

5 OTHER CEQA SECTIONS

Section 15126 of the California Environmental Quality Act Guidelines (State CEQA Guidelines) requires that in addition to an evaluation of a project's significant impacts and identification of mitigation measures to mitigate significant impacts as well as an analysis of alternatives (all of which are analyzed in other sections of this EIR), an environmental impact report (EIR) must also identify (1) significant environmental impacts that cannot be avoided if the project is implemented, (2) significant irreversible environmental changes that would result from implementation of the project, and (3) growth-inducing impacts of the project. Although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under "Growth-Inducing Impacts," below.

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(c) of the State CEQA Guidelines states that an EIR shall "[d]escribe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance...." Accordingly, this section provides a summary of significant environmental impacts of the 2021 LRDP that cannot be mitigated to a less-than-significant level. Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures," provides a description of the potential environmental impacts of the project and recommends various mitigation measures to reduce impacts to the extent feasible. Chapter 4, "Cumulative Impacts," determines whether the incremental effects of the project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. After implementation of the recommended mitigation measures, most of the impacts associated with campus development and growth under the 2021 LRDP would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available, or the mitigation measures available are not enough to reduce the project's impacts to a less-than-significant level. Note, this is only a summary of those impacts; it is important to review the discussions in Chapters 3 and 4 of this EIR to understand the full context of the impact conclusion following mitigation.

Implementation of the 2021 LRDP would result in the following significant and unavoidable environmental impacts following implementation of feasible mitigation measures:

- ▶ Impact 3.3-2: Operational Emissions of Criteria Air Pollutants and Precursors
- ▶ Impact 3.3-3: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan
- ▶ Impact 3.4-4: Impacts to Historical Resources
- ▶ Impact 3.12-1: Generate Substantial Temporary Construction Noise
- ▶ Impact 3.13-1: Directly or Indirectly Induce Substantial Unplanned Population Growth and Housing Demand
- ▶ Impact 3.17-1: Impacts on Water Supply
- ▶ Cumulative impacts related to air quality, historical resources, noise, population and housing, and water supply

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Section 15126.2(d) states:

"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result

from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Generally, a project would result in significant irreversible environmental changes if:

- ▶ the primary and secondary impacts would generally commit future generations to similar uses,
- ▶ irreversible damage could result from environmental accidents associated with the project,
- ▶ the project would involve a large commitment of nonrenewable resources, or
- ▶ the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the 2021 LRDP would result in the continued commitment of UC Santa Cruz (main residential campus and Westside Research Park) to additional institutional uses (including the development of academic facilities, support space and facilities, and housing for students, faculty, and staff), irreversibly removing portions of the plan area from any other potential uses. The UC’s ownership of the main residential campus and Westside Research Park represents a long-term commitment of these lands to an institutional use. Restoration of either site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Additional irreversible commitments to future use include those related to new housing or academic/administrative and support space development. Development of undeveloped lands would constitute an irreversible change of use on these lands because once buildings or pavement are constructed, prior open space related uses, including in support of biological resources and, to a minor degree, agriculture, would be committed to academic support. Implementation of the 2021 LRDP would result in the loss of approximately 2 acres of existing farmland within the lower portion of the main residential campus that are associated with the UC Santa Cruz Farm. As noted in Section 3.2, “Agriculture and Forestry Resources,” this acreage would not represent a significant adverse change in agricultural opportunities. In addition, while implementation of the 2021 LRDP would result in the removal of forested land, some tree cover would be maintained and the potentially affected acreage, which is not designated for forestry purposes, would not represent a significant adverse change in forestry resources in the region. For biological resources, in addition to the loss of the aforementioned agricultural lands, development under the 2021 LRDP could result in the loss of approximately 220 acres of natural vegetation communities/habitat that may be used by wildlife species for foraging. As discussed in Section 3.5, “Biological Resources,” UC Santa Cruz would implement mitigation measures to reduce impacts to these sensitive biological communities, as well as to enhance or protect appropriate compensatory habitat elsewhere within the campus lands. As noted in Sections 3.9, “Hazards and Hazardous Materials,” and 3.18, “Wildfire,” implementation of the 2021 LRDP would not increase the risk of environmental accidents in the area/region. Further, as evidenced by the August 2020 wildfires that occurred in Santa Cruz County and where firebreaks were constructed, the land cover that exists on campus and would be maintained under the 2021 LRDP constitutes a good opportunity for controlling risks to other structures in the County and City.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would be minimized as a result of continued and expanded implementation of the UC Sustainable Practices Policy, as well as the UC Santa Cruz energy efficiency and conservation programs (e.g., Carbon Fund, Green Labs Certification Program, Green Office Program, Student Sustainability Advisors, Enviroslug, and the People of Color Sustainability Collective) identified in Sections 3.6, “Energy” and 3.8, “Greenhouse Gas Emissions and Climate Change.” As such, implementation of the 2021 LRDP would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of energy resources as stated in Section 3.6, “Energy.” As discussed in Section 3.17, “Utilities and Service Systems,” UC Santa Cruz, partially through 2021 LRDP implementation, would implement water conservation measures, including water-efficient fixtures, water recycling (where feasible), the use of drought-tolerant landscaping, turf removal, and public information campaigns, which would result in the efficient use of water.

With respect to operational activities, compliance with and exceedance of applicable building codes, as well as continued implementation of UC Santa Cruz energy efficiency and conservation programs (refer to Section 3.8, “Greenhouse Gas Emissions and Climate Change,”) along with project-specific mitigation measures or project

requirements, would ensure that natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, which would further reduce the campus's reliance upon nonrenewable natural resources. Nonetheless, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the 2021 LRDP as campus enrollment, staffing, and structures are generally expected to increase.

5.3 GROWTH-INDUCING IMPACTS

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (Public Resources Code Section 21100[b][5]). Specifically, the State CEQA Guidelines Section 15126.2[e] states that the EIR shall discuss the ways in which the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this analysis are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, the EIR should discuss the characteristics of the project that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▶ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- ▶ removal of an obstacle to additional growth and development, such as a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth, although recently (2018) the Initial Study checklist questions related to population growth were modified to query whether a project would cause substantial unplanned population growth (the word "unplanned" was added) (see CEQA Guidelines, Appendix G, XIV). This EIR evaluates whether the project would foster (i.e., promote or encourage) growth in economic activity, population, or housing, including whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with the State CEQA Guidelines (Section 15126.2[e]).

Environmental effects resulting from induced growth fit the definition of "indirect" effects in the State CEQA Guidelines (Section 15358[a][2]). These indirect or secondary effects of growth, which although caused by a project, occur later in time or farther removed from the project site and may be significant. CEQA requires analysis of reasonably foreseeable environmental effects, but does not require that the EIR speculate about the precise location and site-specific characteristics of indirect effects caused by induced growth. Potential secondary effects of growth could include environmental impacts that are the result of growth fostered by the project, such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased VMT and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat.

5.3.1 Growth-Inducing Impacts of the 2021 LRDP

This analysis examines the following potential growth-inducing impacts related to implementation of the 2021 LRDP:

- 1) foster population growth;
- 2) foster the construction of new housing in the surrounding environment;

- 3) foster economic growth; and
- 4) remove obstacles to growth by expanding facility capacity, or infrastructure.

Forecasts concerning growth in Santa Cruz County provide a wide range of predictions. Per a recent report published by the California Department of Finance (DOF), the county of Santa Cruz (County) is anticipated to experience a minor decrease in population between 2020 and 2040 (117 fewer residents or 0.04 percent compared to DOF's 2020 estimate of 273,999 residents) (DOF 2020), although countywide population would have minor fluctuations during that period, reaching a peak projected population of 276,168 in 2033. Other growth projections identify an increase in countywide population. The Association of Monterey Bay Area Governments (AMBAG) identifies a countywide increase of 25,734 residents or 9 percent over the same period (AMBAG 2018). Per AMBAG's 2018 Regional Growth Forecast, approximately 8,000 of the projected increase in countywide population between 2020 and 2040 is associated with UC Santa Cruz. Based on projected increases in development within the County, including those listed in Table 4-1 of Chapter 4, "Cumulative Impacts," the AMBAG projections may more accurately reflect growth expectations. Further, the AMBAG projections are used to develop various regional planning documents, including the sustainable community strategy required by SB 375 (Chapter 4.2 of CEQA) to provide for more efficient land use patterns that facilitate a reduction in per capita greenhouse gases over time.

As noted in Section 3.13, "Population and Housing," development under the 2021 LRDP would allow for increased campus population, thereby increasing local student population, as well as the number of faculty/staff on-campus on a daily basis. The 2005 LRDP accommodated up to 19,500 students (FTE), with 18,518 FTE students enrolled in the 2018-2019 academic year. The 2021 LRDP would accommodate up to 28,000 students (FTE), an increase of approximately 9,500 students over existing levels and 8,500 students over previously planned totals in the 2005 LRDP. While there would be an increase in enrollment, the 2021 LRDP provides for development of more on-campus student beds (8,500 beds as part of the 2021 LRDP), which would (taking into consideration the planned-but-not-operational student housing projects, which would also provide additional student beds--a net increase of 2,175 student beds, as discussed in Chapter 4, "Cumulative Impacts") reduce the need for students to seek off-campus housing compared with existing conditions. Therefore, the 2021 LRDP would not foster student population growth at off-campus locations and within local jurisdictions.

With respect to employment growth, the 2021 LRDP would provide new employment opportunities for up to 2,200 FTE faculty/staff and 350 Non-UC employees, which would result in additional housing needs at off-campus locations for employees. Although some of the new employees would be housed in new on-campus housing, the majority of new employees (about 1,992 employees) would seek off-campus housing. The combined (students/employees/dependents, etc.) growth associated with the 2021 LRDP would be 12,830 (see Table 2-1 in the Project Description) and would exceed the 8,000-person AMBAG forecast for the university. As evaluated in Section 3.13, "Population and Housing," under Impact 3.13-1, while the projected demand for off-campus housing under the 2021 LRDP is less than the combined level of available housing and housing construction planned in nearby communities, other considerations, including the recent loss of housing within the county as a result of the CZU Lightning Complex Fire and rental/vacation/second homes that may be reflected as unoccupied in housing statistics, and strong evidence of a tight rental and for-sale housing market, additional housing may be induced as a result of on-campus growth under the 2021 LRDP. This demand for off-campus housing would occur incrementally over the 20-year period of the 2021 LRDP, and not instantaneously upon approval of the 2021 LRDP. It is noted that the 2021 LRDP planned growth is consistent with growth projections developed by AMBAG (see Section 3.13, "Population and Housing" of this EIR).

The 2021 LRDP-related population growth may induce economic growth through an increased demand for goods and services, which could create new jobs in the area, including within the downtown area of the city of Santa Cruz. Based on a 2019 study conducted for UC Santa Cruz regarding economic impacts associated with campus, UC Santa Cruz supported 15,627 jobs in the county in 2017. These included direct employment by UC Santa Cruz; jobs created in the community at hotels, restaurants, and retail; and indirect and induced full- and part-time jobs created for supply and equipment vendors, contractors, and construction workers (UC Santa Cruz 2019). The number of indirect and induced jobs generated by a university is commonly calculated by applying a ratio, or job multiplier, to the number of jobs directly provided by the institution. The projected increase in jobs (faculty and staff) is 2,200 FTE or

approximately 2,900 headcount by 2040. With full implementation of the 2021 LRDP and using a job multiplier of 1.23, which is a reflection of the ratio of indirect/induced: direct employment of UC Santa Cruz in 2017 (UC Santa Cruz 2019), an additional 3,567 jobs elsewhere in the region could be indirectly cause by or induced by growth under the 2021 LRDP. As a result, the 2021 LRDP could result in approximately 3,568 additional jobs within the region. While it is likely that a substantial proportion of the 3,567 jobs would be located in the city of Santa Cruz, it is anticipated that some of the new, indirect jobs would be created elsewhere within the region (e.g., Capitola and other communities of Santa Cruz County where people may locate or buy goods and services). This indirect and induced economic growth may result in the development of additional commercial space in the region, which would be subject to local planning and discretionary actions by local jurisdictions, including the City. The potential environmental impacts associated with such development would be identified consistent with CEQA requirements and evaluated through local jurisdictions' General Plans and project-level evaluations of commercial development proposals. As with this 2021 LRDP EIR, the CEQA review for future regional growth may identify significant impacts and mitigation measures and significant and unavoidable impacts. These impacts are generally part of overall regional growth and the 2021 LRDP would contribute to this growth and to the impacts related to the growth. In considering proposals for future developments, these regional entities would evaluate the details, alternatives, and mitigation measures to decide whether potential impacts would be significant and unavoidable.

Growth may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or land use designations. The 2021 LRDP would be implemented within existing UC Santa Cruz land holdings (specifically the main residential campus and Westside Research Park) which contain established land uses and supporting infrastructure (roads, water distribution, wastewater and drainage collection, and energy distribution). The 2021 LRDP includes redevelopment of certain portions of the LRDP area, predominantly within the main residential campus, and would intensify the uses over existing conditions some areas. This intensification may require the modification and/or replacement of existing infrastructure (e.g. water and sewer lines) to support the increased land use intensity associated with the 2021 LRDP. However, as noted in Section 3.17, "Utilities and Service Systems," the utility infrastructure (in terms of sizing and need) that is maintained by other jurisdictions is sized according to existing agreements and demands of the campus. In addition, due to the location of the main residential campus along the northwestern boundary of the City, any modifications to existing infrastructure would be made only to accommodate campus-related development and would not serve growth in areas outside of the LRDP area. Finally, and notably, because of limitations in water supply (see Section 3.15, "Utilities and Service Systems"), growth on campus could create competition for this resource that may restrict any additional growth.

In summary, implementation of the 2021 LRDP would foster on-campus student and employee population growth. Environmental impacts of on-campus population growth are accounted for in the 2021 LRDP and analyzed in this EIR (e.g., impacts to agricultural resources, air quality, and traffic; see discussions within the relevant chapters of this EIR). As discussed above, 2021 LRDP population growth may induce some off-campus growth, especially related to development of commercial space and possibly housing. This growth would not exceed growth projections in the region, including areas both within and outside of the County. The potential environmental effects of this off-campus growth cannot be specifically known or analyzed at this time without speculation, and any future development induced by the 2021 LRDP in the region would be subject to the review and approval of regional municipal and regulatory agencies, including environmental review required under CEQA. Therefore, the 2021 LRDP could result in adverse growth-inducing impacts off-campus beyond those inherent to the plan itself which are analyzed in this EIR, but the environmental impacts of that growth are not reasonably foreseeable and will be addressed in future environmental review under CEQA.

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