle <eknittle@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:34 PM

To whom it may concern,

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.

Elise Knittle

Professor of Earth and Planetary Sciences

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I81-1



Erika Carpenter <escarpent

Letter
182

[eircomment] LRDP EIR comments

Christopher Lay <cml@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 2:03 PM

Hi,

Please find my comments attached for the 2021 LRDP and EIR.

Thanks!

Chris

--

Chris Lay MS
Administrative Director & Lecturer
Kenneth S. Norris Center for Natural History
University of California Santa Cruz
Natural Sciences 2, Room 241
Phone: 831 459 4763
Mailstop: Environmental Studies
Email: cml@ucsc.edu
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 **UCSC LRDP comment letter- Chris Lay.pdf**
113K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Chris Lay, Administrative Director and Lecturer, Kenneth S. Norris Center for Natural History at UC Santa Cruz

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.'*"

I82-1

Below are several more specific comments relating to the LRDP and associated EIR:

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.

I82-2

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,

I82-3

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.”

I82-3
cont.

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.

I82-4

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.

I82-5

Thank you!



Erika Carpenter <escarpent@ucsc.edu>

Letter
183

[eircomment] UC reserve LRDP

ATHENA LYNCH <athenalynch@g.ucla.edu>
To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 12:31 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Athena Lynch

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I83-1

Thank you,
Athena Lynch

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mailing

list



Erika Carpenter <escarpent@ucsc.edu>

Letter
184

[eircomment] Ucsc natural reserve letter

Lucy Malamud-Roam <lmalamud@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:08 PM

 [UCSC LRDP comment letter template](#)

I I84-1

eircomment mailing list
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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

Erika Carpenter
Senior Environmental Planner
Physical Planning, Development, and Operations
University of California, Santa Cruz
1156 High Street Santa Cruz, CA 95064
eircomment@ucsc.edu

RE: comments on UCSC’s Long Range Development Plan Draft EIR

Please find my comments on UCSC’s Long Range Development Plan Draft EIR below, organized by section.

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).



I85-1

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.



I85-2

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.



I85-3

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



I85-4

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.

I85-4
cont.

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.

I85-5

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.

I85-6

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.

I85-7

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.

Sincerely,

Julie Mascarenhas



Erika Carpenter <escarpent@ucsc.edu>

Letter
186

[eircomment] LRDP public comment

Jack Mazza <jackmazza@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 10:59 AM

Hi,

Here is my comment.

Thank you for your time,
Jack

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC LRDP comment letter template.docx.pdf**
44K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Jack Mazza

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I86-1

Thank you,
Jack Mazza

UCSC Alum 2015



Erika Carpenter <escarpent@ucsc.edu>

Letter
187

[eircomment] LRDP EIR Comments

Alayne Meeks <meekshoney@gmail.com>
Reply-To: meekshoney@gmail.com
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:25 AM

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.

I87-1

Thank you for your time.

Alayne Meeks
Soquel, CA

Please respond to meekshoney@gmail.com, my old account alayne@meekshoney.com no longer exists. Thank you!

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
I88

[eircomment] adding housing for more students?

'melissa' via eircomment@ucsc.edu <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 7:18 AM

Reply-To: melissa <twotonekisser@yahoo.com>

To: "eircomment@ucsc.edu" <eircomment@ucsc.edu>

NO 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

I88-1

eircomment mailing list

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Erika Carpenter <escarpent@ucsc.edu>

Letter
189

[eircomment] comment to protect UCSC natural reserve

Mariam Moazed <mmoazed@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:23 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Mariam Moazed

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

189-1

Thank you,
Mariam Moazed

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Erika Carpenter <escarpent@ucsc.edu>

Letter
I90

[eircomment] Save the UC Reserve!!

Gabriela Navarro <gnavarr6@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:14 PM

Greetings,

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.

Thank you for consideration,
Gabriela Navarro

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I90-1



Erika Carpenter <escarpent

Letter
191

[eircomment] LRDP Comment

Veronica Ness <vness@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 1:42 PM

Hi Erka Carpenter,

I am a concerned ENVS/BIO student and needed to voice my opinion of the LRDP. Below is my comment.

Thank you for reading and considering,
Veronica Ness

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **UCSC LRDP comment letter.docx**
17K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Veronica Ness

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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 be 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.

I91-1
cont.

Thank you for your time,
Veronica Ness
Concerned student



Erika Carpenter <escarpent@ucsc.edu>

Letter
192**[eircomment] UCSC LRDP comment**

Sophie Noda <soph.noda@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 2:01 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Sophie Noda

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I92-1

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 ecologist 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 Woodpecker 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.

Thank you,
Sophie Noda

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
193

[eircomment] UCSC2021 Long Range Development Plan and Environmental Impact Report

Kelsey Pennington <kelseypennington@ucsb.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:57 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Kelsey Pennington

Date: March 8th, 2021

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.

I93-1

Thank you,

Kelsey Pennington

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mailing

list



Erika Carpenter <escarpent@ucsc.edu>

Letter
194

[eircomment] LRDP EIR Comment

Kristen Sandel <krsandel@gmail.com>

Mon, Mar 8, 2021 at 3:49 PM

To: eircomment@ucsc.edu, Kristen Sandel <krsandel@gmail.com>

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)?

I94-1

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.

I94-2

Thank you very much for the opportunity to comment!

Kristen Sandel

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
195

[eircomment] Comment on LRDP

Ajay Shenoy <azshenoy@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 9:09 AM

Dear Erika Carpenter and LRDP Planners,

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.

I95-1

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.

I95-2

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%.

Ajay

--

Ajay Shenoy
Assistant Professor, Economics
University of California, Santa Cruz
<http://people.ucsc.edu/~azshenoy/>
Twitter: @AjaycencyMatrix

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
196

[eircomment] UCSC 2021 Long Range Development Plan and Environmental Impact Report

dsimoni dsimoni <dsimoni@ucsc.edu>

Mon, Mar 8, 2021 at 4:25 PM

To: eircomment@ucsc.edu

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Daniel Simoni

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I96-1

Thank you,

Daniel Simoni

eircomment
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

mailing

list



Erika Carpenter <escarpent

Letter
197

[eircomment] UCSC LRDP

jrsparks jrsparks <jrsparks@ucsc.edu>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 3:02 PM

To whom it may concern:

Please read the attached comment.

Best regards,
Jenna Sparks

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



UCSC LRDP comment letter.docx
16K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Jenna Sparks

Date: March 8th, 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

I97-1

Thank you,
Jenna Sparks



Erika Carpenter <escarpent@ucsc.edu>

Letter
198

[eircomment] Public Comment - UCSC 2021 Long Range Development Plan and Environmental Impact Report

Kelly Trombley <trombleyk@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:47 PM

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations
From: Kelly Trombley
Date: March 8 th , 2021

RE: UCSC 2021 Long Range Development Plan and Environmental Impact Report

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.

Thank you,
Kelly Trombley

KELLY TROMBLEY
trombleyk@gmail.com
925.871.9749

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I98-1



Erika Carpenter <escarpent@ucsc.edu>

Letter 199

[eircomment] 2021 LRDP EIR Comments

1 message

Matthew Waxman <waxman.matt@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:03 PM

Dear UCSC and 2021 LRDP EIR comment process,

Thank you for the opportunity to submit EIR comments.

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.

I99-1

I have also added, below each numbered item, the EIR categories associated and for which the items need to be contextualized and responded to.

Thank you,
Matthew Waxman

LRDP EIR Comment:

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.

I99-2

- *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?*
- *What about the actual experiences of today's and tomorrow's students who are given an increasingly sub-par educational 'product' at massive cost?*
- *What does it mean when we realize students are getting nothing but crumbs compared to what majority white students were given in the past?*

I99-3

I99-4

UCSC is barely able to provide the bare minimum at the same time as the University has become more diverse and no-longer 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 UC-system (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.

I99-5

*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.

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.

I99-6

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 p7.2-6)

I99-7

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.

I99-8

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

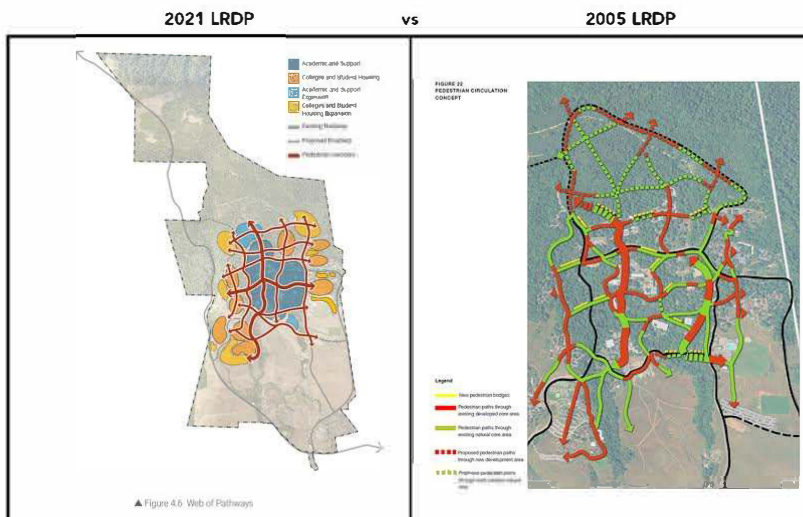
Please address these impacts for EIR section 3.16 Transportation, section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3.18 Wildfire

- 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)
- 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.

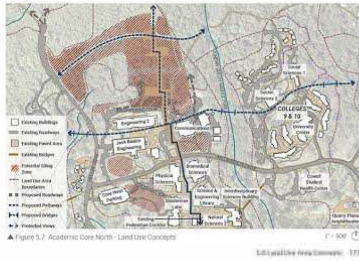
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I99-10

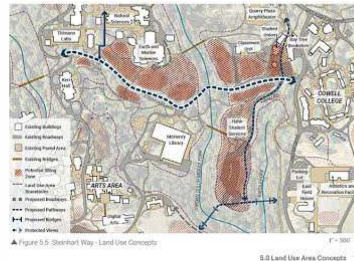
I99-11



2021 LRDP



North-South Corridor Expansion

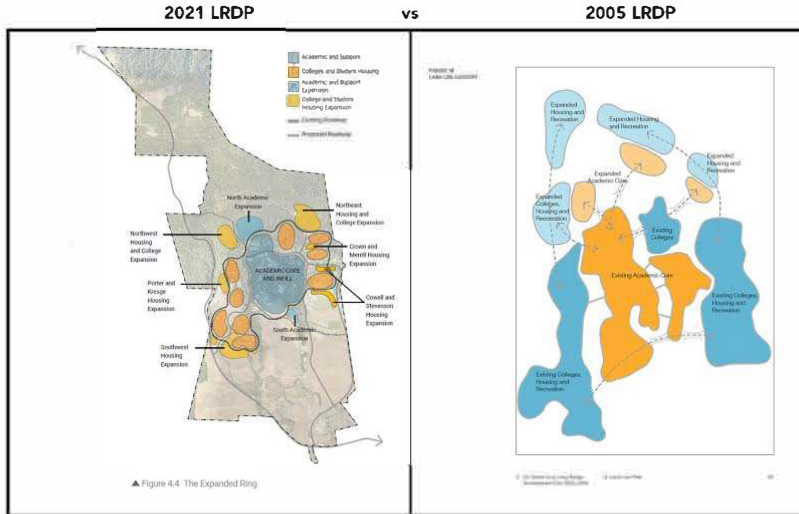


East-West Corridor Expansion

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. [I99-12]
- 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"? [I99-13]
- The 2021 LRDP gives UCSC the ability to build roads through "Campus Natural Reserves" and "Natural Space" (2021 LRDP p 122-123). [I99-14]
- 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. [I99-15]
- 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). [I99-16]



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). [I99-17]
- It is a mistake for UCSC to segregate transfer students, who should be welcomed more, not less, into human-scale college communities. [I99-18]
- 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. [I99-19]

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

199-20

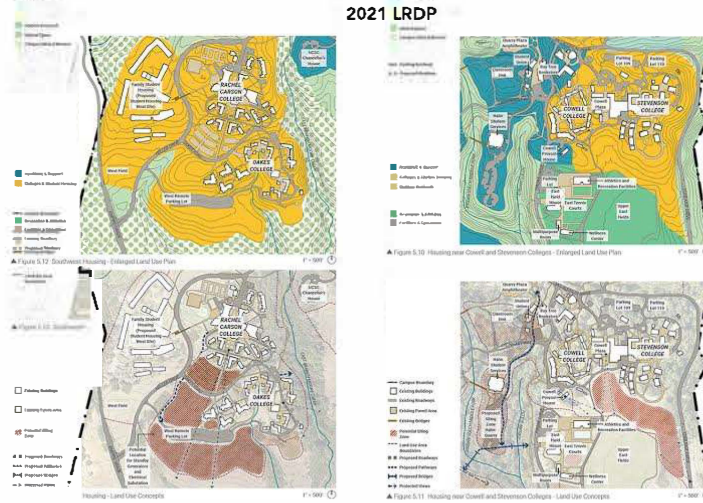
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- The 2021 LRDP does not specify how many students will live in colleges versus unaffiliated apartments. Nor does it clarify the square-feet needed for each.
- When we examine the overall square feet given, the areas zoned for housing, and compare 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

Please address these impacts for EIR section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3.14 Public Services

199-25

199-26

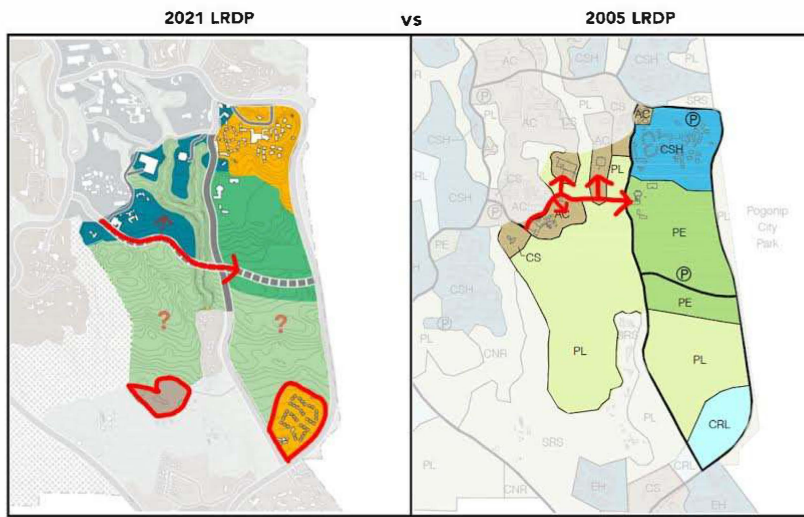
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- Context: Why was UCSC built in the forest and not the meadows? Before UCSC was a campus, its previous owners clear-cut the land. UCSC's landscape architect decided that instead of exposing buildings in the meadows with a conventional lawn and centralized 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.



Matthew Waxman
member, UC Santa Cruz Alumni Council
BA, UC Santa Cruz 2006
M.Arch Harvard University 2012

[eircomment mailing list](#)
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter
1100

[eircomment] 2021 LRDP EIR Comments - additional comments

1 message

Matthew Waxman <waxman.matt@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 12:08 PM

Dear UCSC and 2021 LRDP EIR comment process,

Please additionally respond to these two comments below. These are written versions of the comments I also submitted orally at one of the two public hearings.

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 land-use 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.

I100-1

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 as 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.

I100-2

Thank you,

Matthew Waxman

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter 1101

[eircomment] 2021 LRDP: Fiat Lux?

Claudia Webster <popbeads13@gmail.com>
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 11:22 AM

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-rodged 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.

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.

I101-1

I101-2

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.

I101-2
cont.

What happened to "Fiat Lux"? This LRDP was conducted in the "cover of darkness" and should be resoundingly rejected.

Claudia Webster
Trustee UC Santa Cruz, Trustee UC Santa Barbara

Matthew Waxman's comments below:

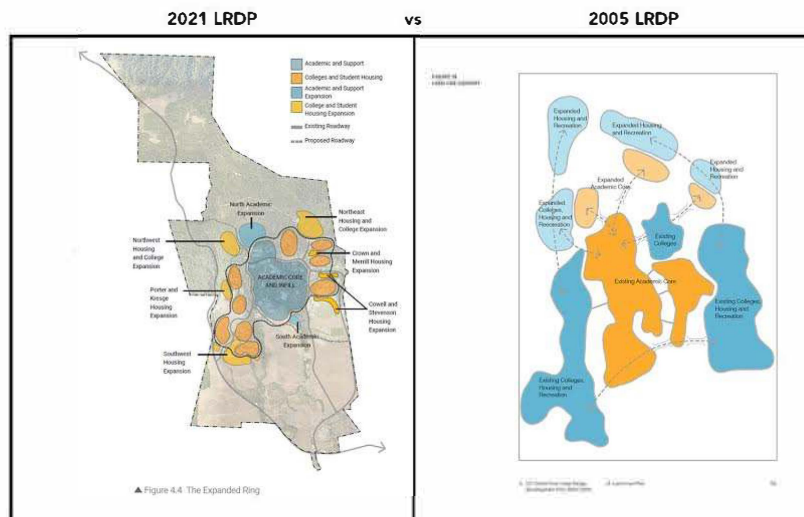
1. Planning Process: the student voice was excluded

- 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).
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- 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).

I101-3



6. Housing: plan separates frosh/soph from upper-division and transfer students

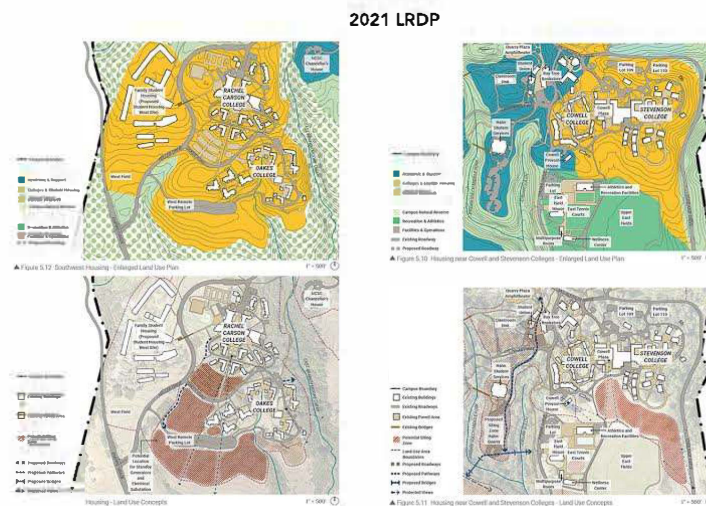
I101-3
cont.

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- It is a mistake for UCSC to segregate transfer students, who should be welcomed more, not less, into human-scale 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.
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- 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).

I101-3
cont.



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.

I101-3
cont.

eircomment mailing list

eircomment@ucsc.edu

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter
I102

[eircomment] EIR Comment

Zoe Arkin <zarkin@ucsc.edu>
To: eircomment@ucsc.edu

Tue, Mar 9, 2021 at 12:09 AM

Hello there,

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.

I102-1

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.

I102-2

The University of California, including Santa Cruz, needs to move away from merely carbon neutrality, but rather carbon-free. 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.

I102-3

Thank you for your time,



Zoe Arkin

SEC Organizer | Enviroslug
Environmental Studies and Politics B.A. '23
University of California, Santa Cruz
(818) 406-8755
zarkin@ucsc.edu

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Letter
I103

Erika Carpenter <escarpen@u

[eircomment] LRDP EIR Comments

Niko Kaplanis <nkaplanis@ucsc.edu>
Reply-To: nkaplanis@ucsc.edu
To: eircomment@ucsc.edu

Tue, Mar 9, 2021 at 10:36 AM

Hello,

I sincerely apologize for submitting this late, but I hope you will still accept the attached comment from the Ecology and Evolutionary Biology Graduate students. Thank you for your consideration,

Sincerely,

Niko Kaplanis

PhD Candidate | NSF Graduate Research Fellow
Raimondi-Carr Lab
Department of Ecology and Evolutionary Biology
University of [California, Santa Cruz](#)
[115 McAllister Way](#)
[Santa Cruz, CA 95060](#)
URL: <http://www.risingtidesproject.com>

eircomment mailing list
eircomment@ucsc.edu
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

 **EEB Graduate Student UCCNR Support Letter (1).pdf**
30K

To: UCSC Campus Planners
Subject: LRDP EIR Comments

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.

Sincerely,

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

I103-1

**Draft EIR 2021 Long-Range
Development Plan for UCSC Public
Comment Hearing (February 3, 2021)**

DRAFT EIR
2021 LONG-RANGE DEVELOPMENT PLAN
FOR UCSC
PUBLIC COMMENT HEARING

REPORTER'S TRANSCRIPT

(Via Zoom)

FEBRUARY 3, 2021

APPEARANCES:

Jolie Kerns: Director of Physical and Environmental
Planning

Erika Carpenter: Senior Environmental Planner

Court Reporter: Cary Blue LaTurno, CSR #9681

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1 JOLIE KERNS: I'll reintroduce myself.

2 And thank you all for your patience as we do this
3 over Zoom. We would much prefer to be doing this in
4 person with all of you.

5 I am Jolie Kerns. I am the director of physical
6 and environmental planning.

7 ERIKA CARPENTER: I am Erika Carpenter, and I am
8 the senior planner at UC Santa Cruz.

9 JOLIE KERNS: We are going to walk through the
10 format and agenda for tonight. We'll start with a short
11 presentation summarizing the LRDP and the EIR followed by
12 the public-comment period.

13 The purpose of this public hearing is to receive
14 comments on the Draft EIR in the 2021 Long-range
15 Development Plan. This is not a community meeting to
16 discuss the project. We are specifically here to receive
17 comments on the materials that have been released. Please
18 limit your remarks to comments on the Draft EIR. As
19 required by the California Environmental Quality Act,
20 UC Santa Cruz will respond to all comments in writing and,
21 therefore, will not respond verbally to comments tonight
22 or engage in dialogue during this webinar.

23 If you wish to speak, please raise your virtual
24 hand. This is located on the toolbar across the bottom.
25 You can click on it to raise your hand. For those on the

1 phone, you can press star nine, and that will raise your
2 hand.

3 When you register, you are asked if you would
4 like to speak. We use that to get a general idea of how
5 many speakers to plan for. So regardless of what you
6 chose when you registered, please use the "raise your
7 hand" function if you would like to speak tonight.

8 Each speaker will have three minutes to provide
9 comments. For those that speak, your comment will be
10 transcribed. So you do not need to also send written
11 comments. If you'd like to provide comments on the Draft
12 EIR in writing, all comments are due by 5:00 p.m. on
13 March 8, 2021.

14 If anyone needs technical assistance, please use
15 the question-answer option, and a staff member will get
16 back to you.

17 So we'll now give a brief overview of the LRDP
18 plan followed by an overview of the EIR.

19 The university's fundamental missions are
20 teaching, research, and public service. Part of this is
21 including educational opportunity to all Californians
22 where demands for UC Santa Cruz education continues to be
23 high, diversity is growing, and increasing number of
24 first-generation and low-income students are being
25 educated. And we rank high for student social mobility.

1 The innovative research conducted on our campus benefits
2 society as a whole.

3 The task at hand for the LRDP on our campus is
4 how to balance development to support our academic mission
5 and educational opportunities with our commitment to
6 environmental stewardship in order to chart an innovative
7 and resilient course for our campus.

8 Every UC campus is required to have an LRDP.
9 It's our regulatory document that governs and guides how
10 we develop the campus and how we utilize the land. The
11 campus is not regulated by city or county general plans.

12 The LRDP indicates where various types of
13 development could be located. In order to plan, we need
14 to understand where we are going. The LRDP is planning
15 for the next 20 years, through 2040.

16 The LRDP plans for a potential projected
17 population of up to 28,000 total student FTE's by 2040.
18 This number represents an outer envelope of student FTE on
19 the campus over the next 20 years to allow us to plan for
20 a building program and evaluate environmental impacts
21 within that envelope.

22 Actual enrollment is determined by the State in
23 conjunction with individual campuses. Our 2005 LRDP plans
24 for total student enrollment of 19,500 by 2020. We are
25 currently at about 18,500.

1 The scope of the LRDP includes the main
2 residential campus at about 2,000 acres and the Westside
3 Research Park at about 18 acres.

4 The Coastal Science Campus, while included as a
5 factor in our planning, has a separate LRDP and is not
6 covered by this one.

7 We began the planning process in early 2017. We
8 worked with several committees throughout, including the
9 LRDP Planning Committee, made up of faculty, staff,
10 community members, students who helped guide the process
11 and steer the direction of the plan. We also engaged with
12 a community advisory group made of City and County
13 representatives to hear their perspectives and feedback
14 along the way. Expert workgroups provided technical
15 feedback on sustainability, resiliency, and
16 infrastructure, circulation and access, housing and campus
17 life, and ecology and the environment. And we had several
18 opportunities for public feedback throughout the process
19 with in-person workshops and meetings, as well as online
20 activities.

21 We anticipate the plan will be considered for
22 approval and the EIR considered for certification by the
23 Regents in the fall of 2021.

24 This is the sixth LRDP for the campus. The 1963
25 LRDP had three goals, which continue to underpin the 2021

1 LRDP as well: establishing a relatively dense academic
2 core encircled by colleges and housing; a commitment to
3 environmental stewardship, including protection of natural
4 features and establishment of a natural reserve; and
5 ongoing cooperation with community, including mutually
6 advantageous planning.

7 Any development on campus begins by evaluating
8 the environmental conditions which make our campus unique.
9 The land-use areas work with -- that are developed for the
10 2021 Long-range Development Plan work with increasing
11 topography to avoid steep slopes, maintain existing
12 watersheds. We have avoided critical habitat. We have
13 critical habitat for the California red-legged frog and
14 Ohlone tiger beetle. We've avoided it where possible. We
15 have some developable land-use areas that are within that
16 habitat, and when we have that, we work with US Fish &
17 Wildlife to establish habitat preserve for these species
18 if projects are implemented on those lands. We currently
19 have about 20 acres of habitat preserve currently on our
20 land.

21 The project is guided by the following LRDP
22 objectives: expand campus facilities and include housing
23 for 100 percent new students above 19,500; ensure compact
24 and clustered developments; provide for two new college
25 pairs to continue the close-knit intellectual and social

1 environment for students; protect existing campus open
2 spaces; increase on-campus housing opportunities for
3 faculty/staff with a commitment to house 25 percent of new
4 faculty and staff on campus based on demand; recognize
5 regional histories within the campus; create a more
6 efficient roadway network to support transit; promote
7 transportation-demand management programs to reduce the
8 use of single-occupancy vehicles; foster long-term
9 physical and social resilience; continue to be a center
10 for public cultural life in the region; and, finally,
11 respect and reinforce the physical planning principles and
12 guidelines in the LRDP.

13 Over the next 20 years, the plan proposes a
14 potential student population growth from 18,518, which is
15 the fall-winter-spring, three-quarter, average on-campus
16 enrollment from 2018 to '19 up to 28,000. This is
17 determined by looking at the campus's growth rate over the
18 previous 20 years and simply projecting it out. Actual
19 enrollment is determined by other factors I mentioned
20 before and is often below projections. In 1963, the
21 campus projected growth to 27,500 by 1990, and our current
22 campus enrollment is approximately a thousand students
23 below, as projected in the 2005 LRDP.

24 The building program was developed to support the
25 proposed student enrollment over the next 20 years and

1 includes up to 2-1/2 million assignable square feet of
2 housing space and up to 3.6 million assignable square feet
3 of academic and support space.

4 The physical planning principles and guidelines
5 in the LRDP articulate broad concepts to guide development
6 over the next 20 years to achieve the LRDP project
7 objectives. These principles reflect the campus's
8 approach of carefully balancing academic research service
9 with our commitment to environmental stewardship and are
10 framed by a deep respect for the natural environment
11 embodying the campus's commitment to being a model to
12 sustainability and resilience, leadership in planning,
13 design, and operations. The plan commits to respect the
14 resilience for our campus land by preserving the integrity
15 of campus landscapes, respecting major natural features,
16 minimizing disturbance to open space, integrating planning
17 for long-term resilience, and continuing to integrate the
18 natural and built environment.

19 The campus continues to look for opportunities
20 for collaboration and communication with the greater
21 community and cultivate public programs as community
22 resources, including protecting our historic, prehistoric,
23 archaeological, and tribal cultural resources.

24 The plan articulates a pattern of development
25 that grows from within, where growth is focused in

1 previously developed areas of the academic core and infill
2 sites. The plan would maintain adjacencies with existing
3 development, with compact expansion north of the academic
4 core, and clustered development south of the academic
5 core, where sensitively sited buildings would protect
6 scenic viewsheds and maintain existing view corridors.

7 By building sustainably and efficiently, the plan
8 embraces density to maximize investments in the land while
9 still maintaining an open-space network within the
10 academic core for contemplation.

11 The plan continues the pattern of colleges and
12 student housing in an expanded ring around the academic
13 core, continuing to balance the context of a major
14 research university with the more intimate scale of the
15 residential colleges and additional noncollege-affiliated
16 student housing.

17 The plan promotes a walkable core by
18 consolidating parking at the periphery, limiting routine
19 vehicular traffic flow, prioritizing pedestrian
20 connectivity, and efficient transit access.

21 So here we have the land-use plans itself. We
22 have one plan. It's noted core for our main residential
23 campus and one for Westside Research Park.

24 The Land-use Plan embraces a compact developable
25 footprint. Most of the development would occur under the

1 designations academic and support, colleges and student
2 housing, and employee housing. The land-use area for
3 colleges and student housing supports capacity to house
4 100 percent of new students above 19,500. The land-use
5 area is for employee housing, supports capacity to house
6 up to 25 percent of new employees based on demand.

7 Some development would also be included in the
8 Historic District, where the campus is interested in
9 rehabilitating existing historic structures -- point down
10 here -- with programs that more actively contribute to
11 campus and community life, as well as, in facilities and
12 operations, we have a little bit of development space and
13 a little bit over in recreation and athletics, which also
14 includes wellness uses.

15 A mixed-use designation is introduced at the
16 Westside Research Park in recognition of the evolving
17 nature of the surrounding area and to allow the
18 development of other program opportunities, including
19 employee housing, to create a diverse, vibrant, and active
20 site.

21 The Land-use Plan includes multiple open-space
22 land-use designations as well where development would not
23 occur: outdoor research for research programs, including
24 the Arboretum, Farm, and Chadwick Garden; Natural Space,
25 formerly called "Protected Landscape," which maintain

1 special campus landscapes intrinsic to the university's
2 identity; Campus Natural Reserve, which includes expanded
3 acreage and protects natural features and processes for
4 the purposes of teaching and research; Campus Habitat
5 Preserve, which preserves habitat for the California
6 red-legged frog and the Ohlone tiger beetle.

7 In addition to the Land-use Plan, the LRDP
8 includes an integrated transportation strategy and
9 utilities and infrastructure framework as part of the
10 campus's comprehensive planning. Three roadway extensions
11 are included in the plan: proposed extension of Meyer
12 Drive onto -- over to Hagar and then Coolidge in order to
13 create an inner-campus loop for more efficient transit and
14 shuttle service. A more efficient transit dovetails with
15 the ability to foster greater pedestrian connectivity
16 through campus.

17 We have a proposed northern entrance to Empire
18 Grade in recognition of increased development north of the
19 academic core and proposed extension of Western Ave into
20 future employee housing areas, which would minimize
21 vehicle trips through the main-campus gateway.

22 While vehicle trips to campus are roughly the
23 same as 20 years ago, the plan continues to be focused on
24 reducing single-occupancy vehicle trips to encourage
25 transit, pedestrian, and bike use and shifting parking to

1 the periphery with mobility hubs for easy transfer to
2 alternative modes of transportation.

3 Finally, a utilities and infrastructure framework
4 would support development. The compact developable
5 footprint allows us to pull on existing utility networks.
6 The plan identifies climate-adaptive strategies to
7 increase resilience on campus over the next 20 years,
8 including minimize increases in potable water use by
9 continuing to expand the non-potable water network,
10 capturing stormwater and run-off for reuse, reducing
11 carbon emissions by increasing reliance on electrical and
12 new buildings.

13 And with that, we will -- I am going to introduce
14 Erika. And we are going to move into the EIR summary.

15 Thank you.

16 ERIKA CARPENTER: Thank you, Jolie. Appreciate
17 that overview of the LRDP.

18 So my presentation is really going to focus on --
19 just start with an overview of what the California
20 Environmental Quality Act is and what the purpose of an
21 EIR is. And then I'll also go over what the EIR
22 conclusions are, as well as what the alternatives were
23 that we evaluated in the EIR.

24 So let me go ahead and share my screen.

25 THE COURT REPORTER: Can you go slower, please.

1 ERIKA CARPENTER: Oh, sure. Yeah.

2 Okay. So this is just our cover slide. I'll
3 just start to the next one, and we'll start talking about
4 what the California Environmental Quality Act is and what
5 it requires public agencies to do as part of the process.

6 The California Environmental Quality Act is a
7 state law that requires public agencies, when considering
8 a project for approval, to evaluate whether and to what
9 degree the project may have an effect on the physical
10 environment. It also requires public agencies to disclose
11 those impacts to the public and interested agencies and
12 reduce any significant impacts, to the extent feasible,
13 with mitigation measures. CEQA also states that if any
14 impacts are found to be significant, not avoidable, and it
15 requires -- it requires further evaluation, then a public
16 agency, such as UC Santa Cruz, shall prepare an
17 Environmental Impact Report.

18 Because of the potential for significant effects
19 and in accordance with the CEQA Guidelines, UC Santa Cruz
20 prepared an EIR to evaluate the environmental impacts
21 associated with implementation of the proposed 2021 LRDP.

22 And I should note that CEQA allows for
23 preparation of a program-level EIR when the project
24 consists of a long-term plan like an LRDP in order to
25 provide a more broader -- a broader consideration of the

1 potential impacts associated with the plan's
2 implementation, as well as development of mitigation
3 programs where appropriate.

4 So this next slide is a graphic that generally
5 summarizes the EIR process under CEQA. It gives you a
6 sense of what steps we've completed, where we currently
7 are in the process, and what the next steps are.

8 We released a Notice of Preparation announcing
9 implementation of the EIR almost a year ago when it went
10 out for public review. We conducted three NOP scoping
11 meetings in the spring of 2020 to receive input on the
12 issues the EIR should address.

13 And then following the close of the NOP comment
14 period, we evaluated those comments and have spent the
15 better part of the last year preparing a Draft EIR, which
16 we released a little over -- a little less than a month
17 ago on January 7. And that document, that Draft EIR, is
18 out for a 60-day public-review period. And the overall
19 purpose of the public-review period is to provide agencies
20 and members of the public an opportunity to comment on the
21 content of the Draft EIR and assist in the evaluation of
22 potential physical environmental impacts.

23 We will also be describing a little later about
24 ways in which you can participate during this
25 public-review process.

1 Following the close of the public-review comment
2 period on March 8 -- and I should note also that the -- we
3 are also in the public-comment hearings tonight and
4 tomorrow night, and there's an opportunity to provide oral
5 comments as well. But following the close of the comment
6 period on March 8, we will prepare responses to comments
7 and a Final EIR, which will also contain any revisions to
8 the Draft that resulted from the comments on that -- on
9 the Draft EIR. And so that is anticipated in the spring
10 of 2021.

11 And then following preparation of that document,
12 it will go to the UC Regents for consideration as part of
13 the overall LRDP approval, which is anticipated in the
14 summer or fall of 2021.

15 So this next slide just really describes all of
16 the environmental issues we evaluated in the EIR. And it
17 was a full-scope EIR. There were 20 CEQA issue areas
18 identified that were, you know, identified in the
19 Appendix G of the CEQA Guidelines that we evaluated. And
20 so I'm just briefly going to go over those right now.

21 Aesthetics, agricultural and forestry resources,
22 air quality, biological resources, cultural resources,
23 energy, geology and soils, greenhouse-gas emissions and
24 climate change, hazards and hazardous materials, hydrology
25 and water quality, land use and planning, mineral

1 resources, noise, population and housing, public services,
2 recreation, transportation, tribal-cultural resources,
3 utilities and service systems, and wildfire.

4 So now we'll start talking a little bit about
5 what the EIR conclusions were. And we are going to start
6 with the significant and unavoidable impacts.

7 And just to give a little context, a project
8 impact is considered significant and unavoidable if it
9 would result in a substantial adverse physical change in
10 the environment that cannot be fully mitigated to a point
11 that it would be less than significant.

12 And so based on the analysis conducted,
13 implementation of the 2021 LRDP would result in six
14 significant and unavoidable impacts. And I am briefly
15 going to summarize these impacts.

16 And so the first one is air quality. LRDP would
17 result in operational-emissions criteria, air pollutants
18 and precursors and potential conflicts with the Monterey
19 Bay Air Resources District Air Quality Management Plan.
20 The LRDP was found to exceed the Monterey Bay Air
21 Resources District thresholds for fine particulate
22 matter, and then because of this exceedence, it also was
23 found to conflict with the Air Quality Management Plan.

24 The LRDP was found to result in the potential for
25 loss of historical resources, the Cowell -- as Jolie was

1 mentioning, some of the historic resources we have on
2 campus. The Cowell Lime Works Historic District, located
3 at the entrance to campus, is on the National and
4 California Register. And the campus core, including the
5 first six colleges and other campus buildings, were
6 surveyed and evaluated and found to be significant as
7 potential hist- -- as a potential historic district under
8 both the National and California Register. And so the EIR
9 includes mitigation measures to protect these contributing
10 structures, as well as other buildings or structures that
11 are 50 years or older within the LRDP area.

12 However, this is a plan-level document and not a
13 specific development project. Therefore, the potential
14 for the permanent loss of historic resources or its
15 integrity within the LRDP area could not be entirely
16 completed even with the implementation of these measures.
17 Therefore, this impact was also considered significant and
18 unavoidable.

19 With respect to noise, the LRDP was found to
20 result in substantial temporary construction noise. And
21 there are mitigation measures in the EIR that would
22 substantially reduce the level of construction noise;
23 however, even with the implementation of these measures,
24 construction noise associated with some future projects
25 could still exceed applicable noise standards; and,

1 therefore, it was found to be significant and unavoidable.

2 With respect to population and housing, the LRDP
3 includes student housing for 100 percent of students above
4 19,500, as well as providing housing for up to 25 percent
5 of new employees based on demand. However, as the housing
6 market is not entirely predictable but is currently
7 considered very tight, therefore, it is possible that
8 there may not be adequate off-campus housing units to meet
9 the demand of additional students and employees in the
10 years leading up to build-out of that LRDP by 2040.
11 Therefore, this impact was also found to be significant
12 and unavoidable.

13 And then with respect to impacts on water supply,
14 UC Santa Cruz is a water customer of the City of
15 Santa Cruz and is subject to the same potential water
16 shortages as the City under the City's
17 water-supply-allocation system and demand-reduction
18 measures.

19 I do note that, you know, UC Santa Cruz has been
20 very successful at reducing water use in recent years and
21 has met water-reduction goals based on proactive
22 conservation; however, the LRDP would contribute to the
23 need for the City to secure any future water source during
24 certain conditions, including multiple dry-year
25 situations.

1 Okay. So now we are going to move on to what the
2 significant but mitigable impacts were that were
3 identified in the Draft EIR.

4 And we'll start with aesthetics. Basically -- I
5 should back up.

6 "Significant but mitigable impacts." Maybe it's
7 somewhat self-explanatory, but it means that there is a
8 significant or a potentially significant impact, but
9 there's mitigation that would reduce it to a
10 less-than-significant level.

11 So with aesthetics, the LRDP has the potential to
12 result in adverse effects on the aesthetic quality of the
13 Cowell Lime Works Historic District, degrade existing
14 visual character or quality, and/or create a new source of
15 light or glare. However, there is mitigation in the EIR
16 that includes setbacks and buffers to protect views from
17 Empire Grade, which is a County scenic road, as well as
18 scenic views on the main residential campus, and measures
19 that would reduce light and glare.

20 With respect to air quality, the LRDP was found
21 to result in construction-generated emissions of nitric
22 oxides from off-road vehicles. And there are mitigation
23 measures to reduce construction-generated emissions such
24 as using renewable diesel and off-road construction
25 equipment.

1 With respect to archaeological, historical, and
2 tribal-cultural resources, there are potential impacts to
3 unique archaeological resources, as well as in the
4 significance of tribal-cultural resources within the LRDP
5 area. And there's mitigation that includes surveys and
6 notification of protection of these archaeological and
7 tribal-cultural resources on campus.

8 Go to the next slide.

9 With respect to biological resources, the LRDP
10 was found to result in the potential disturbance or loss
11 of special-status plant and animal species, sensitive
12 habitat and natural communities, wetlands, wildlife
13 nurseries, and potential conflicts with Habitat -- with
14 the Habitat Conservation Plan on campus.

15 And so we have mitigation in the EIR that
16 includes a number of surveys and habitat assessments, as
17 well as measures requiring the provision for compensatory
18 mitigation, if needed. And then we also have an
19 alternative mitigation requiring establishing an
20 alternative preserve to amend the existing Habitat
21 Conservation Plan, if needed.

22 There is one habitat -- there is one preserve
23 located on our lower campus. We would need to amend that
24 if we were to move forward with any development on that
25 site.

1 With respect to geology and soils, there is a
2 potential significant impact from the disturbance of
3 paleontological resources. And the EIR includes
4 mitigation requiring awareness training when construction
5 occurs within a fossil-bearing formation on campus as well
6 as requirements if anything is found.

7 With respect to greenhouse gases, the LRDP was
8 found to generate greenhouse-gas emissions that may have a
9 significant impact on the environment. And mitigation
10 includes reduction of annual GHG emissions through both
11 on-campus or regional GHG reduction projects and, if
12 necessary, the purchase of carbon offset credits that meet
13 appropriate State definitions and criteria.

14 With respect to hazards and hazardous materials,
15 the LRDP was found to result in a potential significant
16 impact in the release of hazardous materials from unknown
17 contamination that has not been characterized or
18 remediated.

19 So there are mitigation measures requiring
20 investigation and work plans, as well as a contingency
21 plan and minimization of hazards during demolition.

22 With respect to interference with the Campus
23 Emergency Operation Plan, there is a mitigation measure in
24 the EIR which requires a traffic management plan during
25 construction to ensure that if there's a potential

1 evacuation, that no roadways are obstructed.

2 For impacts to the karst aquifer supply and
3 recharge, we have mitigation procedures that require --
4 that require -- or excuse me -- procedures for building on
5 karst as well as groundwater-level and spring-flow
6 monitoring.

7 The LRDP was found to also result in the
8 generation of temporary construction-generated migration,
9 as well as stationary source noises. And so there's
10 mitigation that requires the reduction of ground vibration
11 in proximity to sensitive receptors as well as measures to
12 reduce stationary noise levels at loading-dock activity on
13 campus.

14 With respect to fire facilities, there was a
15 potential impact identified that required mitigation for
16 new fire equipment, an expansion of the on-campus fire
17 station through build-out of that LRDP. It really
18 requires implementation of a vegetation management plan on
19 campus.

20 So now we'll talk a little bit about the
21 significant and unavoidable impacts of the project. And
22 CEQA provides for an evaluation of the significance of our
23 project's cumulative impact based on whether the project's
24 incremental effect is cumulatively considerable.

25 And "cumulatively considerable" means that the

1 incremental effects of an individual project are
2 significant when viewed in connection with the effects of
3 past projects, the effects of other current projects, and
4 the effects of probable future projects.

5 So for cumulative projects considered in the LRDP
6 area, we evaluated those projects on campus under the 2005
7 LRDP, and then we also considered cumulative projects
8 outside of the LRDP area, including those in the city of
9 Santa Cruz and the county of Santa Cruz, and then the
10 California Department of Transportation projects in
11 proximate to the cam- -- you know, proximate to the
12 campus.

13 So those impacts are operational air quality
14 emissions, potential for the loss of historical resources,
15 the potential to generate substantial temporary
16 construction noise, and then impacts on water supply.

17 So now we'll talk a little bit about project
18 alternatives. And there were a number of alternatives
19 that were evaluated in the EIR. And the EIR evaluated
20 eleven alternatives, although seven were considered but
21 dismissed. There are four alternatives that were
22 evaluated compared to the impacts of the proposed 2021
23 LRDP.

24 So this first one is the no-project alternative.
25 And this is required by the California Environmental

1 Quality Act Guidelines to compare the impacts of approving
2 the project with the impacts and not approving the
3 project.

4 And so this particular alternative allows the
5 planned growth as contemplated in the 2005 LRDP of up to a
6 thousand additional students in addition to the 19- --
7 to -- I'm sorry -- up to 19,500 students. And it also
8 allows for 150 additional faculty and staff. Development
9 under this alternative would be about 1.3 additional
10 assignable square feet of academic and administrative
11 space.

12 Alternative No. 2 is the reduced-LRDP-enrollment
13 alternative. And it includes both reduced density and
14 lower enrollment. So it would allow for a student
15 population of an additional 7,882 above the baseline for a
16 total of 26,400 students, an additional 11- -- you know,
17 just under 1200 faculty and staff for a total of 4,000
18 total faculty and staff, as well as development of just
19 under 2.5 million assignable square feet of new academic
20 and administrative space.

21 Alternative 3 is the
22 reduced-development-footprint alternative. And it
23 essentially avoids some of the environmental impacts
24 associated with development of campus, and it densifies
25 development in the central and lower campus. And it

1 would -- it envisions a similar population to Alternative
2 No. 2 with an additional student population, employee
3 population, as well as a similar development scenario.

4 Alternative No. 4 is the reduced campus growth
5 and use of UC MBEST off-site. And so this alternative
6 would reallocate some of the projected growth to the UC
7 MBEST site, which is a UC campus located in Marina on the
8 former -- and about 20, 25 miles south of here. And then
9 this alternative would also expand the online and
10 remote-learning component. And so this alternate really
11 kind of splits up development as far as how many students
12 would be located within the LRDP area and how many would
13 be in expanded online remote-learning programs, as well as
14 how many graduate students would be at the UC MBEST site.
15 So there's a breakdown of, you know, how that would be
16 allocated.

17 There would also be a smaller development
18 scenario on -- within the LRDP area of 1.1 million
19 assignable square feet of academic and administrative and
20 support space within the LRDP area and then 250,000 square
21 feet -- assignable square feet of academic and
22 administrative space at UC MBEST in Marina.

23 So the environmentally superior alternative would
24 be Alternative 2. It is the reduced LRDP enrollment
25 scenario. And it would meet most of the project

1 objectives and result in a reduction of impacts compared
2 to the 2021 LRDP, especially with respect to the overall
3 level of development.

4 This alternative would not meet the key project
5 objective of allowing campus growth to the full 28,000
6 students, and it would not avoid the significant and
7 unavoidable impacts associated with historic resources,
8 noise, population and housing, and water supply that were
9 identified for the 2021 LRDP.

10 So that concludes the CEQA portion of our
11 presentation. And I am going to hand this over to Jolie,
12 who is going to start the public-comment period.

13 (Technical difficulties.)

14 JOLIE KERNS: We went through these -- this
15 information -- a lot of information quickly. We have the
16 documents available, and we'll review again how to access
17 all of that, but we wanted to make sure that we had enough
18 time to hear public comments. So we will bring up a
19 couple reminders in just a second here.

20 I am going to go ahead and ask, before I walk
21 through this, if you haven't raised your hand and you
22 would like to give a comment, please raise your hand by
23 clicking on the "hand" icon now.

24 So all attendees are muted until asked to unmute
25 by the host. If you would like to speak, raise your hand.

1 This should be at the bottom toolbar on your Zoom screen.
2 And, again, if you are joining by phone, you can dial a
3 "star nine" to raise your hand and a "star six" to unmute.

4 Commenters will be called in the order of hands
5 raised. So if you lower your hand, you will lose your
6 place in the queue. So leave your hand raised once you
7 click on it. When it's your turn to speak, we will
8 announce your name, ask you to unmute yourself, and ask
9 you to state your name, spell it before providing your
10 comment.

11 Each speaker has three minutes to provide
12 comments. A timer will appear on the screen when you have
13 about 30 seconds of comment time remaining.

14 If you speak, your comments will be transcribed
15 and addressed in the Final EIR.

16 You do not need to also provide a written comment
17 if you are providing a verbal comment tonight.

18 And then, finally, the meeting is being recorded,
19 and a court reporter is present to transcribe comments.

20 Again, if you are having any difficulties,
21 technical difficulties, you can use the question-answer to
22 send a question to staff, and we can try and help you as
23 best possible.

24 So I am going to pull up the list of participants
25 here.

1 And we are going to leave this housekeeping slide
2 on the screen as a reminder for anyone speaking.

3 And I am going to start at the top of the list.
4 I'll go ahead and read the top three names I see so that
5 the first name, we'll hear from now, and the two beyond
6 that, you will be on deck.

7 So, Karen Holl, I've just unmuted you. And if
8 you could go ahead and state your name and spell it and
9 please provide your comment.

10 KAREN HOLL: I am Karen Holl. H-o-l-l is my last
11 name. I am a professor in the environmental studies
12 department. And I served on both the 2005 and 2021 LRDP
13 advisory committees.

14 My two comments, I have made at several LRDP
15 committees meetings and I submitted here as written
16 comments on the NOP. However, neither was addressed in
17 the meetings. So I am repeating them here.

18 First, the EIR should not only consider a growth
19 envelope of 28,000 students, but it should also address
20 what resources are needed for the campus to increase
21 enrollment --

22 THE COURT REPORTER: I'm sorry. You are going to
23 have to speak a lot slower.

24 KAREN HOLL: Well, I am going to speak because I
25 need to get my 30 seconds. I will send you my transcript.

PH1-1

1 Should address what -- if these conditions --
2 sorry. Enrollment in specific increments such as 22,000,
3 24,000, et cetera. If those conditions are not met,
4 enrollment should not increase.

5 The 2005 LRDP Committee carefully reviewed the
6 environmental impacts needed -- construction and
7 mitigation to grow to an enrollment of 18,500 students.
8 The campus has now nearly reached that enrollment figure,
9 but much of the proposed housing, class, or lab space and
10 mitigation for cumulative environmental impacts has not
11 happened.

12 I compared the proposed new assignable square
13 footage from the 2005 LRDP with the numbers of what has
14 been constructed, and, in fact, only 12 percent of the
15 proposed academic and support space and 45 percent of the
16 housing proposed has actually been constructed despite the
17 fact that enrollments have reached 18,500 students. This
18 means that student is overcrowded, class times have been
19 shortened, and campus lands have become increasingly
20 degraded. And to my knowledge, there is currently no
21 available public funding for academic building
22 construction, and the budget situation is even worse now
23 with the additional COVID-related deficits.

24 I know the LRDP has a plan to allow for growth
25 rather than a mandate for growth, but as the last LRDP

PH1-1
cont.

1 shows, the student population can grow without the
2 resources outlined in the LRDP being available.

3 Therefore, I consider it essential that the 2021
4 LRDP EIR include discussion of specific intermediate
5 student-population limits beyond which UCSC cannot grow
6 without adequate resources.

7 The aesthetically pleasing and thoughtful LRDP
8 that the consultants produced is meaningless if we do not
9 have the funding to implement it.

10 My second concern regards permanently protecting
11 at least some portion of the Campus Natural Reserves,
12 which falls under several EIR topics. The CNR is critical
13 resource for the campus teaching and research mission as
14 noted in the Draft LRDP. I appreciate that the area of
15 the CNR was nearly doubled in the new LRDP. However, for
16 faculty to invest in long-term research projects that
17 involves students, they need to know that certain areas of
18 lands are permanently protected. However, every time I've
19 asked about permanent protection of the CNR during the
20 planning process, I've been told, "Not now. We'll discuss
21 it later."

22 In the Final LRDP Committee meeting and in my
23 correspondence to the Planning Office staff, I was told
24 that this issue would be addressed during the EIR process.
25 So I was anticipating that permanent protection would be

PH1-1
cont.

PH1-2

1 addressed in the Draft LRDP and EIR, but it wasn't, which
2 I consider a major oversight for a document that will
3 guide the next 20 years of campus planning.

4 I know that the UCSC reserves director,
5 Gage Dayton, and others are meeting with the Chancellor in
6 March to discuss this topic, and I feel strongly that
7 permanent protection of the CNR does need to be addressed
8 in the final version of the LRDP.

9 Thank you.

10 And I will be happy to provide a transcript of
11 the exact wording.

12 JOLIE KERNS: Great. Thank you, Karen.

13 I am going to move to our next speaker,
14 Andy Schiffrin.

15 I am unmuting you right now. And please unmute
16 yourself. And we look forward to your comment.

17 ANDY SCHIFFRIN: Can you hear me?

18 JOLIE KERNS: Yes, we can hear you. And if you
19 could state your name and spell it for our court reporter,
20 that would be appreciated.

21 ANDY SCHIFFRIN: Will do.

22 First, I want to thank you for the opportunity to
23 speak on the LRDP's Draft EIR.

24 My name is Andy Schiffrin, A-n-d-y
25 S-c-h-i-f-f-r-i-n. And I teach a class entitled

PH1-2
cont.

PH1-3

1 "Environmental Assessment" at UCSC.

2 I'll keep my comments brief here.

3 In reviewing the Draft EIR, I found many
4 inadequacies in the document in terms of the requirements
5 of CEQA. Perhaps the most glaring is that the entire
6 analysis is built on the assumption that the objective of
7 housing 100 percent of the new students and up to
8 25 percent of the new faculty and staff will be attained;
9 however, there is no substantial evidence -- none at all,
10 actually -- provided that supports this assumption, and
11 there is no recognition, also, of the need to tie the
12 provision of housing to enrollment increases.

13 The Population and Housing chapter analyzes the
14 potential of environmental impacts of housing 100 percent
15 of the students on campus, but the proposed mitigation
16 measures are inadequate.

17 Mitigations must be action forcing and must avoid
18 or reduce the significant impacts of a proposed project.
19 Simply planning to house the students and to address the
20 need to house the students is not an adequate mitigation
21 measure. It does not reduce the impacts.

22 As proposed, these are not adequate mitigation
23 measures. The mitigation measures need to ensure that the
24 housing will be provided and when they'll be provided in
25 order to avoid both significant off-campus and on-campus

PH1-3
cont.

PH1-4

1 impacts.

2 A second major inadequacy of the Draft EIR
3 concerns its treatment of the significant impacts of the
4 development in the North Campus subarea. The Draft EIR
5 identifies the danger of wildfires as a potentially
6 significant impact of the LRDP; however, given the
7 particular wildfire danger in this subarea based on its
8 location in a designated high-fire-hazard-severity zone
9 with no new road access and no secondary access, housing
10 3,700 students as well as academic support facilities
11 there is not responsible. And the Draft EIR doesn't
12 adequately analyze these dangers or provide meaningful
13 mitigation measures. Simply considering the future
14 preparation of a Vegetation Management Plan with general
15 performance standards as sufficient for reducing the
16 impact to a less than significant level is simply not
17 adequate under CEQA.

18 I urge the university to take these concerns
19 seriously and revise the EIR to adequately respond to
20 them.

21 While I have many other specific issues with the
22 Draft EIR, time is short. So I will end here.

23 JOLIE KERNS: Thank you for your comment, Andy.

24 Our next speaker I see is Joanne Brown.

25 I am going to go ahead and unmute you. And if

PH1-4
cont.

PH1-5

1 you could please state your name and spell it, that would
2 be appreciated.

3 JOANNE BROWN: Hi. My name is Joanne Brown,
4 J-o-a-n-n-e B-r-o-w-n.

5 I am a resident of Santa Cruz County and live in
6 the Santa Cruz Mountains with a master's degree in biology
7 with a focus in ecology.

8 My comments are on the Biological Resources
9 section. And I'll be submitting additional comments in
10 writing.

11 Landscape within the boundaries of the LRDP is
12 rich in biodiversity. It includes sensitive natural
13 communities, 15, in total, wildlife-movement corridors for
14 a number of species, including mountain lions, wildlife
15 nursery sites, environmentally sensitive habitat areas, at
16 least seven special-status plant species, at least 19
17 special-status wildlife species.

18 The EIR does not address the permanent loss of
19 habitat for its special-status species from construction
20 activities in the resulting permanent changes. The
21 proposed mitigations do not afford real protection to help
22 ensure the survival of special-status species over time in
23 this area.

24 For wildlife, the primary focus of mitigation
25 efforts is during the breeding season. There's little

PH1-6

1 effort planning for long-term protection and preservation
2 of habitat for these species outside of the breeding
3 season.

4 In areas impacted by new construction, the EIR
5 does not afford protection to intact habitats nor address
6 negative impacts on surrounding natural areas outside the
7 boundaries of the LRDP. These permanent changes to the
8 landscape will affect all species of wildlife therein, not
9 just special-status species.

10 Rather than implementing mitigation efforts after
11 habitats are destroyed, why not initially plan to protect
12 the sensitive natural communities, sensitive habitat
13 areas, and special-status species that currently or
14 potentially occur within LRDP boundaries? Protecting the
15 biodiversity and natural beauty that occurs within the
16 boundaries of the LRDP will be a gift to generations of
17 students, educators, and our community. These unique
18 habitats offer opportunities for ecological research and
19 long-term environmental studies.

20 Although UCSC is not subject to municipal
21 regulations of surrounding local governments, I would hope
22 that UCSC decision makers feel a moral obligation to do
23 their part by adhering to municipal regulations that
24 protect our locational environment and wildlife,
25 especially considering the current environmental crises we

PH1-6
cont.

1 are experiencing: fires, floods, debris flows, and
2 resulting loss of wildlife habitat, including wildlife
3 nurseries and corridors.

PH1--6
cont.

4 Several questions for consideration:

5 What percentage of recent biological research for
6 the LRDP was conducted in the field as compared to online?

PH1-7

7 How can a plan implementing wildlife and
8 environment for the next 20 years be realistic unless it
9 is based on current data collected in the field?

10 As a result of the CZU Complex fires, over
11 100,000 acres were burned, resulting in massive habitat
12 loss for wildlife in the Santa Cruz Mountains.

13 How has the increased necessity of protecting
14 wildlife habitat in the Santa Cruz Mountains been
15 addressed in the LRDP?

PH1-8

16 Thank you.

17 JOLIE KERNS: Thank you for your comment.

18 We'll go ahead and go on to the next speaker.

19 And I'll name the next three that I see so others can be
20 on ready. Just a second.

21 I will call Abraham Borker; after that,
22 Christopher Connery; and after that, Gillian Greensite.

23 Abraham Borker. I am unmuting you. And if you
24 could please state your name and spell it, that would be
25 helpful.

1 ABRAHAM BORKER: Hi. Thanks. My name is Abraham
2 Borker, A-b-r-a-h-a-m B-o-r-k-e-r. I am the program
3 director of the UC Santa Cruz Doris Duke Conservation
4 Scholars Program and a former lecturer of the Ecology and
5 Evolutionary Biology Department.

6 And I believe that -- I want to come here to
7 advocate for the Campus Natural Reserve being considered
8 part of the UC Natural Reserve system.

9 Our Scholars Program, a nationally recognized
10 program, just strengthened conservation by accelerating
11 and connecting a diverse community of emerging
12 conservation leaders at UC Santa Cruz largely because of
13 our outdoor classrooms and the biological integrity of our
14 campus. This program comes with millions of dollars of
15 funding, raises the reputation of the university, and is
16 an essential part of our community, and without our
17 natural reserves and our outdoor classrooms, it would not
18 be possible.

19 So I implore you to consider protecting the
20 Campus Natural Reserve as a UC natural reserve to ensure
21 that, as the EIR suggests, it will get permanent
22 protection and leverage the resources of the largest most
23 effective network of outdoor laboratories and classrooms.
24 It would ensure that future generations of UCSC students,
25 staff, and scientists all benefit from the threefold

PH1-9

1 mission of the UC reserves in research, teaching, and
2 service.

3 And I want lots of people to talk. So I will end
4 my comments there. Thanks for having me, and thank you
5 for hosting this.

6 JOLIE KERNS: Thanks so much for your comment.

7 I am going to move on to the next one. We have
8 Christopher Connery.

9 I am unmuting you right now. And, again, just
10 stating your name and spelling for our court reporter
11 would be appreciated.

12 CHRISTOPHER CONNERY: Okay. Thanks very much.
13 I am Chris Connery, C-h-r-i-s-t-o-p-h-e-r C-o-n-n-e-r-y.

14 A few comments mainly about the meadows.

15 I'll note that the 1963 Long-Range LRDP had a
16 principle that has been adhered to up until this point of
17 protecting the meadows, of not building on the meadows.
18 Sometimes the meadow -- the Great Meadow refers to what
19 now includes the Great Meadow and the East Meadow.

20 Sometimes these are referred to as two, sometimes as one.

21 Problem is with the current LRDP. The NOP shows
22 student housing along the part of Student Housing West
23 that is planned for the East Meadow as a fait accompli.
24 This is an open question whether that project will be
25 built. There's several -- there's litigation ongoing

PH1-9
cont.

PH1-10

1 about that, and that has not been settled. At this point,
2 that portion of the East Meadow should be shown as natural
3 space or campus resource land.

4 I want to re- -- and then going to what's now
5 referred to as the "Great Meadow," I want to read
6 something that Chancellor Pister said in 1991 when he
7 decided not to build the Meyer Drive Extension on the
8 Great Meadow.

9 "We totally relocated the Meyer Drive Extension.
10 By the way, it didn't take me more than a couple of days
11 to realize the stupidity and, in a sense, the error in
12 trying to put Meyer Drive through the Great Meadow."

13 That was 1991. There should be -- that -- the
14 potential permanent roadway should be eliminated.

15 And I would just like to conclude by saying that
16 the aesthetic impact of developing the meadows is woefully
17 underplayed in the current EIR. And the encroaching
18 development that's already happening in the East Meadow,
19 the so-called "temporary construction zone," which has
20 been there for ten years, now includes semipermanent
21 buildings. This is below the East Remote Parking Lot.
22 There should be no development below the Eastern Remote
23 Parking Lot all the way down to Hagar.

24 And the campus should reaffirm its commitment to
25 protecting the meadows, which have not only biological and

PH1-10
cont.

PH1-11

1 environmental, but also cultural historical values.

2 Thank you.

3 JOLIE KERNS: Thank you, Chris, for your
4 comments.

5 The next hand I am seeing here is Gillian
6 Greensite.

7 I am unmuting you now. And if you could state
8 your name and spell it, that would be appreciated.

9 GILLIAN GREENSITE: Yes. Can you hear me?

10 JOLIE KERNS: We can.

11 GILLIAN GREENSITE: Thank you very much. And
12 thank you for the opportunity. And thank you for the
13 court reporter.

14 I have a number of issues with the Draft EIR, but
15 given the time, I will just focus on a couple, and I will
16 submit others in writing by the due date.

17 Much has been made of housing all new students on
18 campus. I think what's being forgotten is the other
19 students who will be living off campus. And using your
20 numbers that a build-out -- there could be 17,000 students
21 and staff looking for off-campus housing compared to the
22 10,000 currently who live off campus. And you've made no
23 study in the EIR of the impacts of that extra 7,000
24 students looking for off-campus housing. In fact, what
25 the EIR says, it cites the vacancy rate in Santa Cruz,

PH1-11
cont.

PH1-12

1 5.6 percent, and says that that vacancy rate plus the new
 2 developments that are being built off campus will take
 3 care of that. In fact, their quote is "Housing is
 4 generally available for all of those new --" not new like
 5 first year, but "additional students that all of this
 6 build-out would bring." I feel that's an enormous lack in
 7 an EIR. You only study or say you will study unplanned
 8 growth.

PH1-12
cont.

9 And, similarly, the impact on recreation
 10 facilities seems woefully inadequate. You say that the
 11 on-campus land will be offset by off-campus and that --
 12 provisions -- and the impact is none or less than
 13 significant because city -- additional students will pay
 14 on city fees. Well, there's no additional fees paid for
 15 surfers in the surfing lineups. So I found that very
 16 inadequate.

PH1-13

17 You also are not looking at the issue of
 18 displacement. And, in fact, you say it's not relevant. I
 19 disagree, and I think others would disagree. All of the
 20 new development which is going in in Santa Cruz, which
 21 apparently will be for students given that that's what you
 22 say is adequate provisions, leads to the displacement of
 23 our low-income workers. I feel that really should be
 24 examined.

PH1-14

25 I feel the Westside Research Park impact is

T PH1-15

1 inadequately researched. It is opposite a monarch
2 overwintering site.

3 There's many others, but I can see my time's
4 running out.

5 Lastly, then, what I would say is on the public
6 services, you mention nothing about safety.

7 I'm sorry. I didn't spell my name, and I see
8 time is running out. Shall I do that now?

9 JOLIE KERNS: Sure. If you want to take a couple
10 of minutes to wrap up, that's fine, and you can spell your
11 name at the end of your comment.

12 GILLIAN GREENSITE: Thank you very much.

13 So I think in terms of student safety, I worked
14 at university for 30 years, in charge of rape prevention
15 education, and to have no comments in terms of whether
16 it's police security or other resources with this
17 expansion of the campus, I believe, is an oversight.

18 And I would just add that the Biology section in
19 terms of the critical species has very little detail. You
20 omit where the current burrowing owls are along Hagar
21 Drive, and it's very vague. There's no baseline
22 documentation or data.

23 And, lastly, I'll just say that the aesthetics
24 under "visual impact" are going from the current 2 million
25 assigned square feet to 5 million ASF in terms of

PH1-15
cont.

PH1-16

PH1-17

PH1-18

1 buildings is very poorly depicted as an impact, and it
2 needs much more impact since your conclusion is the new
3 development is consistent with existing, quote,
4 esthetically compatible facilities. Well, I assume
5 Student Housing West is not included in that, but if that
6 is the yardstick for future development, then it is -- I
7 don't think it could be objectively called "esthetically
8 compatible."

9 I'll leave it there. Thank you for the extra
10 time. My name is Gillian, G-i-l-l-i-a-n. And the last
11 name, Greensite, G-r-e-e-n-s-i-t-e.

12 Thank you very much.

13 And thank you, Court Reporter.

14 JOLIE KERNS: Thank you for your comment,
15 Gillian.

16 I see three commenters. I am going to read all
17 three names. And we'll be starting with the first name.
18 Kathy Haber, Fabra Constantine, and Faye Crosby.

19 Kathy Haber, I am unmuting you right now. And I
20 do -- again, if you could state your name and spell it,
21 that would be appreciated.

22 KATHY HABER: Hello. My name is Kathy Haber.
23 Can you hear me? Can you hear me?

24 JOLIE KERNS: Yes, we can hear you. Thank you.

25 KATHY HABER: It is K-a-t-h-y H-a-b-e-r.

PH1-18
cont.

1 I don't have any professional qualifications as
2 many of the people who have spoken previously have
3 mentioned, but I've -- I was a student. I graduated --
4 I am an alumni of UCSC from the very earliest times. I
5 graduated in 1970, and I've lived in Santa Cruz
6 continuously since then. So I have a great interest in
7 the campus and what occurs up there. I use it often. I
8 attend events, and I hike on the campus frequently.

9 And I have several things that I would like to
10 say. And I don't know how to fit them into an EIR. I
11 really don't understand how to do that.

12 Number one is the development of the East Meadow.
13 With the housing stuck down in the corner where it is so
14 far away from the central campus is not fair to the people
15 who might live there. They are very, very far from any
16 facilities that they would be using. It is very poor
17 planning.

18 And, also, it does not fit in with any sense of
19 aesthetics. To interrupt the beautiful view as you drive
20 onto the campus, I think, is just terrible. And others
21 who know about the biological value of that meadow have
22 spoken to that, and I certainly agree with them, but I
23 can't say anything like they have.

24 And the water issue is completely not specified
25 in what you were talking about. You are going to add all

PH1-19

PH1-20

PH1-21

1 of these people to the community, and you are just saying,
2 well, the water -- the City of Santa Cruz will have to
3 take care of that when we are probably facing water
4 restrictions this summer. As we speak, we are 7 inches
5 below normal and only six weeks of rainfall to make that
6 up. And we will not make that up. We will have water
7 restrictions this summer, I am sure.

PH1-21
cont.

8 And about the campus reserves, I don't understand
9 the Campus Natural Reserve system because I have a map
10 that shows that, and when I go to those places, they are
11 crisscrossed with mountain bike trails. Any animals that
12 might have lived there were squashed years ago. You have
13 not enforced any protection on the Campus Reserve now. So
14 all of this conversation and talk in the EIR about the
15 Campus Reserve is just hollow.

PH1-22

16 I welcome development of AMBEST. It is the first
17 time I have ever heard it mentioned. I've been aware of
18 it. Some people are aware of it. And that is where
19 campus growth needs to go, down in Marina, where they have
20 dozens of acres, hundreds of acres. I think it's
21 1600 acres of flat, buildable land.

PH1-23

22 Thank you for providing this opportunity for me
23 to speak. And I am off now.

24 JOLIE KERNS: Thank you for your comment.

25 I am going to go to our next commenter,

1 Fabra Constantine.

2 I am unmuting you right now.

3 FABRA CONSTANTINE: Hi, everyone. Thank you for
4 the ability to speak tonight.

5 I work personally with students. I am an
6 independent education consultant. What an independent
7 education consultant does is we work daily with students
8 who have goals to get into colleges. And I do currently
9 have students that are attending UCSC, and I stay in
10 contact with them. And they are telling me of the
11 problems they are experiencing because of the high cost to
12 get second-, third-, fourth-, and fifth-year housing
13 within Santa Cruz. The pricing is very high. They are
14 upset about it. They are emotionally drained. They feel
15 they might not even be able to complete their degree
16 because of what's been going on with campus. There's food
17 insecurity.

18 There's graduate students complaining and
19 actually petitioning, doing everything they can for the
20 campus to understand this is not the campus to increase
21 enrollment. There's other areas of California. Big
22 state, lots of land. They would definitely welcome,
23 welcome with open arms, students to the Humboldt area,
24 even taking over the Cal State campus there, down in
25 Marina, even Merced, or spread it out in the other eight

PH1-24

1 SUC's. No reason to plop 10,000 more in an area that is
2 not conducive for higher education.

3 These students need to complete their degrees,
4 and they need to do it in a place that offers them what
5 will help them further their lives. Not so much debt, not
6 so much stress, not so much being in war with the
7 community. We don't like what we see the students have to
8 go through. It's not fair to them. It's not the way they
9 should be launched for their careers.

10 There is so much you just went through on the
11 EIR. We are not ignoring that. These are definite
12 problems. We don't want these problems. We don't really
13 want UCSC to expand at all. And it's already been a voted
14 measure, and it passed gloriously because this community
15 is not welcoming 10,000 more students.

16 So you have to start really looking at other
17 places to expand. It makes no sense. It would be much
18 more even affordable. Wasting your time on this is
19 ridiculous. The wisdom that could be done to really take
20 care of the needs of the baby boom that I know is coming
21 and you are planning for does not make sense to do it
22 here. You really have to start again, start from scratch,
23 be in an area that makes sense, that will actually help
24 your students. That's the goals of the UC's. Bring up
25 those first-gen students and do things that further them,

PH1-24
cont.

PH1-25

1 not saddle them with debt. Because the debt doesn't
2 necessarily come from tuition. The debt comes from the
3 housing problem. They cannot buy food. This is an
4 expensive area. It is not conducive.

5 Thank you for the very important meeting tonight,
6 and I hope you pay attention. Thank you.

7 JOLIE KERNS: Thank you for your comments.

8 I see our next commenter is Faye Crosby.

9 I am unmuting you right now. And if you could
10 state your name and spell it before you give your comment,
11 that would be appreciated.

12 FAYE CROSBY: Thank you. I hope you can hear me.

13 My name is Faye Crosby.

14 JOLIE KERNS: We can hear you.

15 FAYE CROSBY: Thank you.

16 Faye Crosby, F-a-y-e C-r-o-s-b-y.

17 I'd like to echo the comments made by many of the
18 previous speakers and, in particular, pick up on what
19 Chris Connery has said and also Kathy Haber.

20 I'd like to speak against the -- any kind of
21 building going on in the East Meadow, that little corner
22 where Hagar Drive takes up. I know that you know there's
23 a lawsuit going on. But preserving the aesthetic and the
24 beautiful view of the campus seems to be just as important
25 as -- it seems to be a very important part of the

PH1-25
cont.

PH1-26

1 education of the student.

2 So -- and I'd like to say that there sometimes
3 are false dichotomies. One of them crept into what you
4 said, Jolie Kerns. You talked about balancing an
5 educational mission versus environmental stewardship in
6 your really well-prepared and lovely presentation. We are
7 all grateful for the time to speak. But that shows that
8 even a person as intelligent and dedicated as you sees a
9 false dichotomy between education on the one hand of many
10 students and a protection of this beautiful and sacred
11 environment. I think education would include protecting
12 the environment.

13 So another false dichotomy that I'd like to
14 address, because no other speaker has, is the false
15 dichotomy that has erupted on the campus between the need
16 for child care on the one hand and the need to preserve
17 the aesthetic beauty and educational soaring function of
18 the East Meadow and also the Great Meadow. There are many
19 places where child care and family-student housing can be
20 placed. In fact, Ranch View Terrace II, which has already
21 been environmentally vetted, could be a place where you
22 could have the debouching of the students from
23 family-student housing currently. They could be relocated
24 there, and then they could be relocated someplace else.

25 You spoke about going to MBEST. And MBEST might

PH1-26
cont.

PH1-27

PH1-28

T PH1-29

1 be a great place to put graduate students and then take
2 over what we have now as current graduate-student housing
3 and use that as a place to have the eleventh college and
4 put the twelfth college up where we had a park for RVs.

PH1-29
cont.

5 So creative rethinking is very important. And
6 let us avoid false dichotomies. The real dichotomy is
7 between a quality education for students today and
8 tomorrow and the future and just cramming in one more
9 student, one more student, one more student to meet some
10 sort of goal dictated from on high. Let's give a real
11 education, not just an education in name.

PH1-30

12 Thank you.

13 JOLIE KERNS: Thank you for your comment.

14 I have three more names I am going to call out.
15 The first one, we'll hear from in just a minute, and the
16 two after that will be on deck.

17 The first will be Matthew Waxman, the second will
18 be Michael Boyd, and the third I see as R. Ora.

19 So, Matthew Waxman, I am unmuting you right now.
20 And if you could state your name and spell it, we'd
21 appreciate that.

22 MATTHEW WAXMAN: Hi. Thank you very much. Are
23 you able to hear me?

24 JOLIE KERNS: Yes, we can hear you.

25 MATTHEW WAXMAN: Matthew Waxman. Last name,

1 Waxman, W-a-x-m-a-n.

2 Land Use and Planning Section 3.11 says there are
3 no mitigation measures needed because there is less than
4 significant impact. This is false. EIR Table 3.11-2
5 lists acreage numbers for land-use zoning comparing 2005
6 LRDP and 2021 LRDP. These numbers showed total acreage in
7 aggregate, but it does not describe or show visually how
8 such changes in acreage also change physical adjacencies
9 between different land-use zones from the 2005 LRDP.
10 Place study include mitigation that illustrates with
11 overlay to land-use map and photographic documentation to
12 address how changes to physical location of land use in
13 2021 LRDP significantly impacts the way current campus
14 2005 LRDP land-use zones create benefit and functional
15 utility to educational experience through complementary
16 land-use adjacencies.

17 Example 1: 2021 LRDP rezones the entire top of
18 Great Meadow, a single-use category, academic core. This
19 replaces the way same area was zoned in 2005 LRDP with
20 smaller patch of academic core and larger patch of
21 protected landscape. 2021 LRDP removes complementary
22 relationship between academic core and protected
23 landscape, replaces with academic core only. This will
24 dramatically impact qualitative relationship and benefit
25 of protected landscape that the Great Meadow brings to

PH1-31

1 student and faculty academic experience and impact to the
2 community-based value of Campus Meadow as public asset.

3 Example 2: Meyer Drive Extension in 2021 LRDP
4 functions to connect to a single function: a parking lot.
5 This dramatically contrast in 2005 LRDP, which ran through
6 forest edge and had been planned to use adjacencies
7 between different functions to bring benefit by linking
8 the arts area, McHenry Library, Hahn parking lot, and
9 Athletics & Recreation center.

10 2021 LRDP fails to address the impact of changes
11 to land-use adjacencies and fails to address the impact of
12 student, faculty, and community experience by removing
13 complementary land-use zoning from 2005 LRDP and replaces
14 it with mono-functional zoning.

15 Thank you.

16 JOLIE KERNS: Thank you, Matthew, for your
17 comment.

18 I am going to call on Michael Boyd.

19 Michael, I am muting you -- I am unmuting you
20 right now.

21 MICHAEL BOYD: Hello. This is Michael Boyd.

22 JOLIE KERNS: Hi. We can hear you.

23 MICHAEL BOYD: My name is spelled M-i-c-h-a-e-l
24 B-o-y-d, just like shown.

25 First, I am a resident of the County. I live at

PH1-31
cont.

PH1-32

1 5439 Soquel Drive, Soquel, California.

2 I request that you -- these -- in these
3 commenting, you incorporate by reference Appendix B of the
4 Notice of Preparation comments starting at page 57,
5 comments prepared for the -- on behalf of the Habitat and
6 Watershed Caretakers by the Law Offices of Stephan C.
7 Volker. I request you incorporate this by reference in my
8 comments here. It starts at 57, and it goes -- I don't
9 know where his last attachment goes to. But I request you
10 incorporate that.

11 My comments are related to the fact that the
12 Environmental Impact Report has an improper baseline.
13 It's based on the 2005 LRDP as opposed to what CEQA
14 requires, which is that it be based on the current
15 conditions at the time NOP was filed. And at the time NOP
16 was filed, the pandemic was known. In the time the
17 comments were made, the alternative educational methods of
18 online learning were in place and have been in place since
19 then, and now that is the current baseline. And as a
20 result of that flawed baseline, I believe that your
21 alternative analysis is inadequate because the no-project
22 alternative is not correct because it uses the wrong
23 baseline. And your -- you also did provide some -- an
24 alternative for online learning, but that analysis is
25 inadequate because it's, again, based on the wrong

PH1-33

PH1-34

1 baseline.

2 And so I request -- my request is that you --
3 that you correct that, you redo the analysis, and if it
4 requires you to do a supplemental EIR, so be it.

PH1-34
cont.

5 And then my -- the other issue that I am
6 concerned with is this -- I am looking at the land-use map
7 for the 2005 Long-range Development Plan amended
8 March 2019, and the East Field Great Meadow is designated
9 as protected landscape. In the current -- it's called
10 "natural space" and is no longer protected. I object to
11 that, and that should be justified somehow. What does
12 that have to do with teaching, research, or public
13 service? So I request that be protected in perpetuity.

PH1-35

14 Thank you.

15 JOLIE KERNS: Thank you for your comment.

16 I am going to go ahead and call R. Ora.

17 I am unmuting you now.

18 REBECCA ORA: Hi. Can you hear me?

19 JOLIE KERNS: If you could please state your name
20 and spell --

21 REBECCA ORA: Can you hear me?

22 JOLIE KERNS: Yes, we can hear you.

23 REBECCA ORA: Okay. My name is Rora.

24 JOLIE KERNS: Yes, we can hear you.

25 REBECCA ORA: My name is Rora. I am the GSA

1 president of UC Santa Cruz, the graduate student
2 association.

3 And I want to, first of all, recognize everything
4 everybody said about the details of the LRDP and the EIR
5 that are flawed and need attention.

6 But I would actually rather speak holistically
7 and fundamentally to what is being planned for the future
8 of this campus and how it is just fundamentally flawed.
9 This is not a campus that's built to be the size of UCLA
10 or competitive in the ways that some of the other UC's
11 are.

12 A number of years ago -- I want to say it was
13 maybe 2015 -- at a UC Regents meeting, George Blumenthal
14 submitted a report to the UC Regents, something about the
15 campus's long-term plan. And the Regents said, "Oh, thank
16 you, George. We really appreciate your work. And how do
17 you plan to implement this?" And Chancellor Blumenthal
18 looked at the Regents and said, "Well, you tell me to
19 write your reports, and then you give me no money to
20 implement anything. You tell me how I am supposed to get
21 this done."

22 And this has consistently been the situation of
23 our campus. We don't have the resources. We don't
24 have -- we can't build on our campus. We don't have
25 adequate access to water, and the grade is prohibited, and

PH1-36

PH1-37

1 we have protected lands around us. This is not a
2 situation where we should be growing by 10,000 people. We
3 just shouldn't be doing it. It is not at all sustainable,
4 and we all know it.

5 At what point -- what will it take for our
6 administration to tell the Regents, actually, no. You
7 need to open another UC campus and keep UC Santa Cruz the
8 way it is, which actually should resemble a small liberal
9 arts school. We don't have the resources.

10 As a graduate student, I want to know what is the
11 plan for grad students? When we say 100 students living
12 on campus, what about grad students?

13 We asked for a cost-of-living adjustment last
14 year, which was one of the few ways that I can think of to
15 try to make education on this campus more sustainable.
16 Because we are not actually supporting the people who are
17 educating the vast majority of the students here. There
18 really is no way out. We can submit as many reports as we
19 like and try to plan as many buildings that will take, you
20 know, years and years to build, and by the time they are
21 built, the cost will have ballooned to the point that
22 students can't afford to live there as tuition will
23 continue to increase for undergraduates and as graduate
24 student payment stagnates.

25 So I just want to say that students are not for

PH1-37
cont.

PH1-38

1 this. A few years ago, the SUA at UC Santa Cruz, the
2 undergraduate student union, voted to freeze enrollment.
3 That is unprecedented. Because undergraduates, more than
4 anyone, want so badly for the UC's to represent the
5 demographics of California.

6 We can't do it. This can't fall on Santa Cruz.
7 We are not other campuses. And our administration just
8 has to put its foot down and stop this growth, which is
9 not supported.

10 JOLIE KERNS: Thank you for your comment.

11 I see one -- I think one more comment, and that
12 is Joe Serrano.

13 I am going to go ahead and unmute you right now.
14 And if you could state your name before you speak, that
15 would be helpful.

16 JOE SERRANO: Thank you, madam. Again, this is
17 Joe Serrano, J-o-e S-e-r-r-a-n-o. I am the executive
18 officer for the Local Agency Formation Commission of
19 Santa Cruz County, better known as LAFCO. We are a state
20 agency that oversees the boundaries of cities and special
21 districts. And we encourage smart growth and the
22 efficiencies of delivering municipal services. So what
23 does that mean? We are the ones that determine the most
24 logical service provider of municipal services, such as
25 water, sewer, fire protection.

PH1-38
cont.

PH1-39

1 Based on our analysis, it seems that the main
2 campus, half of it, is in the city of Santa Cruz, and the
3 remaining half is in unincorporated county territory. And
4 under state law, when there's developments that need
5 municipal services such as water, they need to get LAFCO's
6 approval.

PH1-39
cont.

7 So my commission has adopted a comment letter
8 that we will be sending out indicating that there are five
9 proposed projects that are just outside the city limits.
10 Should the university move forward with developing those
11 five projects, they would need to get LAFCO's approval to
12 receive water from the City. So what my comment letter
13 identifies is possible governance options for the
14 university to fulfill that State requirement.

PH1-40

15 That being said, I do want to commend the
16 university and its staff in doing this type of long-range
17 planning. As you could hear from the other commenters,
18 it's not easy. Planning for the future is difficult. But
19 if you emphasize on the comments that you are receiving
20 and be as transparent as you can, there can be ways to
21 prepare for the future.

PH1-41

22 And I know housing for -- affordable housing in
23 general, but, housing, it's difficult to plan. So I do
24 commend the university for looking on areas to develop.
25 And LAFCO is here to help, and we want to identify

1 possible government options for the university. But,
2 again, should the university move forward with
3 developments outside the city limits, LAFCO approval would
4 be required.

5 On that note, I look forward to working with the
6 university. And I do appreciate the comments from the
7 residents and faculty and everyone else because it's -- in
8 order for us to plan for the future, everyone needs to
9 have skin in the game; everyone should provide their
10 emphasis on the development of this plan.

11 With that, I am more than happy to answer any
12 questions, but I do thank you for the opportunity to
13 provide comments. Thank you.

14 JOLIE KERNS: Thank you, Joe, for your comments.

15 Chris Connery, we have your hand raised. Would
16 you like to provide another comment? I am going to go
17 ahead and unmute you. Sorry.

18 CHRISTOPHER CONNERY: Yeah. Yeah, I would.

19 I just wanted to bring up one more thing, which
20 is that the LRDP would be a great occasion to do a
21 campus-wide habitat conservation plan. This addresses
22 issues that many commenters tonight have raised, and it's
23 something that the Fish & Wildlife Service has advocated
24 for many, many years, and the university has refused to do
25 so. I think that with a campus-wide -- a whole campus,

PH1-41
cont.

PH1-42

1 including into all potentially planned buildable areas --
2 if we had a holistic habitat conservation plan, we could
3 have more informed discussions and reasonable discussions
4 about many of these issues.

5 Thanks.

6 JOLIE KERNS: Thank you, Chris.

7 Regarding a campus habitat plan, read the
8 Biological Resources section, and I think you'll find some
9 information about that.

10 CHRISTOPHER CONNERY: Okay.

11 JOLIE KERNS: The university is in discussion for
12 moving forward with that.

13 I see another hand. Karen Holl.

14 Karen, I am going to go ahead and unmute you.

15 KAREN HOLL: All I wanted to say was that I
16 wanted to echo Chris's point. And I did read the
17 Biological Resources section and have more detailed
18 comments that I'll put in there, but it wasn't that clear,
19 and it has been done piecemeal in the past, like, with
20 Ranch View Terrace. And I really agree with Chris that as
21 a biologist myself who works on endangered species, that
22 we really need to do this in a more coordinated manner as
23 opposed to a development-by-development process for
24 managing the concerns. So I am glad to hear that this
25 conversation is happening.

PH1-42
cont.

PH1-43

1 JOLIE KERNS: Yes. Yes, it is. And thank you
2 for your comment.

3 Okay. Oh, I see a hand. I am going to call in
4 Darrow Feldstein.

5 I am unmuting you now. And if you could state
6 your name and spell it, that would be helpful for us.

7 DARROW FELDSTEIN: Thanks very much. My name is
8 Darrow Feldstein. That's D-a-r-r-o-w F-e-l-d-s-t-e-i-n.
9 I am an alumnus of UC Santa Cruz Environmental Studies
10 Department, and I was the past assistant steward of the
11 Upper Campus Natural Reserve.

12 And I also want to just add my comment to echo
13 Karen and Chris on this desire for a more complete and
14 thorough conservation plan. And as someone who has
15 commented on the LRDP hearings for the last decade or so,
16 I just want to share my deep, deep desire for permanent
17 protection of the Campus Natural Reserve and also for the
18 natural spaces that are now written into this 2021 plan.

19 And there were a couple places in the plan that I
20 wanted to address. One is just protection of the Upper --
21 the Great Meadow. I recognize -- I think that that's not
22 in the plan to develop, but I am just going to put my word
23 in that I ask that that stays protected, as well as I
24 believe there was a little bit of development for a road
25 around -- connecting, like, Crown/Merrill up to the sort

PH1-44

PH1-45

1 of northern part of the campus, as well as one that was on
2 the west side of fuel brick road (phonetic), I believe it
3 is, that heads down into the ravine that goes over to
4 Empire Grade. And so just wanting to really suggest that
5 there is protection for all of those places and just that
6 those comments that have all been stated before are
7 honored.

8 Thank you for your time.

9 JOLIE KERNS: Thank you, Darrell, for your
10 comments.

11 I am scanning the raised hands. And I am not
12 seeing any more raised hands. If anyone would like to
13 speak and you haven't raised your hand yet, please do so
14 now. We are here until 7:00 p.m. It's 6:30 right now.
15 And we will keep taking comments as we see the hands
16 raised.

17 I see one more comment -- or one more hand. So
18 I am going to go ahead and call on this person now.
19 Hunter Giesman.

20 I am unmuting you right now. Hunter, would you
21 like to provide a comment? You may need to unmute
22 yourself. I'll give you one more minute in case you are
23 trying.

24 We are not hearing anything. We have a
25 question-and-answer open with our staff to help with any

PH1-45
cont.

1 technical difficulties. And we are still here until 7:00.

2 So I am going to go ahead and lower your hand.

3 If you would like to raise it again and provide a comment
4 verbally, we are happy to take it.

5 ERIKA CARPENTER: Jolie, he just noted in the Q
6 and A that he is looking to log in to a different device.
7 So hopefully he'll join us shortly.

8 JOLIE KERNS: Okay. Okay. Perfect.

9 ERIKA CARPENTER: And I just saw another question
10 in Q and A that I thought I would just answer really
11 quick. It's when is the next hearing? And so we have
12 another hearing tomorrow night from 5:00 to 7:00. So I
13 just wanted to reiterate there is another opportunity to
14 provide comments if you would like to attend tomorrow
15 night as well.

16 JOLIE KERNS: We will wait a minute for Hunter.
17 And I don't see any other comments, but if anyone would
18 like to make a comment, do please raise your hand, and
19 that indicates to us that we can call on you and hear your
20 comment. But we'll be just standing by for Hunter for a
21 few minutes.

22 ERIKA CARPENTER: Just to follow up on my last
23 comment about tomorrow's meeting, I just wanted to
24 reiterate, too, if anyone would like to attend, you have
25 to register again for tomorrow night's meeting. You'll

PH1-46

1 get a unique URL that you'll use to attend. So I think it
2 is pretty clear on our website, but I just wanted to
3 reiterate that.

4 Jolie, we can't hear you. Sorry. I think you
5 might be muted.

6 JOLIE KERNS: Yeah. I am. I see another hand.
7 Faye Crosby.

8 I am going to go ahead and call on you while I
9 know we are waiting for Hunter, who wanted to comment as
10 well. I just unmuted you.

11 FAYE CROSBY: Thank you. Faye Crosby again.

12 I am actually hoping, in the available time that
13 we have, that you could explain to us, from your points of
14 view, whether this is all just pro forma or whether
15 there's really a hope that our campus could stand up
16 against dictates coming from on high, from central, to
17 have our campus expand.

18 I think many of us have spoken against the idea
19 of just automatically getting to some larger number. I
20 know that when the campus started originally, it thought
21 it would be at 27,000 by this time, but I also know from
22 the administrative roles that I had on the campus that
23 sometimes UCSC can't say, oh, we want to do this, we want
24 to do that.

25 Are you able to comment at all about this

PH1-47

1 process? Are we just all flapping our lips, but somebody
2 up high is going to decide it? Or how will these very
3 brilliant comments by so many people here be taken into
4 account?

5 JOLIE KERNS: As part of this, I think we can't
6 comment right now. We can direct you back to the
7 documents. I understand that that may be a frustrating
8 response. There's obviously a lot to discuss with all of
9 this. But for this session, I need to direct you back to
10 the EIR and the LRDP for kind of any response for that.

11 FAYE CROSBY: Thank you very much.

12 JOLIE KERNS: We are -- as we said before, all of
13 these comments are transcribed. We do respond to them
14 formally in the Final EIR. So I encourage you to submit
15 this comment, as you have now, verbally, and we will have
16 a response in the Final EIR.

17 FAYE CROSBY: Thank you.

18 JOLIE KERNS: Okay. I am going to try Hunter.
19 Hunter Giesman.

20 We are going to unmute you. And we are ready for
21 your comment.

22 HUNTER GIESMAN: Okay. Can you hear me now?

23 JOLIE KERNS: We can hear you.

24 HUNTER GIESMAN: Okay. Thank you so much for
25 waiting and -- while I was trying to figure out my

PH1-47
cont.

1 technical difficulties.

2 But I just had a question. I didn't know if,
3 tomorrow, during the public comment period, I would be
4 able to share my screen and do sort of like a short
5 three-minute presentation on my comments, like a visual
6 presentation.

7 ERIKA CARPENTER: Jolie, do you want to answer
8 that, or do you want me to? Either way.

9 JOLIE KERNS: Yeah. I think, for the purpose of
10 this, we can only accept verbal comments for the purposes
11 of this meeting. We can accept comments in writing, as
12 well, via e-mail. I am not sure CEQA has recognized video
13 as a way to comment.

14 But, Erika, do you have anything more to add than
15 CEQA --

16 ERIKA CARPENTER: Unfortunately, it is something
17 we need to have in writing so that we can respond to it.
18 And so I apologize. But, yeah, it needs to be in writing,
19 or verbally, obviously, during the hearing.

20 HUNTER GIESMAN: Yeah. That's not a problem. I
21 was just wondering, that way I could prepare for the next
22 public comment.

23 And when I submit my comment in writing, is there
24 any way that I could include illustrations? When it comes
25 to the writing, is it just like a pdf submission or --

PH1-48

PH1-49

1 ERIKA CARPENTER: Correct. Yeah. You could
2 submit a pdf to us that's sent via e-mail, or you could
3 print it out and mail it to us. Either way. Either one
4 would work.

5 HUNTER GIESMAN: Okay.

6 JOLIE KERNS: And you can also just write in the
7 body of the e-mail itself.

8 ERIKA CARPENTER: Right.

9 JOLIE KERNS: And we would get it that way too,
10 if that is helpful.

11 HUNTER GIESMAN: Yeah. Because I'll send, like,
12 a second writing portion to my comment. But, okay. Thank
13 you so much.

14 JOLIE KERNS: Thank you, Hunter, for your
15 comments and questions.

16 We have one more hand raised for Ron Goodman.

17 Ron, I am going to unmute you now. And --

18 RON GOODMAN: Hi there.

19 JOLIE KERNS: -- if you could state your name
20 before giving your comment, that would be helpful.

21 RON GOODMAN: Sure. This is Ron Goodman.

22 I apologize. This actually is a question. I
23 wanted to understand, based on Faye's question, is the
24 EIR, the process -- like, to my understanding the EIR is
25 where you are evaluating the environmental impacts, but

PH1-50

1 you are not actually evaluating whether or not it's a
2 project that the UC wants to do or should do or will do.
3 It's just limited to the environmental impacts. And so
4 I am thinking, in my comments that I want to submit,
5 that's where I should focus.

6 Am I correct in that, or is there actually a
7 component of this where I, you know, might be advocating
8 for a different position?

9 ERIKA CARPENTER: Yeah. I would say it would be
10 good to focus your comments on the Draft Environmental
11 Impact Reports, but if you have comments on the project
12 itself, which is the LRDP, you could also include those in
13 your comment letter.

14 RON GOODMAN: Okay. So it is an appropriate
15 place to say I do or don't support the growth plan in
16 general, in addition to specific environmental, like, you
17 know -- like, because it impacts students' education?
18 That's, like, a relevant thing to include in a response to
19 the Draft EIR?

20 ERIKA CARPENTER: Yes. If you would like it to
21 be in the record, that's what will be going to the Regents
22 when they consider the project. So if you would like to
23 make comments about the LRDP, they'll ultimately, you
24 know, be in the record when the Regents consider the LRDP,
25 as well as evaluates and determines whether or not to

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cont.

PH1-51

1 certify the EIR at that time.

2 RON GOODMAN: Okay. Sorry. If I can just get
3 more clarification.

4 ERIKA CARPENTER: Sure.

5 RON GOODMAN: So when you respond to comments, if
6 I, you know, make a comment that says, you know, doing
7 this will cause, you know, this hydrological damage, there
8 will be a response that explains either here's why it
9 doesn't or here is how that is going to be mitigated and
10 you have this requirement in the EI -- in the Draft EIR to
11 respond to those types of comments? If I make a comment
12 that is -- you know, I think this, you know, badly impacts
13 student education or helps student education -- I am not
14 actually saying either one, you know, of those two -- do
15 you also respond into that in the comments, or is the
16 response to that, you know, out of scope of the Draft EIR?

17 ERIKA CARPENTER: All comments will be responded
18 to, you know, to a certain extent, obviously, in the Final
19 EIR. There will be a response to each comment. And then
20 if it doesn't raise a specific environmental issue with
21 respect to the Draft EIR, you know, there may be -- it
22 may -- there may be some discussion about that. But
23 ultimately every comment letter and every response is sent
24 to the Regents when they consider the project. So they
25 will be able to see every comment that is submitted.

PH1-52

1 RON GOODMAN: Okay. Thank you.

2 ERIKA CARPENTER: Sure.

3 JOLIE KERNS: Thank you.

4 Let's see. We are at about 6:43, and I am not
5 seeing any blue hands, but we are here till 7:00, and if
6 anyone would like to raise a hand and make a comment, we'd
7 be happy to honor those and hear those. But we'll be
8 here. Maybe we'll take a pause and mute for a couple
9 minutes, and I can check back and let everyone know if
10 there has been additional hands.

11 Oh, I see one right now. So we have someone
12 filling the void here.

13 Matthew Waxman, I am calling on you, and I am
14 unmuting you as well.

15 MATTHEW WAXMAN: Thank you, Jolie. Can you hear
16 me?

17 JOLIE KERNS: We can hear you.

18 MATTHEW WAXMAN: Okay. Thank you.

19 The 2021 LRDP covers its funding process with
20 14 pages. Section 3.11, Land Use and Planning, does not
21 provide commentary on the planning process despite the
22 fact that the planning process results in ultimately an
23 approved regental policy that would become the 2021 LRDP.

24 Please provide commentary on the consequence and
25 impact to the location of land-use zones, specifically

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1 that of housing and residential zoning, given that there
2 were no community members, no faculty, no graduate
3 students, no alumni, and no undergraduate students on the
4 Housing and Campus Life Work Group of the 2021 LRDP
5 Committee.

6 Thank you.

7 JOLIE KERNS: Thank you for your comment.

8 We'll take a minute -- couple minutes and pause
9 and see if we have any more comments. I am not seeing any
10 hands right now.

11 Maybe, while we're waiting here, we'll go
12 ahead -- we have a couple last slides, and we'll go ahead
13 and give you all that information, and then we'll come
14 back to our kind of housekeeping slide in case anyone else
15 would like to make a comment. A few last slides here.

16 Hopefully you are aware, but all of the documents
17 are located on our lr dp.ucsc.edu website. You can find
18 the Draft Long-range Development Plan, the Draft
19 Environmental Impact Report, and the Community Handbook,
20 which summarizes the Draft Environmental Impact Report.

21 ERIKA CARPENTER: Thank you.

22 So Jolie just mentioned earlier on how you can
23 review the Draft EIR. And so the documents are available,
24 as she just mentioned. And then you can also request a
25 USB or flash drive upon request, and we'll mail it to an

PH1-53
cont.

1 address that you provide to us, as well as hard copies are
2 also available for grab-and-go at the library at any of
3 the Santa Cruz County branches, as well as available for
4 pickup from UC Santa Cruz. And you can arrange to have a
5 copy available for you to review for a specific period of
6 time. So the contact information is here on the slide for
7 that.

8 And then, finally, I think we were going to --
9 there we go. So public comments on the Draft EIR. We
10 talked a little bit about comments earlier, about what --
11 you know, what would be addressed. And so all comments
12 will be responded to either tonight during the public
13 hearings or written comments that are submitted via
14 US mail or via e-mail. And so this is the address to send
15 any written comments to us. And then you can also e-mail
16 us at eircomment@ucsc.edu. And our public-comment period
17 is open for a little over a month, and it closes on
18 Monday, March 8, at 5:00 p.m.

19 And so we thank you for participating, and we
20 hope we'll hear from you during the public-comment period.

21 JOLIE KERNS: Just reported I don't see any blue
22 hands, but we've got about 12 more minutes left. So
23 we're -- we will be here, and if someone pops up or if
24 someone wants to make a comment, we are here to hear it.

25 Just confirming, I don't see any more blue hands,

1 but I thought I would go ahead and -- you still have about
2 ten minutes.

3 We did -- we do want to thank you all for joining
4 tonight and participating. We know there's a lot of other
5 things going on in the world right now, and we really
6 appreciate your interest in the project.

7 I just got a question that, while we are sitting
8 here, if we could run through the slides. We won't
9 present them, but we could certainly walk through them and
10 share those. So if there's a request for the EIR portion
11 or the LRDP -- or we could probably go through both kind
12 of quickly -- just let us know.

13 We do plan to include the slides up on our
14 website after these public hearings. So they'll be
15 available for anyone that would like to spend a little bit
16 more time with them. We covered a lot of information, and
17 we intentionally went through it pretty quickly to make
18 sure that we had enough time for comments later.

19 So we'll just kind of scroll through these while
20 we're sitting here, and then Erika can do the same on the
21 EIR slides as well.

22 And this is the last call for the LRDP. And I'll
23 have Erika maybe pull up slides, and we can conclude after
24 that.

25 ERIKA CARPENTER: Okay. Sounds good. I'll pull

1 mine up. They're up. Let's see here. Excuse me. It's
2 at the end. I'll just need to -- sorry about that. Sorry
3 about the quick flip-through. Go a little slower now.

4 So I believe, Jolie, there's another comment, or
5 there's somebody else that would like to speak.

6 JOLIE KERNS: Yes. I think, Erika, correct me if
7 I am wrong, to see if I have it partially covered, is it
8 Gillian?

9 ERIKA CARPENTER: Uh-huh.

10 JOLIE KERNS: Yes. Perfect. I see one more
11 comment.

12 I just unmuted you. Gillian Greensite. Perhaps
13 we missed the signal, but it looks -- Gillian Greensite,
14 it looks like your hand is raised. We are happy to take
15 your comment, if you would like to provide a comment.

16 GILLIAN GREENSITE: Yes. Sorry. I did it on
17 mute and some other place. It didn't work. Sorry about
18 that. This is very quick.

19 Couple of areas in a map on a table which I
20 didn't include before because of time, but it may be
21 helpful to correct it earlier rather than later. One is
22 on page 70, Figure 2:20. I think it's the LRDP. It's the
23 map of the existing and planned development, and it omits
24 the current family-student housing. So that would be good
25 to correct that, especially if Regents are looking at

PH1-54

1 things.

2 And the second one is in the EIR -- DEIR. It's
3 Table 3.13-11. It is Baseline and Projected On-campus
4 Housing and Demand. And I think -- I won't go into what's
5 incorrect in there, a typo or something, but when somebody
6 looks at it, you'll see exactly what's incorrect in there.

7 Thank you very much.

8 JOLIE KERNS: Thank you, Gillian. We'll note
9 those. Thank you.

10 Okay. We are at 7:03. I don't see any other
11 hands raised. So I think we will go ahead and call it.

12 Thank you all so much for participating tonight,
13 for your interest in the project. Like I said, we know
14 there's a lot happening in our world right now. And thank
15 you for reading the documents and providing comments. We
16 are very appreciative.

17 We will be out here tomorrow night from 5:00 to
18 7:00 p.m. You do need another link to register for that.
19 So you do need to register separately. And it will give
20 you a separate link.

21 And then we, of course, are taking comments after
22 that in writing by mail or e-mail. And all of that
23 information is on our website.

24 Thank you again. We are going to go ahead and
25 shut down the webinar.

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cont.

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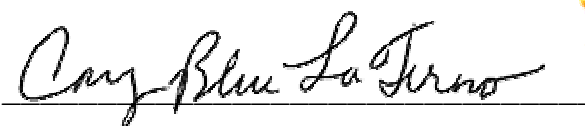
ERIKA CARPENTER: Thank you.

--oooOooo--

1 STATE OF CALIFORNIA)
2) SS:
3 COUNTY OF SANTA CRUZ)
4

5 I, Cary Blue LaTurno, hereby certify that I was
6 present via Zoom and took down correctly in stenotype to
7 the best of my ability all the proceedings in the
8 foregoing-entitled matter; and I further certify that the
9 annexed and foregoing is a full, true, and correct
10 statement of such proceedings.

11 Dated at Santa Cruz, California, on
12 February 13, 2021.

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15 
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17 Cary Blue LaTurno

18 CSR No. 9681
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**Draft EIR 2021 Long-Range
Development Plan for UCSC Public
Comment Hearing (February 4, 2021)**

DRAFT EIR
2021 LONG-RANGE DEVELOPMENT PLAN
FOR UCSC
PUBLIC COMMENT HEARING

REPORTER'S TRANSCRIPT

(Via Zoom)

February 4, 2021

APPEARANCES:

Jolie Kerns:	Director of Physical and Environmental Planning
Erika Carpenter:	Senior Environmental Planner
Court Reporter:	Lisa McMillan, CSR #10383

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14	Matthew Wetstein	56
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1

2 MS. KERNS: Hi everybody. Welcome. Thank you
3 for joining us for the public hearing for the Draft EIR
4 for the 2021 Long Range Development Plan at UC Santa
5 Cruz. We'll go ahead and get started.

6 I'm Jolie Kerns. I'm director of Physical and
7 Environmental Planning at UC Santa Cruz.

8 MS. CARPENTER: Hi. Good Evening. My name is
9 Erika Carpenter, and I'm a Senior Environment Planner at
10 UC Santa Cruz. Thank you for joining us.

11 MS. KERNS: Before we jump in, we would like to
12 take a minute to describe the format, agenda, and
13 provide information for how to participate in the public
14 hearing tonight.

15 We will start with a short presentation
16 summarizing the LRDP and EIR, followed by the public
17 comment period. The purpose of this public hearing is
18 to receive comments on the Draft EIR for the 2021 Long
19 Range Development Plan. This is not a community meeting
20 to discuss the project or engage in dialogue. Please
21 limit your remarks to comments on the Draft EIR and
22 project specifically.

23 As required by the California Environmental
24 Quality Act, or CEQA, UC Santa Cruz will respond to all
25 comments in writing, and therefore, will not respond

1 verbally to comments tonight. It's important that we
2 leave time for everyone to be able to participate. And
3 we want to make sure that those comments are part of the
4 record.

5 If you wish to speak, please raise your virtual
6 hand. This is located on the tool bar across the
7 bottom. You can click on it to raise your hand. For
8 those on the phone only, press star nine to raise your
9 hand.

10 When you registered, you were asked if you
11 would like to speak. We used that to get a general idea
12 of how many speakers to plan for. So regardless of what
13 you chose when you registered, if you would like to
14 speak tonight, please use that raise-the-hand function.

15 Each speaker will have three minutes to provide
16 comments. For those that speak, your comment will be
17 transcribed, so you don't -- you do not need to also
18 send written comments. If you would like to provide
19 comments on the Draft EIR in writing, all comments will
20 be reviewed by 5:00 p.m. on March 8, 2021.

21 And finally, if anyone needs technical
22 assistance during the hearing tonight, please use the
23 question-and-answer option. We have staff ready that
24 can get back to you and help with any technical
25 assistance that you may need.

1 So we'll now get started. I'm going to give a
2 brief overview of the LRDP itself, and then Erika will
3 follow with an overview of the EIR.

4 The university's fundamental missions are
5 teaching, research, and public service. Part of this is
6 including educational opportunity's to all Californians,
7 where demand for a UC Santa Cruz education continues to
8 be high, diversity is growing, an increasing number of
9 first-generation and low-income students are being
10 educated, and we rank high for student social mobility.
11 The innovative research conducted on our campus benefits
12 society as a whole.

13 The task at hand for the LRDP on this UC Santa
14 Cruz campus is how to balance the development needed to
15 support our academic mission and educational
16 opportunities, with our commitment to environmental
17 stewardship in order to chart an innovative and
18 resilience course for our campus.

19 Every UC campus is required to have an LRDP.
20 It's our regulatory document that governs and guides how
21 we develop the campus, how we utilize the land. The
22 campus is not regulated by city or county general plans.

23 LRDP indicates where various types of
24 development could be located. In order to plan, we need
25 to understand where we're going. The LRDP is planning

1 for the next 20 years, through 2040.

2 The LRDP plans for a potential projected
3 population of up to 28,000 total student FTE by 2040, so
4 over the course of the next 20 years. This number
5 represents the outer envelope of student FTE on the
6 campus over the next 20 years, to allow us to plan for a
7 building program and evaluate environmental impacts
8 within that envelope.

9 Actual enrollment is determined by the state in
10 conjunction with individual campuses. Our 2005 LRDP
11 plans for total student enrollment of 19,500 by 2020.
12 We're currently at about 18,500.

13 The scope of the LRDP includes the main
14 residential campus at about 2,000 acres, and the
15 Westside Research Park at about 18 acres. The Coastal
16 Science Campus, while included as a factor in our
17 planning, has a separate LRDP that is not covered by
18 this one.

19 We began the planning process in early 2017.
20 We worked with several committees throughout, including
21 the LRDP Planning Committee made up of faculty, staff,
22 community members, students, who helped guide the
23 process and steer direction of the plan. We also gave
24 the community advisory group, made up of city and county
25 representatives to hear their perspective and feedback.

1 Extra work groups provided technical feedback on
2 sustainability and resiliency and infrastructure,
3 circulation and access, housing and campus life, and
4 ecology and the environment. And we had several
5 opportunities for public feedback through in-person
6 workshops and meetings, as well as online activities, in
7 spring and winter of 2018 and December 2019.

8 We anticipate the plan will be considered for
9 approval and the EIR considered for certification by the
10 UC Regents in fall of 2021.

11 This is the sixth LRDP for the campus. The
12 1963 LRDP has three key goals, which continued to unpin
13 the 2021 LRDP as well, establishing a relatively dense
14 academic core, followed by colleges and housing; a
15 commitment to environmental stewardship, including
16 protection of natural features of establishment of the
17 natural reserve; and ongoing cooperation with community,
18 including mutually advantageous planning.

19 Any development on campus begins by evaluating
20 our unique environmental conditions. The land use areas
21 work with existing topography to avoid steep slopes,
22 maintain existing watersheds, and avoid critical
23 habitats for the California red-legged frog and Ohlone
24 tiger beetle, where possible. We have some developable
25 land use areas that are within that critical habitat.

1 And we work with UC Fish and Wildlife to establish
2 habitat preserve for these species, if projects are
3 implemented on those lands.

4 The LRDP objectives -- I'm going to walk
5 through the LRDP objectives here, which really kind of
6 guide the project.

7 Expand campus facilities and include housing
8 for 100 percent new students above 19,500;

9 Ensure compact and clustered developments;

10 Provide for two new college pairs to continue
11 the close-knit intellectual and social environment for
12 students;

13 Protect existing campus open spaces;

14 Increase on-campus housing opportunities for
15 faculty and staff, which with a commitment to house
16 25 percent of new faculty and staff on campus, based on
17 demand;

18 Recognize regional histories within the campus;

19 Create a more efficient roadway network to
20 support transit;

21 Promote Transportation Demand Management
22 programs to reduce the use of single-occupancy vehicles;

23 Foster long-term physical and social
24 resilience;

25 Continue to be a center for public cultural

1 life in the region;

2 And finally, respect and reinforce the Physical
3 Planning Principles and Guidelines.

4 Over the next 20 years, the plan proposes the
5 potential student population growth from 18,518, which
6 is the fall, winter, spring, three-quarter average,
7 on-campus enrollment from 2018-'19 up to 28,000. This
8 was determined by looking at the campus' growth rate
9 over the previous 20 years and projecting it out.
10 Actual enrollment is determined by other factors and is
11 often below projection. In 1963, the campus projected
12 growth to 27,500 by 1990. And as mentioned, our current
13 campus enrollment is approximately 1,000 students below
14 what was projected in our 2005 LRDP, which was 19,500.

15 The building program was developed to support
16 the proposed student enrollment over the next 20 years.
17 It includes up to two-and-a-half million assignable
18 square feet of housing space, and up to 3.6 million
19 assignable square feet of academic and support space.

20 The physical planning principles and guidelines
21 in LRDP articulate broad concepts to guide development
22 over the next 20 years to achieve the LRDP project
23 objectives. These principles reflect the campus'
24 approach of carefully balancing academic research
25 service with our commitment to environmental

1 stewardship, and a deep respect for the natural
2 environment embodying the campus' commitment to being a
3 model of sustainability and resilience leadership, in
4 planning design and operation.

5 The plan commits to respect the resilience for
6 our campus land by preserving the integrity of campus
7 landscape, respecting major natural features, minimizing
8 disturbance to open space, integrating planning for
9 long-term resilience, and continuing to integrate the
10 natural and built environment.

11 The campus continues to look for opportunities
12 for collaboration and communication with the greater
13 community, and cultivate public programs as community
14 resources, including protecting our historic,
15 prehistoric, archaeological tribal cultural resources.

16 The plan articulates a pattern of development
17 that grows from within, where growth is spoken in
18 previously developed areas of the academic core and
19 infill sites. The plan would maintain adjacency for the
20 existing development, with compact expansion north of
21 the academic core, and some clustered development south
22 of the academic core, for sensitively sited buildings
23 would protect scenic view sheds and maintain existing
24 view corridors.

25 By building sustainably and efficiently, the

1 plan embraces density to maximize investments in the
2 land, while still maintaining an open-space network,
3 certainly outside of the academic core, but within the
4 academic core itself, for contemplation and wellness.

5 The plan continues the pattern of colleges and
6 student housing in an expanded ring around the academic
7 core, continuing to balance the context of a major
8 research university with a more intimate scale of the
9 residential colleges.

10 The plan promotes a walkable corridor by
11 consolidating parking at the periphery, limiting routine
12 vehicular traffic flow, prioritizing pedestrian
13 connectivity, and efficient transit access.

14 The land use plan itself embraces a compact
15 developable footprint. Most of the development would
16 occur under the designation academic and support, shown
17 in blue, colleges and student housing, shown in yellow,
18 and employee housing shown in brown.

19 The land use areas for colleges and student
20 housing support the capacity to house 100 percent of new
21 students above 19,500. The land use area for employee
22 housing supports the capacity to house up to 25 percent
23 of new employees, based on demand.

24 Some development would also be included in the
25 historic district, where the campus is interested in

1 rehabilitating existing historic structures, the
2 programs are actively contributing to campus community
3 life, as well as facility and operations, and in
4 recreation and athletics, which also include wellness
5 uses.

6 A mixed-use designation is introduced at the
7 Westside Research Park. This allows for multiple
8 program opportunities, including employee housing to
9 create diverse, vibrant, and an active site.

10 The land use plan also includes multiple open
11 space land use designations. In these areas,
12 development would not occur. Outdoor research for
13 research programs, including the Arboretum Farm and
14 Chadwick Garden, there are some opportunities for
15 low-density development in the arboretum, structures
16 that support that research.

17 Natural space, formerly called Protected
18 Landscape, which maintains special campus landscape
19 intrinsic to the university's identity, natural space
20 continues to be a protected land use designation, where
21 development is not permitted.

22 The campus natural reserve, which includes
23 expanded acreage, nearly doubling the acreage that we
24 had in the 2005 LRDP, and protects natural features and
25 processes for the purpose of teaching and research, and

1 campus habitat preserve, which preserves habitat for the
2 California red-legged frog and Ohlone tiger beetle.

3 Two areas on the campus are designated habitat
4 preserve. They include a 13-acre parcel in the
5 southwest corner, and a second near the campus entry.
6 Approximately 12-and-a-half acres of the employee
7 housing land use designation is shown within the
8 southern portion of the main residential campus as an
9 overlay. And you can see it's Employee Housing Overlay.

10 I just want to take one second to explain what
11 that means. The area was previously set aside in the
12 Habitat Conservation Plan, or HCP. The campus is
13 exploring the feasibility of developing this parcel for
14 employee housing. Its adjacency to the entrance, as
15 well as other employee housing sites, is advantageous
16 for this land use. Any development would require
17 permission from state and federal agencies to either
18 amend the existing HCP and set aside suitable habitat at
19 a different location on campus, or incorporate it into a
20 more comprehensive HCP that also addresses other land
21 use areas that overlap a critical habitat in order to
22 ensure the long-term viability of sensitive species and
23 habitat on our campus.

24 And finally, the land use plan also includes
25 projects that are planned or approved -- that were

1 planned and approved under the 2005 LRDP. Even if they
2 are not yet operational. These include the Student
3 Housing West Project and the Kresge College Renewal
4 Project, and it's why you're seeing these projects on
5 the proposed land use plan, even though they're not
6 proposed specifically under the 2021 LRDP.

7 In addition to the land use plan, the LRDP
8 includes an integrated transportation strategy and
9 utilities and infrastructure framework as part of the
10 campus' comprehensive planning.

11 Three roadway extensions are included in the
12 plan: A proposed extension of Meyer Drive over the
13 Hagar and Coolidge in order to create an intercampus
14 loop for more efficient shuttle service. A more
15 efficient transit loop dovetails with the ability to
16 foster greater pedestrian connectivity through campus.

17 When we would actually implement this, so
18 actual kind of alignment, shown diagrammatically here,
19 but actual alignment would be studied closely before
20 anything were implemented.

21 We're showing a proposed northern entrance to
22 Empire Grade; recognition of increased development north
23 of the academic core. And a proposed extension of
24 Western Avenue in the future employee housing areas,
25 which would minimize vehicle trips through the main

1 campus gateway. While vehicle trips through campus were
2 roughly the same as 20 years ago, the plan continues to
3 be focused on reducing single-occupancy vehicle trips to
4 occur, encouraging transit, pedestrian, and bike use,
5 and shifting parking to the periphery, with mobility
6 hubs for easy transfer to alternate modes of
7 transportation.

8 A utility is an infrastructure framework which
9 would support development as well. The compact
10 development footprint allows us to pull on existing
11 utility networks, and the plan identifies climate
12 strategies to increase stability on campus over the next
13 20 years, including minimizing increases in potable
14 water use, by continuing to expand the non-potable water
15 network, and by capturing storm water and runoff reuse,
16 and reducing carbon emissions by increasing reliance on
17 electrical on new buildings.

18 And with that, I'm going to conclude the
19 overview of the LRDP itself. And I am going to turn it
20 over to Erika Carpenter, our Senior Environmental
21 Planner, who will walk through and summarize the EIR.
22 Thank you.

23 MS. CARPENTER: Thank you, Jolie.

24 So I'll go ahead and bring out my presentation
25 just momentarily.

1 Thank you again for joining us this evening. I
2 thought I would start by giving you an overview of what
3 we'll talk about with respect to the CEQA portion of our
4 presentation tonight.

5 First, we'll talk a little bit what the
6 California Environmental Quality Act is and what the
7 purpose of an EIR is. And then we'll review some of the
8 EIR conclusions, as well as some of the alternatives
9 that were evaluated in the EIR. And then finally, we'll
10 talk a little bit more about how you can get involved
11 and review the documents and provide comments during the
12 60-day public review period.

13 So I will go ahead and get started.

14 So the California Environmental Quality Act
15 essentially requires agencies to evaluate whether and to
16 what degree a project would have an effect on the
17 physical environment. And it requires public agencies
18 to disclose those impacts to the public, and interested
19 agencies, and then reduce those impacts, to the extent
20 feasible, through mitigation measures or alternatives.
21 And CEQA also states that any impacts that are found to
22 be significant and unavoidable and require further
23 evaluation, that an environmental impact should be
24 prepared. And so an agency such as UC Santa Cruz is
25 required to prepare an environmental impact report when

1 you have a significant and unavoidable impact.

2 And I should note that we prepared an EIR for
3 the 2021 LRDP, and that CEQA allows for the preparation
4 of what is called a program-level environmental impact
5 report, when a project consists of a long-term plan,
6 like an LRDP, in order to provide a more broader
7 consideration of the potential impacts associated with
8 the project, as well as development and mitigation
9 measures and programs, where appropriate.

10 Now, this graphic generally summarizes the EIR
11 process, and it talks a little bit -- shows a little bit
12 about where we have been, where we are right now, and
13 where we're going through the CEQA process for that 2021
14 LRDP.

15 And first off, we released a notice of
16 preparation in February of last year, and that went out
17 for a comment period. And then we also held three
18 scoping sessions during that comment period, and
19 received oral comments from the public.

20 And then based on that, based on all the
21 comments we received during the comment period, as well
22 as the oral comments we received during the public
23 hearings, we took a look at those and our scope of work,
24 and we spent the better part of the last year preparing
25 a Draft EIR, and we issued that Draft EIR on

1 January 7th, so a little more than a month ago.

2 And so that document has been out for public
3 review, and it will be out for a public review of a
4 total of 60 days. The last day of the public review
5 period is March 8th. And we are at one of two public
6 hearings tonight. This is our last public hearing on
7 the Draft EIR. So we will be receiving oral comment
8 from the public and interested agencies during our
9 public hearing tonight.

10 And the overall purpose of the public review
11 period is to provide agencies and members of the public
12 an opportunity to comment on the content of the Draft
13 EIR and assist in the evaluation of potential physical
14 and environmental effects. We will also be describing a
15 little bit later, as I mentioned, how you can get
16 involved and review the documents and provide your
17 comments to us.

18 So following the close of the public review
19 period, we will then take all of the comments we
20 received and prepare a response to comments and a Final
21 EIR. And that will also consist of any amendments to
22 the Draft EIR. And that will go to the UC Regents for
23 consideration as part of the broader approval of the
24 2021 LRDP.

25 Now, this slide here really shows the full

1 scope of the environmental issues we evaluated in the
2 Draft EIR. And we evaluated all of the environmental
3 issues that are in Appendix G of the CEQA Guidelines.
4 And I'll just go ahead and read these to you.

5 We evaluated aesthetics, agricultural and
6 forestry resources, air quality, biological resources,
7 cultural resources, energy, geology and soils,
8 greenhouse gas emissions and climate change, hazards and
9 hazardous materials, hydrology and water quality, land
10 use and planning, mineral resources, noise, population
11 and housing, public services, recreation,
12 transportation, tribal cultural resources, utilities and
13 service systems, and wildfire.

14 Our next slide here really starts with the
15 conclusions in the EIR, and we're going to start with
16 the significant and unavoidable impacts. And what a
17 significant and unavoidable impact is, is substantial
18 adverse physical change on environment that cannot be
19 fully mitigated to the point that it would be less than
20 significant. So a lot of these significant unavoidable
21 impacts actually have mitigation measures, but they
22 cannot be fully mitigated.

23 So we'll start with air quality. The LRDP
24 would result in operational emissions criteria air
25 pollutants and precursors and conflict with the Monterey

1 Bay Resources District Air Quality Management Plan, and
2 the LRDP was found to exceed the Monterey Bay Air
3 Resources District threshold for fine articulate matter.
4 And because of the exceedance, the LRDP was also found
5 to be -- conflict with the air quality management plan.

6 Our second significant unavoidable impact is
7 the potential for the loss of historical resources. The
8 Cowell Lime Works Historic District, as Jolie mentioned,
9 is at the base of campus, and it is on both the
10 California and National Register, and in addition to
11 that existing historic district, there is a potential
12 historic district in the campus core. The first six
13 colleges and other campus buildings were surveyed and
14 evaluated and found to be significant as a potential
15 historic district, under both the National and
16 California Register. So the EIR includes mitigation
17 measures to protect these contributing structures, as
18 well as other buildings or structures that are 50 years
19 or older. However, this is a plan-level document and
20 not a specific development project. Therefore, the
21 potential for the loss of historic resources within
22 either of these two areas cannot be entirely precluded,
23 and therefore, even with the implementation of these
24 mitigation measures, it was found to be a significant
25 and unavoidable impact.

1 Our next significant unavoidable impact is
2 noise. And the EIR was found to result in substantial
3 temporary construction noise. And mitigation is
4 included in the EIR. But based on the location of
5 future construction, as well as the location of future
6 sensitive receptors, this impact was found to be
7 significant and unavoidable.

8 With respect to population and housing, the
9 LRDP includes student housing for 100 percent of
10 students up to -- from 19,500 students. It also
11 includes housing for up to 25 percent of new employees,
12 based on demand. However, as the housing market is not
13 entirely predictable, it is currently considered very
14 tight at this point in our region. It is possible that
15 there may not be adequate off-campus housing in the next
16 20 years of the LRDP to meet the demand of additional
17 students and employees in the years leading up to
18 build-out, and therefore, this was considered
19 significant and unavoidable impact.

20 Our last significant and unavoidable impact was
21 related to impacts on water supply. UC Santa Cruz is a
22 water customer of the City of Santa Cruz and is subject
23 to the same potential water shortages of the city under
24 the city's water supply allocation and demand reduction
25 measures. And we do note that UC Santa Cruz has been

1 very successful at reducing water use on campus in
2 recent years, and has met water reduction goals, based
3 on proactive water conservation all over the campus.
4 However, the LRDP would contribute to the need for the
5 city to secure a new future water source during certain
6 conditions, including multiple dry year scenarios.
7 Therefore, the university's contribution to that was
8 found to be significant and unavoidable.

9 Our next slide starts with the conclusions
10 related to significant but mitigable impact, and is
11 probably somewhat self-explanatory, but it's those
12 impacts that have mitigation and can be reduced to a
13 less than significant level.

14 So we'll start with esthetics. The LRDP has
15 the potential to result in adverse effects on the
16 aesthetic quality of the Cowell Lime Works Historic
17 District, as well as potentially degrade the existing
18 visual character quality and/or create a new source of
19 light or a glare within the LRDP area. And so there's
20 mitigation in the EIR requiring setbacks and buffers to
21 protect views, for example, from Empire Grade, which is
22 a county-designated scenic roadway, as well as scenic
23 views on the main residential campus, and at Westside
24 Research Park. There are also measures to minimize
25 light and glare from future development.

1 With respect to air quality, the LRDP was found
2 to result in construction-generated emissions of nitrous
3 oxide that exceeded the Monterey Bay Resource's District
4 threshold. So there are mitigation measures in the EIR
5 which require reduction of construction-generating
6 emissions from off-road vehicles, for example, by using
7 renewable diesel and other measures.

8 With respect to archaeological, historical, and
9 tribal cultural resources, there are potential impacts
10 to unique archaeological resources on campus, as well as
11 the potential to affect a significance of a tribal
12 cultural resource, and so mitigation in the EIR includes
13 surveys, notifications, and monitoring by the local
14 tribes, as well as protection of these archaeological
15 and tribal cultural resources, should anything be found.

16 Next, I'll move on to biology. And as Jolie
17 mentioned in her presentation, we have a very
18 biologically diverse campus, with several special status
19 plant and animal species. And the LRDP was found to
20 result in the potential disturbance or loss of special
21 status plant and animal species, potential disturbance
22 of sensitive habitat, natural communities, wetlands,
23 wildlife, and potential conflict of habitat conservation
24 plans. And the EIR has a very extensive mitigation
25 program for protecting biological resources on campus,

1 that includes extensive surveys, preservation, and
2 compensatory mitigation, if needed. And as Jolie
3 mentioned, we do have several endangered species. We
4 have the California red-legged frog, which has critical
5 habitat on campus. And we also have habitat for the
6 endangered Ohlone beetle. And so if any future project
7 would result in the take of these species, UC Santa Cruz
8 would pursue incidental take coverage, or develop a
9 campuswide -- campus conservation plan. Mitigation also
10 includes establishment of an alternative preserve to
11 amend the Ranch View Terrace Habitat Conservation Plan.
12 We have a preserve, as Jolie was mentioning, at the
13 entrance of our campus called Inclusionary Parcel D, and
14 so there is an overlay for employee housing, so if any
15 future development was to proceed on that parcel, we
16 would need to determine either establishing an
17 alternative preserve and work with UC Fish and Wildlife
18 to come up with an agreeable solution.

19 So our next impact is the potential disturbance
20 of paleontological resources. And the EIR includes
21 mitigation measures requiring awareness training. And
22 if any work is to occur within a fossil-bearing
23 formation on campus, as well as protection of a resource
24 if it is found, there's measures to ensure that that
25 takes place.

1 With respect to greenhouse gas emissions, the
2 LRDP was found to result in emissions that may have a
3 significant impact on the environment, and so there is
4 mitigation in the EIR which includes implementation of
5 on-campus or participation in regional GHG protection
6 project, and if necessary, the purchase of off-site
7 credits that meet appropriate state definitions and
8 criteria.

9 With respect to hazards and hazardous
10 materials, the LRDP was found to result in the potential
11 release of hazard materials from unknown contamination
12 which has not been characterized or remediated, so there
13 is mitigation requiring investigation and work plans,
14 contingency plans, and minimization of hazards, for
15 example, during demolition and those types of activities
16 associated with future development of the LRDP.

17 With respect to conflict or potential conflict
18 with our campus emergency operations plan, there was a
19 potential conflict that was identified, and essentially
20 had to do with reduction of travel lanes on roadways
21 when construction is underway. And so there is EIR
22 in -- there's mitigation in the EIR that requires the
23 preparation of traffic management plans to ensure that
24 there's no conflicts on our roadways, to ensure if any
25 evacuation is needed, that there would be adequate

1 capacity on our roadways.

2 So hydrology and water quality, the LRDP EIR
3 found that there was a potential impact to the karst
4 aquifer supply and recharge, and so there procedures in
5 the EIR for building on karst, as well as groundwater
6 level and spring flow monitoring.

7 With respect to noise, the EIR found that there
8 was a potentially significant impact with temporary
9 construction-generated vibration levels, as well as
10 stationary source noise levels during operations, and so
11 there's mitigation requiring the reduction of ground
12 vibration in proximity to sensitive land uses, as well
13 as noise reduction measures for potential loading-dock
14 activities.

15 With respect to public services, there was a
16 potential impact on fire facilities on -- within the
17 LRDP area. And so there is mitigation requiring
18 acquisition of new fire equipment, as well as the
19 expansion of the on-campus fire station as future
20 development occurs within the LRDP area.

21 With respect to transportation, the LRDP was
22 found to conflict with the CEQA guidelines related to
23 vehicle miles traveled. And for those that are not
24 familiar, the vehicle miles traveled replaced what was
25 called "level of service" when evaluating traffic

1 impacts associated with that project. And VMT is really
2 a measure of the number of daily vehicle trips to and
3 from a given location by a particular individual,
4 multiplied by their trip lane. In its simplest form,
5 that's what it is. And so there's mitigation in the EIR
6 requiring preparation of a transportation demand
7 management program to reduce vehicle trips to campus and
8 will adaptively manage campus-related VMT.

9 And then our final significant mitigable impact
10 is with respect to wildfire. So as I just mentioned,
11 with respect to compatibility of adopted emergency
12 response plans, there was a similar mitigation required
13 regarding the traffic management plan; it was the same
14 mitigation, just requiring that there's no conflict
15 during construction activity on campus.

16 And then finally, wildfire risk associated with
17 new development and land use patterns. The EIR found
18 that that was also a significant impact with some of the
19 development encroaching to the north, and so there's
20 mitigation in the EIR requiring implementation of a
21 vegetation management plan.

22 And now we'll move a little bit on to
23 significant and cumulative impacts.

24 CEQA provides for evaluation of the
25 significance of a project's cumulative impact based on

1 whether the project's incremental effect is cumulatively
2 considerable. And "cumulatively considerable" means
3 that the incremental effects of an individual project
4 are significant when viewed in connection with the
5 effects of past projects, the effects of other current
6 projects, and the effects of probable future projects.
7 Cumulative projects considered within the LRDP area
8 include development proposals relying on the 2005 LRDP,
9 for example, the Kresge College Renewal Project. Other
10 cumulative projects were considered outside of LRDP
11 area, including those projects located in the city of
12 Santa Cruz, and in the county of Santa Cruz, as well as
13 California Department of Transportation projects that
14 were in proximity to the campus. And so some of these
15 were project-related impacts, and they're also
16 cumulative impacts. And so operational air quality
17 emissions was also found to be a cumulative impact, as
18 well as a potential for the loss of historical
19 resources, the potential to generate substantial
20 temporary construction noise; and impacts on water
21 supply were also considered a cumulative -- significant
22 cumulative impact.

23 Now, we're going to move on to the alternatives
24 we evaluated in the Draft EIR. And we took a look at 11
25 different alternatives, although seven were considered

1 and dismissed, and four alternates were evaluated and
2 compared to the impact of the proposed project.

3 So I'll start with the first alternative, which
4 is the no-project alternative. And this project is
5 required by the California Environmental Quality Act
6 Guidelines to compare the impact of approving the
7 project with the impact of not approving the project.
8 And this particular alternative allows for the
9 contemplated growth in the LRDP in the -- contemplated
10 in the 2005 LRDP about to a thousand additional students
11 to 19,500 students. It also includes other 150
12 additional faculty and staff, and development of 1.3
13 additional assignable square feet of academic and
14 administrative space.

15 The second alternative that we evaluated was
16 the reduced LRDP enrollment alternative. And it
17 includes both reduced density and lower enrollment. So
18 it provides for an additional 7,882 above the baseline,
19 which would be 26,400 students total.

20 It also allows for employee population growth
21 of just under 1,200 faculty and staff, for a total of
22 4,000 total faculty and staff. And then development
23 growth of about 2.4 -- two million four hundred
24 sixty-seven assignable square feet of new academic and
25 administrative space.

1 Our third alternative is the reduced
2 development footprint, and it essentially avoids some of
3 the environmental impact associated with development on
4 campus. So it densified development in the central and
5 lower campus. And it also provides an additional -- it
6 basically provided the same student population growth
7 and employee population growth as the prior alternative
8 No. 2, as well as the same amount of development. So it
9 just takes that growth and just densifies it. But it
10 has the same student, employee population and amount of
11 new academic and administrative space.

12 Alternative 4 is a reduced campus growth and
13 use of the UCMBEST off-site. And just to give you kind
14 of -- those who are not familiar, UC Santa Cruz has a
15 campus in Marina on the former Fort Ord, which is about
16 30 miles or so south of us. And this alternative would
17 reallocate some of the projected growth to this off-site
18 location at UCMBEST and expand online and remote
19 learning. So it has a student population and employee
20 population that kind of takes that additional growth and
21 then has some of that occur within the LRDP area, and
22 then some of it would be associated with an expanded
23 online and remote learning program. And then some
24 graduate students would be at UCMBEST, so you can kind
25 of see the breakdown on the slide of the number of

1 students at each location, as well as the number of
2 employees. And then also kind of breaks out that
3 assignable square feet within those two locations, so
4 it's about 1.1 million of assignable square feet and
5 support space, and academic, administrative and support
6 space within the LRDP area. And then 250,000 assignable
7 square feet of academic and administrative space at
8 UCMBEST.

9 So out of all the alternatives, alternative 2
10 would meet most of the project objectives and result in
11 a reduction of impact compared to the 2021 LRDP,
12 especially with respect to the overall level of
13 development. Alternative 2 would not meet the key
14 project objective of allowing campus growth to the full
15 28,000 FTE students. Alternative 2 would not avoid the
16 significant and unavoidable impact associated with
17 historic resources, noise, population, and housing and
18 water supply that were identified for the 2021 LRDP.

19 So I wanted to just move on to how you might be
20 able to get involved in this process. We're in the
21 60-day public review process, and this actually gives
22 you a sense of -- these are the covers of all of our
23 documents. The first one here on the left is the Long
24 Range Development Plan. The one in the middle is the
25 Draft Environmental Impact Report. And then the one on

1 the far right is a community handbook, which really
2 summarizes some of the key impacts that are in the Draft
3 EIR. And it's a supplement to the Draft EIR just for
4 ease of review.

5 And so this is our website here. It's
6 lrdp.ucsc.edu. And all of these documents are available
7 on our website.

8 So as I just mentioned, all of the documents
9 are available online at our website. And then in
10 addition to that, we have a USB and flash drive we can
11 provide to you upon request. So if you would like to
12 receive a copy of that, there's an e-mail address below
13 with -- kind of this last bullet point here that you can
14 e-mail us and let us know if you would like a copy of
15 that sent to your address.

16 Hard copies are also available at the Santa
17 Cruz Public Library -- any of the Santa Cruz public
18 library branches in their Grab & Go Library Service. So
19 we have the website that you can take a look at to see
20 if you would like to check it out there. And then we
21 also have hard copies available on campus, and you can
22 schedule a pickup by contacting us or e-mailing us an
23 address.

24 And then finally, once you have had a chance to
25 review the Draft EIR, public comments can be submitted

1 either via e-mail or U.S. mail, and so this is the
2 address that you would want to send your comments to the
3 UC Santa Cruz campus, or you can send it to us via
4 e-mail at eircomment@ucsc.edu. So our public comment
5 period is open until 5:00 p.m. on Monday, March 8, 2021.

6 Thank you for being here tonight. And I'm
7 going to pass it to Jolie, who will start the next part
8 of our meeting tonight.

9 MS. KERNS: Thanks, Erika.

10 Hi everyone. We're going to get started with
11 our public comment period. Before we get started, I
12 want to go over just a few housekeeping, kind of,
13 guidelines again, on how we will be conducting this. We
14 will go ahead and turn to the next slide to run through
15 those.

16 So all attendees are muted right now. We will
17 unmute you when we come to your name. Just a reminder,
18 if would you like to speak, raise your virtual hand.
19 You need to chick on the hand. This is shown at the
20 bottom of your screen. If you're joining from your
21 phone, you can dial a star nine to raise your hand and
22 then a star six will allow you to unmute.

23 Commenters will be called in the order of hands
24 raised. If you lower your hand, you will lose your
25 place in the queue. You get in again at the bottom.

1 But do keep your hand raised and we'll get to you.

2 When it's your turn to speak, staff will
3 announce your name. We will ask you to unmute yourself
4 and ask you to state your name and spell it before
5 providing your comment.

6 So each speaker will have three minutes. A
7 timer will appear when you have about 30 seconds left of
8 comment time remaining, to help manage time.

9 If you think your comments will be transcribed
10 and addressed in the final EIR, you do not need to also
11 provide written comments.

12 I'll have Erika address the last comment here.

13 MS. CARPENTER: I'm sorry, Jolie. You were
14 saying -- which bullet point were you at here?

15 Okay. Each speaker will have three minutes to
16 provide comments. A timer will appear when you have 30
17 seconds of comment time remaining, and so it will just
18 show up on screen and just alert you as to where you are
19 in the time frame.

20 And I think Jolie just mentioned, if you speak,
21 your comments will be transcribed and addressed in the
22 Final EIR. And the meeting is being recorded and a
23 court reporter is present to transcribe your comments,
24 so please speak clearly to ensure the court reporter
25 captures your comment.

1 MS. KERNS: Okay. I think we're ready to move
2 into the public comment period.

3 So just a reminder to raise your hand if you
4 want to comment. I'm only seeing one hand right now.
5 We'll go ahead and start with that one commenter. But
6 if anyone else would like to comment, please do raise
7 your hand so that we can make sure to hear what you have
8 to say.

9 We will start with Maria Borges.

10 And to let you know, we can see everybody, and
11 I know you cannot. I'm also seeing -- after Maria,
12 we'll hear from Joshua Ayala, and then Faye Crosby.

13 So I'm going to go ahead and start with Maria
14 Borges. Maria, I'm unmuting you right now. And please
15 state your name and spell your name, that would be
16 appreciated.

17 MS. BORGES: My name is Maria Borges,
18 M-A-R-I-A, B-O-R-G-E-S. And I am a UCSC alumni, and a
19 resident and taxpayer of Santa Cruz County. And so I
20 would just like to say the whole reason that I attended
21 UCSC was to be around the nature and natural beauty that
22 the campus had to offer. The best part of my time at
23 UCSC was not the buildings or even the professors or
24 activities that the school had to offer, but rather
25 spending time getting to know the native plants and

PH2-1

1 wildlife, and so if these areas are destroyed by
2 construction projects in order to build new buildings,
3 then it's getting rid of the very reason why I and many
4 other students decided to attend UCSC in the first
5 place. My stance is that the no action plan is the only
6 acceptable plan for development at UCSC. The mitigation
7 ideas that are being proposed do not consider the
8 importance of protection for the entire ecosystem within
9 the boundaries of the LRDP. Permanent loss of habitat
10 is not considered, which would lead to the loss of
11 endangered species and many native animals over time.
12 UCSC needs to take a holistic approach that involves
13 environmental stewardship of the natural areas on their
14 property.

15 In addition, I'm not just concerned with
16 preserving the scenic beauty of the campus, but I'm here
17 to speak up for the native animals and plants that live
18 on campus. According to UCLA's Belinda Waymouth, it is
19 less costly to protect natural areas than to restore
20 them later on. The LRDP is shortsighted when
21 considering longevity of the ecosystem on campus that we
22 humans are also a part of.

23 It is time that people start valuing things
24 that are more important than making profits. Connection
25 to nature helps to reduce stress for students, and if

PH2-1
cont.

1 the natural places on campus are destroyed, it will be a
2 great loss for future students of UCSC, and of course
3 for all of the animals that call those places home,
4 including burrowing owls, California red-legged frogs,
5 mountain lions, bobcats, white tailed kites, golden
6 eagles, and many, many more. Thank you very much.

7 MS. KERNS: Thank you for your comment.

8 We're going to go ahead and call on our next
9 commenter. I'm seeing Joshua Ayala. And Joshua, I have
10 unmuted you.

11 JOSHUA AYALA: So my name is Joshua Ayala,
12 J-O-S-H-U-A, A-Y-A-L-A. I am currently finishing up my
13 undergrad here at UCSC, and my comments, or questions,
14 I'd say, are more water based. So with the potential
15 expansion of new students, expanding student population
16 of about, I believe it was 8,500 over the next 20 years,
17 how well does the Environmental Impact Report and the
18 Long Range Development Plan plan to the effects seen
19 with the increased effect of climate change in
20 precipitation events being more essentially rapid in
21 dumping water in a shorter amount of time versus our
22 historical precedence of longer rain events, we're
23 having more severe events, which generally lead to more
24 runoff, which leaves less usable water for the city
25 within the watershed. And so I would like to know if

PH2-1
cont.

PH2-2

1 the plan has any considerations for developing
2 groundwater, and if that development like energy costs,
3 where a water treatment plant is going to need to be
4 built, so I would like to see, from a cursory glance,
5 there has been not that much in terms of groundwater
6 development in the Environmental Impact Report. So I
7 would like to see a little bit more of that. But I
8 understand that it's going to take time and research and
9 study, which the report does mention. Thank you.

10 MS. KERNS: Thank you, Joshua.

11 I'm going to go ahead and call on our next
12 person. I'm seeing Faye Crosby. I just unmuted you,
13 Faye.

14 FAYE CROSBY: Faye Crosby, F-A-Y-E,
15 C-R-O-S-B-Y.

16 UCSC is one of ten campuses and must operate in
17 a fashion consistent with rules and regulations. You
18 have made it clear that we don't have an option not to
19 prepare an LRDP. And by regional regulations, we don't
20 have an option to not prepare an EIR. But perhaps for
21 the LRDP, we do have the option to ask the Regents to
22 pause the process.

23 You have been striving for transparency and
24 public participation. Last night and tonight you have
25 been fantastic in how you're running these meetings,

PH2-2
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PH2-3

1 with public participation, and you have tried to have a
2 lot of materials available to us. But I, for one, have
3 not been able to discern who sets the timelines, nor is
4 it clear to me, perhaps it is to others, how to pause
5 the process. Yet, I would propose that a delay seems
6 appropriate. Both the LRDP and the EIR must be based on
7 good data. It would seem to me that some data were
8 lacking at the beginning of the LRDP.

9 In 2015-2016, UCSC lagged far behind our sister
10 campuses in terms of assignable square footage per
11 student, and classroom and residential space. And it
12 may be that we have caught up in the five years, but
13 maybe not. If we haven't, what would be the impact, the
14 environmental impact, say, in terms of water, of meeting
15 the standard, the UC-wide standard, of having the
16 appropriate ASF per student.

17 There's some other data that could not have
18 been ready at the beginning because circumstances now
19 have changed our world. So some answers would be to
20 questions like: What are the UC-wide system
21 possibilities for distal learning; what would the
22 post-pandemic demand look like for undergraduate
23 education statewide; what are the state's needs, now
24 that we know them, for training post-grad students in
25 health sciences and in environmental sciences; what are

PH2-3
cont.

1 the effects of the fires of 2020 on water usage and on
2 the soil in the areas abutting our campus and some other
3 campuses; what have the fires done in terms of water
4 usage?

5 Answers to questions like these seem to be
6 important if we are going to have good data, and we must
7 base our conclusions and our recommendations on good
8 data.

9 So I hope that somebody knows who has the
10 authority to request and who has the authority to grant
11 a pause in the LRDP process. Thank you very much.

12 MS. KERNS: Thank you for your comment, Faye.

13 I'm seeing two more hands, and I'm going to
14 give both of those names so those people can be ready.
15 We'll start with Nadia Peralta, and after Nadia, we'll
16 go ahead and call on Rick Longinotti.

17 Nadia, I just unmuted you. You should be able
18 to speak now. If you would state your name and spell
19 it, we would appreciate it.

20 NADIA PERALTA: Thank you. Nadia Peralta,
21 N-A-D-I-A, Peralta, P-E-R-A-L-T-A.

22 So my comment piggybacks on some of what has
23 already been spoken this evening.

24 I don't discredit or doubt the good effort that
25 you all have put into having these meetings for the

PH2-3
cont.

PH2-4

1 community, but once again, they follow a similar model
2 and esthetic flow of really not offering like a quality
3 alternative to what you frame as inevitable in this
4 project. And I think that there is actually way more
5 community support against the LRDP than there is for it.
6 And I actually think that the City of Santa Cruz, the
7 residents, the alumni, and the current students have the
8 capacity to organize on behalf of a delay, a significant
9 delay or halt. And I think that to avoid all of that
10 energy on both sides that it would take, I really
11 encourage you to listen to the people that continue to
12 show up to these meetings to express concerns about all
13 of the significant mitigation and impacts that you laid
14 out for us for.

PH2-4
cont.

15 For me, personally, as a community member and
16 an alumni, the ones that stick out significantly are the
17 water and its impact on the sensitive hydrology and the
18 karsts of hydrology that drains into the High Street
19 neighborhood. And I don't see enough info about how
20 that's going to affect the various creeks and streams
21 that go through that neighborhood and down into Santa
22 Cruz; and as well as the impacts on tribal resources.
23 It's extremely unfortunate and historical and deliberate
24 that California tribes are not recognized, including the
25 (inaudible) speaking Ohlone people, whose territory this

PH2-5

PH2-6

1 is, they were absolutely decimated in the mission
2 system.

3 Currently, we have the (inaudible) tribal ban,
4 who on top of all of the things that Chairman
5 (inaudible) handles, I'm sure that this will be of
6 significance importance. And I would really think it
7 would be transformational in the year 2021 for the UC to
8 be actually considering the impacts of colonization and
9 an ongoing -- just a repetition of historical trauma to
10 go ahead with this plan in its current form, and all the
11 impacts that it might have on -- like Maria pointed out,
12 the wildlife, as well as tribal historical artifacts.

13 There's so much more that can be said, but I
14 really appreciate how many people are coming together
15 for this, and I really hope to not see this become a
16 fight and actually something that you listen to.

17 MS. KERNS: Thank you for your comments, Nadia.

18 I'm going to call up our next -- and here is
19 Rick Longinotti. Rick, I'm unmuting you now.

20 RICK LONGINOTTI: My name is Rick Longinotti.
21 I have a question Erika and Jolie, and I don't know if
22 in this format you're able to answer a question. Are
23 you able to answer a question?

24 MS. KERNS: No, we're really not able to answer
25 questions. We have had other formats, workshops, where

PH2-6
cont.

PH2-7

1 we like to engage with everybody and have more back and
2 forth, but the focus for this specific meeting as a
3 public hearing is to make sure we capture your comments.
4 And then all questions and comments are included in the
5 record and responded to in writing as part of the final
6 EIR.

7 RICK LONGINOTTI: Well, I'll put my question in
8 the record and maybe I'll email you and you can respond
9 to it. The question is: You know, it seems like a
10 given that the University California Santa Cruz accepted
11 8,500 more students, and that decision was made at a
12 higher level; the Regents, presumably. So I wonder if
13 there was an environmental review of the Regents'
14 decision about how to allocate student enrollment, the
15 growth of student enrollment. Because if there was not
16 an environmental review on that decision, then I wonder
17 how valid the current EIR would be just for the
18 University of California Santa Cruz growth, because it's
19 based on a decision that's not under the purview of this
20 environmental review, so if there was no environmental
21 review, how can this one be valid? Does that make
22 sense?

23 MS. KERNS: Just a reminder for everyone to
24 mute, unless you're speaking.

25 Thank you, Rick, for your comments.

PH2-8

1 I will respond, this EIR is a vehicle to
2 address the addition of students, and the environmental
3 impact. And then like I said, before all comments and
4 questions will be responded to in writing in the Final
5 EIR.

6 I am seeing three more names. We'll start with
7 Sue Terence. After Sue, we'll have Elaine Sullivan.
8 And after Elaine, we'll have Sara Bassler.

9 So I'll start with Sue. Sue, I have just
10 unmuted you. If you could state your name and spell it
11 for our court reporter, that would be great.

12 SUE TERENCE: Sue Terence, S-U-E,
13 T-E-R-E-N-C-E, and I'm a resident of Santa Cruz.

14 First of all, I would like to say, the UC
15 system has a number of campuses, but they're all in the
16 southern half of the state more or less. I believe UC
17 Davis is the farthest north, and half the state is north
18 of that. So I guess my first comment would be: Why
19 aren't we dispersing the campuses in a more equitable
20 way for the population of California?

21 And then to bring it closer to home, I support
22 that you're trying to make this whole process make the
23 UCSC campus sustainable in terms of all the concerns you
24 have talked about. I wish the same were true for the
25 city. This expansion plan will mean thousands of

PH2-9

PH2-10

1 students will be looking for housing in the city of
2 Santa Cruz and the environs. 25 percent, you say, will
3 be housed on campus, of the new students and staff. The
4 other 75 percent will continue to make prices for
5 rentals in this town go up and up and up. So our
6 efforts to create an affordable housing in the city,
7 which we're all in support of, are kind of futile,
8 because we find these prices going up.

9 You have outlined the physical and
10 environmental effects on the campus in saying you are
11 going to avoid slopes, you're going to have parking on
12 the perimeter, you're going to retain new corridors,
13 you're going to retain the transit access and open space
14 designations, and maybe one of the biggest luxuries is
15 that you get to have an EIR, at all.

16 I live half a block from a proposed development
17 at Branciforte and Water Street. They proposed
18 151 units on a bluff, basically 100 percent slope, and
19 no open space, terrible traffic concerns that will be
20 exacerbated greatly. 151 units on less than an acre of
21 land, and we find ourselves up against no possibility,
22 almost, of an EIR because of the state laws that are
23 being imposed.

24 So I ask that you look at the cumulative
25 effects on the entire community and not just the campus.

PH2-10
cont.

1 This is a problem we need to work on together. Thank
2 you.

3 MS. KERNS: Thank you for your comment.

4 One thing I want to state, is that the LRDP
5 plans for housing for 100 percent of new FTE students
6 above 19,500 and 25 percent of new employees, based on
7 the demand. I just want to make sure that simple fact
8 was clarified.

9 I'm going to go ahead and go to our next person
10 I'm seeing here, Elaine Sullivan. Elaine, I'm unmuting
11 you right now.

12 ELAINE SULLIVAN: Thank you. It's Elaine,
13 E-L-A-I-N-E, Sullivan, S-U-L-L-I-V-A-N. I'm a current
14 faculty member at UCSC.

15 Great. And so I wanted to comment that the new
16 LRDP states that its goal is to maintain the integrity
17 of natural spaces, which it says, quote, our valued as
18 scenic resources. It also suggests for the goal is to
19 preserve existing historic view sheds and to limit the
20 expanding into areas of existing core use of campus.

21 I wanted to mention that the choice of
22 construction for housing in the East Meadow area
23 contradicts all of those stated goals. That area was
24 designated in the 2005 LRDP as campus resource land,
25 that was supposed to be maintained in its original

PH2-10
cont.

PH2-11

1 state. Over the past two years, community members in
2 the form of the East Meadow Action Committee have
3 organized and come together and formally and repeatedly
4 objected to new construction in the East Meadow. Our
5 participation and opinions have been completely ignored,
6 as the LRDP includes the East Meadow construction as a
7 foregone conclusion.

8 So I would like to object to the LRDP as it
9 stands, and especially the development of housing in the
10 East Meadow area. Thanks.

11 MS. KERNS: Thank you, Elaine, for your
12 comment.

13 Our next commenter is Sara Bassler. I'm going
14 to unmute you right now. And if you could state your
15 name and spell it for the record.

16 SARA BASSLER: My name is Sara Bassler. That's
17 S-A-R-A, Bassler, B-A-S-S-L-E-R.

18 I'm a member of the Santa Cruz -- I live in
19 Santa Cruz, the city of Santa Cruz. And I had a couple
20 comments. One, you said 100 percent of students would
21 be housed over, I think, 19,500, and currently there's
22 approximately 18,500 students. So that still leaves a
23 thousand students who would be unhoused; plus any
24 students who would be unable to afford housing on campus
25 would look for housing in our community. And as already

PH2-11
cont.

PH2-12

1 mentioned, that's in very short supply.

2 And then my other comment is on water. You
3 mentioned that UCSC is a customer of Santa Cruz City
4 water, and that there would be times where the city
5 would have to secure a new water source. And I don't
6 know if the EIR addressed how realistic it would be for
7 the city to find a new water source, considering water
8 is already in short supply. And what would happen if
9 the city is unavailable to secure a new water source, or
10 if they were able to secure new water source, what the
11 cost would be to other customers of Santa Cruz city
12 water. Thank you.

13 MS. KERNS: Thank you for your comment.

14 I see three more hands. I'm going to go ahead
15 and call all three. The first one is the next
16 commenter, and the two after that will be on deck.

17 So the next one will be Brett Hall, after that
18 we'll have Morgan Bostic, and then Matthew Wetstein.

19 Brett, I just unmuted you.

20 BRETT HALL: Thank you very much. My name is
21 Brett Hall, B-R-E-T-T, H-A-L-L, and I am on the staff at
22 the UCSC Arboretum. I'm director of the California
23 Native Plant Program, and we have been working in
24 biodiversity conservation, specifically, plant
25 conservation, for well over four decades. And so we

PH2-12
cont.

PH2-13

PH2-14

1 come to the LRDP kind of with a lot of that in mind.
2 And we are particularly interested in the long-term
3 conservation of the campus natural reserve, especially.
4 And I know that there are significant areas that have
5 been very thoughtfully mapped to promote the campus
6 natural reserve. And I would like to recommend, which
7 is the recommendation of many faculty and groups of
8 people working hard on the environmental concerns on
9 campus, is to make that permanent protection and put it
10 in the UC Natural Reserve system. So I wanted to lodge
11 that.

12 And then also, on a couple other notes, I have
13 been through about four different Long Range Development
14 Plans now on the campus, and I think it was in 1988,
15 about 40 acres of arboretum land was put jointly with
16 the campus natural reserve, and that was preserved, as
17 well, in the 2002, I think it was, or 2005 Long Range
18 Development Plan, and I see also that it is here, and I
19 very much appreciate that. However, there is no
20 specific language that conveys the management, other
21 than in the LRDP it says the Campus Natural Reserve will
22 continue to be managed in consultation with Campus
23 Natural Reserve committee, and where there are common
24 borders with the UC Santa Cruz Arboretum. The Campus
25 Natural Reserve is located primarily on the west side of

PH2-14
cont.

1 campus.

2 And I would like to encourage the language
3 that's in the proposal for a permanent Campus Reserve,
4 which says that the West Meadow features the
5 well-developed California Conservation Garden, and the
6 UCSC Arboretum project that the Arboretum would maintain
7 oversight and management of through a memorandum of
8 understanding with the UC Natural Reserves.
9 Additionally, the seasonal pond and Cowell Reservoir,
10 within the campus, or within the Arboretum's core is
11 included in the proposed Campus Natural Reserve, due to
12 its importance as a breeding ground for the California
13 red-legged frog.

14 So I'm just promoting these different ways of
15 making sure there's specificity going forward.

16 And one last thing is, now to the east, towards
17 the edge of the great meadow, an additional 20 or so
18 acres are going from the Arboretum to the Natural
19 Reserve, under joint management, I suppose, but
20 primarily under the oversight of Arboretum. And I would
21 like to see more specificity and language that really
22 describes the management and relationships and
23 leadership, that the Arboretum continue to prevail in
24 those plans.

25 Thank you very much, and thanks for your

PH2-14
cont.

1 process here.

2 MS. KERNS: Thank you for your comments, Brett.

3 All right. We'll go to the next name, Morgan
4 Bostic. Morgan, I just unmuted you. Speak now and
5 state your name and spell it, that would be appreciated
6 for our record.

7 MORGAN BOSTIC: Yes. My name is Morgan Bostic,
8 M-O-R-G-A-N, B-O-S-T-I-C. And I'm a recent UC Santa
9 Cruz graduate, and I'm also the advocate for the Santa
10 Cruz City/County Task Force on UCSC growth plans, which
11 is a working group of city and county elected officials
12 that was formed in response to local ballot Measure U,
13 which was passed in 2018, by 77 percent of the voters,
14 and which contained specific policies to restrain UCSC
15 growth and ensure the mitigation of all of its impacts.

16 Among other imperatives, Measure U directs the
17 city council to participate in reviewing and commenting
18 on the EIR in an effort to ensure full mitigation of all
19 of adverse impacts, of any proposed growth on the Santa
20 Cruz community, particularly, in the areas of housing
21 and traffic, public transportation, and public services,
22 like water and public safety.

23 Over the past two months, the task force has
24 initiated a public campaign informing the community
25 about the details of the growth plans, and has been

PH2-14
cont.

PH2-15

1 encouraging members of the public to participate, either
2 on their own or through a task-force-sponsored working
3 group.

4 While there are numerous inadequacies with the
5 EIR, many of which were mentioned eloquently by so many
6 community members earlier tonight, and at the meeting
7 yesterday, we were focusing our comments tonight only on
8 a few of them.

9 First, the analysis of the impact of the entire
10 plan are based on the university actually housing
11 100 percent of their additional student growth on campus
12 and after 25 percent of faculty on campus. However,
13 there is no evidence to justify this assumption, and
14 there are no mitigation measures proposed that require
15 UCSC to meet these objectives.

16 In addition, there is no mitigation measure
17 that requires UCSC to tie (inaudible) growth to the
18 provision of housing and other critical infrastructure.
19 According to data located in the Student Housing West
20 Environmental Impact Report, UCSC has, in reality, only
21 built five and a half percent of the infrastructure they
22 said they would need to support the current level of
23 enrollment at UCSC under the 2005 LRDP.

24 Instead, students have been without lounges,
25 without social, academic, and recreational space, and

PH2-15
cont.

PH2-16

PH2-17

1 cramped in converted housing rooms.

2 According to UCSC's CAPS director, there has
3 been an increasing demand for mental health resources as
4 a direct result of no private space and the stress of
5 housing conflicts. UCSC students have some of the
6 highest level of dissatisfaction of any UC campus, which
7 can be directly connected to the lack of infrastructure
8 and resources that were said to be necessary to support
9 a 19,500 student enrollment, but were not provided.
10 Many of those commitments resemble those of the 2021
11 LRDP.

12 Without mitigations requiring UCSC to provide
13 the housing that it's proposed, requiring students to
14 live on campus and ensuring that rates are affordable,
15 and/or time enrollment growth, to the provision of
16 housing, the analysis of the impacts and the mitigation
17 measures proposed are inadequate under CEQA. Thank you
18 so much.

19 MS. KERNS: Thank you for your comment. We
20 have one person that would like to comment left right
21 now. But I encourage anyone else to raise the hand
22 function so that we can call on you if you would like to
23 provide a comment tonight.

24 We will call the next name. John Aird. John,
25 I just unmuted you. If you can state your name and

PH2-17
cont.

1 spell it for our record, that would be helpful.

2 JOHN AIRD: I'm John Aird. I have been
3 involved in the university, I think, since I was born,
4 since my father founded the Department of Neurology at
5 UC San Francisco. And I'm also a Berkeley graduate, and
6 I have been involved in this community for the last
7 40 years, and in particular, through the last Long Range
8 Development Plan, and was one of the leaders with the
9 CLUE organization, the Coalition for Limiting University
10 Expansion.

11 Let me just comment on three things here that I
12 found disturbing, and I don't know exactly how this fits
13 in, Jolie, with your program here, but one is just the
14 question of feasibility. Let's just think about this.
15 In 60 years, this university has added 3,750,000 square
16 feet of facilities, in 60 years. And as Morgan just
17 outlined, in the last 20-year program, 2005, 2020, the
18 facility development fell far short of what was outlined
19 in that plan and what was required to support the
20 students in a quality education.

21 This plan proposes five million six-hundred
22 twenty-nine million square feet (phonetic), 150 percent
23 more over the next 20 years than was done in the
24 previous 60.

25 Now, I mean, it's great to have a plan, but

PH2-18

1 somewhere there has got to be a truth serum in terms of
2 whether it's going to actually happen. Where is the
3 funding for this?

4 The reason that the chancellor said that the
5 university was not able to keep pace with student
6 enrollment and what was committed in term of facilities,
7 was there wasn't funding. Well, the state doesn't have
8 funding now. And certainly coming out of the economic
9 situation that we find in this state, and in the city,
10 and in the county, I don't see where the funding is
11 going to come from.

12 I totally support the expression that was made
13 by somebody earlier, that this plan be put on a hold
14 pattern until we catch up, and both in the community and
15 at the university. Again, as the chancellor said, there
16 is a deficit here that needs to be addressed on both
17 sides.

18 So I'm disappointed that the one major
19 recommendation that CLUE made was not considered among
20 the alternatives, which was, that a moratorium on future
21 enrollment increases be made until this catch-up has
22 actually occurred. And I would hope -- and it wasn't
23 even addressed. That particular alternative, which was
24 our major alternative, was not even addressed at all.

25 Finally, I think that it goes without saying,

PH2-18
cont.

PH2-19

PH2-20

1 that if you bow by the interests of -- the
2 expression -- this community of 80 percent or almost
3 80 percent of the views of this community, at the very
4 least, you need to adopt a pattern in which any growth
5 has the facilities to support that growth in place
6 before the growth occurs, and then you can go to phase 2
7 and so forth. Again, it's very much along the lines
8 that the Chancellor Blumenthal had suggested in our
9 earlier meetings. Thank you very much.

10 MS. KERNS: Thank you for that comment.

11 I see our next commenter is Matthew Wetstein.
12 I have just unmuted you, Matthew.

13 MATTHEW WETSTEIN: Thank you, Jolie, and Erika,
14 I much appreciate it.

15 My name is Matt Wetstein, W-E-T-S-T-E-I-N, and
16 I serve as the president of Cabrillo College, so I want
17 to make sure my comments are as an individual, but I
18 wear that hat as part of my employment.

19 So obviously housing and transportation issues
20 are critical to residents of this county. And in my
21 work, I serve on a housing and college affordability
22 task force for the community college system. And
23 housing and security is a grave concern for students in
24 my sector. We know, for example, that 20 percent of
25 students attending Cabrillo College report that they

PH2-20
cont.

PH2-21

1 have been homeless or suffered housing insecurity in the
2 last 12 months. So the impact of UCSC plans for housing
3 are critical in driving housing availability and rental
4 prices for students and for all people in this
5 community.

6 So I'm grateful that the LRDP had a vision for
7 housing 100 percent of students above 19,500. I wonder
8 if the university would consider the need to house
9 100 percent of students from outside the area above the
10 current level of 18,500.

11 I also want to thank you for your consideration
12 of the impact of staff housing and the costs that are
13 borne by our employees in the higher ed sector. The
14 idea of creating space for 25 percent of new faculty and
15 staff is an innovative approach; I'm hopeful that can be
16 delivered upon, and certainly something that I would be
17 looking at in my role at the college that I lead.

18 You have a difficult challenge. You're trying
19 to balance housing and transportation demands in a
20 beautiful campus setting. It's such a unique campus,
21 and as many of the commenters have said tonight, we're
22 all hopeful that that character and that protection of
23 balancing the beauty of the campus can be weighed at the
24 same time with providing more housing to our community.

25 So thank you for hosting these sessions, and I

PH2-21
cont.

1 appreciate your willingness to take our comments.

2 MS. KERNS: Thank you for your comment.

3 I'm seeing one hand raised, and that is Robert
4 Singleton. Robert I'm going to unmute you. If you can
5 state your name and spell it for our court reporter.

6 ROBERT SINGLETON: My name is Robert Singleton.
7 That's R-O-B-E-R-T, S-I-N-G-L-E-T-O-N.

8 And honestly, after hearing the president,
9 Matthew Wetstein's comments, I feel for the position
10 that the campus is in, having to do the long range
11 planning, knowing that a lot of the enrollment goals and
12 the educational mission of the University California
13 system dictates how many students are there, and they
14 have an obligatory mission to provide for the
15 educational well-being of the top 10 percent of
16 California. We're a growing state. We have 40 million
17 people. That's a big mission for the UC to take on.
18 And so individual campuses oftentimes don't get to
19 dictate how many students are, essentially, mandated
20 that they enroll to provide for this educational
21 quality.

22 So the university is doing a great job at
23 balancing the needs and providing for that mission,
24 providing for that educational opportunity, in the best
25 way possible, given the constraints that have been put

PH2-21
cont.

PH2-22

1 on them.

2 Obviously, everyone cares about maximizing and
3 balancing the beauty of the campus. As an alum myself,
4 I thoroughly enjoyed the meadows, the forest, the caves,
5 everything that makes our campus a special and magical
6 place to go to school. But at the same time, housing is
7 a huge issue. Housing and security is a major issue.
8 Affordability is a huge issue. The impact on the
9 collective Santa Cruz community is big. So I just
10 support the university moving forward with developing
11 the infrastructure and housing that it essentially has
12 to because of the mandated mission of the University
13 California system. And I think you are doing the best
14 job with what you got. So I just want to say that.
15 Keep it going.

16 MS. KERNS: Thank you for your comment, Robert.

17 Okay. I would like to remind everyone that if
18 you would like to make a comment, you can click the
19 "raise hand" icon at the bottom of your screen. I'm
20 seeing just a few more pop up, so we'll go ahead and
21 continue and take those.

22 I have got two more comments that I see. We'll
23 start with Faye Crosby, and then we'll go to Ted
24 Benhari.

25 FAYE CROSBY: Faye Crosby, again, still.

PH2-22
cont.

1 It's true that UCSC is part of a larger system,
2 and that following the plan for higher education, we are
3 requested as a UC system to take the top -- at one point
4 it was the top 12 percent, now it's to take a look at
5 the top 9 percent. It keeps shifting. But there's no
6 mandate that it has to be on any particular campus. And
7 different campuses have talked about being landlocked,
8 for example -- or at least talked about being
9 landlocked.

10 There are different ways to look at
11 distributing the student growth. As you have mentioned,
12 Merced has a very small campus, and so one way to absorb
13 the increasing demand, the appropriate increasing
14 demand, is to redirect students to Merced. They may not
15 want go to Merced, but they want a UC education, and it
16 can be provided there as well. It's the job of the
17 Regents to not only balance everything on each campus,
18 but to balance among the campuses.

19 For many years, UCSC got short tripped. For
20 example, nine other campuses were connected by fiber
21 optic connections, and we were not; the idea being that
22 it was too expensive to bring it here. During his
23 chancellorship, George Blumenthal changed that; he did
24 it quietly and discreetly.

25 Our campus does not have to lie down and be

PH2-23

1 railroaded by the needs of some people in the
2 higher-than-our-campus administration. A collegial
3 relationship might be one in which we ask to have the
4 Regents pause and look at everything in the way that
5 they want to.

6 Now, the lawsuit about the East Meadow brought
7 the Regents to task, because they didn't look
8 appropriately at information that they should have been
9 looking at. So it's in the tradition of just asking the
10 Regents to just take our campus seriously, and allow us
11 the same privileges as the other nine campuses. We do
12 have a mission to educate the wonderful students of the
13 great state of California, but it doesn't all have to be
14 done in Santa Cruz. Thank you.

15 MS. KERNES: Thank you for your comment.

16 Our next commenter is Ted Benhari. Ted, I just
17 unmuted you. If you could state your name and spell it.

18 TED BENHARI: My name is Ted Benhari,
19 B-E-N-H-A-R-I. I live in Bonny Doon. I'm advisor to
20 the Rural Bonny Doon Association, signatory to the
21 comprehensive settlement agreement from the 2005 LRDP.

22 Obviously, UCSC is a great university, though
23 not quite as great these last few years as it's been in
24 the past, but a great asset for our community, in terms
25 of the economics and culture and all the rest of it.

PH2-23
cont.

PH2-24

1 But our community has very limited resources.
2 And the amount of resources that UCSC presently uses is
3 pretty much the capacity of the community, and any
4 further growth will just have enormous impacts.
5 Certainly the people before me who have talked about the
6 impacts on housing, when you say that we will have 8,500
7 more students, we all know that that really means a lot
8 more bodies than 8,500, because these are full-time
9 equivalents. So we might have 10,000 more actual people
10 living here. The faculty and staff also, they bring
11 families with them. So overall, we're probably talking
12 about 15,000 to 20,000, perhaps more actual people
13 coming here to live, than the number that you state, as
14 large as they are.

15 Also, I would like to state specifically that
16 the impacts on Empire Grade, which comes up into Bonny
17 Doon, is one of the main, if not the main,
18 transportation route for Bonny Dooners. It's a very
19 dangerous road. The Cave Gulch area just above the West
20 Entrance is prone to slippage into the gulch. It's
21 constantly being repaired. To put more traffic on that
22 area is not only dangerous for the many bicyclists, who
23 more and more are using that route, but the commuters,
24 and the trucks that come down from the Felton Quarry,
25 it's just not a very feasible transportation route, and

PH2-24
cont.

PH2-25

1 suddenly you're adding a new entrance to the university
2 that will bring people to the new areas that you're
3 coming to, to prefer over the other two areas. So
4 you're talking about just a horrible increase in traffic
5 on a very narrow and dangerous road.

PH2-25
cont.

6 I would also like to point out that the campus
7 reserve, people think of it as kind of a natural reserve
8 that's permanently there to help the environment and
9 animals and plants to live there, but you guys just keep
10 changing the borders of it. And the animals and the
11 plants can't read your signs about where the natural
12 reserve is now located. You can't just tell them,
13 "Okay, we have got these acres over here, why don't you
14 guys move over here." It has a huge impact on the
15 animals and plants. And this new change will just have
16 more and more of an impact on it.

PH2-26

17 So I know that these comments that all of us
18 have made have nothing to do with what's going to be in
19 the actual EIR and the things you have to address, but
20 it's just basically us pointing out the real problems
21 with this and griping about the other things. But it's
22 just a tremendous growth in an area that already is
23 seeing enough growth. And education is vitally
24 important, but it needs to take into account that there
25 are other places in California where people can get

PH2-27

1 educated. And you also have to take into account the
2 fact the state has much less money than it did before.
3 You guys didn't build anything under the 2005 LRDP, so
4 in a way, this is all just an exercise in futility to
5 just proceed with this at this time. It should be
6 delayed until everything is clear financially and from
7 any other respects.

8 MS. KERNS: Ted, I think our three minutes are
9 up.

10 MR. BENHARI: I'm done.

11 MS. KERNS: Thank you very much for your
12 comments.

13 I see one other name. We're going to go ahead
14 and call on her, Martha Zuniga.

15 MARTHA ZUNIGA: My name is Martha, M-A-R-T-H-A,
16 Zuniga, Z-U-N-I-G-A. I'm on the faculty here at UCSC.
17 I have been here -- next month will be my 31st
18 anniversary.

19 I have two comments. One of them is, I don't
20 understand when you say that 100 percent of the new
21 student FTEs will live on campus. Does that mean you
22 will somehow force them to live there the whole time
23 that they're here? Because most undergraduates find the
24 campus housing very expensive, and as soon as they can
25 find students to live with, they move off campus. So I

PH2-27
cont.

PH2-28

1 don't understand how they're going to be forced to live
2 on campus their entire time here.

PH2-28
cont.

3 Secondly, if they do live on the campus the
4 entire time, I just don't see how the traffic is going
5 to work unless we have little pods that allow us to fly
6 over all these people.

PH2-29

7 But the third thing I want to comment on is --
8 somebody else alluded to it -- I have been here
9 31 years. There is no doubt the quality of the
10 education has eroded, and even students who just
11 graduated last year are thanking their lucky stars that
12 they were freshmen when they were freshmen, because they
13 see what the freshmen have available to them now, is so
14 much diminished, relative to what they had.

15 So we're fooling ourselves if we think we can
16 just keep growing, growing, growing, and somehow
17 magically we're going to be delivering quality education
18 to these students, and maintaining a beautiful
19 environment, and harmony with the university and with
20 our community. Just I think that's not possible. So I
21 support the comments that have been made before, we need
22 to hit pause here and really look seriously at what
23 we're trying to do. Thank you very much.

PH2-30

24 MS. KERNS: Thank you for your comment.

25 We have one more hand. That Sabra Cossentine.

1 And Sabra, we'll go ahead and unmute you now.

2 SABRA COSSENTINE: Thank you very much.

3 I agree with the intelligent comments that were
4 just made by the last speaker. And this speaks, because
5 I'm very familiar with college campuses, because I'm a
6 college admission advisor, and I work independently with
7 students. And I know what housing costs throughout the
8 many different universities in the United States.

9 And already UCSC, is on the high side for
10 housing. The housing meal plan is so high that the
11 students can get into housing in the city for
12 substantially less. Even though it's cramped conditions
13 at times, they feel they need to save the money; they
14 have no choice, and they're very willing to do that.

15 So the housing will definitely affect our
16 community. It won't work. We don't have enough housing
17 now. And what the problem is, you can't require them to
18 live on campus. Most UCs have one year, maybe two years
19 of required housing on campus, so because there is so
20 much that you're in competition with with other
21 campuses, it makes no sense to increase here where you
22 already have so many problems. You can easily put a
23 thousand students on the other -- or even a clue to our
24 campus; nine campuses, 1,000 for each campus, 9,000, you
25 will meet what your goal is. There is no reason to even

PH2-31

1 spend all the money you want to spend, even including
2 this meeting and the many, many hours that have been
3 spent on this plan just don't do it, and save yourself
4 enough money to accommodate the needs of the students,
5 because that's what you're there for, is to educate and
6 help our students have an excellent education; not make
7 plans that are outlandish in a community that's already
8 voted they do not want your 10,000 students here. It
9 makes no sense. Use the amazing brains that are
10 involved with upper division education and find another
11 solution. This is a very bad solution. Thank you for
12 your time.

13 MS. KERNS: Thank you for your comment.

14 Okay. I'm not seeing any more hands raised
15 right now. We have about 20 minutes left. I'll give it
16 another second in case somebody would like to raise your
17 hand.

18 I think we'll go ahead and just take a pause
19 for three minutes. I have 6:41 right now, and we'll
20 come back just before 6:45. We'll go ahead and remove
21 our video and just leave this slide on if anybody wants
22 to join who hasn't yet, or if anyone would like to
23 comment for the last few minutes that we have left.

24 We'll be back on in about three minutes.

25 (Break taken.)

PH2-31
cont.

1 MS. KERNS: Hi everyone. We are at 6:44. And
2 I think we'll run through a couple more slides and
3 explain how to comment, make sure you all have that
4 information. And then we will see if anyone is
5 interested in commenting after that.

6 MS. CARPENTER: Thank you, Jolie.

7 We just wanted to reiterate for those that want
8 to participate and prepare written comments, that you
9 can either e-mail them at eircomment@ucsc.edu, or you
10 can send them via U.S. mail. Our address is here on
11 this slide.

12 So public comment period is open until Monday,
13 March 8th, that's the close of the 60-day public review
14 period. And we look forward to reviewing your comments.
15 Thank you.

16 It looks like we might have another comment
17 tonight, or maybe not.

18 MS. KERNS: Yes, I'm seeing Catherine
19 Soussloff. And Catherine, I'm going to go ahead and unmute
20 you. You're now unmuted. If you could state your name.

21 And it looks like we have one comment after
22 that.

23 CATHERINE SOUSSLOFF: Hi. This is Catherine
24 Soussloff, C-A-T-H-E-R-I-N-E, S-O-U-S-S-L-O-F-F,
25 professor emeritus of History of Art and Visual Culture

PH2-32

1 at UCSC, and presently professor of Art History at the
2 University of British Columbia, but resident in Santa
3 Cruz since 1987.

4 I just want to understand what will happen to
5 the written comments; if you can answer that question.
6 Rather than giving my oral comment, I would like to
7 submit a written comment, but where will those go and
8 who will read them? Thanks.

9 MS. CARPENTER: So I can answer that, Jolie, if
10 it's helpful.

11 All of the comments that we receive either
12 tonight during our hearing, as well as written comments
13 we receive via e-mail or U.S., we will be reviewing
14 those and evaluating them, and then preparing written
15 responses to every comment we receive. And then those
16 will be part of the Final Environmental Impact Report
17 that will then be used for the broader approval at the
18 Regents. So every comment that we receive, we will be
19 responding to.

20 CATHERINE SOUSSLOFF: Just to clarify that, if
21 you don't mind, because I'm not clear still, you will be
22 responding to me directly or to the commenters directly,
23 or you will be responding in writing that will go
24 forward to the next stage at the Regents or at the
25 Office of the President, which do you mean?

PH2-32
cont.

PH2-33

1 MS. CARPENTER: I'm sorry if that wasn't clear.
2 We will be responding in writing. That will be part of
3 our Final Environmental Impact Report, and so that will
4 then go to the Regents, and then each comment letter,
5 you will receive a response to your comment, that way,
6 through the Final EIR.

7 CATHERINE SOUSSLOFF: Okay. That's very
8 helpful. Thank you very much.

9 MS. CARPENTER: Thank you.

10 MS. KERNS: Thank you. I'm not seeing any more
11 hands. We'll go ahead and take a three-minute pause.
12 It's 6:47. We will be here until 7:00. We'll come on
13 right at 6:50. Thank you.

14 (Break taken.)

15 MS. KERNS: We are back at 6:50. We do have
16 one more hand raised. I'll go ahead and call that now.

17 So I'm going to unmute. I'm calling Morgan
18 Bostic.

19 MORGAN BOSTIC: I just want to know when these
20 live stream recordings will be posted online. Thank
21 you. Or when you expect they'll be available.

22 MS. KERNS: Sure. We are posting information
23 from this session, from the public hearing, in the next
24 few days. I'll visit it early next week we should have
25 them.

PH2-34

1 MORGAN BOSTIC: Thank you very much. I
2 appreciate it.

3 MS. KERNS: One more hand raised, I'll go ahead
4 and call. This is Martha Zuniga.

5 MARTHA ZUNIGA: I have a follow-up to the
6 previous question. How will we know when you have
7 posted your responses and so forth? How do we find that
8 out?

9 MS. KERNS: Erika, do you want to answer this?
10 You're asking when we issue the Final EIR? All the
11 responses will be in the Final EIR.

12 MS. CARPENTER: Yes.

13 Martha, if you are on our mailing list, we can
14 make sure and give you information. We'll be obviously
15 letting everyone know that's on our mailing list when
16 that Final EIR has been completed.

17 MARTHA ZUNIGA: I must be on the mailing list
18 because I got the announcement. Is that true, or is
19 that not a fair conclusion?

20 MS. CARPENTER: Was it via e-mail, or was it a
21 physical mailer?

22 MARTHA ZUNIGA: It was e-mail. I might have
23 gotten physical mail as well, but definitely the e-mail
24 is what got my attention.

25 MS. CARPENTER: Okay. Great. Then you're on

PH2-35

PH2-36

1 our mailing list. That's how we would let everyone
2 know.

3 MARTHA ZUNIGA: Thank you.

4 MS. KERNS: Looks like two more hands. Candace
5 Brown, and after that, Sarah Bassler.

6 I'll call Candace right now. Candace, I just
7 unmuted you. If you could state your name for the
8 record.

9 CANDACE BROWN: Yes. My name is Candace Brown,
10 and I have lived in this community for 47 years, and I
11 came to Santa Cruz as a university student.

12 The university has quadrupled during that time
13 period. When I was there, transportation was readily
14 available. We also had to hop on banana slug
15 transportation. Housing was plentiful, and it didn't
16 seem to have any impact on the housing market downtown.
17 There was some traffic up to the university, but most
18 people took the bus, and it was readily available.

19 Now, students have to wait for buses. They
20 miss when they have to run up to campus. Housing is so
21 dire, that there's -- before the pandemic, there was
22 quadruple or quintets. That kind of density is causing
23 some mental illness, my understanding, up at campus.
24 The housing downtown has become so unaffordable that
25 many lower income families are being driven out of town.

PH2-37

1 I would invite you to check out urbandisplacement.org.
2 Research by Karen Chappell of University of Berkeley,
3 who is tracking this traumatic impacts, and also Beacon
4 Economics, who did a study about the fact that
5 low-income families are being gentrified out of this
6 town.

7 Most of the growth, according to the water
8 advisory committee is as a result of the university
9 growth in the last 40 years. They actually tracked that
10 and were able to account for all the growth of the city,
11 for the town, as a result of the university.

12 So any shifts in transportation,
13 infrastructure, budgetary shortfalls, we're housing --
14 the fact that Santa Cruz is now in the top five of the
15 world in unaffordability relative to wage is something
16 you just cannot ignore.

17 So also to look at the fact that the original
18 agreement, which is supposedly a binding agreement, said
19 you couldn't even grow to triplet, and yet that was
20 exceeded. And so I don't quite understand why the
21 university or Regents think that they would take
22 seriously any kind of agreement with the university when
23 you haven't even met the housing needs of existing
24 students.

25 Now hundreds of students are living out of

PH2-37
cont.

1 their cars. This is before the pandemic. And they're
2 not allowed to live up in campus in their cars, so
3 they're spread throughout the communities, which is
4 problematic. This is a very serious and dire situation.

5 And then there is a proposed proposition of
6 building 3,000 more units, but that won't even catch up
7 to the housing needs of today.

8 Yes, water is lower. Yes, traffic trips are
9 lower. But there's so many other aspects that are
10 impacted in our town, that are seriously impacted. I
11 would hope -- also it doesn't account for the fact that
12 the graduate student population has grown, and I don't
13 believe was in the original agreement.

14 There have been opportunities to buy older
15 hotels and convert them to housing, which has not been
16 done. Up in Scotts Valley, there is an opportunity to
17 buy a hotel, which by the way, is potentially on the
18 market again, I think 170 units. The university does
19 nothing to address these issues, and yet imposes that
20 upon the community. We simply cannot continue with this
21 kind of behavior. Thank you.

22 MS. KERNS: Thank you for that comment.

23 I'm going to go ahead and call Sarah Bassler.

24 SARA BASSLER: Sarah Bassler. I just had a
25 question of how you get on the mailing list, because I

PH2-37
cont.

PH2-38

1 think I found out about this in the paper?

2 MS. KERNS: Erika, do you want to answer that?
3 If she gives us her name or maybe in the question and
4 answer we could add her?

5 MS. CARPENTER: Yes. Sara, if you could give
6 us your e-mail address in the question and answer, that
7 might be really helpful, we can write it down and make
8 sure we add you to our mailing list.

9 And also, on our lrpd.ucsc.edu website, I
10 believe there's an area where you can actually be added
11 to our website. And we can provide a link, maybe, in
12 the Q&A of where that is.

13 SARA BASSLER: Thank you. I just put it in the
14 Q&A.

15 MS. CARPENTER: Thank you, Sara. And we will
16 add you to our mailing list.

17 MS. KERNS: And I'm seeing one more comment
18 here. Commenter Hunter Gieseeman. Hunter, I'm unmuting
19 you right now.

20 HUNTER GIESEMAN: Okay. Hello. My name is
21 Hunter Gieseeman, H-U-N-T-E-R, G-I-E-S-E-M-A-N. And I'm
22 a junior transfer student here who currently lives on
23 campus.

24 Before I start, I would like to say that UC
25 Santa Cruz is my dream university. It took me six

PH2-38
cont.

PH2-39

1 applications to be here, so I'm really happy to be here
2 and talk with everyone today about the future of our
3 beautiful campus.

4 So yeah, going forward, my comment today was
5 bringing up something that I notice hasn't been voiced
6 by any of my peers, to my knowledge. I'm really
7 surprised, considering, like, the impact it has on our
8 campus pollution. It's one of the most overlooked forms
9 of pollution that we see every day but is overlooked by
10 most. So what I'm talking about is light pollution.
11 This affects all of our wildlife. It disrupts our
12 circadian rhythm for both humans and animals. And it
13 can cause run-ins with wildlife on all of our roadways,
14 all of this while increasing pollution in our night
15 skies.

16 So I actually first thought of this when I
17 moved in on campus, and I currently live here. But I
18 have a chronic disability that has flare-ups, making it
19 really painful to walk sometimes, like any micro
20 movements that I do. So while I walk around campus in
21 the afternoon, and at night I bring a flashlight, but I
22 still have trouble seeing the paved walkways, even --
23 well, actually, especially where there are lights. So
24 it makes it hard to avoid trip hazards and slips hazards
25 like branches and bumps along the paved pathways. And I

PH2-39
cont.

1 have slipped and fallen during some of my chronic
2 flare-ups, and thankfully nothing has caused me to go to
3 the hospital.

4 But I'm calling for an addition on the current
5 EIR Draft on page 3.1-3 or page 137 of the PDF,
6 specifically, the section, "Exterior Lighting
7 Standards." I'm happy that it implements down-lighting
8 and all outdoor lighting to prevent light pollution on
9 our campus, but the section is actually missing one of
10 the most important elements of light pollution itself.

11 So what I'm proposing is creating a limit for
12 outdoor lighting in Kelvin and CRI, and to retrofit
13 current outdoor lighting to be shielded and directional
14 to their intended light area. The one meter addition
15 I'm calling for in this section is warmer Kelvin at
16 other lower than 3,000 in Kelvin, so that would create
17 like a warm white light that a lot of us are used to.
18 And high CRI, which is color rendering, or color
19 accuracy index, for all new outdoor lighting and
20 lighting replacements on campus.

21 So these two factors do not affect the
22 brightness at all; it just makes it more color accurate
23 to see anywhere. And since they're warmer, it doesn't
24 have as much of an impact on your sleep rhythm, your
25 circadian rhythm.

PH2-39
cont.

1 I have about a minute left. Can I keep
2 ongoing?

3 MS. KERNS: If you could wrap up, actually,
4 about 30 seconds or so. I see that we have one more
5 hand, and I know we're a little bit after 7:00.

6 HUNTER GIESEMAN: Okay.

7 So most of us are probably familiar with the
8 high energy volt, because they have a lot of washed out
9 colors and fresh blue lights since they have been
10 replaced on our campus, especially older CFLs. But
11 thankfully LED technology has greatly surpassed an
12 energy efficient color accuracy.

13 So my purpose, 3,000 or lower Kelvin. And the
14 other proposals that I will submit through e-mail would
15 make it much easier for us to notice any sort of trail
16 hazards. It would create an environment where animals
17 don't walk up to them as much or, like, they're not
18 attracted to them, because the blue light has an effect
19 where it actually attracts animals to the source of
20 light, creating, like, a lot of collisions or potential
21 for collisions.

22 So yeah, I'm going to be submitting these with
23 illustrations to help you guys implement these
24 guidelines.

25 And before I leave, I want to emphasize that my

PH2-39
cont.

PH2-40

1 proposed additions in this EIR could apply to any
2 version of campus development, whether there is growth
3 or there is no growth on campus.

4 So I would like to ask my peers to help echo my
5 additions, to require warm white LEDs at 3,000 Kelvin or
6 below, and retrofit current outdoor streetlights that
7 are built on campus to be shielded or directional so
8 that they do not shine directly into the sky and
9 lighting up their intended area of where we walk.

10 Because if you notice the sphere lights, they
11 light up everything above it, but they don't really
12 light up the ground that we have. So I'm sure many of
13 you have also tripped or have done some things similar.
14 But yeah, it doesn't just affect any students with
15 disabilities, it's something that affects everyone.

16 So thank you for everyone who is here tonight.
17 And I really look forward to the future of our wonderful
18 campus and community. And I ask everyone here remembers
19 my comment any time you see outdoor lighting on our
20 campus. LED light bulbs have a 20-plus-year lifespan,
21 so any replacements that we have, and new development of
22 these lights, are very permanent, so we have to get it
23 right the first time. So it's like a lot of other
24 environmental problems where it's really expensive
25 changing it later, once we have realized our mistake.

PH2-40
cont.

1 But thank you everyone.

2 MS. KERNS: Thank you for your comment, Hunter.

3 I see one last hand. And we're at 7:05. We
4 would like to honor this comment and include that, and
5 then I think we will wrap up after that.

6 So we have got John Aird, and I'm just about to
7 unmute you.

8 JOHN AIRD: I guess my comment is simply that
9 what many have stated this evening and last evening, and
10 at your earlier outreach meetings that were held last
11 year, sort of echo the same issues as to how you balance
12 the resources of the community and the resources of the
13 University with what appears to be a pretty arbitrary
14 target of 28,000.

15 And I don't want to be disagreeable, but I was
16 a little bit shocked when Erika said that one of the
17 reasons that Alternative 2 was rejected was because it
18 didn't meet the objective, quote, of 28,000.

19 I thought the whole point here was to provide
20 feedback which might lead to some change of direction,
21 some modification of plan. I don't see it. And at
22 least at this point, I hope that in the intervening
23 time, as you're looking at the comments you've received,
24 that you will go back and look at the other alternatives
25 and the comments that have been made concerning this

PH2-40
cont.

PH2-41

1 icing of this, and the capability of both the campus to
2 keep its unique flavor, as well as this community and to
3 support it. Thank you.

4 MS. KERNS: Thank you for that comment. And I
5 want to provide one piece of information. When you
6 registered, you all gave your e-mail address, and I
7 didn't realize, but we are putting you automatically on
8 our mailing list. Many of you already are. There was a
9 question about being included on the mailing list, and
10 we'll go ahead and default to that and make sure that
11 all of you are included.

12 And with that, I'm not seeing any other hands
13 raised. I think we have given everyone information
14 about how to comment. But please refer to our website
15 lrdp.ucsc.edu.

16 In addition to the documents, we have a running
17 list of FAQs with questions that we get throughout this
18 process that we want to clarify for you, so please look
19 through that as well.

20 I see one more hand. And I know that we're
21 beyond 7:08. I'm just going to honor this last one.

22 HUNTER GIESEMAN: Hunter Gieseeman. Just a
23 quick question. And people asked it earlier, but I was
24 busy, like, writing down what I was going to say.

25 But so when are you guys going to publish the

PH2-41
cont.

PH2-42

1 transcript for this? And are you going to have a video
2 published as well and sent to everyone? And what would
3 the timeline on that be?

4 MS. KERNS: We'll be putting information from
5 this session up on our website. We should have that up
6 early next week. And then all comments are included in
7 the Final EIR, which we'll be notifying everybody about.

8 HUNTER GIESEMAN: Thank you.

9 MS. KERNS: All right. Thank you so much,
10 everyone, for joining us tonight. We know all of you
11 have a lot in your lives right now and are busy, and we
12 appreciate your interest in the campus and sharing your
13 comments with us on this plan.

14 We are going to go ahead and sign off. Thank
15 you.

16 MS. CARPENTER: Thank you.

17 (Hearing concluded.)

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PH2-42
cont.

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