

# Appendix A

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Comment Letters Received

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# 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](mailto:chad_mitcham@fws.gov) or Karen Sinclair at [karen\\_sinclair@fws.gov](mailto: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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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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.

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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/](http://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](mailto: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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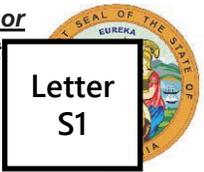
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# State Comment Letters



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](http://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](mailto: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

Ms. Erika Carpenter  
University of California, Santa Cruz  
March 1, 2021  
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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 LRDP 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

Ms. Erika Carpenter  
University of California, Santa Cruz  
March 1, 2021  
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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  
University of California, Santa Cruz  
March 1, 2021  
Page 4 of 5

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.

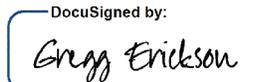
S1-7

Ms. Erika Carpenter  
University of California, Santa Cruz  
March 1, 2021  
Page 5 of 5

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](mailto:wesley.stokes@wildlife.ca.gov); or Mr. Craig Weightman, Environmental Program Manager, at [craig.weightman@wildlife.ca.gov](mailto: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](mailto: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 Plummetts: 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](http://www.westernmonarchcount.org)
- Xerces Society (2020). <https://xerces.org/press/western-monarch-butterfly-population-still-at-critical-level>. Accessed January 5, 2021.



Erika Carpenter &lt;escarpent

Letter  
S2

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**[eircomment] LRDP EIR Comments-Norris**

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**'Richard Norris' via eircomment@ucsc.edu** <eircomment@ucsc.edu>

Sun, Mar 7, 2021 at 2:41 PM

Reply-To: Richard Norris &lt;rnorris@ucsd.edu&gt;

To: eircomment@ucsc.edu, Don Croll &lt;dcroll@ucsc.edu&gt;, Gage Dayton &lt;ghdayton@ucsc.edu&gt;

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](mailto:rnorris@ucsd.edu)

"We are off on the Greatest Adventure of our lives!"

---

eircomment mailing list

[eircomment@ucsc.edu](mailto: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 &lt;escarpent

Letter  
S3

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**[eircomment] LRDP EIR Comments**

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**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](mailto:asjones@ucsc.edu)  
[website](#)  
[facebook](#)  
[instagram](#)

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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94K



Erika Carpenter &lt;escarpen@ucsc.edu&gt;

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**[eircomment] LRDP EIR Comments**

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**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]

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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 3<sup>rd</sup> 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**

5<sup>th</sup> 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,



Alex Jones  
UCSC Campus Natural Reserve  
Manager 1156 High St  
Santa Cruz, CA  
95064  
831.459.5798  
asjones@ucsc.edu



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

Admin. Director, UCSC Natural Reserves  
Wilton W. Webster Jr. Presidential Chair  
[1156 High Street](#), ENV5  
Santa Cruz, CA 95062  
Of: (831) 459-4867  
Cell: (831) 227-5887  
<https://naturalreserves.ucsc.edu/>  
<https://www.facebook.com/ucscnaturalreserves>



Erika Carpenter &lt;escarpent

Letter  
S5

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**[eircomment] comments on 2021 LDRP Draft EIR**

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**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

California Coastal Commission

725 Front St., Suite 300

Santa Cruz, CA 95060

[Colin.Bowser@coastal.ca.gov](mailto:Colin.Bowser@coastal.ca.gov)

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

---

 **UCSC LDRP DEIR comment letter.pdf**  
71K



## 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 &lt;escarpent

Letter  
S6

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## UC Santa Cruz LRDP Comment Letter

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**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



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 **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](mailto:christopher.bjornstad@dot.ca.gov).

S6-8

Sincerely,



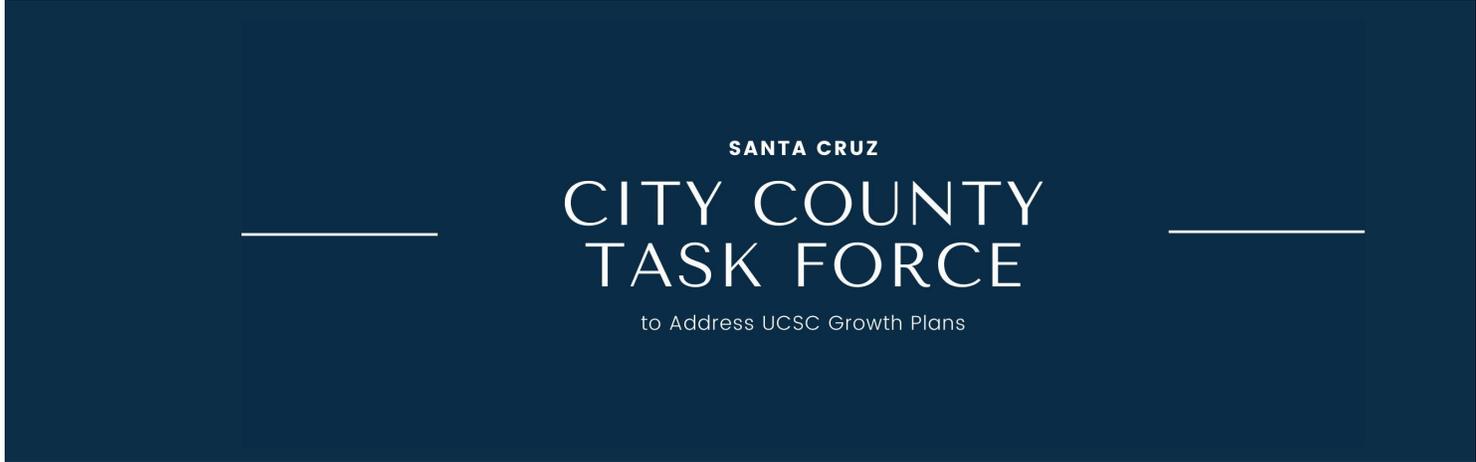
Chris Bjornstad  
Associate Transportation Planner  
District 5 Development Review

Cc: Rachel Moriconi, SCCRTC  
Claire Gallogly, City of Santa Cruz

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# Local Comment Letters

**From:** "Santa Cruz Task Force on UCSC Growth Plans" <info@actonucscgrowth.org>  
**To:** [eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
**Date:** 1/11/2021 10:28:43 AM  
**Subject:** [eircomment] The Draft Environmental Impact Report Has Been Released!



# ***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.)



**TOPICS INCLUDE**

- AESTHETICS
- AGRICULTURE AND FOREST RESOURCES
- AIR QUALITY
- BIOLOGICAL RESOURCES
- CULTURAL RESOURCES
- ENERGY
- GEOLOGY, SOILS, PALEONTOLOGY, & MINERAL RESOURCES
- GREEN HOUSE GAS EMISSIONS
- HAZARDS AND HAZARDOUS MATERIALS
- HYDROLOGY & WATER QUALITY
- LAND USE & PLANNING
- NOISE
- POPULATION & HOUSING
- PUBLIC SERVICES AND RECREATION
- TRANSPORTATION AND TRAFFIC
- TRIBAL CULTURAL RESOURCES
- UTILITIES AND SERVICES SYSTEMS
- WILDFIRE

...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](mailto: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.



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You can reach us via email at [info@actonucscgrowth.org](mailto:info@actonucscgrowth.org)

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Visit this [link](#)

[www.actonucscgrowth.org](http://www.actonucscgrowth.org)

**From:** "Santa Cruz Task Force on UCSC Growth Plans" <info@actonucscgrowth.org>  
**To:** [eircomment@ucsc.edu](mailto: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](mailto: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](mailto: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".

## 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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[www.actonucscgrowth.org](http://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><b>1) Focus on developments within the city limits of Santa Cruz</b></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><b>2) Consider an extraterritorial service agreement with the City of Santa Cruz</b></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><b>3) Consider annexation of the 5 areas into the City of Santa Cruz</b></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><b>4) Consider annexation of the remaining campus area outside the City of Santa Cruz</b></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:

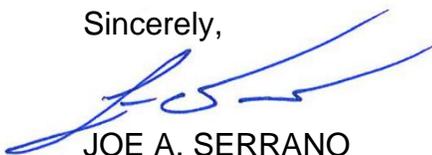
- a) To administer separate urban and rural growth rates and the allocation of residential building permits;
- b) To encourage residential development to locate in urban areas and to discourage division of land in rural areas;
- c) To develop and apply different policies governing urban and rural development;
- 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.

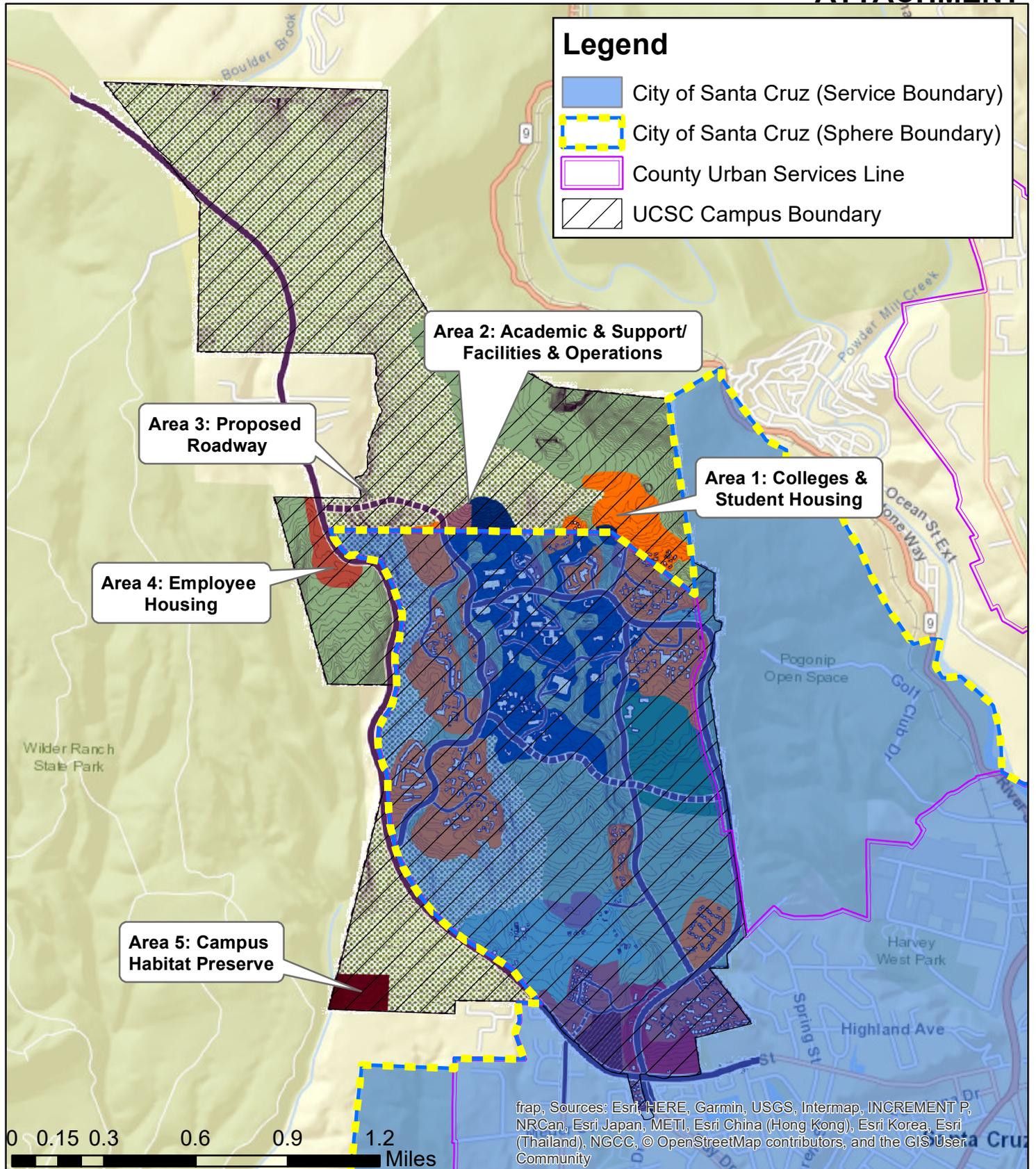
Sincerely,



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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FIFTH DISTRICT

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](mailto: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.

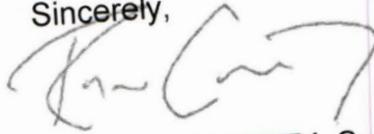
**RECEIVED**

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  
BOARD OF SUPERVISORS  
GOVERNMENTAL CENTER  
701 OCEAN STREET  
SANTA CRUZ, CALIFORNIA 95060-4069

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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 &lt;escarpenc@ucsc.edu&gt;

Letter  
L5

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**[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](mailto:hadamson@ambag.org)**

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](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](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](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

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**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](mailto: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  
[www.actonucscgrowth.org](http://www.actonucscgrowth.org) | @ActOnUCSCGrowth  
She | Her  
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---

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 **Bostic, Morgan - Comments on the 2021 LRDP Draft EIR.pdf**  
534K

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).

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
<b>Academic Land Use Designation</b>			
Academic & Support (Academic Core in the 2005 LRDP)	132	163	31 (23.5%)
<b>Residential Land Use Designations</b>			
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 map<sup>1</sup>. 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**.

<sup>1</sup> <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 <b>significant and unavoidable</b> .	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 <b>significant and unavoidable</b> .	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 MTCO<sub>2</sub>e 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.”<sup>2</sup> 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

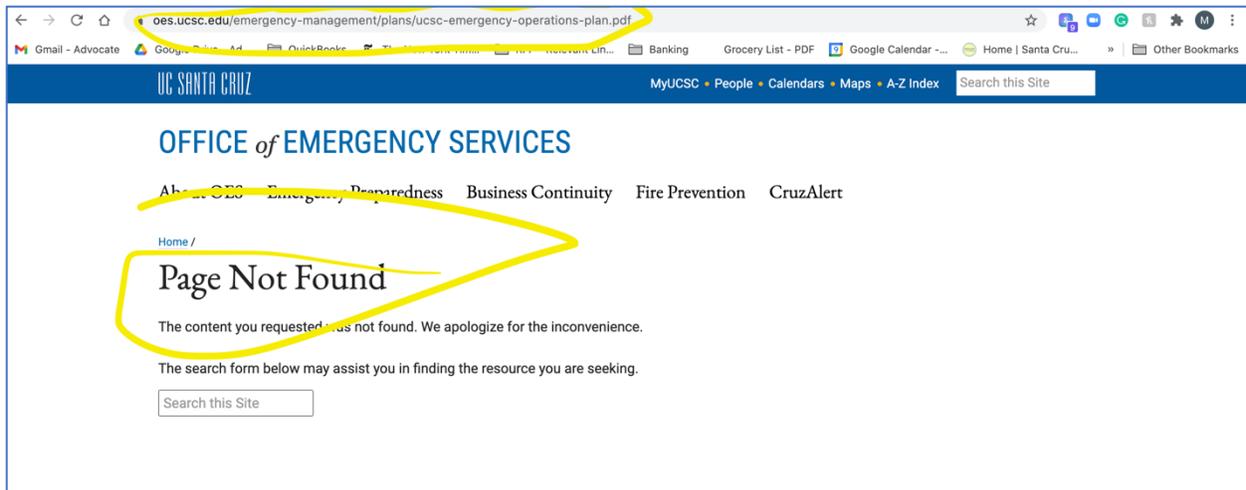
- 3.9-25 – Impact 3.9-4 – Implementation of an Emergency Evacuation Plan - The DEIR only considers short-term, construction related potentially significant impacts of implementation of the draft LRDP on emergency plans. This is inadequate. The draft LRDP proposes at least one new road in the north campus 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

<sup>2</sup> <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"> <li>• “Diesel truck at 50 feet at 50 miles per hour — 80dB — Food blender at 3 feet, Garbage disposal at 3 feet</li> <li>• Noisy urban area, daytime, Gas lawn mower at 100 feet — 70dB — Vacuum cleaner at 10 feet, Normal speech at 3 feet”</li> </ul>	 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 Article<sup>3</sup> 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.”<sup>4</sup> 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

<sup>3</sup> <https://www.cityonahillpress.com/2016/10/21/the-overcrowding-problem/>

<sup>4</sup> <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  
cont.

- 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 hygiene<sup>5</sup>, etc., on the additional students, faculty, staff, and the entire population that exist within the City’s municipal services district.

L7-158

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<sup>5</sup> 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  
cont.

- 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.<sup>6</sup> 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

<sup>6</sup> [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.

L7-172  
cont.

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.

L7-173

- 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  
cont.

- 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  
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L7-194

L7-195



Erika Carpenter &lt;escarpent@ucsc.edu&gt;

Letter  
L8

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**[eircomment] UCSC Long Range Development Plan EIR**

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**Christine Duymich** <cduymich@mbard.org>

Mon, Mar 8, 2021 at 5:21 PM

To: "eircomment@ucsc.edu" &lt;eircomment@ucsc.edu&gt;

Cc: Cindy Searson &lt;CSearson@mbard.org&gt;, David Frisbey &lt;DFrisbey@mbard.org&gt;, Richard Stedman &lt;Rstedman@mbard.org&gt;, Shawn Boyle &lt;SBoyle@mbard.org&gt;

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](mailto:cduymich@mbard.org).

Respectfully,

Christine Duymich, Air Quality Planner II



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Monterey, CA 93940

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eircomment mailing list[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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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  
831/420-5120 • FAX 831/420-5434  
PLANNING ADMINISTRATION  
831/420-5110 • FAX 831/420-5101

**PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT**  
809 Center Street • Room 206 • Santa Cruz, CA 95060 • [www.cityofsantacruz.com](http://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](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.

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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.

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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.

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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.

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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*).

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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.

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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 \(ucop.edu\)](https://ucop.edu/pacaos-80). 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](https://www.nrpa.org/~/media/Files/2017/04/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.

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### **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

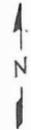
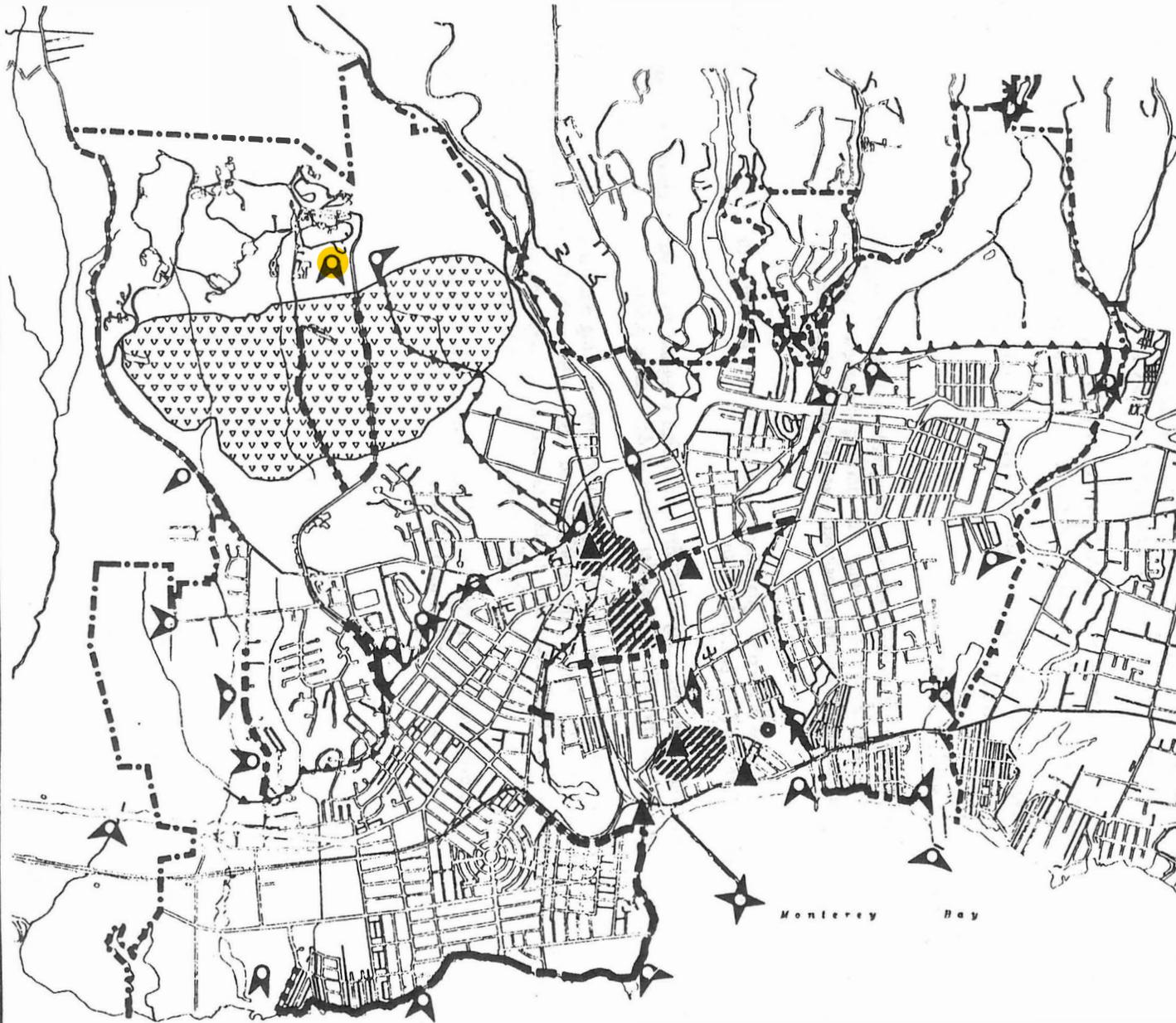
Attachments:

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

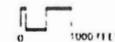


RIDGE SKYLINE



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

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## [eircomment] LRDP EIR Comments

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**Pete Rasmussen** <PRasmussen@scmttd.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@scmttd.com | 831.420.2585**

---

eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](mailto: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

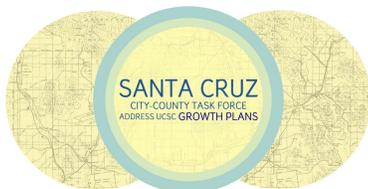
Dear Erika,

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



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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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 &lt;escarpent@ucsc.edu&gt;

Letter  
L12

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**[eircomment] LRDP EIR Comments**

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**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](mailto:stephanie.hansen@santacruzcounty.us)

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **SCCO Comments on LRDP DEIR (3-8-21).pdf**  
252K



# COUNTY OF SANTA CRUZ

## PLANNING DEPARTMENT

701 OCEAN STREET, 4<sup>TH</sup> 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](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:  
*Kathleen Molloy*  
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



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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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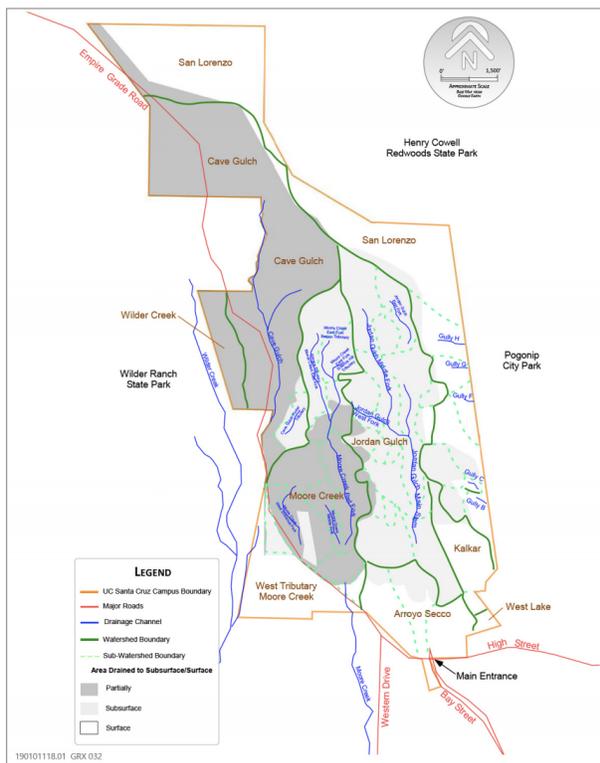
 **Bostic, Morgan - Comment on the 2021 LRDP EIR (2).pdf**  
506K

## 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](mailto:info@actonucscgrowth.org) | [www.actonucscgrowth.org](http://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

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# Organization Comment Letters



Erika Carpenter &lt;escarpent

Letter  
01

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**[eircomment] LRDP EIR Comments**

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**'Jan Karwin' via eircomment@ucsc.edu** <eircomment@ucsc.edu>

Tue, Feb 23, 2021 at 4:12 PM

Reply-To: Jan Karwin &lt;jankarwin@yahoo.com&gt;

To: "eircomment@ucsc.edu" &lt;eircomment@ucsc.edu&gt;

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](mailto:jankarwin@yahoo.com)  
831-460-1714

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **LWVSCC comments on UCSC LRDP DEIR.pdf**  
173K



Post Office Box 1745  
Capitola CA, 95010  
Email: <http://lwvsc.org>  
Phone: 831-325-4140

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](mailto: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



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## [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](mailto:whatisron@gmail.com)

---

eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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

O2-8



*Main drain inlet at Hager and Coolidge*

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.

O2-10

- ① How will the University ensure that increased runoff and increasingly toxic runoff does not cause additional harm to the ecosystem of the pond?

- 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 &lt;escarpent

Letter  
03

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**[eircomment] Comment on UCSC's Long Range Development Plan Draft EIR.**

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**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](http://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](mailto: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](http://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,

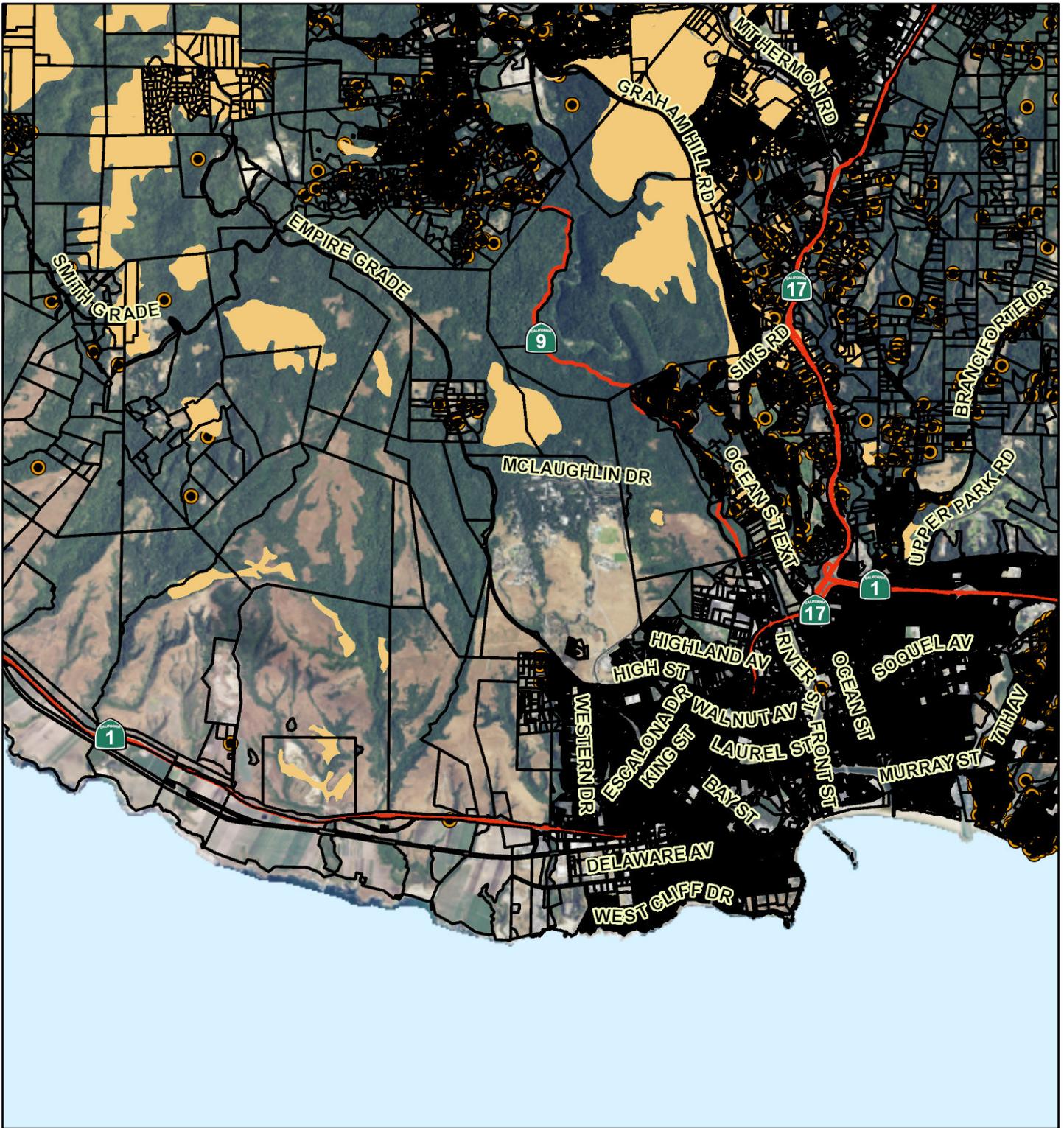
Nancy Macy, Chair  
Valley Women's Club Environmental Committee for the SLV

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**

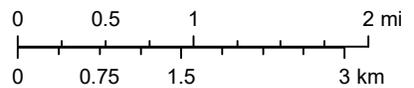
— State Highways

**Soil Reports**

● Soil Reports

**Major Roads**

— Major Roads





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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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### 2 attachments

 **Comments dEIR LRDP.pdf**  
128K

 **Zero New Vehicle Trips for LRDP.pdf**  
182K



# Campaign for Sustainable Transportation

Rick Longinotti, Co-chair [Rick@sustainabletransportationSC.org](mailto: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:



# Campaign for Sustainable Transportation

Rick Longinotti, Co-chair [Rick@sustainabletransportationSC.org](mailto:Rick@sustainabletransportationSC.org)

direct displacement, in which residents are forced to move out because of rent increases, building rehabilitation, or a combination of both..."<sup>1</sup>

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)*<sup>2</sup>, 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.



# Campaign for Sustainable Transportation

Rick Longinotti, Co-chair [Rick@sustainabletransportationSC.org](mailto: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,



# Campaign for Sustainable Transportation

Rick Longinotti, Co-chair [Rick@sustainabletransportationSC.org](mailto: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



# Campaign for Sustainable Transportation

Rick Longinotti, Co-chair [Rick@sustainabletransportationSC.org](mailto:Rick@sustainabletransportationSC.org)

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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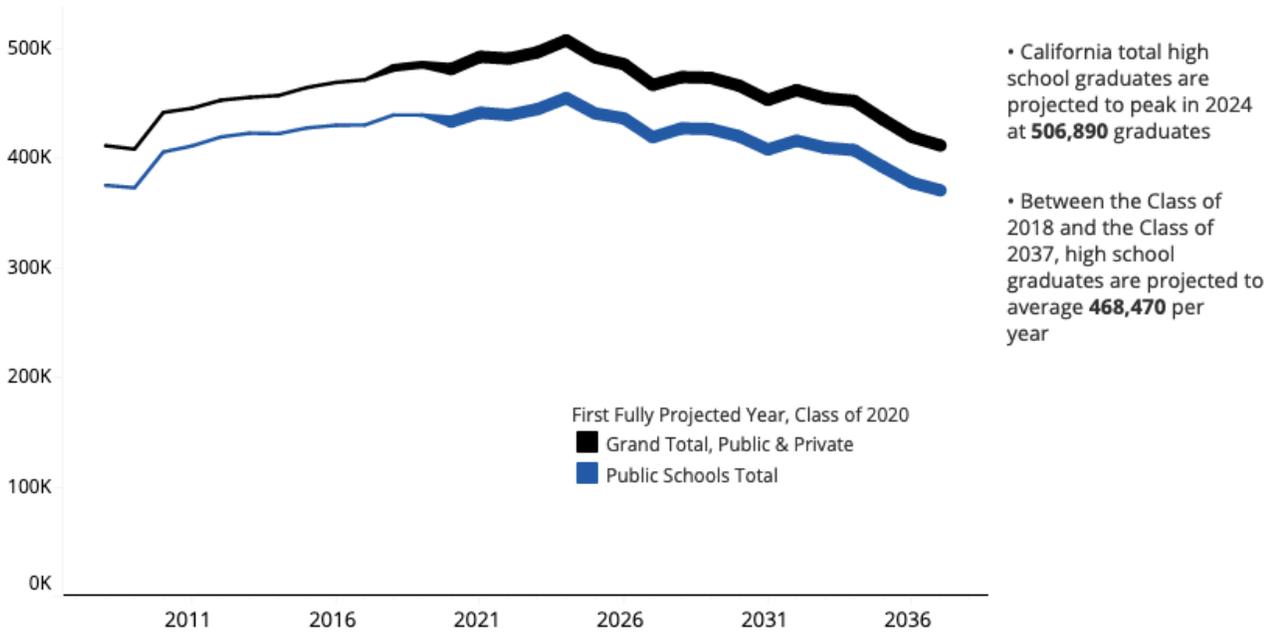
## High School Graduates Profile for

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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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, subs. (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



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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.

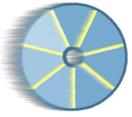
## **Trans 6. The Draft EIR lacks essential information about parking and commute trips to campus**

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.

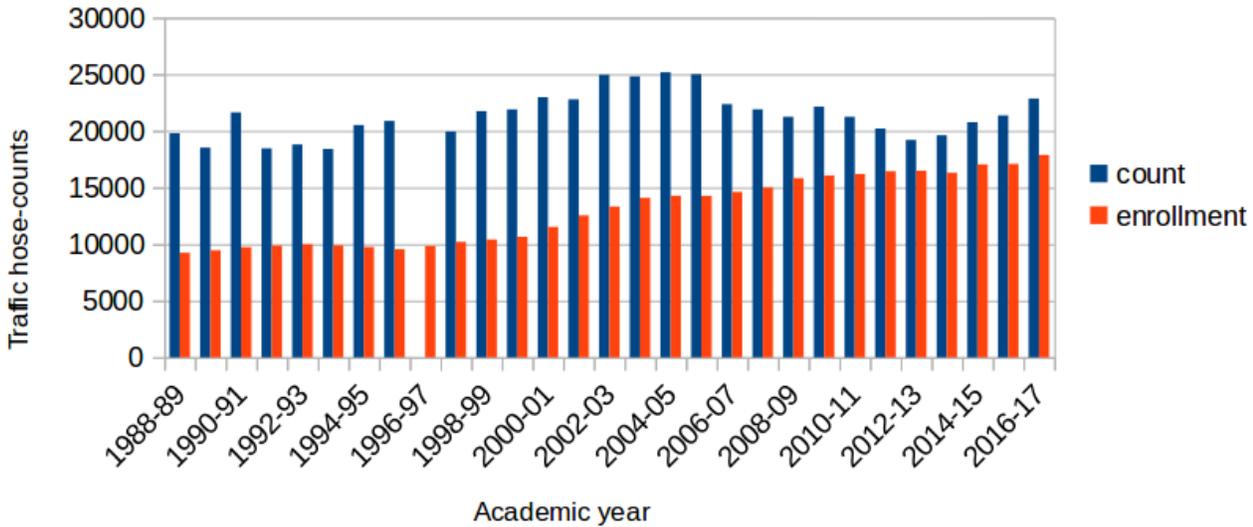


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## Term Weekday Vehicle Traffic through Both UCSC Entrances: Academic Year Ave

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.

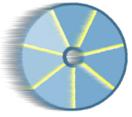
The Draft EIR gives no indication of how any agency or member of the public would be able to access anonymous cell phone data. And reliance on a travel model can result in gross inaccuracies, as the Draft acknowledges:

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.

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<sup>1</sup> HUD, *Displacement of Lower-Income Families in Urban Areas Report* (2018)

<sup>2</sup> 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)<sup>1</sup>. 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

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<sup>1</sup> Source: <https://lrdp.ucsc.edu/2020/files/community-minded.pdf>

<sup>2</sup> 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.

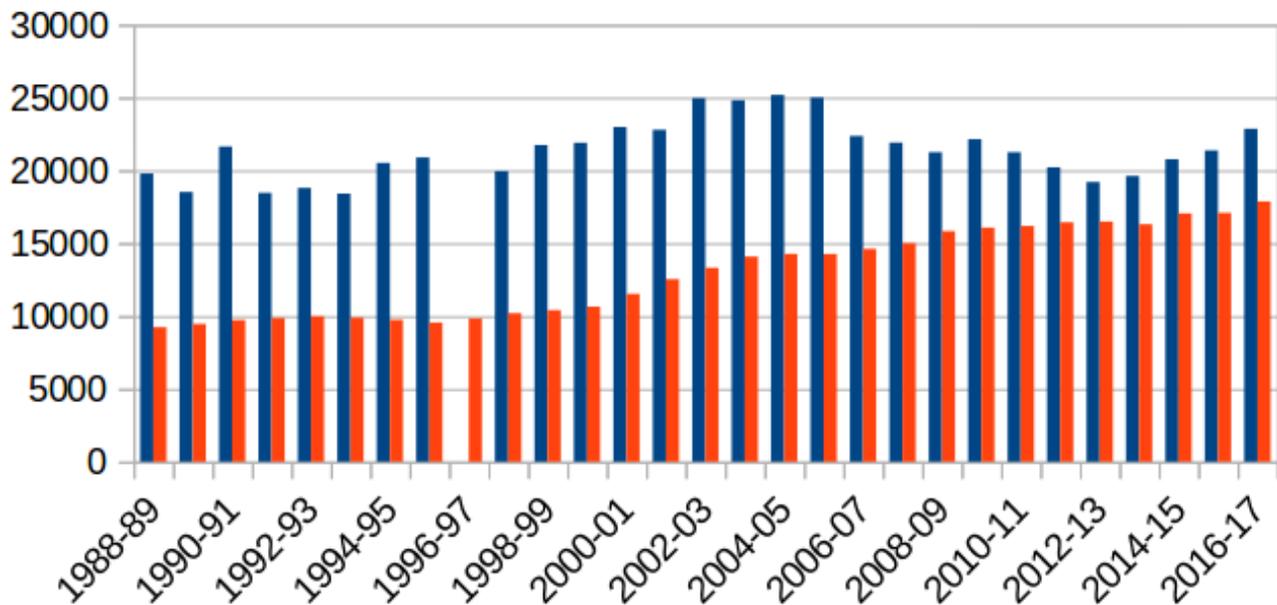
Whatever the outcome of UCSC's housing goals, it is possible for the City of Santa Cruz to implement measures that would result in zero new trips to campus. We know it is feasible to prevent an increase in vehicle trips due to growth through the experience of Stanford University. In 2000, Santa Clara 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.<sup>2</sup>

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.



<sup>2</sup> 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 time<sup>3</sup>. 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.

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<sup>3</sup> 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 20<sup>th</sup> 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.<sup>4</sup>

### **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 \(2014\)](#)

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<sup>4</sup> assuming the IRS rate per mile for auto travel of \$0.54 and 40 mile round trip to campus



Erika Carpenter <escarpent



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**[eircomment] LRDP comment**

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**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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James Clifford  
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 **EMAC comment on draft LRDP..docx**  
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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 Hershatler, 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 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.

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.

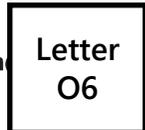
| O5-9  
| cont.

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



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**[lr dp] comments on the DEIR of the draft LRDP**

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**Micah Posner** <micahposner@cruzio.com>  
Reply-To: lr dp+managers@ucsc.edu  
To: lr dp@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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 **SIERRA CLUB-LRDP.pdf**  
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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](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 remained<sup>1</sup> Arnold and Knisley (2018) found the OTB total population at its four primary sites to range between 500 and 1,750 individuals.<sup>2</sup> 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.*”

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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:

<b>Habitat Evaluation Matrix</b>						
<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>						
<b>Natural communities/ habitat types</b>	<b>Evaluation parameters</b>					
	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 <sup>1</sup>	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 <sup>2</sup>	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 <sup>3</sup>	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

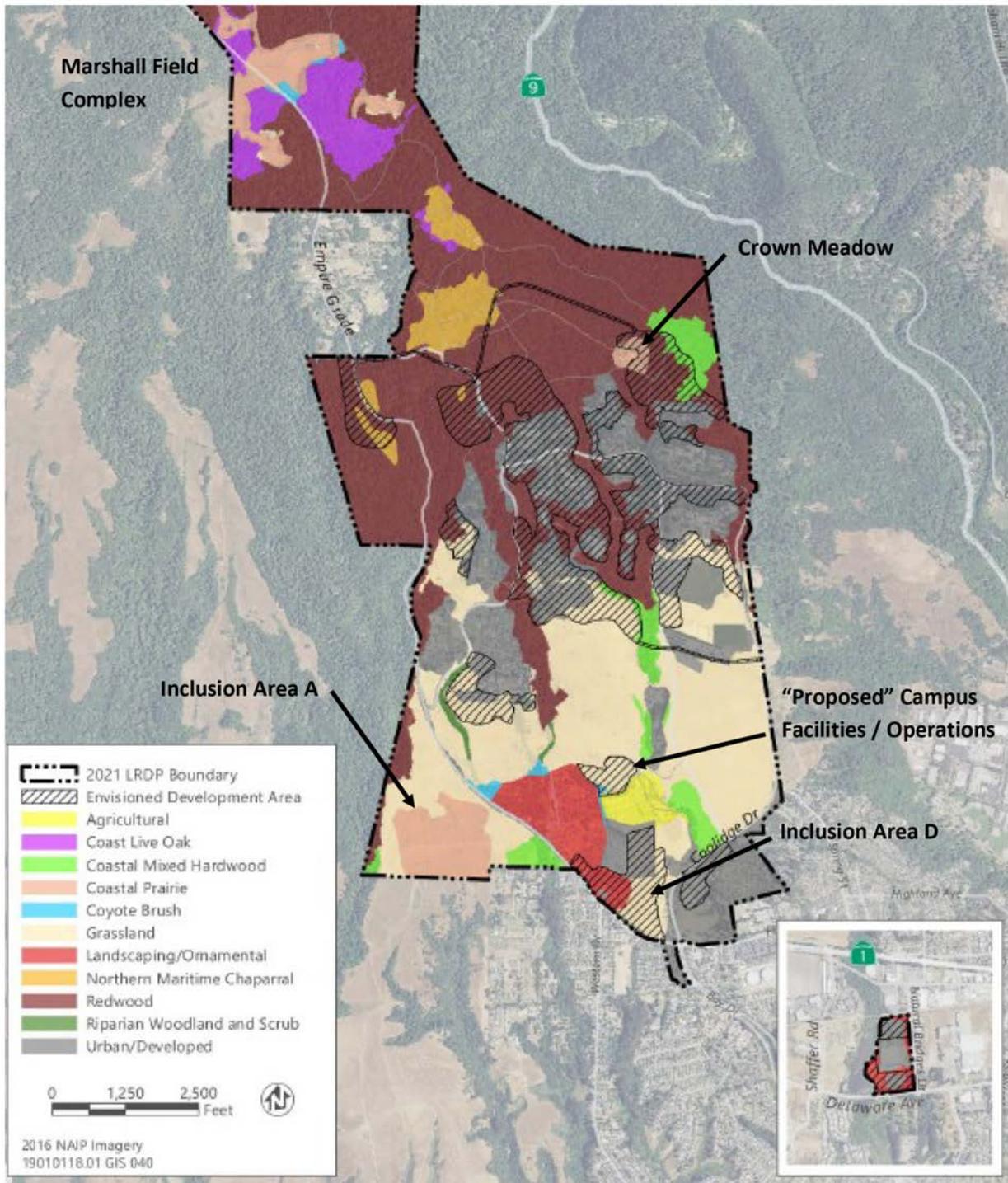
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cont.

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 &lt;escarpent

Letter  
07

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**[eircomment] LRDP EIR Comments**

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**Stephanie Clarke** <sclarke@volkerlaw.com>

Mon, Mar 8, 2021 at 4:55 PM

To: eircomment@ucsc.edu

Cc: Stephan Volker &lt;svolker@volkerlaw.com&gt;, Jamey Volker &lt;jvolker@volkerlaw.com&gt;, Alexis Krieg &lt;akrieg@volkerlaw.com&gt;

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,  
Stephanie Clarke  
Law Offices of Stephan C. Volker  
(510) 496-0600  
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 **2021-03-08 HAWC 2021 LRDP DEIR Comments.pdf**  
7390K

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March 8, 2021

**VIA EMAIL AND U.S. MAIL**

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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.

O7-1  
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.

O7-3  
cont.

## 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.

O7-4  
cont.

### 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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cont.

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).

O7-7

#### 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.

O7-8

##### 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

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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.

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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.

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### **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.

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### **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

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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.

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### 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.

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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.*

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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

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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.

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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.

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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

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evacuate in an emergency.

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## 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.

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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  
Page 18

## 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.

07-30

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

## 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  
cont.

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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cont.

**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

O7-38  
cont.

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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cont.

**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.**

O7-39

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.

O7-40  
cont.

O7-41

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).

07-42

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.

O7-42  
cont.

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.

O7-43

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.

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cont.

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.

O7-45

For these reasons, in my professional judgment the DEIR is substantially deficient.

Dated: March 8, 2021



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Lewis Goodkin

# EXHIBIT 1

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STUDENT HOUSING DEMAND ANALYSIS

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# 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.

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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%
<b>Total:</b>	<b>17,199</b>	<b>17,864</b>	<b>17,903</b>	<b>18,781</b>	<b>19,457</b>	<b>13%</b>

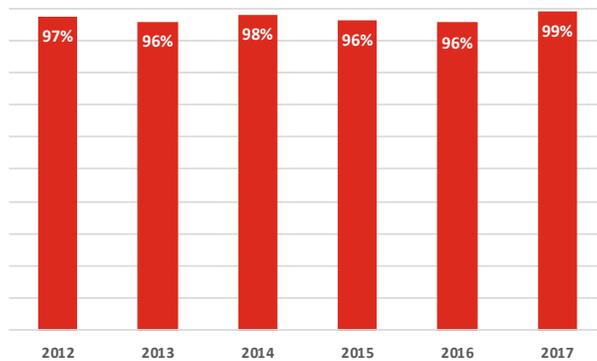
**FIGURE 1.1:** Total Enrollment by Class Year, 2013-2017

### 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 <sup>1</sup>	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications <sup>2</sup>	(773)	0	(197)	(970)
<b>Revised Current Supply</b>	<b>8,289</b>	<b>80</b>	<b>0</b>	<b>8,369</b>
Student Housing West	2,713	220	140	3,073
<b>Current Supply + New Beds</b>	<b>11,002</b>	<b>300</b>	<b>140</b>	<b>11,442</b>
Total Demand	11,626	1,166	310	13,102
<b>Remaining Unmet Demand</b>	<b>624</b>	<b>866</b>	<b>170</b>	<b>1,660</b>

**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 3<sup>rd</sup> 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%
<b>Admissions Rate:</b>	<b>51%</b>	<b>56%</b>	<b>50%</b>	<b>58%</b>	<b>51%</b>	<b>-0.7%</b>
<b>Enrolled</b>	<b>3,301</b>	<b>4,035</b>	<b>3,620</b>	<b>4,221</b>	<b>4,048</b>	<b>23%</b>
<b>Yield</b>	<b>17%</b>	<b>18%</b>	<b>16%</b>	<b>15%</b>	<b>15%</b>	<b>-10%</b>

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.

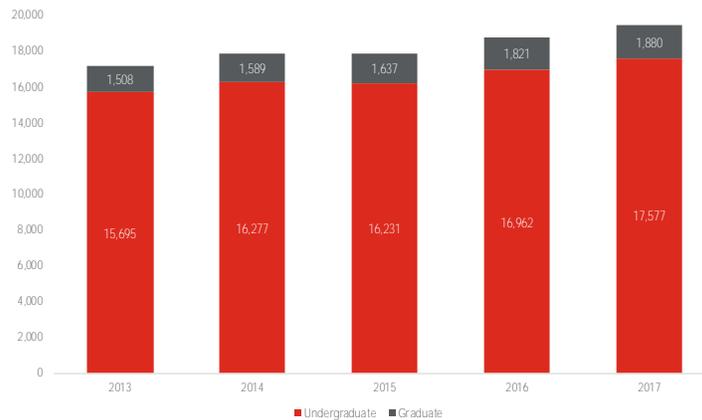


FIGURE 2.2: Total Enrollment, 2013-2017

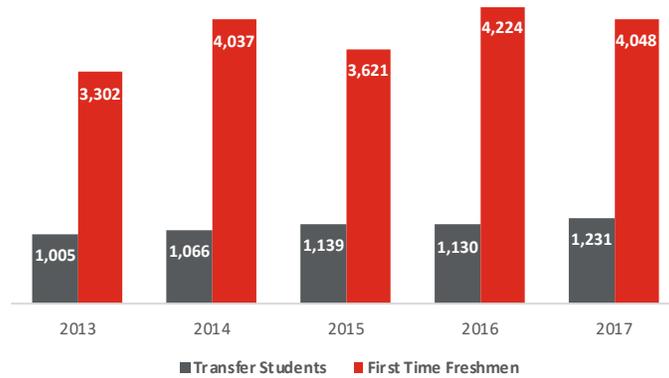
Analysis of undergraduate enrollment by class level reveals that the distribution of students is generally evenly spread among the class levels ranging between 19% and 26%. Graduate enrollment accounts for 10% of all UCSC students. Undergraduate enrollment growth by class year is consistent among all 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%
<b>Total:</b>	<b>17,199</b>	<b>17,864</b>	<b>17,903</b>	<b>18,781</b>	<b>19,457</b>	<b>13%</b>

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
<b>Freshmen to Sophomore</b>	91%	91%	89%	89%	88%	90%	90%	0%
Grad Rate: Freshmen	2006	2007	2008	2009	2010	2011	2012	5 Year Growth
<b>Four Year</b>	2%	2%	3%	4%	2%	2%	1%	-48%
<b>Five Year</b>	51%	50%	55%	55%	52%	53%	49%	-4%
<b>Six Year</b>	70%	69%	74%	75%	74%	74%	71%	2%
Grad Rate: Transfer	2006	2007	2008	2009	2010	2011	2012	5 Year Growth
<b>Four Year</b>	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	↑
<b>Total:</b>	<b>17,203</b>	<b>17,866</b>	<b>17,868</b>	<b>18,783</b>	<b>19,457</b>	↑

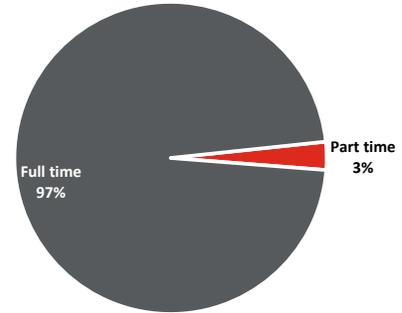


FIGURE 2.6 (Left): Total Enrollment by Status, 2013-2017

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%
<b>Total:</b>	<b>17,203</b>	<b>17,866</b>	<b>17,868</b>	<b>18,783</b>	<b>19,457</b>	↑ 13%

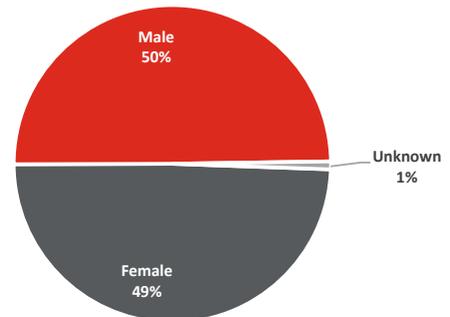


FIGURE 2.8 (Left): Total Enrollment by Gender, 2013-2017

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-density existing residence halls. An estimated 773 beds will be removed from USCS inventory through de-density 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
<b>Subtotal</b>	<b>7,060</b>	<b>2,431</b>	<b>(153)</b>	<b>9,338</b>

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.

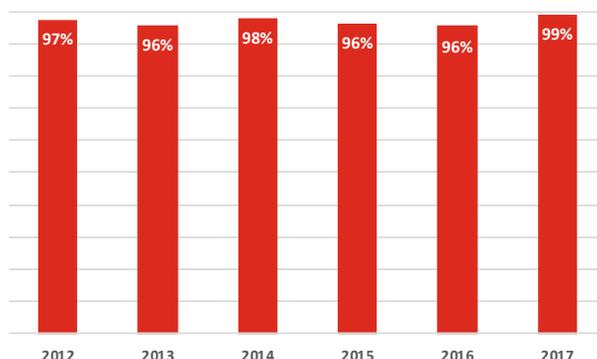


FIGURE 2.11: UCSC Housing Occupancy of Available Beds 2012-2017

## 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 plan<sup>1</sup>. 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

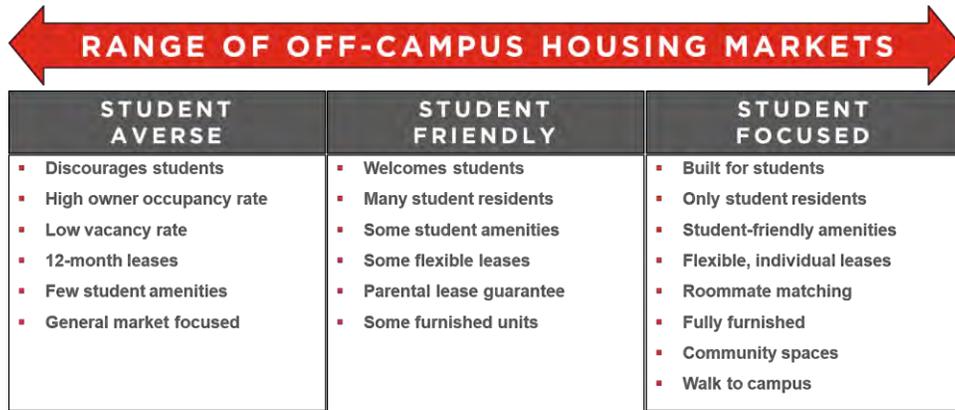
UCSC does not have a live-on requirement in place for any students. On-campus housing is available only to students enrolled in a degree-granting program, and priority is given to full-time students. The University does offer a housing guarantee to undergraduate students who indicate a preference for 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.

<sup>1</sup> 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 properties<sup>2</sup>. 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.

<sup>2</sup> 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 <sup>3</sup>	Undergraduate <sup>1</sup>				Graduate <sup>1</sup>		Family Housing <sup>2</sup>
	A. 4BR/1BA (Single)	B. 2BR/2BA (Double) <sup>4</sup>	C. 1BR/1BA (Triple)	D. 2BR/2BA (Triple)	A. Studio (Apartment)	B. 2BR/1BA (Suite)	2BR/1BA Family Unit
Average Off-Campus Rental Rate <sup>5</sup>	\$1,690	\$889	-	-	\$1,926	-	\$3,381
On-Campus Rental Rates <sup>6</sup>	\$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

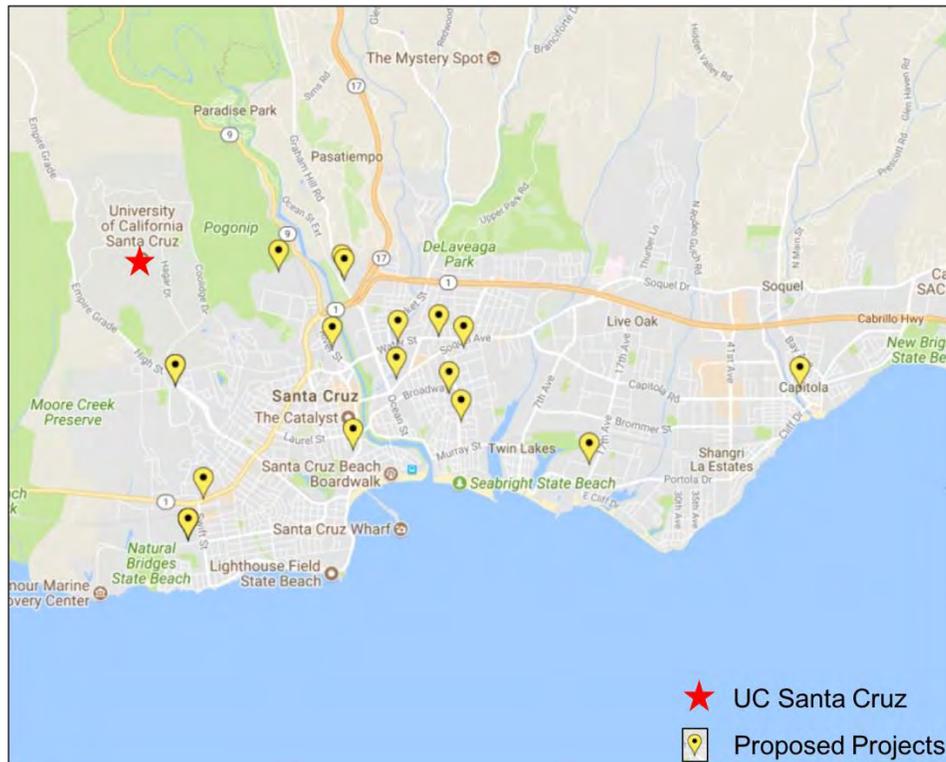
The Student Housing West private apartment bedroom, studio, and family housing units are priced very competitively costing 4%, 35%, and 51% less than the off-campus average, respectively. Overall, the average rental rates for the Student Housing West Two-Bedroom / Two-Bathroom double occupancy apartments 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.



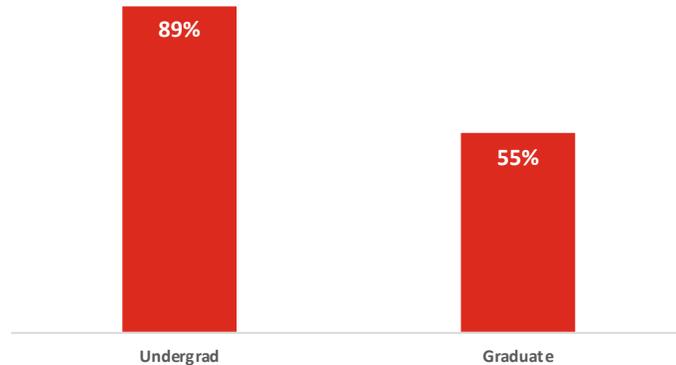
**FIGURE 2.17:** Location of Future Housing Development in Santa Cruz

## 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.

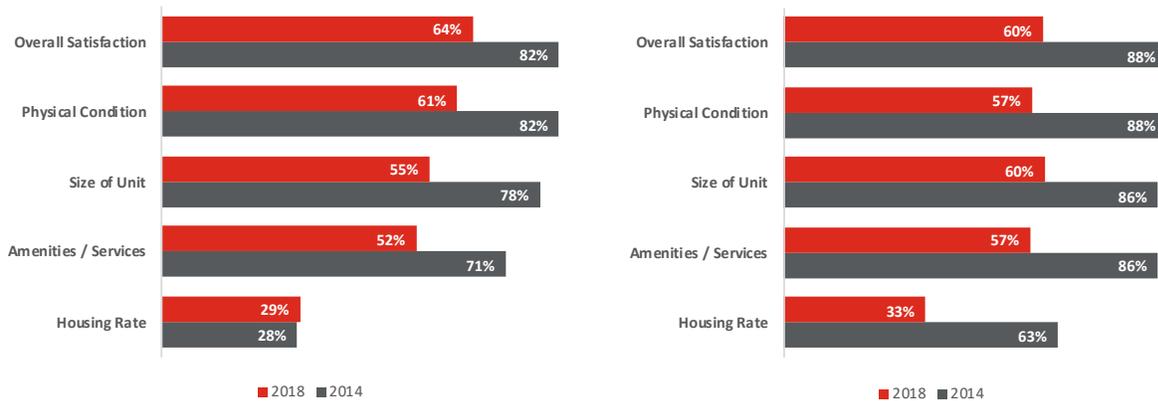


FIGURE 2.19 (Left): On-campus Housing Satisfaction, 2014 vs. 2018

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.

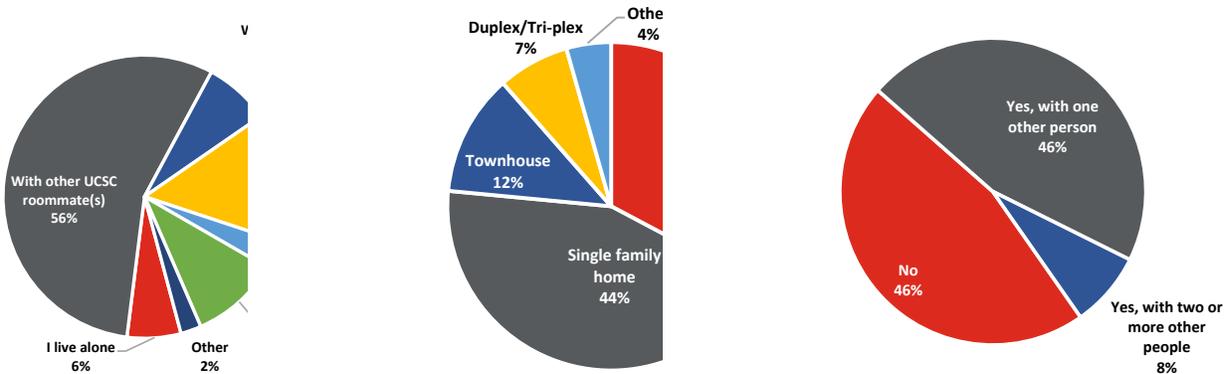
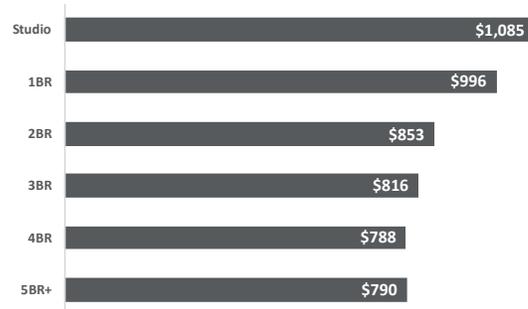


FIGURE 2.24 (Left): Who C

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

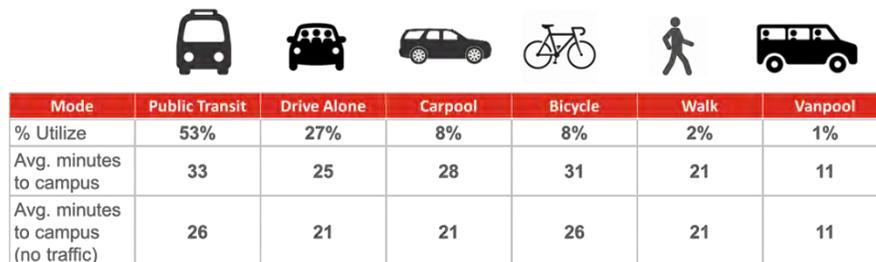
Students self-reported that they pay an average of \$87 per month in utilities in the off-campus market. The most common utilities that they are paying for are Internet, electricity, and water. The \$87 figure is much lower than what B&D typically sees due to many students who are sharing a bedroom.

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

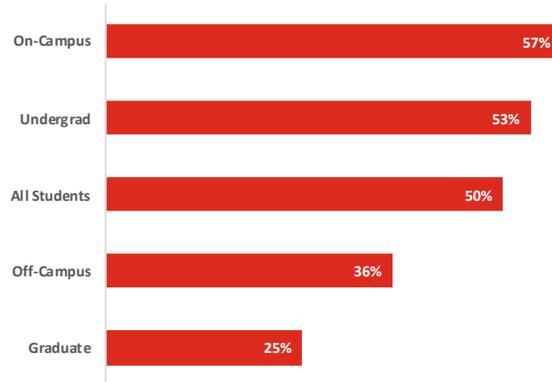
To understand how transportation to campus impacts students' living situation, B&D asked a series of questions about how students get to campus. Approximately 53% of respondents ride public transit to campus while 27% drive alone. The average one-way commute time is 30-minutes. Respondents indicated 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

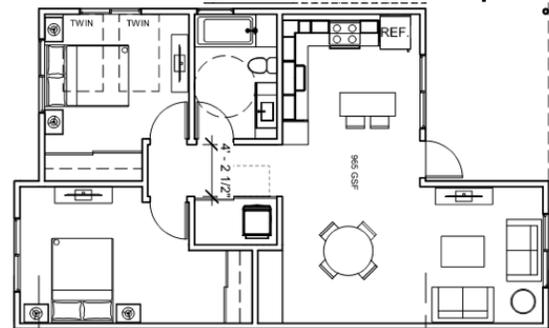
**Unit B: Two-Bedroom / One-Bathroom Suite  
(With Shared Communal Kitchen)**



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) <sup>1</sup>
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
<b>Total</b>	<b>19,457</b>	<b>9,049</b>	<b>47%</b>	<b>66%</b>	<b>12,792</b>	<b>310</b>

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 <sup>1</sup>	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications <sup>2</sup>	(773)	0	(197)	(970)
<b>Revised Current Supply</b>	<b>8,289</b>	<b>80</b>	<b>0</b>	<b>8,369</b>
Student Housing West	2,713	220	140	3,073
<b>Current Supply + New Beds</b>	<b>11,002</b>	<b>300</b>	<b>140</b>	<b>11,442</b>
Total Demand	11,626	1,166	310	13,102
<b>Remaining Unmet Demand</b>	<b>624</b>	<b>866</b>	<b>170</b>	<b>1,660</b>

**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.

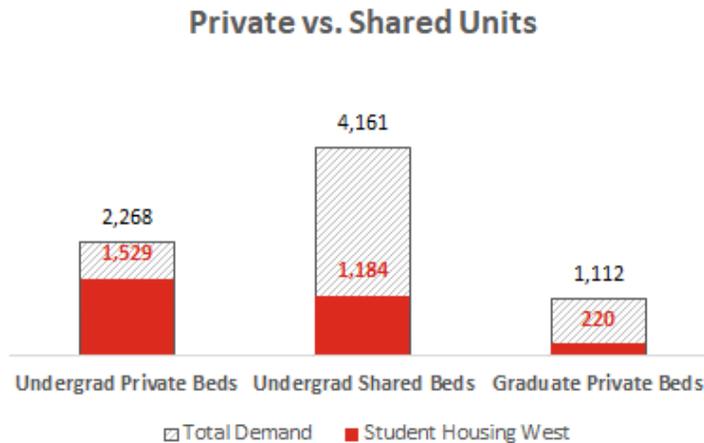
DEMAND ANALYSIS

	Undergraduate Beds				Graduate Beds		Family Housing
	4BR / 1BA Apt.	2BR / 2BA Apt.	Studio Triple	2BR / 2BA Apt. (Triple Conversion) <sup>3</sup>	Studio Apartment	2BR Suite (W/ Comm. Kitch.)	2BR Apt.
	Single	Double	Triple	Triple	Single	Single	Family Unit
Total Demand <sup>1,2</sup>	2,268	1,466	930	1,766	523	590	310
Student Housing West Program	1,529	620	564	0	92	128	140
<b>Unmet Demand<sup>2</sup></b>	<b>739</b>	<b>846</b>	<b>366</b>	<b>1,766</b>	<b>431</b>	<b>462</b>	<b>170</b>

**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

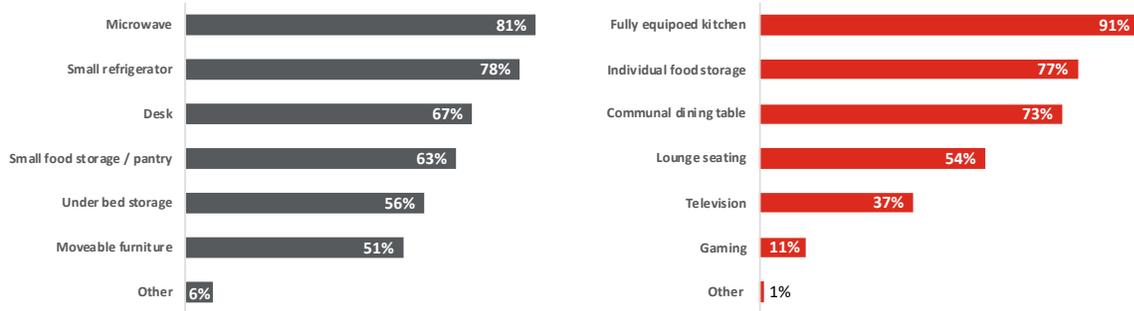
**HOUSING AMENITY PREFERENCES**

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**

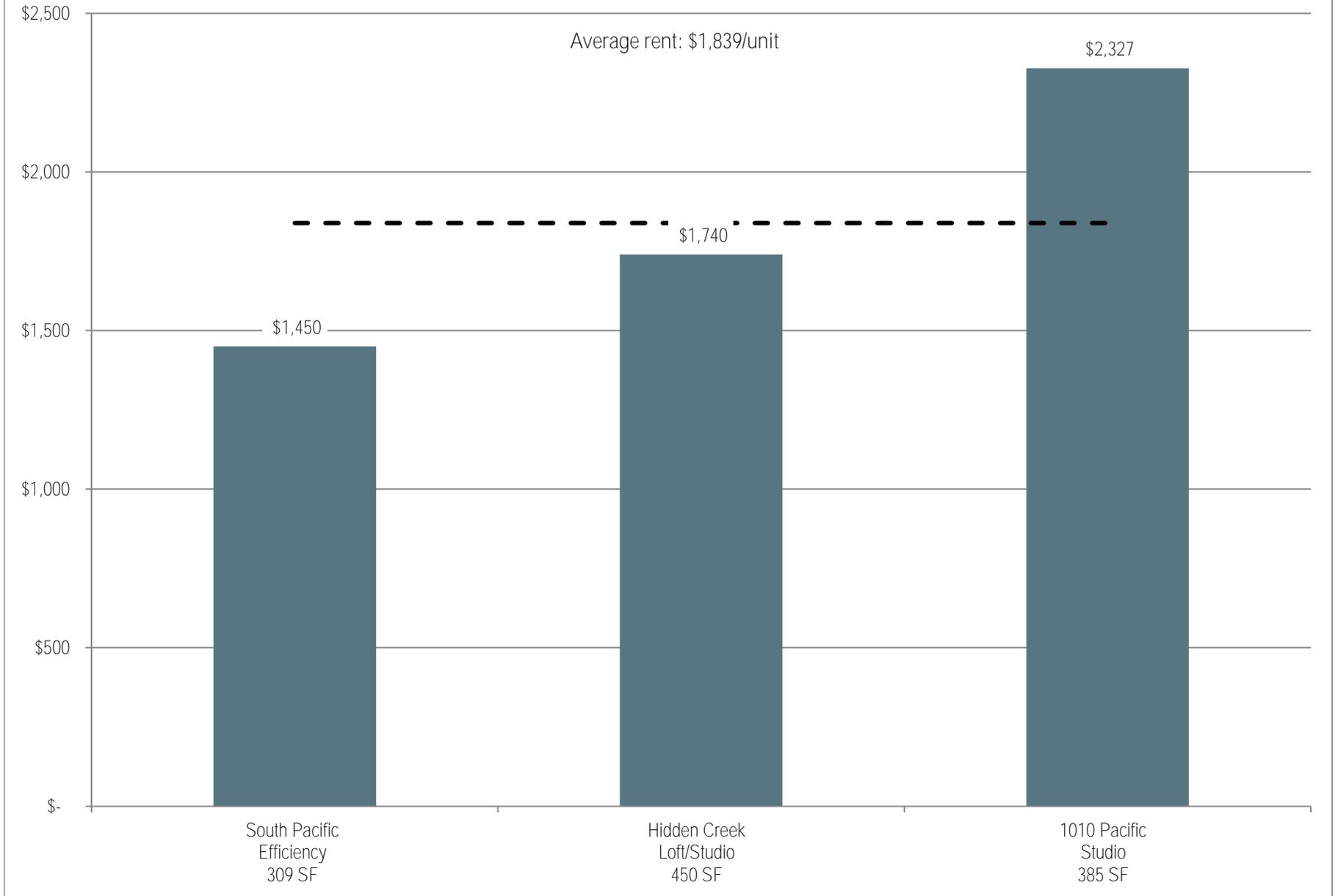
Rental Comparables			Unit Type	Number of Units	Avg. Sq. Ft.	Unit Rent			Unit Rent psf		
						Low	Hi	Avg	Low	Hi	Avg
South Pacific 401 Pacific Avenue Santa Cruz, CA 95060 (831) 466-9467 Owner Barry Swenson Builder Manager Santa Cruz Seaside Company		Units 71 Built 2003 Occupancy 99% Leased 99%	Efficiency Total	71 71	309 309	\$1,450 \$1,450	\$1,450 \$1,450	\$1,450 \$1,450	\$4.69 \$4.69	\$4.69 \$4.69	\$4.69 \$4.69
			Concessions: None.								
			<b>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.</b>								
1010 Pacific 1010 Pacific Avenue Santa Cruz, CA 95060 (831) 471-9900 Owner Pacific Union Land Company Manager Woodmont Real Estate Services		Units 113 Built 2004 Occupancy 96% Leased 97%	Studio 1x1 2x2 3x2 Total	2 72 37 2 113	385 611 911 1,160 715	\$1,898 \$2,233 \$3,337 \$4,071 \$2,621	\$2,755 \$3,483 \$4,398 \$4,086 \$3,780	\$2,327 \$2,858 \$3,868 \$4,079 \$3,201	\$4.93 \$3.65 \$3.66 \$3.51 \$3.67	\$7.16 \$5.70 \$4.83 \$3.52 \$5.29	\$6.04 \$4.68 \$4.25 \$3.52 \$4.48
			Concessions:								
Oceanview 222 Columbia Street Santa Cruz, CA 95060 (831) 458-5042 Owner Acclaim RE Investment Manager Acclaim Companies		Units 104 Built 1965/1970 Occupancy 93% Leased N/A	1x1 2x2 Total	81 23 104	680 860 720	\$2,695 \$3,400 \$2,851	\$2,970 \$3,800 \$3,154	\$2,833 \$3,600 \$3,002	\$3.96 \$3.95 \$3.96	\$4.37 \$4.42 \$4.38	\$4.17 \$4.19 \$4.17
			Concessions: None.								
Hidden Creek 200 Button Street Santa Cruz, CA 95060 (831) 425-7000 Owner First Pacific Group Manager First Pacific Group		Units 146 Built 1971 Occupancy 97% Leased 99%	Loft/Studio 1x1 2x1 Total	24 76 46 146	450 525 686 563	\$1,690 \$1,850 \$2,400 \$1,997	\$1,790 \$1,900 \$2,400 \$2,039	\$1,740 \$1,875 \$2,400 \$2,018	\$3.76 \$3.52 \$3.50 \$3.54	\$3.98 \$3.62 \$3.50 \$3.62	\$3.87 \$3.57 \$3.50 \$3.58
			Concessions: None.								
Pacific Shores 1240 Shaffer Road Santa Cruz, CA 95060 (831) 427-1290 Owner Pacific Union Land Company Manager Woodmont Real Estate Services		Units 206 Built 2004 Occupancy 99% Leased 100%	1x1 2x2 Total	110 96 206	809 1,024 909	\$2,800 \$3,376 \$3,068	\$2,800 \$3,983 \$3,351	\$2,800 \$3,680 \$3,210	\$3.46 \$3.30 \$3.37	\$3.46 \$3.89 \$3.69	\$3.46 \$3.59 \$3.53
			Concessions: None.								
Chestnut Street 143 Chestnut Street Santa Cruz, CA 95060 (831) 469-3620 Owner Essex Property Trust Manager Essex Property Trust		Units 96 Built 2002 Occupancy 99% Leased 100%	1x1 2x1 2x2 2x2 TH Total	30 18 2 46 96	650 900 950 1,040 890	\$2,100 \$2,800 \$2,825 \$3,443 \$2,890	\$2,250 \$2,800 \$3,000 \$3,443 \$2,940	\$2,175 \$2,800 \$2,913 \$3,443 \$2,915	\$3.23 \$3.11 \$2.97 \$3.31 \$3.25	\$3.46 \$3.11 \$3.16 \$3.31 \$3.30	\$3.35 \$3.11 \$3.07 \$3.31 \$3.28
			Concessions: None.								

Rental Comparables			Unit Type	Number of Units	Avg. Sq. Ft.	Low	Unit Rent Hi	Avg	Low	Unit Rent psf 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

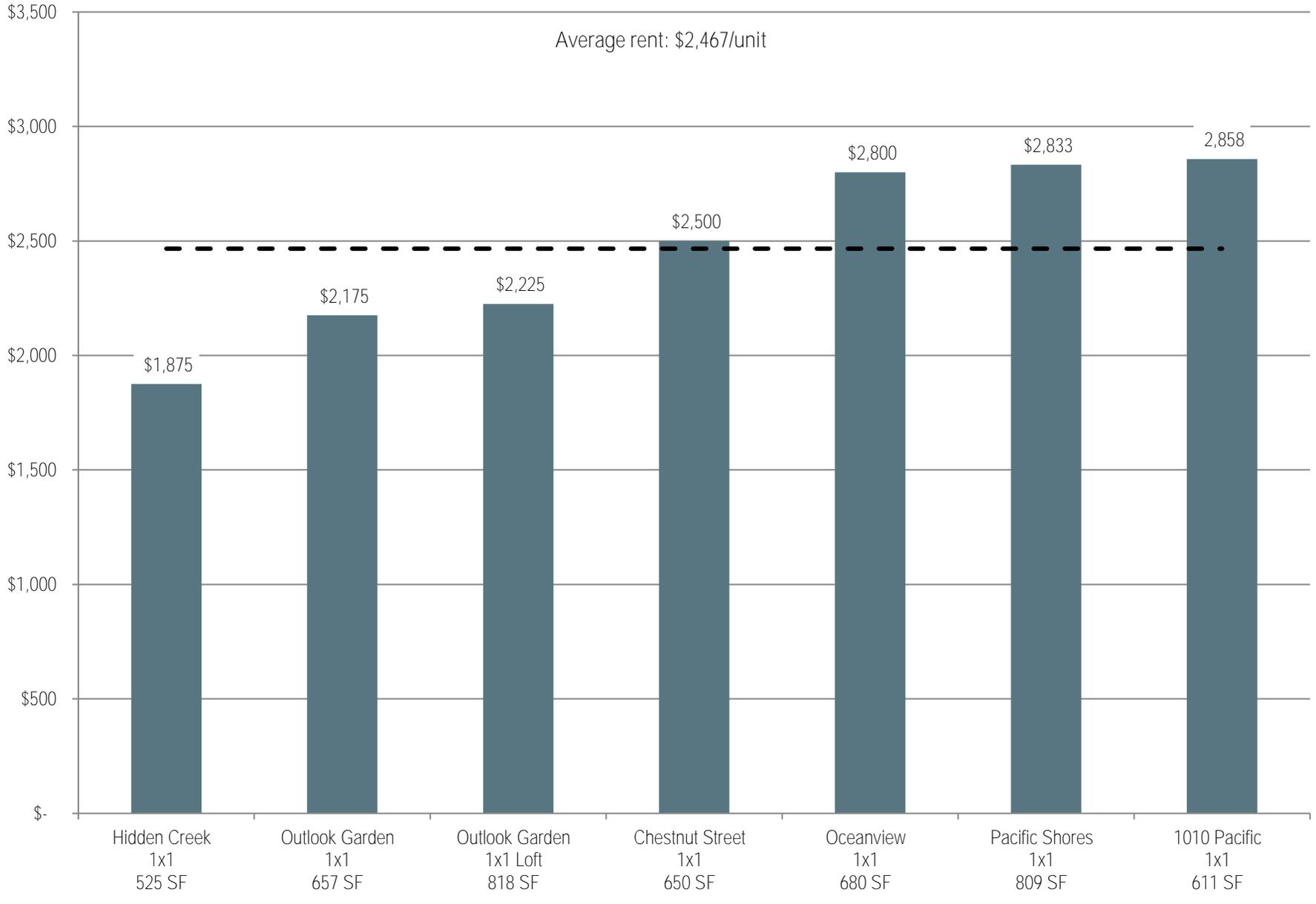
Source: Survey of property managers, leasing agents and certain principals conducted by Jones Lang LaSalle.

# Studio Apartment Rents



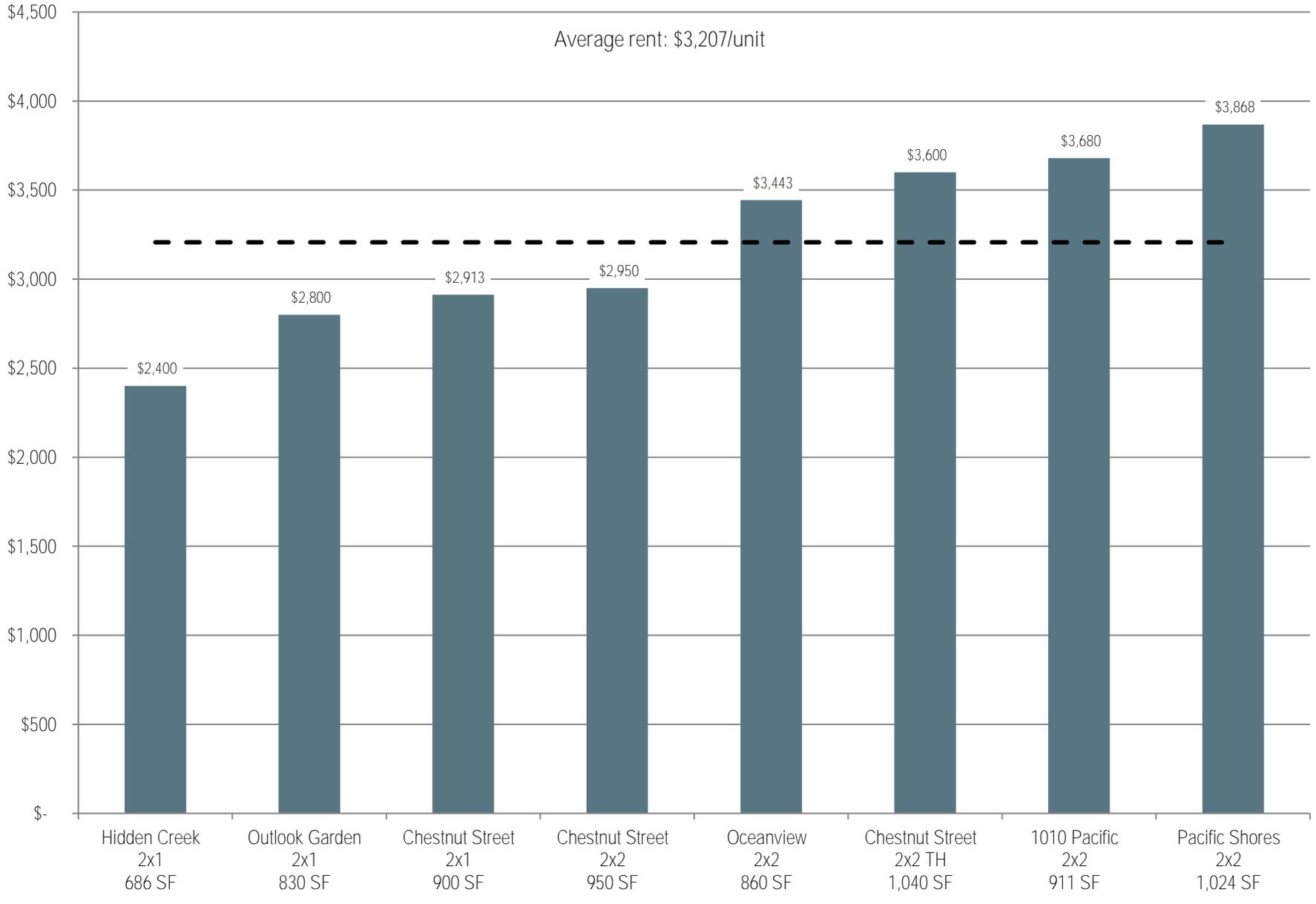
# One Bedroom Apartment Rents

Average rent: \$2,467/unit



# Two Bedroom Apartment Rents

Average rent: \$3,207/unit



# EXHIBIT **B**

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SURVEY RESULTS

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**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 %	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	Rank
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	Rank
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	

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SURVEY RESULTS

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**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		

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SURVEY RESULTS

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**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	

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SURVEY RESULTS

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**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	

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SURVEY RESULTS

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**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

<b>Q57. What is your race/ethnic background?</b>		
<b>Count</b>	<b>Percent</b>	
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

<b>Q58. What is your current residency status?</b>		
<b>Count</b>	<b>Percent</b>	
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

<b>Q59. Please let us know if you have any other comments regarding UCSC's Housing program:</b>		
<b>Count</b>	<b>Percent</b>	
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. Our 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, our 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 project 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 to 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 its 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!
- 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



# 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

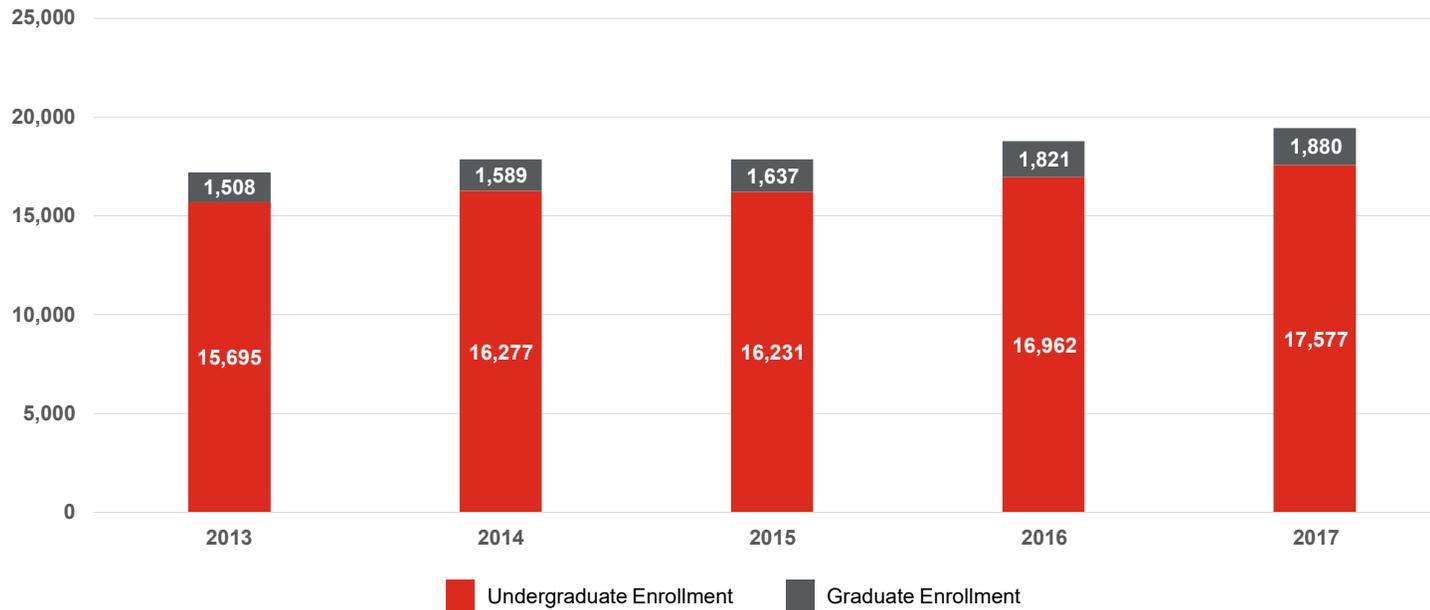
## Market Analysis

- 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

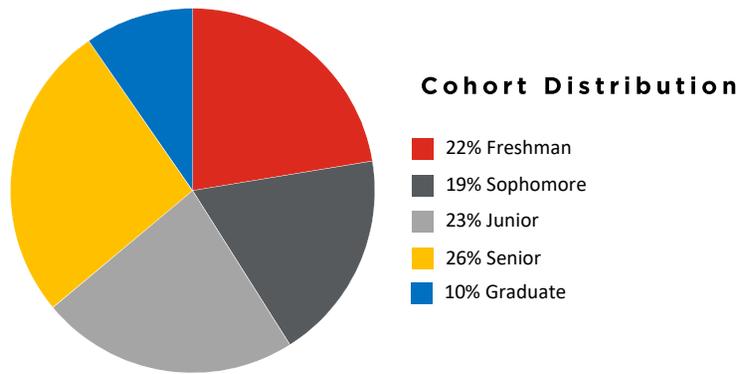
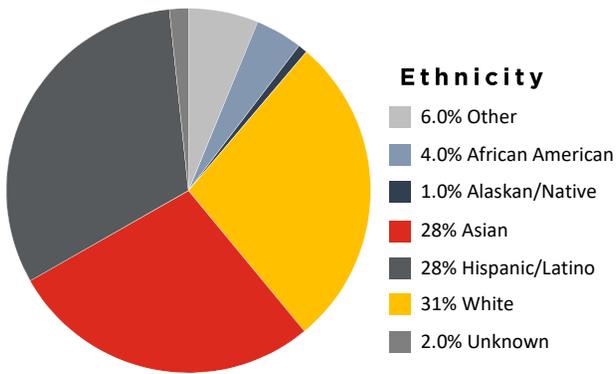
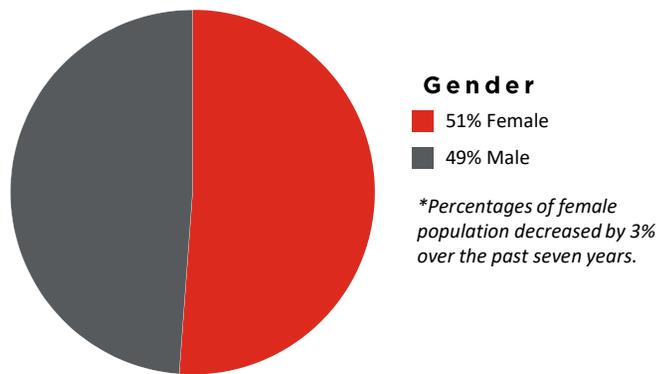
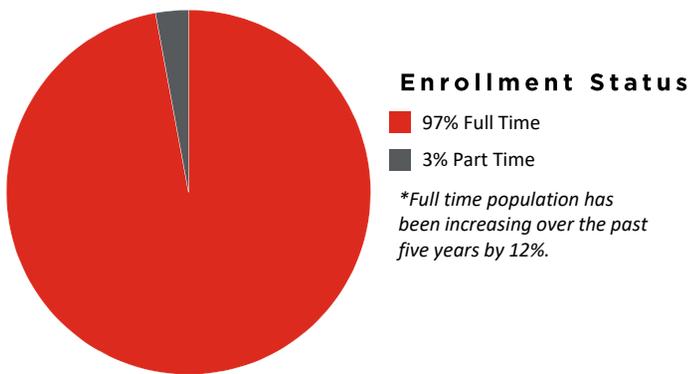
**+25%**  
Graduate Enrollment  
Since 2013

**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)

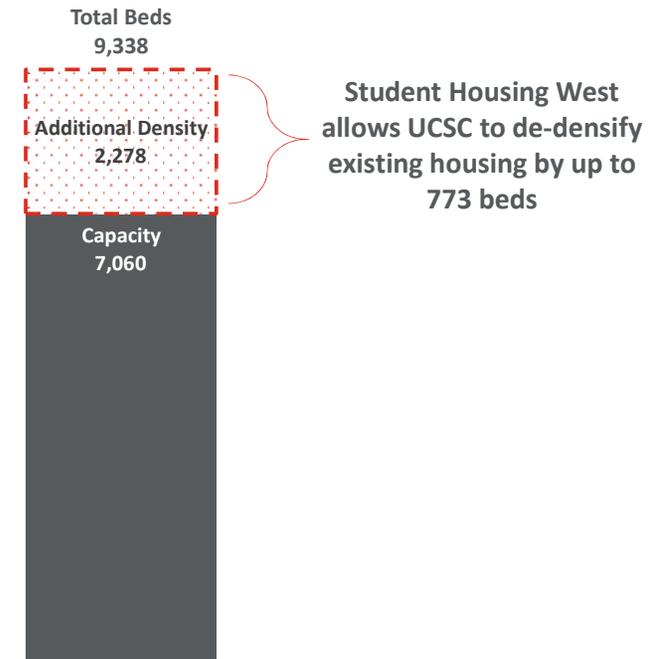
**UCSC's student academic and demographic profile are consistent with those who would likely live on campus**

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
<b>Subtotal</b>	<b>7,060</b>	<b>2,431</b>	<b>(153)</b>	<b>9,338</b>

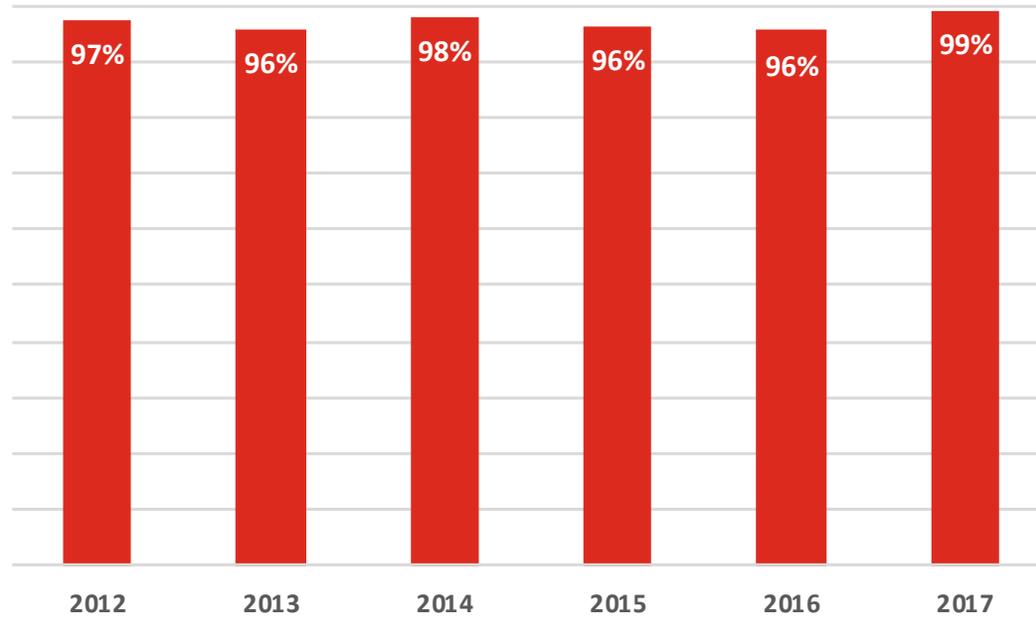


The additional residential density impacts the student residential experience and creates logistical challenges for UCSC

# 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

<b>Population</b>	<b>62,752</b>
<b>Median Age</b>	<b>28.7</b>
<b>Non-Family Households</b>	<b>40%</b>
<b>Total Housing Units</b>	<b>23,499</b>
<b>Owner Occupied</b>	<b>44%</b>
<b>% Multi-Unit Structures</b>	<b>33%</b>

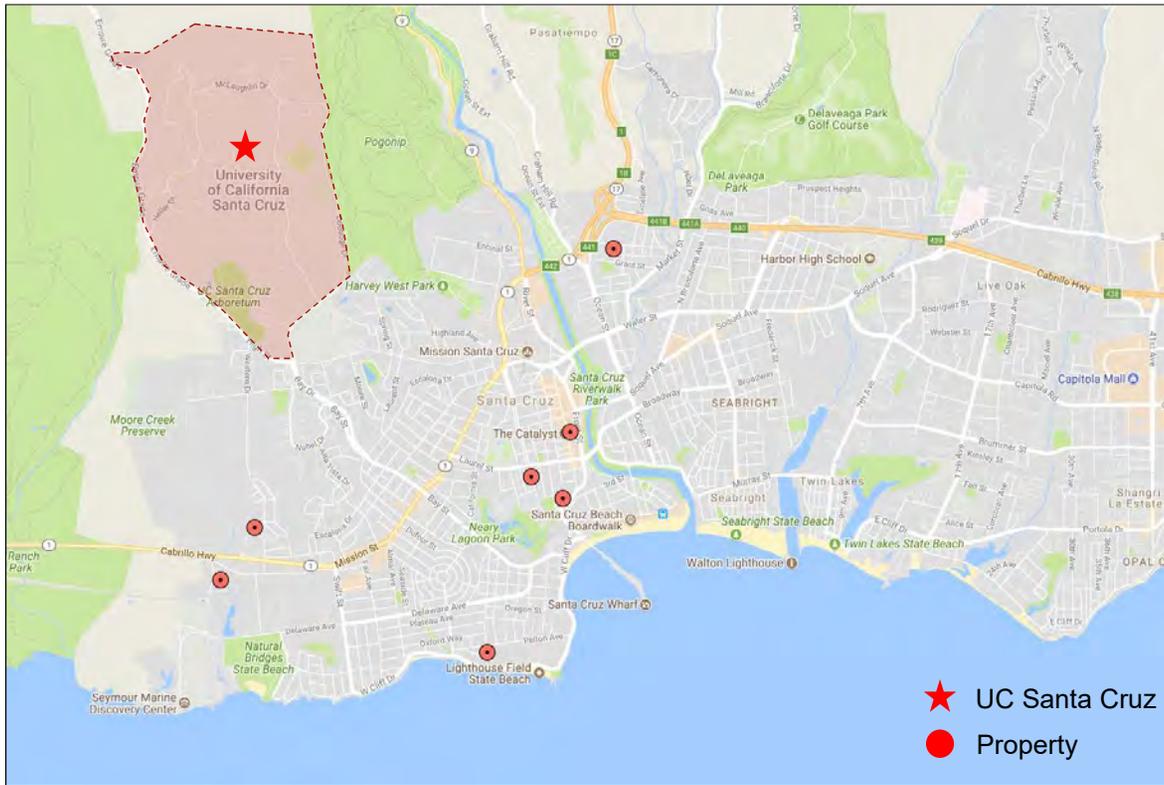
Source: 2015 5-year census at [censusreporter.org](http://censusreporter.org)



**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

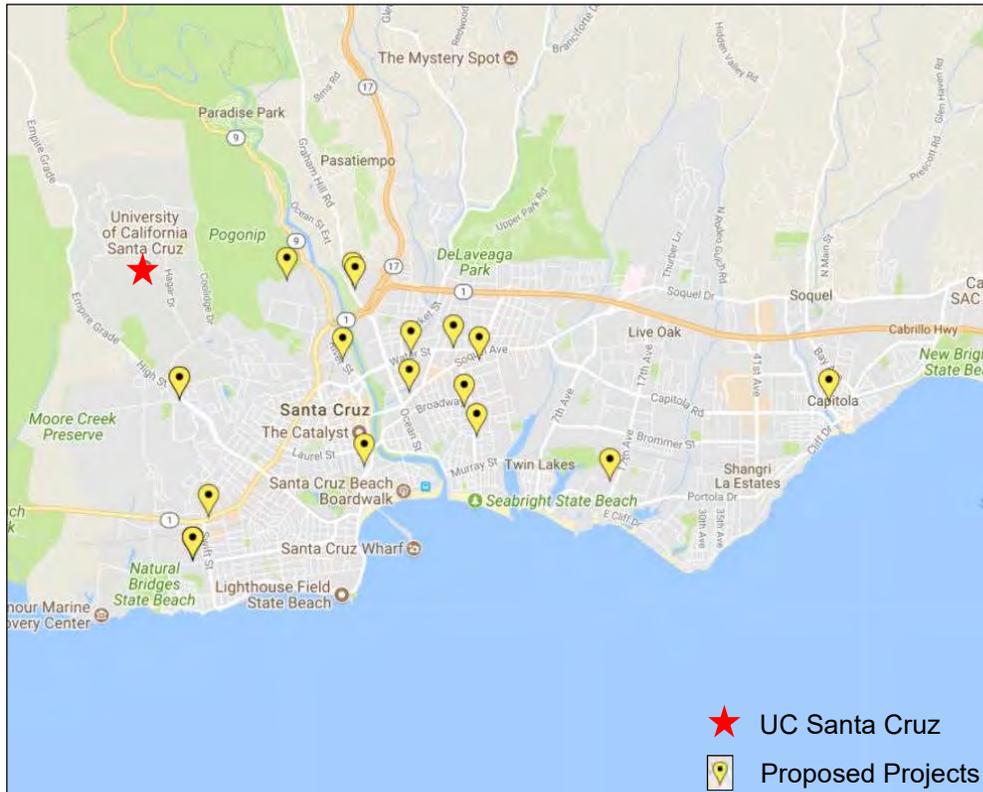


**There is a scarcity of three and four-bedroom units within the market. Larger units are attractive to students because they can spread the cost of rent among more people.**

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



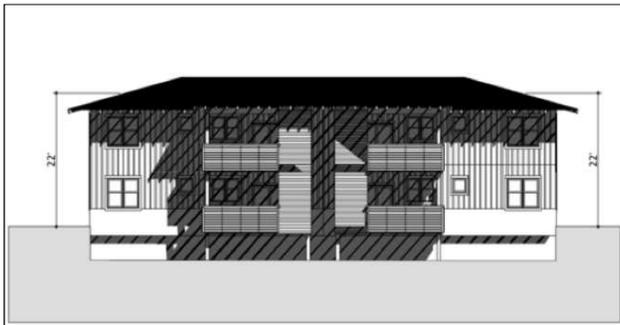
### Upper Crust Apartments

- 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 <sup>3</sup>	Undergraduate <sup>1</sup>				Graduate <sup>1</sup>		Family Housing <sup>2</sup>
	A. 4BR/1BA (Single)	B. 2BR/2BA (Double) <sup>4</sup>	C. 1BR/1BA (Triple)	D. 2BR/2BA (Triple)	A. Studio (Apartment)	B. 2BR/1BA (Suite)	2BR/1BA Family Unit
Average Off-Campus Rental Rate <sup>5</sup>	\$1,690	\$889	-	-	\$1,926	-	\$3,381
On-Campus Rental Rates <sup>5</sup>	\$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.

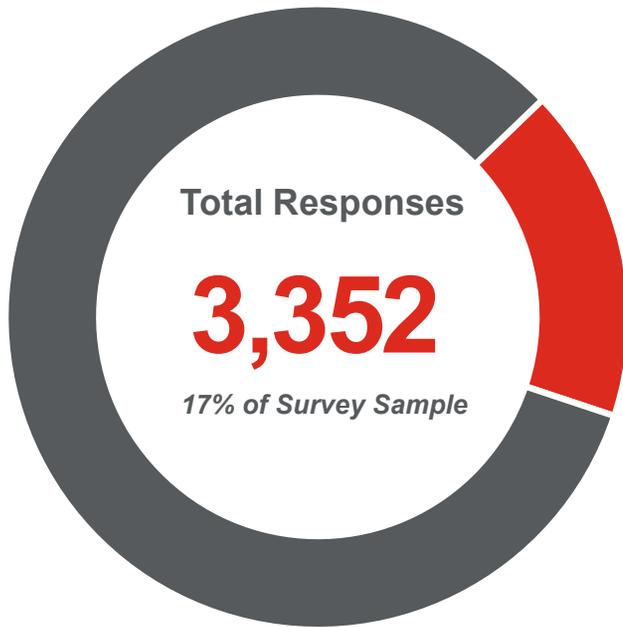
**Proposed Graduate and Family units at Student Housing West are priced competitively with the average off-campus rental rates.**

# Survey Analysis

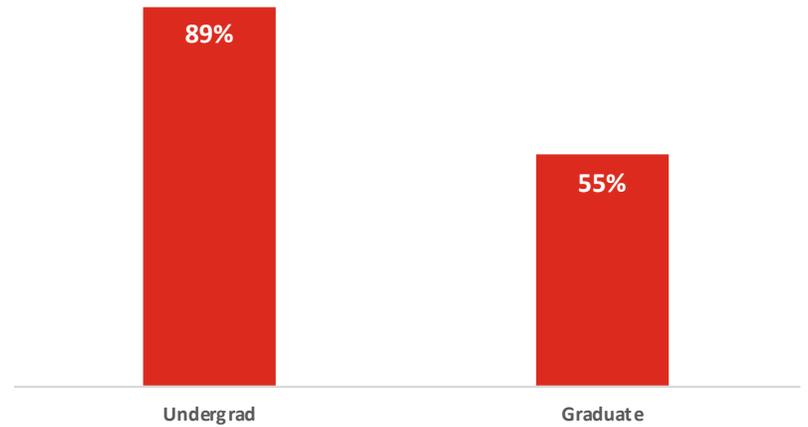


# Overview

## Survey Analysis



### Importance of the availability of housing in decision to attend UCSC



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<b>Percent Complete</b>	<b>86%</b>
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<b>Confidence Level</b>	<b>95%</b>
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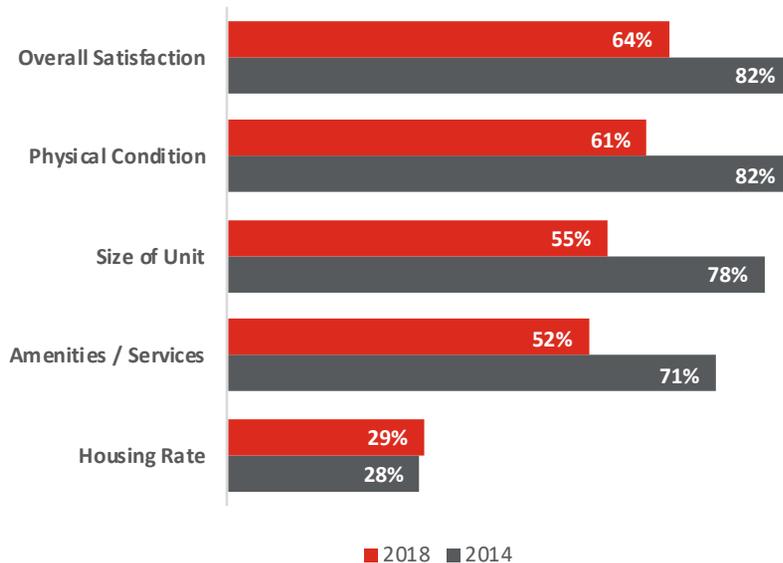
<b>Margin of Error</b>	<b>2%</b>
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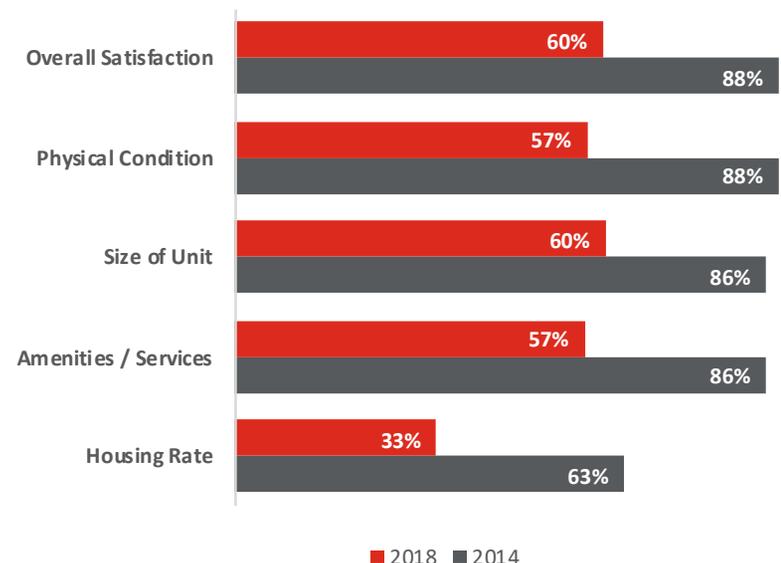
# Current Satisfaction

## 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

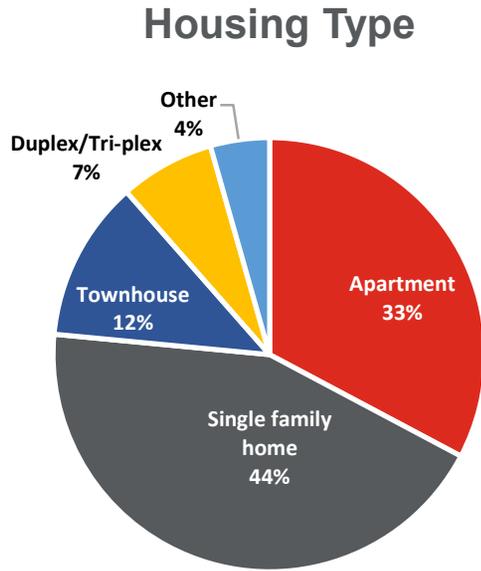
Rank	Factor	Weighted Average
1	Keep housing costs affordable	79%
2	Create more on-campus housing opportunities for currently enrolled students	69%
3	Provide modern and attractive living environments to students	59%
4	Expand existing residential dining programs	53%
5	Create more theme areas around academic 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

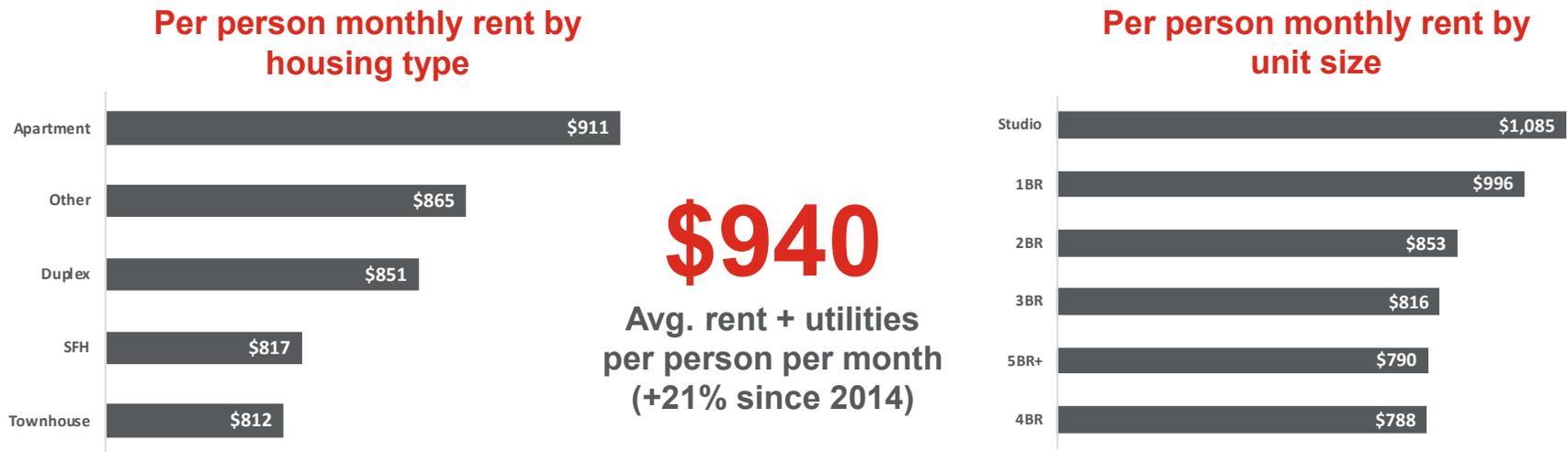
**\$87**

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

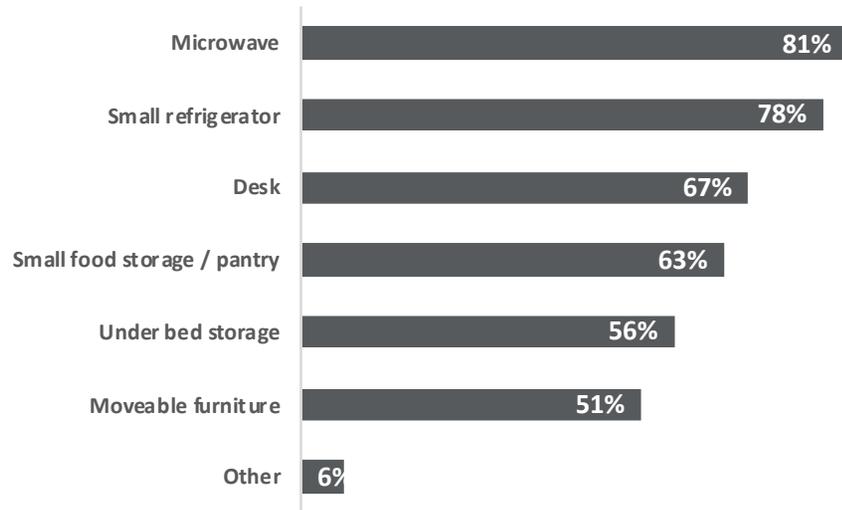
## Survey Analysis

	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%

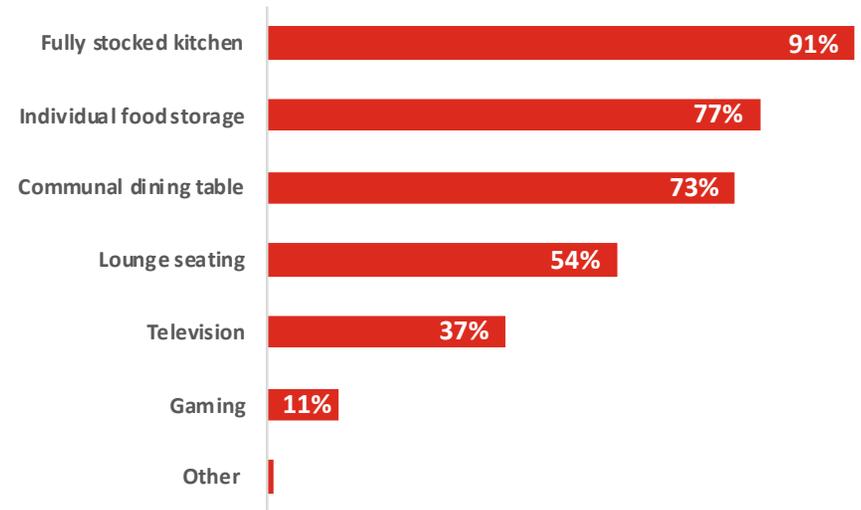
# Graduate Communal Unit Preferences

## 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

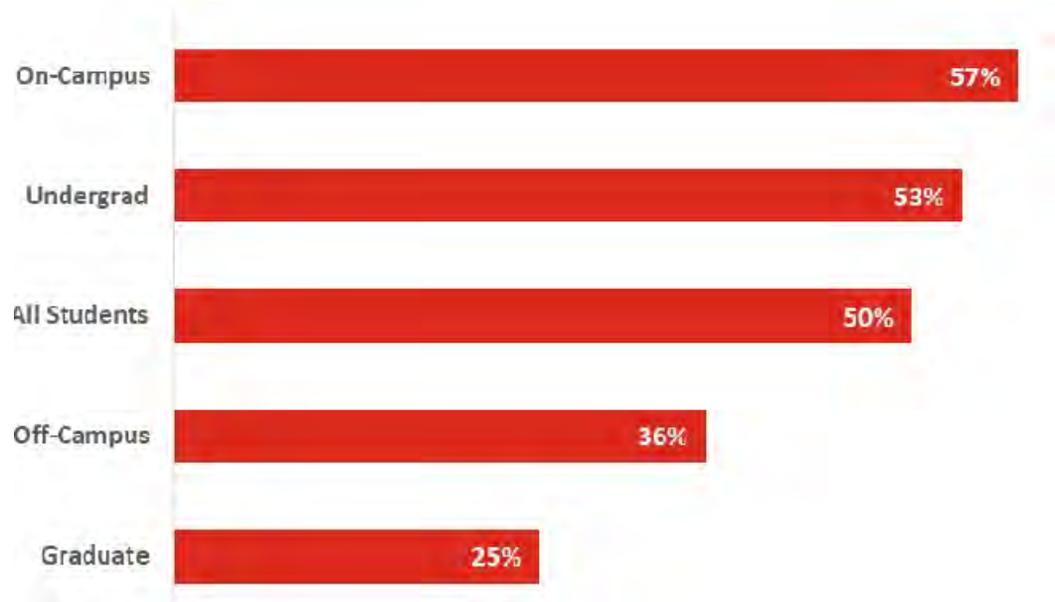
# Dining

## 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)**



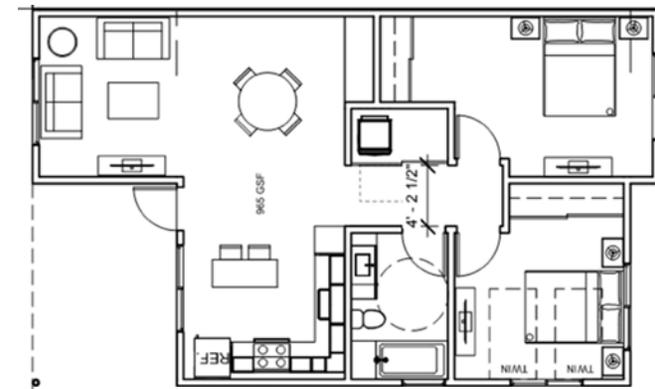
**\$1,249 / unit / month**

**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) <sup>1</sup>
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
<b>Total</b>	<b>19,457</b>	<b>9,049</b>	<b>47%</b>	<b>66%</b>	<b>12,792</b>	<b>310</b>

**Total Demand:** 13,102

<sup>1</sup>: 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 <sup>1</sup>	Total
	Undergraduate	Graduate		
Current Supply (Beds)	9,062	80	197	9,339
Supply Modifications <sup>2</sup>	(773)	0	(197)	(970)
<b>Revised Current Supply</b>	<b>8,289</b>	<b>80</b>	<b>0</b>	<b>8,369</b>
Student Housing West	2,713	220	140	3,073
<b>Current Supply + New Beds</b>	<b>11,002</b>	<b>300</b>	<b>140</b>	<b>11,442</b>
Total Demand	11,626	1,166	310	13,102
<b>Remaining Unmet Demand</b>	<b>624</b>	<b>866</b>	<b>170</b>	<b>1,660</b>

**Notes:**

1. Family housing is in units.
2. Planned de-densification and replacement of Family Student Housing.

# Student Housing West

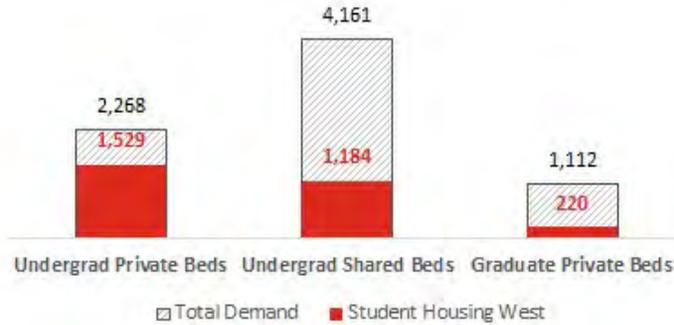
## Demand Analysis

	Undergraduate Beds				Graduate Beds		Family Housing
	4BR / 1BA Apt.	2BR / 2BA Apt.	Studio Triple	2BR / 2BA Apt. (Triple Conversion) <sup>3</sup>	Studio Apartment	2BR Suite (W/ Comm. Kitch.)	2BR Apt.
	Single	Double	Triple	Triple	Single	Single	Family Unit
Total Demand <sup>1,2</sup>	2,268	1,466	930	1,766	523	590	310
Student Housing West Program	1,529	620	564	0	92	128	140
<b>Unmet Demand<sup>2</sup></b>	<b>739</b>	<b>846</b>	<b>366</b>	<b>1,766</b>	<b>431</b>	<b>462</b>	<b>170</b>

**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

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## 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).

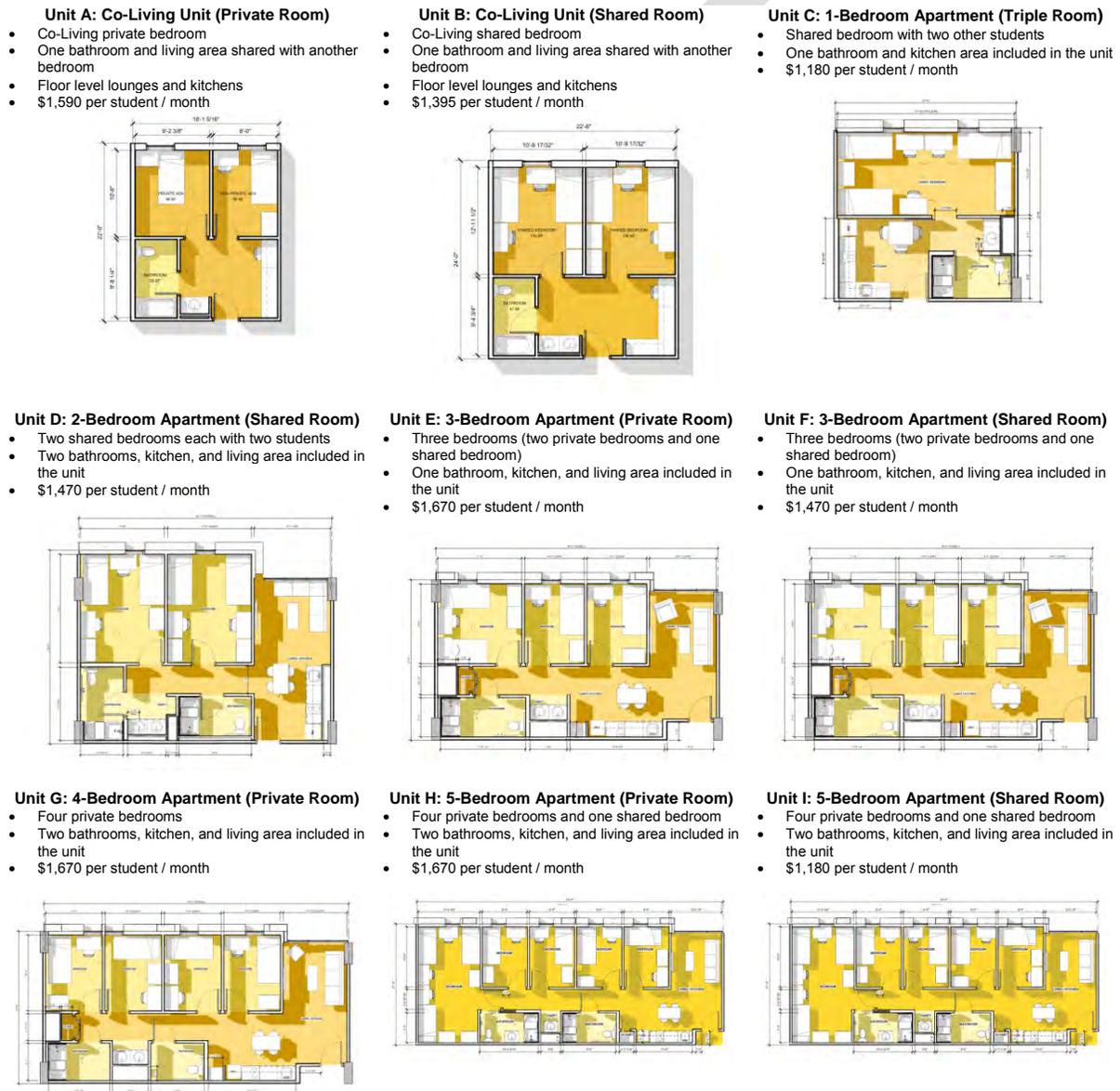
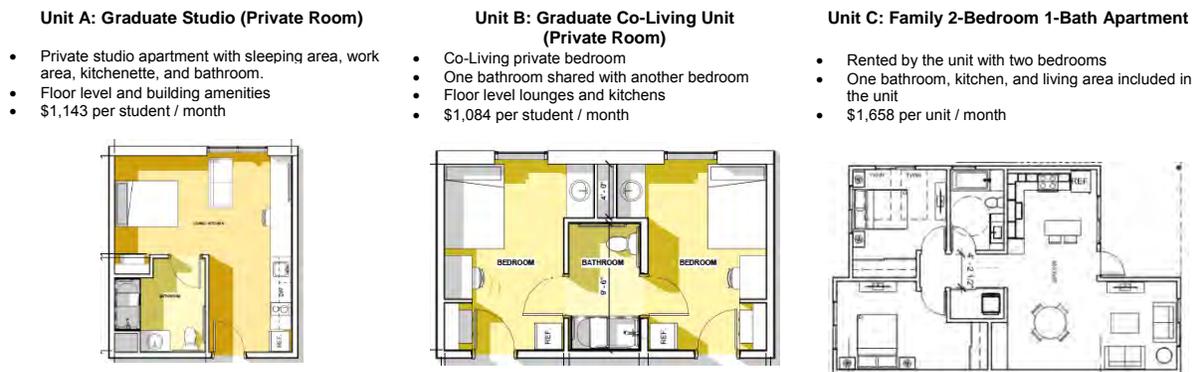


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students



**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
<b>Student Housing West FSH</b>			139								139
<b>Student Housing West Undergrad</b>					1,754	978					2,732
<b>Student Housing West Grad</b>					226						226
Total Existing:	9,283										
Net Change:	0	142	-57	35	1,392	1,065	-78	-78	-78	0	
<b>Total Available Beds (Existing + Net Change):</b>	<b>9,283</b>	<b>9,425</b>	<b>9,368</b>	<b>9,403</b>	<b>10,795</b>	<b>11,860</b>	<b>11,782</b>	<b>11,704</b>	<b>11,626</b>	<b>11,626</b>	<b>11,626</b>
<b>Total On-Campus Single Undergraduate Beds:</b>	<b>8,958</b>	<b>9,109</b>	<b>9,109</b>	<b>9,144</b>	<b>10,310</b>	<b>11,375</b>	<b>11,297</b>	<b>11,219</b>	<b>11,141</b>	<b>11,141</b>	
<b>Total On-Campus Single Graduate Beds:</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	
<b>Total On-Campus Family Student Housing Units:</b>	<b>196</b>	<b>196</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	

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 in 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
<b>Total</b>	<b>17,928</b>	<b>8,906</b>	<b>50%</b>	<b>71%</b>	<b>12,643</b>	<b>310</b>

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 <sup>1</sup>		(315)	Supply Modifications <sup>1</sup>		0	Supply Modifications <sup>1</sup>		(196)
<b>Revised Current Supply</b>		<b>8,643</b>	<b>Revised Current Supply</b>		<b>82</b>	<b>Revised Current Supply</b>		<b>0</b>
Student Housing West		2,732	Student Housing West		226	Student Housing West		139
<b>Current Supply + New Beds</b>		<b>11,375</b>	<b>Current Supply + New Beds</b>		<b>308</b>	<b>Current Supply + New Beds</b>		<b>139</b>
Total Demand		11,477	Total Demand		1,166	Total Demand		310
<b>Remaining Unmet Demand</b>		<b>102</b>	<b>Remaining Unmet Demand</b>		<b>858</b>	<b>Remaining Unmet Demand</b>		<b>171</b>

**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 &lt;escarpent@ucsc.edu&gt;

Letter  
08

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**[eircomment] Comments on DEIR for Proposed 2021 LRDP For UCSC**

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**'Gary Patton' via eircomment@ucsc.edu** <eircomment@ucsc.edu>

Mon, Mar 8, 2021 at 10:34 AM

Reply-To: Gary Patton &lt;gapatton@me.com&gt;

To: eircomment@ucsc.edu

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](mailto:gapatton@mac.com)  
Website / Blog: [www.gapatton.net](http://www.gapatton.net)  
Facebook: <https://www.facebook.com/gapatton>

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **CLUE Letter on DEIR.pdf**  
149K

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**Gary A. Patton, Attorney At Law**  
**Post Office Box 1038, Santa Cruz, California 95061**  
**Telephone: 831-332-8546 / Email: gapatton@mac.com**

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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](mailto: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)**

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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.

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\*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-8<sup>th</sup> 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.

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](mailto:nadialuciaperalta@gmail.com)

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eircomment mailing list  
[eircomment@ucsc.edu](mailto: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:

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09-4

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09-5

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*

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**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

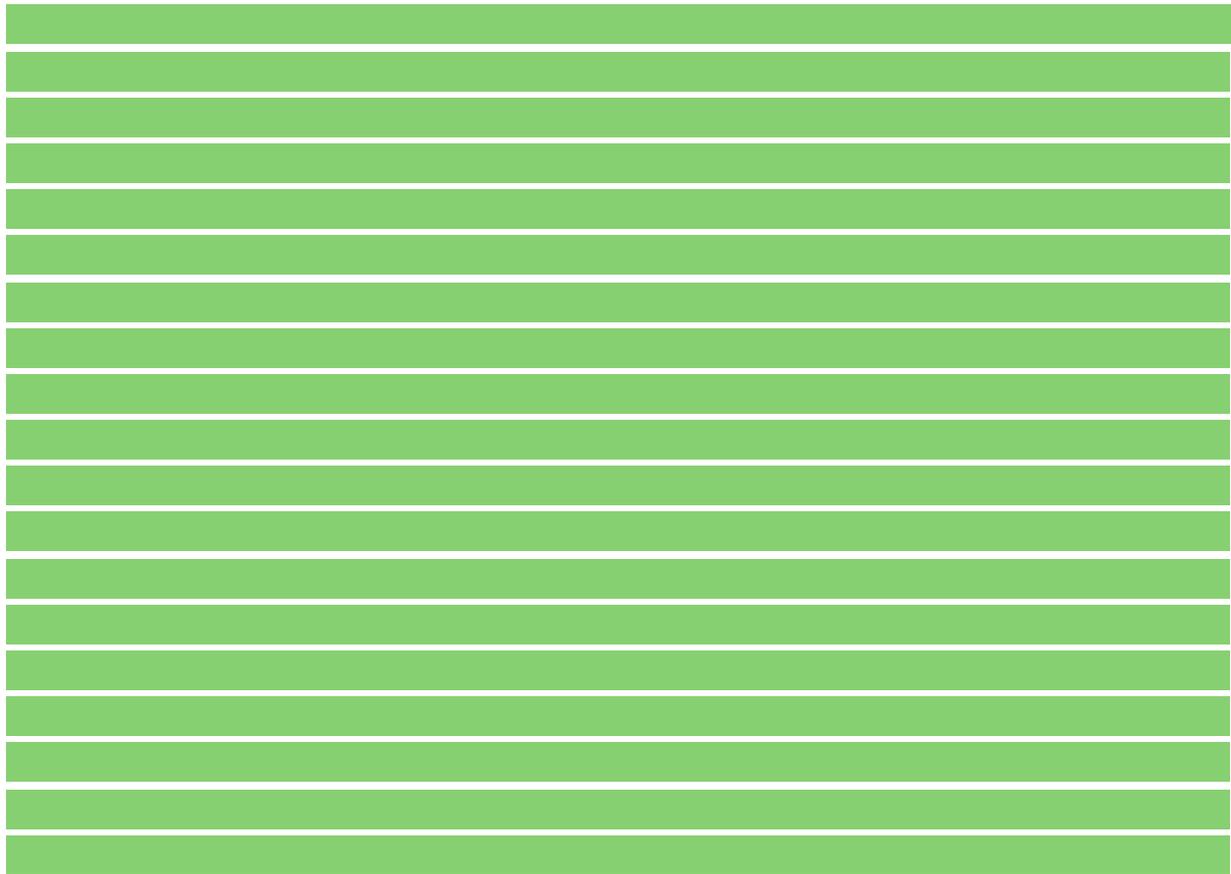
O10-5

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.

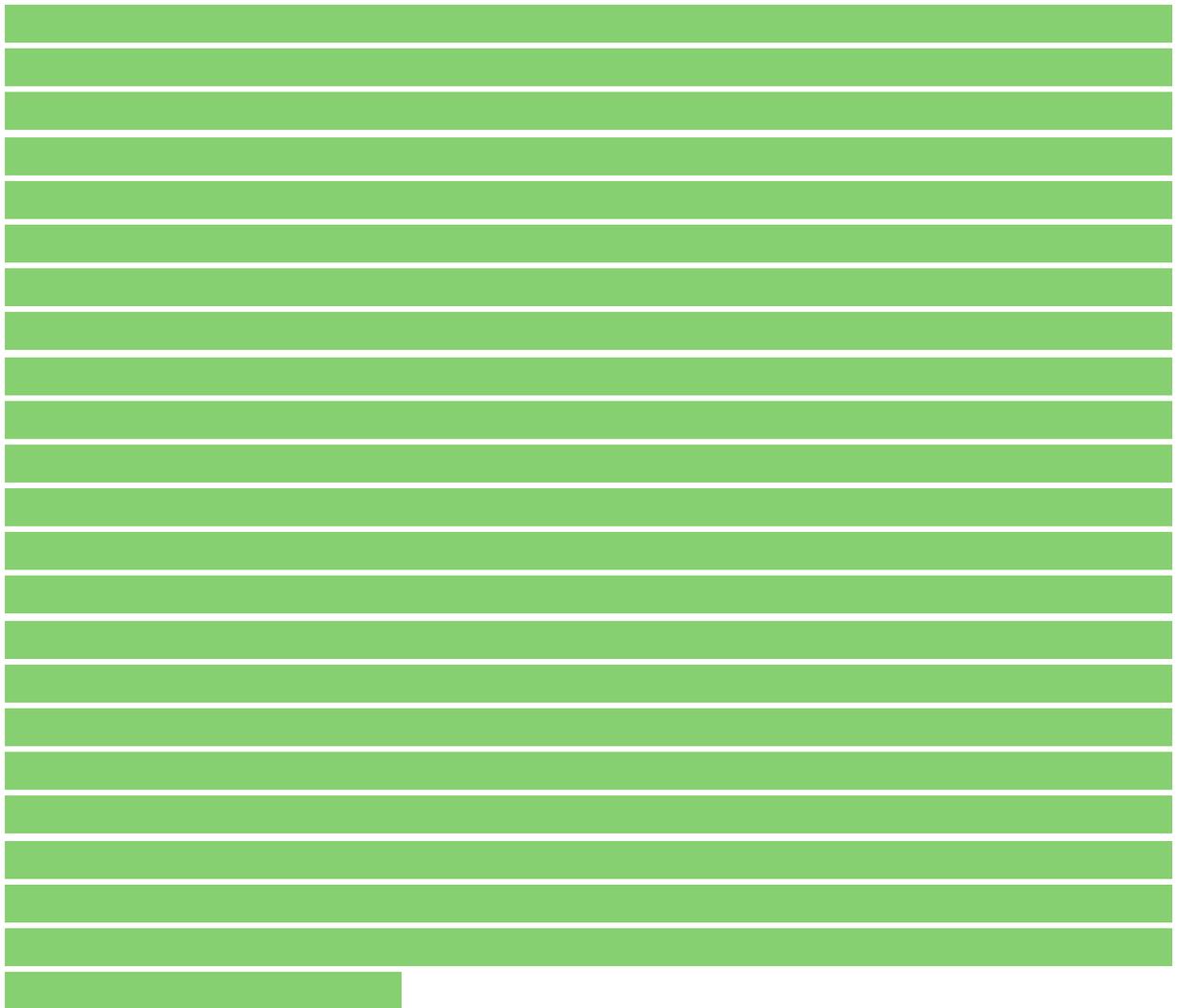
O10-5  
cont.

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

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**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.

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### **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

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## 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.

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### **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

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### **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.

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## 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.

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## **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

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### **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

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# 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](mailto: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]

---

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[eircomment@ucsc.edu](mailto: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

---

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[eircomment@ucsc.edu](mailto: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

---

eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



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]

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

**From:** "David kk" <davidkk9897@gmail.com>  
**To:** [alinajack45@gmail.com](mailto: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](mailto: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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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



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 18-1  
I 18-2

--  
**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](http://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!

-----  
eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<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](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I9-1



Erika Carpenter <escarpent@ucsc.edu>

Letter  
I10

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## [eircomment] UCSC 2012 Student Expansion Plans

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**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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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto: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](mailto:eircomment@ucsc.edu) <eircomment@ucsc.edu>  
Reply-To: matty lums <lumsemail@yahoo.com>  
To: eircomment@ucsc.edu

Sat, Jan 23, 2021 at 6:23 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.

I12-1

Sent from my iPhone

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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter  
114

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## [eircomment] UCSC LRDP DEIR review notes

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**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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](mailto: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.*

---

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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<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 &lt;escarpent

Letter  
I18

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**[eircomment] LRDP EIR Comments**

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**Alex Krohn** <arkrohn@ucsc.edu>

Wed, Feb 3, 2021 at 9:29 AM

To: eircomment@ucsc.edu

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](#)

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eircomment mailing list  
[eircomment@ucsc.edu](mailto: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](mailto: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](mailto: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](mailto:Marymac1918@gmail.com)

Sent from my iPad

eircomment mailing list  
[eircomment@ucsc.edu](mailto: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](mailto:eircomment@ucsc.edu)

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpenc>

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/>

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I21-1



Erika Carpenter <escarpent@ucsc.edu>

Letter  
122

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## [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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto: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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter &lt;escarpent@ucsc.edu&gt;

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

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eircomment mailing list

[eircomment@ucsc.edu](mailto: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](mailto: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](mailto: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/](http://people.ucsc.edu/~adammb/)



Erika Carpenter &lt;escarpent@ucsc.edu&gt;

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.

I28-1

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.

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](mailto:eircomment@ucsc.edu)

<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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I28-1  
cont.



Erika Carpenter <escarpent

Letter  
129

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## [eircomment] Comments on the UCSC EIR

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**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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](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**

change become more severe, it will be essential to incorporate the role of riparian habitats.

I29-30  
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.**

I29-33  
cont.

### **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.*

I29-34

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.**

I29-35

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:*

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**

I29-36  
cont.

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.

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.

I29-41  
cont.

### **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**

I29-43  
cont.

I29-44

**-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

I29-44  
cont.

I29-45

I29-46

I29-47

environment for the next 20 years be realistic unless it is based on current data collected in the field?

I29-47  
cont.

- 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  
University of California, Santa Cruz  
[people.ucsc.edu/mfmassoud](http://people.ucsc.edu/mfmassoud)



Erika Carpenter <escarpent

Letter  
I31

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## [eircomment] comments on 2021 LRDP & EIR

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**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  
[holl-lab.com](http://holl-lab.com)

[Learn more about my new "Primer of Ecological Restoration" and use the "PRIMER" discount code to save 20%](#)

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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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.<sup>1</sup> 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

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<sup>1</sup> 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 <sup>1</sup>	Percent additional space needed for 2021 LRDP <sup>2</sup>
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

<sup>1</sup>This 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.

<sup>2</sup>This 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).<sup>2</sup> 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

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<sup>2</sup> 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  
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**[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.

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Sincerely,  
Karen Stout

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Erika Carpenter <escarpent@ucsc.edu>

Letter  
134

**[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  
Professor  
Environmental Studies Department  
University of California  
Santa Cruz, CA 95064  
Lab Web Page: <http://wildlife.ucsc.edu>  
Puma Project: <http://santacruzpumas.org>  
African Lion Project: <http://africanlions.org>

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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](#)  
[burrill.haley@ku.edu](mailto:burrill.haley@ku.edu)  
*she/her*

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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

Gregory S. Gilbert, Ph.D.  
Professor of Environmental Studies  
University of California Santa Cruz  
[greggilbertlab.sites.ucsc.edu](http://greggilbertlab.sites.ucsc.edu)

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Erika Carpenter <escarpent

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

--  
Alex Krohn  
Assistant Director  
Kenneth S. Norris Center for Natural History  
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he/him/his

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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

Andrew S. Mathews  
Associate Professor  
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Santa Cruz, CA 95064  
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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 &lt;escarpent@ucsc.edu&gt;

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  
Professor, Department of Ecology and Evolutionary Biology  
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 &lt;escarpent@ucsc.edu&gt;

Letter  
141

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**[eircomment] LRDP EIR Comments**

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**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](mailto: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).<sup>1</sup> 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.<sup>2</sup> 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).)*

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<sup>1</sup> 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).

<sup>2</sup> 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.**”<sup>3</sup> 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.”<sup>4</sup> 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.*<sup>5</sup>

*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.*<sup>6</sup> In short, land use planning and project design is an important determinant of wildfire ignition risk and the scale of wildfire spread.<sup>7</sup> **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

<sup>3</sup> 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](https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf) (“CNRA Final Statement”).

<sup>4</sup> Ibid.

<sup>5</sup> 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))

<sup>6</sup> 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.

<sup>7</sup> 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.*<sup>8</sup>

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,”<sup>9</sup>

**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.

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<sup>8</sup> Note 1, op cit.

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

I41-4  
cont.

“UCSC Wildland Fire Response Procedures”<sup>10</sup> 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.<sup>11</sup>

And

<sup>10</sup> “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>

<sup>11</sup> 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.<sup>12</sup>

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.

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<sup>12</sup> Draft DEIR for 2021 LRDP, Impact 3.9-4., p. 25.



Erika Carpenter &lt;escarpent

Letter  
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**[eircomment] LRDP EIR Comments**

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**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

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**"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](mailto: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?<sup>1</sup> 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

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<sup>1</sup> 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 &lt;escarpent

Letter  
147

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**[eircomment] LRDP EIR Comments**

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**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

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Elaine A. Sullivan, Ph.D.  
UC Santa Cruz  
Associate Professor, History  
<https://constructingthesacred.org>  
<https://people.ucsc.edu/easulliv>  
Affiliated Faculty, Anthropology  
831-459-3109

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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

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Erika Carpenter &lt;escarpent@ucsc.edu&gt;

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](mailto:mtbrown@ucsc.edu)).

I49-1

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Erika Carpenter &lt;escarpent@ucsc.edu&gt;

Letter  
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**[eircomment] LRDP EIR Comments**

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**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](mailto: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. ~*

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 **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 &lt;escarpent@ucsc.edu&gt;

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 &lt;clarive@ucsc.edu&gt;

Cc: Chancellor's Office &lt;chancellor@ucsc.edu&gt;

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

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Erika Carpenter <escarpent@ucsc.edu>

Letter 152

[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  
[jag@ucsc.edu](mailto:jag@ucsc.edu)

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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  
Coastal Biology Building  
[130 McAllister Way](#)  
UC Santa Cruz  
Santa Cruz, CA 95060  
831-459-3446  
<http://kay.eeb.ucsc.edu/>

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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

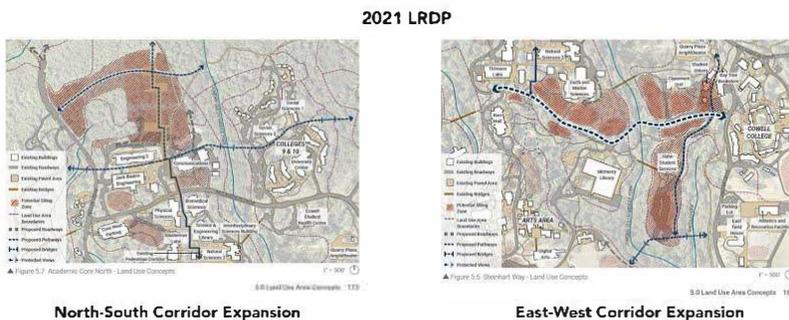
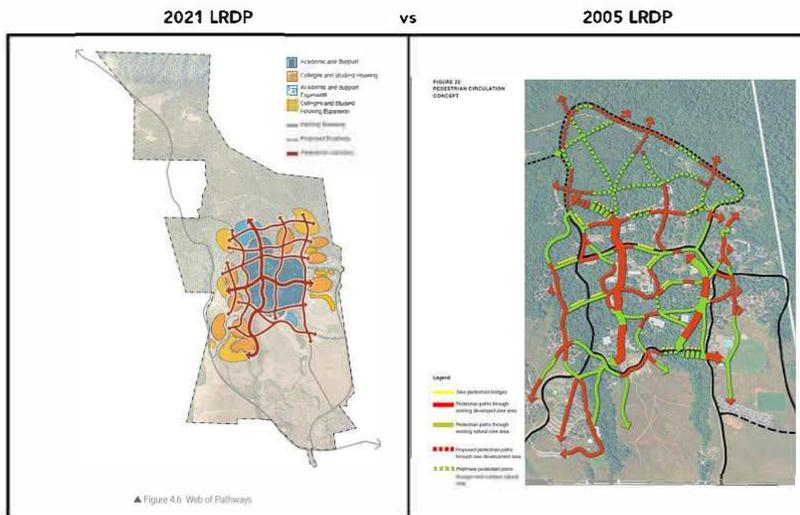
- While the prior 2005 LRDP had a special faculty-driven process integrated with its physical plan that proposed three enrollment scenarios based on faculty and student academic needs, the 2021 LRDP had no such academic process despite a misleading reference to former EVC Tromp's 2018 academic plan.
- 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

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[eircomment@ucsc.edu](mailto: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

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter  
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**[eircomment] Letter to Erika Carpenter on UCSC 2021 LRDP and DEIR**

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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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](mailto:bashtian@ucsc.edu)

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<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

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<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](mailto: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

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<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 8<sup>th</sup>, 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

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<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

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Erika Carpenter <escarpent@ucsc.edu>

Letter  
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**[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



I62-1

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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

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter  
164

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## [eircomment] comment on UCSC 2021 Long Range Development Plan and Environmental Impact Report

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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

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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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 8<sup>th</sup>, 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

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<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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mailing

list



Erika Carpenter <escarpent@ucsc.edu>

Letter  
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## [eircomment] UCSC growth

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**eduardo izquierdo** <chateauedo@cruzio.com>

Mon, Mar 8, 2021 at 1:58 PM

To: eircomment@ucsc.edu

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

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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

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<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](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent

Letter  
170

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## [eircomment] UCSC natural reserve

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'Jacob Ferrall' via [eircomment@ucsc.edu](mailto: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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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 8<sup>th</sup>, 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

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## [eircomment] Please read my petition

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**Litzia Galvan** <liigalva@ucsc.edu>  
To: eircomment@ucsc.edu

Mon, Mar 8, 2021 at 4:51 PM

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **UCSC LRDP comment letter template (1).docx**  
8K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Litzia Galvan

Date: March 8<sup>th</sup>, 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](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



# **EIR Proposal: Light Pollution in UC Santa Cruz**

By: Hunter M. Giese  
UCSC Email: [hgiese@ucsc.edu](mailto:hgiese@ucsc.edu)

# About Me

3rd Year Transfer – UCSC dream university!

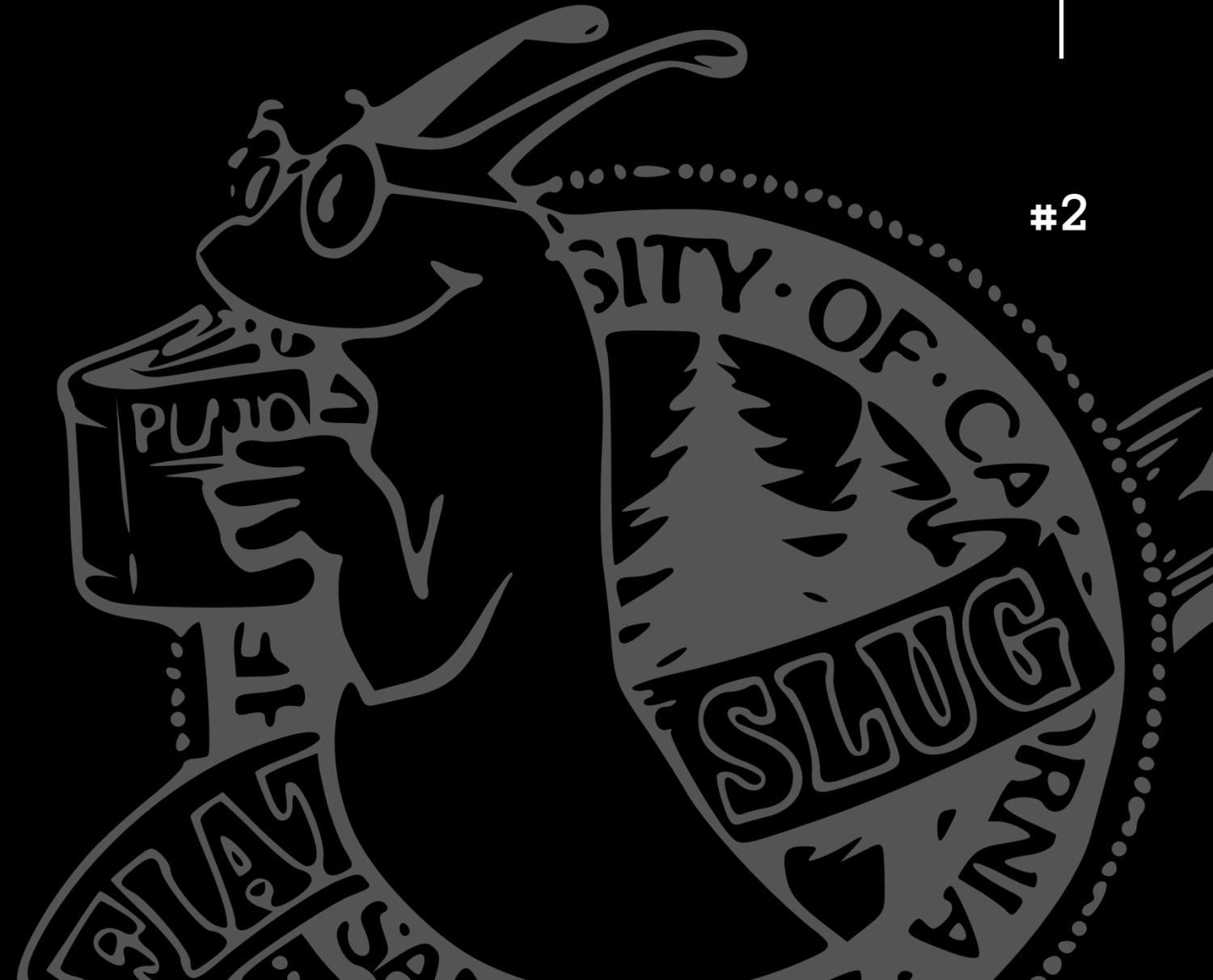
BME and likely going into Environmental Studies PhD

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](mailto: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 low as 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

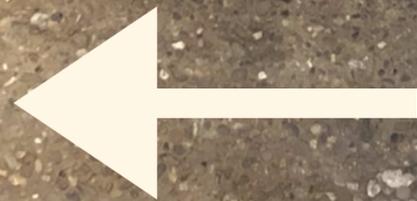


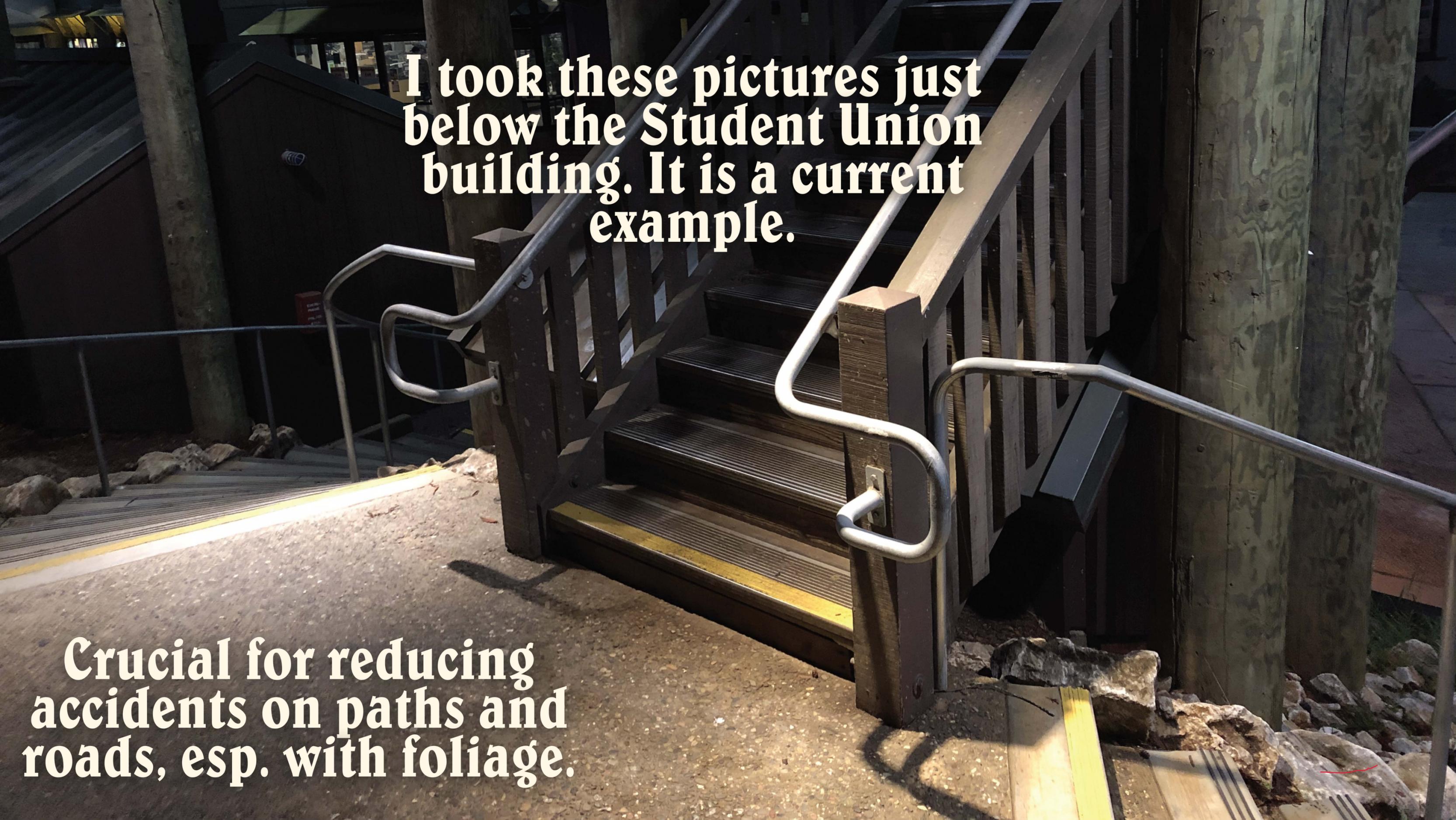
**Here's an Example on Campus**

**Lower Kelvin  
(likely 2700k)**

**Higher Kelvin  
(likely 3000k+)**

**improved visibility on  
ground, with less glare  
from blue light.**

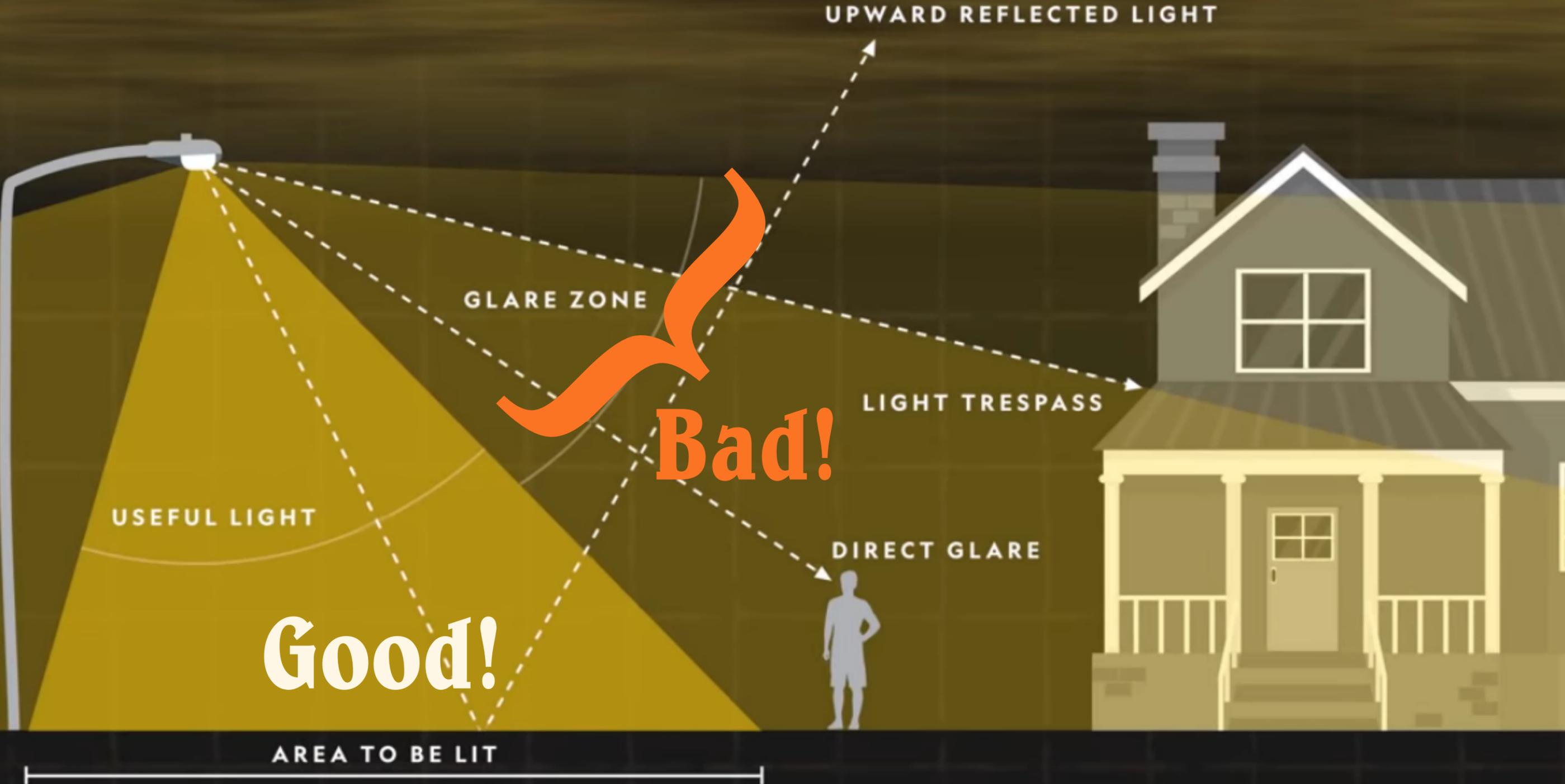




**I took these pictures just below the Student Union building. It is a current example.**

**Crucial for reducing accidents on paths and roads, esp. with foliage.**

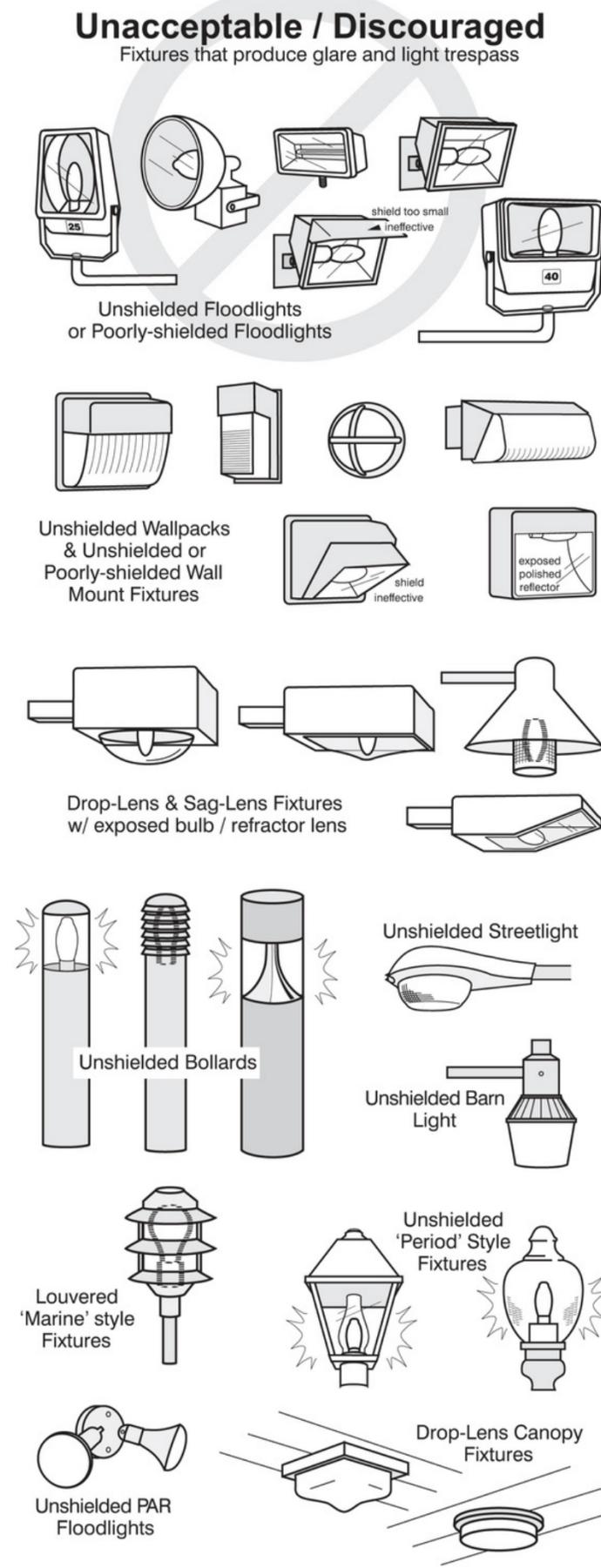
# SKY GLOW



# 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

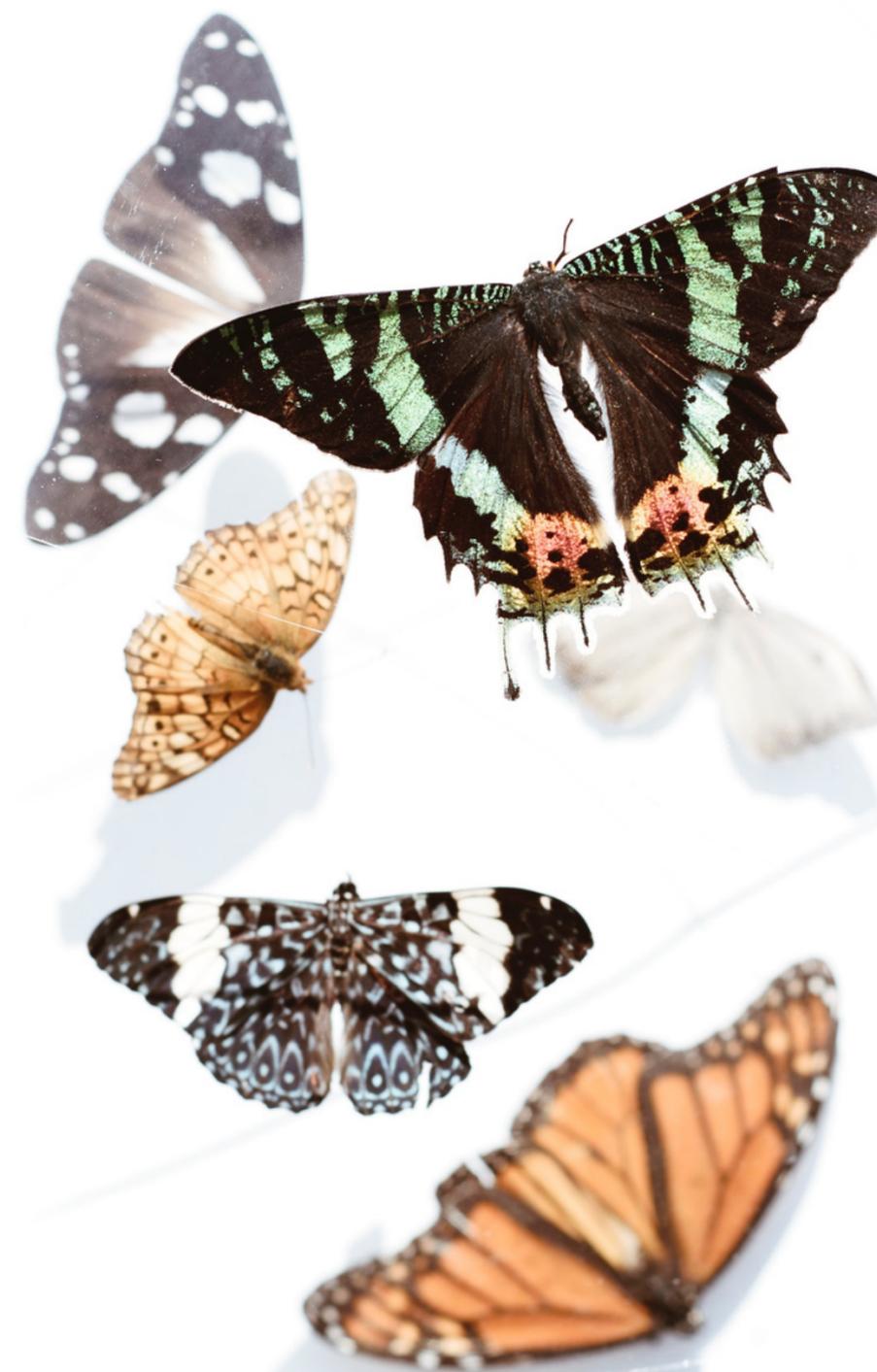
Biology & Conservation

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](mailto: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](mailto: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 8<sup>th</sup>, 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](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

mailing

list



Erika Carpenter &lt;escarpenc

Letter  
175

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**[eircomment] LRDP EIR Comments**

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**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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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](mailto: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.

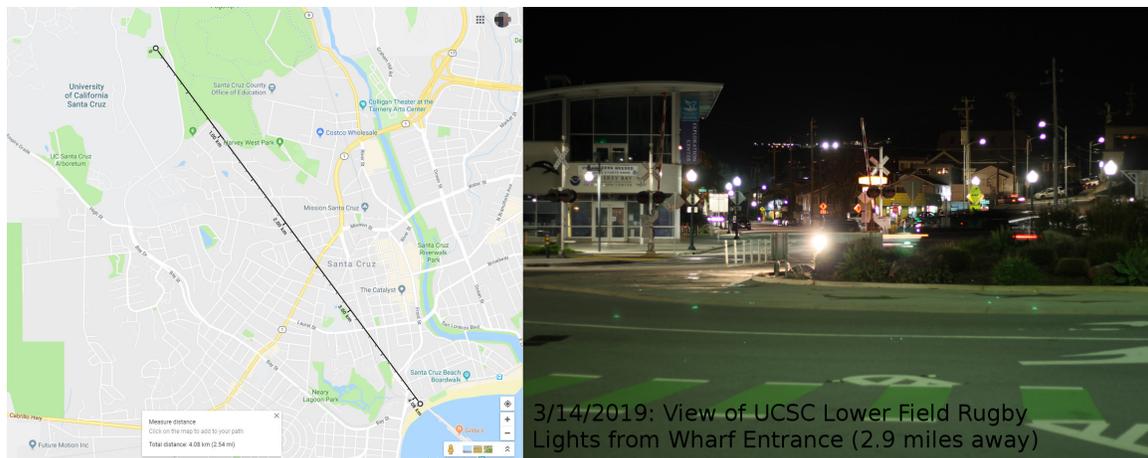
Gillian Greensite  
gilliangreensite@gmail.com

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**

<b>Rental Type</b>	<b>Rent Range</b>	<b>Average</b>	<b>Number of Listings</b>
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).

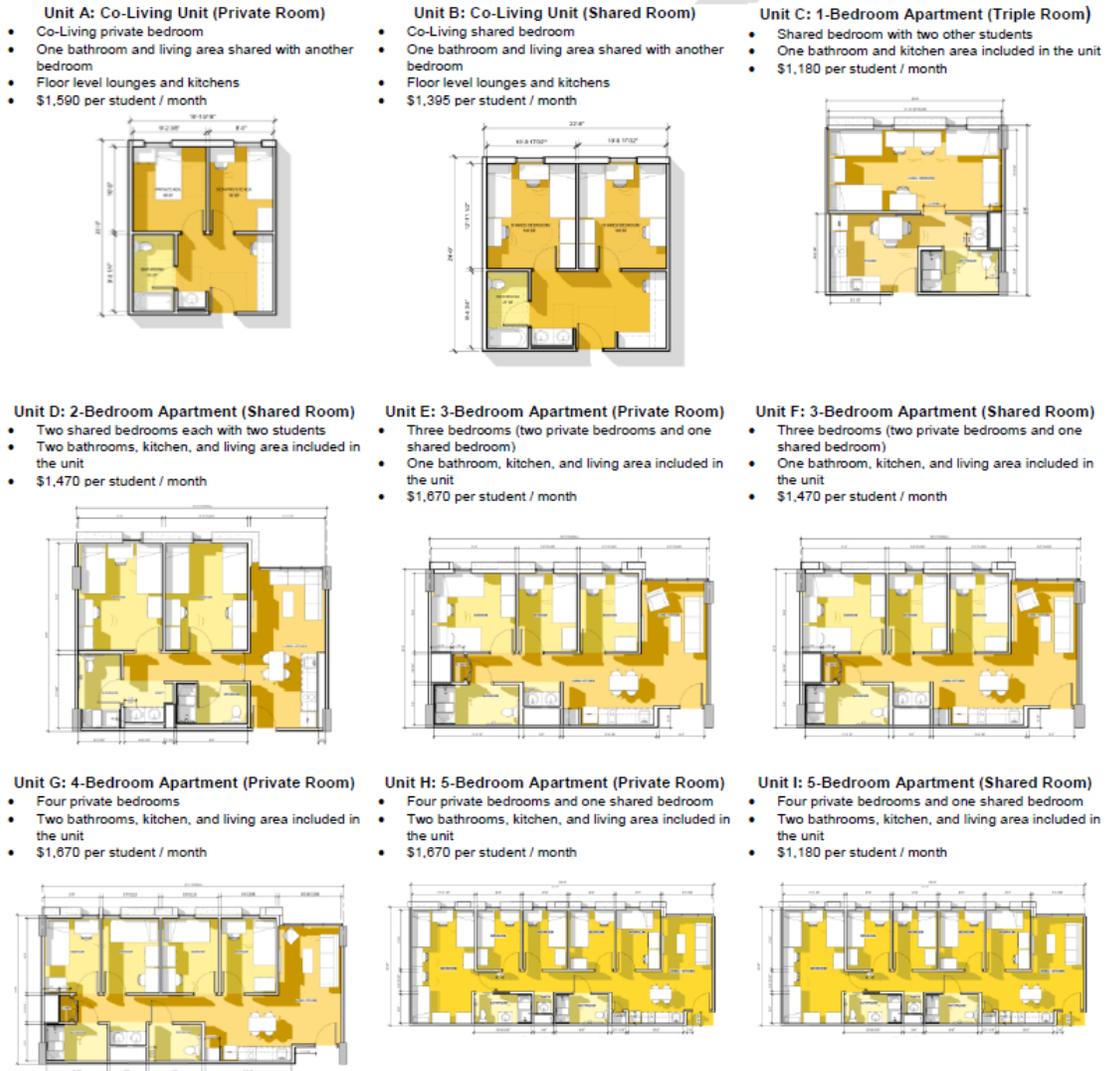


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students

From: **Chancellor Cynthia Larive** <[chancelloroffice@ucsc.edu](mailto: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

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## 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).

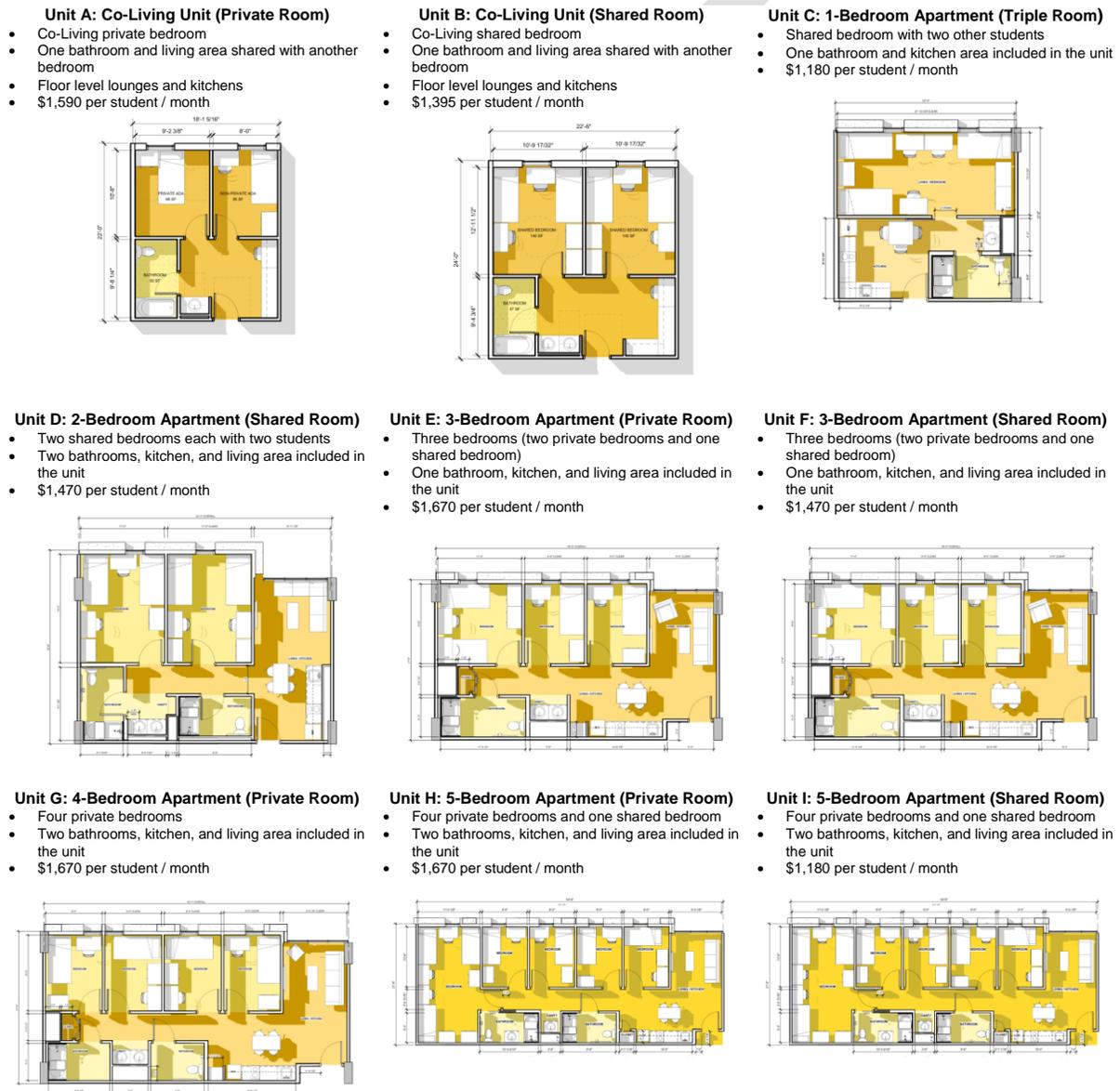
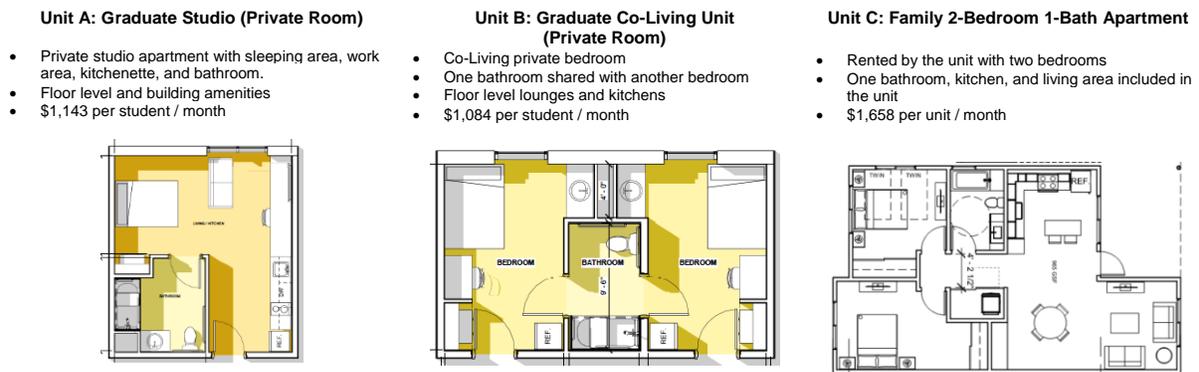


Figure 1: Unit Type Descriptions Shown to Single Undergraduate Students



**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
<b>Student Housing West FSH</b>			139								139
<b>Student Housing West Undergrad</b>					1,754	978					2,732
<b>Student Housing West Grad</b>					226						226
Total Existing:	9,283										
Net Change:	0	142	-57	35	1,392	1,065	-78	-78	-78	0	
<b>Total Available Beds (Existing + Net Change):</b>	<b>9,283</b>	<b>9,425</b>	<b>9,368</b>	<b>9,403</b>	<b>10,795</b>	<b>11,860</b>	<b>11,782</b>	<b>11,704</b>	<b>11,626</b>	<b>11,626</b>	<b>11,626</b>
<b>Total On-Campus Single Undergraduate Beds:</b>	<b>8,958</b>	<b>9,109</b>	<b>9,109</b>	<b>9,144</b>	<b>10,310</b>	<b>11,375</b>	<b>11,297</b>	<b>11,219</b>	<b>11,141</b>	<b>11,141</b>	
<b>Total On-Campus Single Graduate Beds:</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	<b>308</b>	
<b>Total On-Campus Family Student Housing Units:</b>	<b>196</b>	<b>196</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	<b>139</b>	

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 in 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
<b>Total</b>	<b>17,928</b>	<b>8,906</b>	<b>50%</b>	<b>71%</b>	<b>12,643</b>	<b>310</b>

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 <sup>1</sup>	(315)	Supply Modifications <sup>1</sup>	0	Supply Modifications <sup>1</sup>	(196)
<b>Revised Current Supply</b>	<b>8,643</b>	<b>Revised Current Supply</b>	<b>82</b>	<b>Revised Current Supply</b>	<b>0</b>
Student Housing West	2,732	Student Housing West	226	Student Housing West	139
<b>Current Supply + New Beds</b>	<b>11,375</b>	<b>Current Supply + New Beds</b>	<b>308</b>	<b>Current Supply + New Beds</b>	<b>139</b>
Total Demand	11,477	Total Demand	1,166	Total Demand	310
<b>Remaining Unmet Demand</b>	<b>102</b>	<b>Remaining Unmet Demand</b>	<b>858</b>	<b>Remaining Unmet Demand</b>	<b>171</b>

**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](mailto:brett@ucsc.edu)

<http://arboretum.ucsc.edu/visit/garden/native-plant-program/wild-life-corridor.html>



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eircomment mailing list

[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)

<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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.

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178-4

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.

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178-5

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.

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178-6

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.

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178-7

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.

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).

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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.

I  
178-9

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](mailto:goth@ucsc.edu)



Erika Carpenter <escarpent

Letter  
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**[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 8<sup>th</sup>, 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

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](mailto: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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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I81-1



Erika Carpenter &lt;escarpent@ucsc.edu&gt;

Letter  
182

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**[eircomment] LRDP EIR comments**

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**Christopher Lay** <cml@ucsc.edu>

Mon, Mar 8, 2021 at 2:03 PM

To: eircomment@ucsc.edu

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](mailto:cml@ucsc.edu)  
Web: <http://norriscenter.ucsc.edu/>

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eircomment mailing list[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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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 8<sup>th</sup>, 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  
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**[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 8<sup>th</sup>, 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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Erika Carpenter <escarpent

Letter  
184

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## [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

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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

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## [eircomment] LRDP public comment

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**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

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 **UCSC LRDP comment letter template.docx.pdf**  
44K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Jack Mazza

Date: March 8<sup>th</sup>, 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](mailto:meekshoney@gmail.com), my old account [alayne@meekshoney.com](mailto:alayne@meekshoney.com) no longer exists. Thank you!

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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter  
188

**[eircomment] adding housing for more students?**

'melissa' via [eircomment@ucsc.edu](mailto:eircomment@ucsc.edu) <[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)>

Mon, Mar 8, 2021 at 7:18 AM

Reply-To: melissa <[twotonekisser@yahoo.com](mailto:twotonekisser@yahoo.com)>

To: "eircomment@ucsc.edu" <[eircomment@ucsc.edu](mailto: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

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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 8<sup>th</sup>, 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

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

I90-1



Erika Carpenter <escarpent

Letter  
191

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## [eircomment] LRDP Comment

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**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

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[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **UCSC LRDP comment letter.docx**  
17K

To: Erika Carpenter, Senior Environmental Planner, Physical Planning, Development, and Operations

From: Veronica Ness

Date: March 8<sup>th</sup>, 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 4<sup>th</sup> 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

I91-1

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 &lt;escarpent@ucsc.edu&gt;

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 8<sup>th</sup>, 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

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[eircomment@ucsc.edu](mailto: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 8<sup>th</sup>, 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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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

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<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  
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Ajay Shenoy  
Assistant Professor, Economics  
University of California, Santa Cruz  
<http://people.ucsc.edu/~azshenoy/>  
Twitter: @AjaycencyMatrix

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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 8<sup>th</sup>, 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

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<https://lists.ucsc.edu/mailman/listinfo/eircomment>

mailing

list



Erika Carpenter <escarpent

Letter  
197

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**[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

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eircomment mailing list  
[eircomment@ucsc.edu](mailto: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 8<sup>th</sup>, 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](mailto:trombleyk@gmail.com)  
925.871.9749

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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.*

I99-2

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?*
- *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**

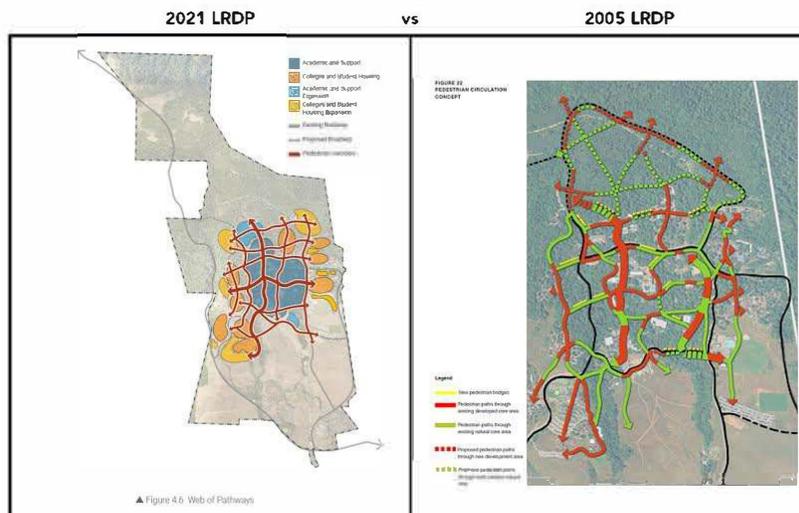
Please address these impacts for EIR section 3.16 Transportation, section 3.11 Land Use and Planning, section 3.1 Aesthetics, and section 3.18 Wildfire

- 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.

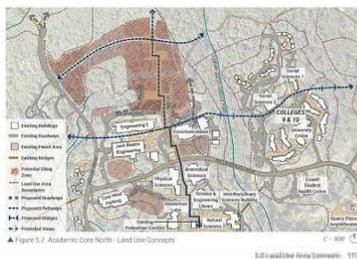
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I99-10

I99-11



2021 LRDP



North-South Corridor Expansion

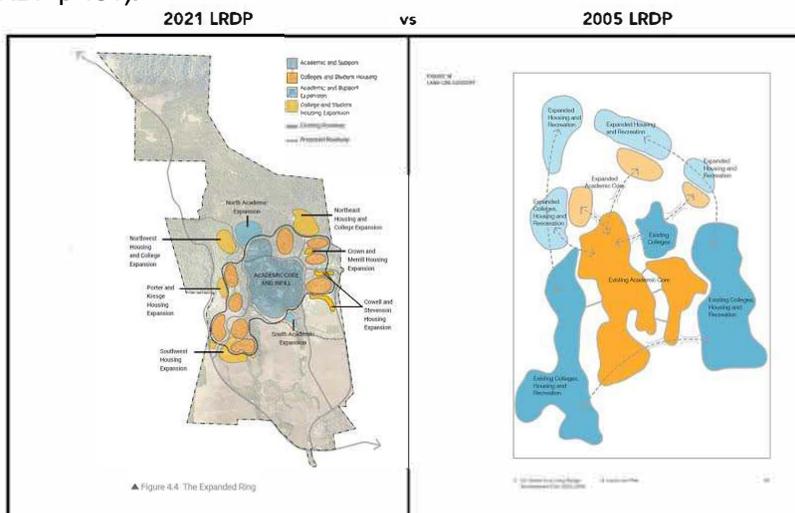


East-West Corridor Expansion

**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. I 99-12
- 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"? I 99-13
- The 2021 LRDP gives UCSC the ability to build roads through "Campus Natural Reserves" and "Natural Space" (2021 LRDP p 122-123). I 99-14
- 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. I 99-15
- 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). I 99-16



**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). I 99-17
- It is a mistake for UCSC to segregate transfer students, who should be welcomed more, not less, into human-scale college communities. I 99-18
- 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. I 99-19

**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

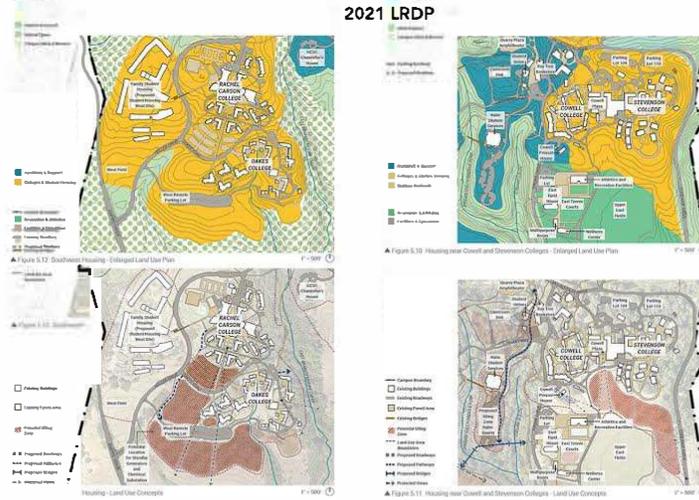
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- The 2021 LRDP does not specify how many students will live in colleges versus unaffiliated apartments. Nor does it clarify the square-feet needed for each.
- When we examine the overall square feet given, the areas zoned for housing, and compare 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

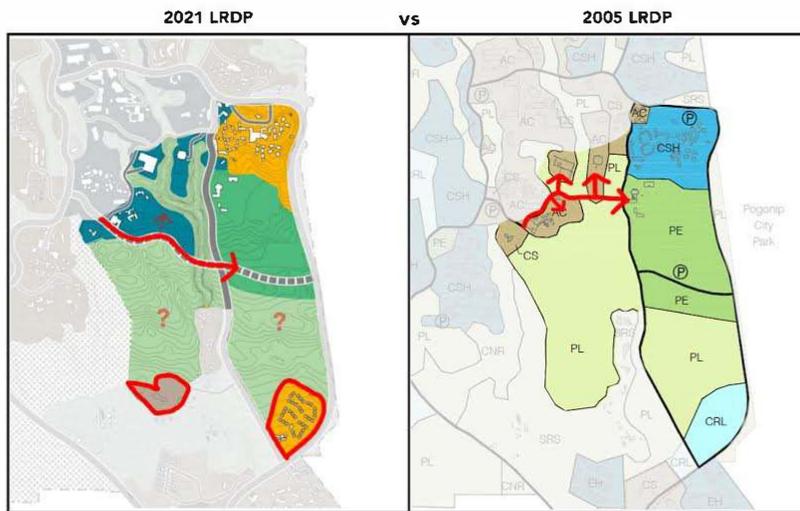
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- Context: Why was UCSC built in the forest and not the meadows? Before UCSC was a campus, its previous owners clear-cut the land. UCSC's landscape architect decided that instead of exposing buildings in the meadows with a conventional lawn and centralized 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

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<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](mailto:eircomment@ucsc.edu)  
<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter  
I101

## [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

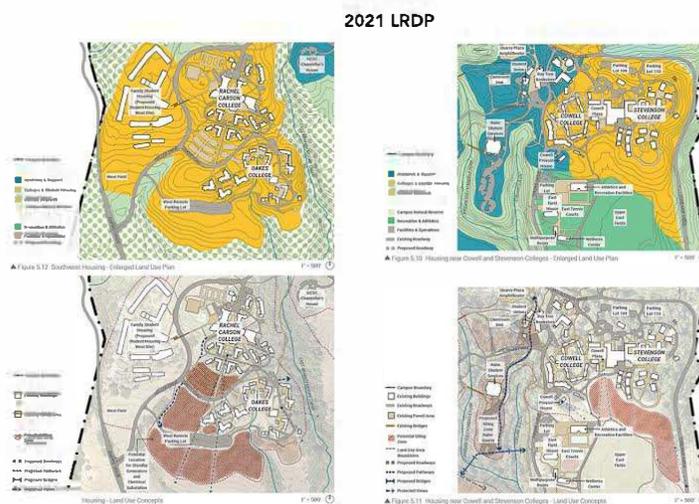


- The 2021 LRDP says there will be two new pairs of colleges but their tenants will only be frosh and sophomores who enter from high school. Upper-division and transfer students will be separated to live in unaffiliated apartments (2021 LRDP p 100).
- It is a mistake for UCSC to segregate transfer students, 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).

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.

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eircomment mailing list

[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)

<https://lists.ucsc.edu/mailman/listinfo/eircomment>



Erika Carpenter <escarpent@ucsc.edu>

Letter  
1102

**[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.

I1102-1

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.

I1102-2

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.

I1102-3

Thank you for your time,



**Zoe Arkin**

SEC Organizer | Enviroslug  
Environmental Studies and Politics B.A. '23  
University of California, Santa Cruz  
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Letter  
I103

Erika Carpenter &lt;escarpen@u

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**[eircomment] LRDP EIR Comments**

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**Niko Kaplanis** <nkaplanis@ucsc.edu>

Tue, Mar 9, 2021 at 10:36 AM

Reply-To: nkaplanis@ucsc.edu

To: eircomment@ucsc.edu

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>

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eircomment mailing list[eircomment@ucsc.edu](mailto:eircomment@ucsc.edu)<https://lists.ucsc.edu/mailman/listinfo/eircomment>

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 **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

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**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

PH1-50  
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

PH1-53

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](http://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.

PH1-54  
cont.

PH1-55

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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.

13  
14  
15   
16



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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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  
cont.

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.

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.

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

PH2-25  
cont.

PH2-26

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](http://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](http://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  
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CERTIFICATION

I, LISA M. McMILLAN, a Certified Shorthand Reporter, License No. 10383, in and for the State of California, do hereby certify:

That said proceedings were taken down by me in shorthand at the time and place therein named and were thereafter transcribed by means of computer-aided transcription; and the same is a true, correct and complete transcript of said proceedings.

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