# Responses to Comments

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

## Commenters on the Draft EIR

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

Table 2-1 List of Commenters

| Letter No. | Commenter | Date |
| --- | --- | --- |
|  | FEDERAL |  |
| F1 | U.S. Fish and Wildlife Service, Ventura, California  Leilani Takano, Assistant Field Supervisor | Feb 25, 2021 |
|  | STATE |  |
| S1 | California Department of Fish and Wildlife, Bay Delta Region  Gregg Erickson, Regional Manager | March 1, 2021 |
| S2 | University of California San Diego  Scripps Institution of Oceanography  Richard D. Norris, Director | March 1, 2021 |
| S3 | University of California-Santa Cruz  Alex Jones, Campus Natural Reserve Manager | March 6, 2021 |
| S4 | University of California, Santa Cruz Natural Reserves  Wilton W. Webster Jr. Presidential Chair | March 8, 2021 |
| S5 | California Coastal Commission  Colin Bowser, Coastal Planner | March 8, 2021 |
| S6 | California Department of Transportation, District 5  Chris Bjornstad, Associate Transportation Planner | March 8, 2021 |
|  | LOCAL/REGIONAL |  |
| L1 | Santa Cruz Task Force on UCSC Growth Plans | January 11, 2021 |
| L2 | Santa Cruz Task Force on UCSC Growth Plans | January 14, 2021 |
| L3 | Santa Cruz Local Agency Formation Commission  Joe A. Serrano, Executive Officer | February 3, 2021 |
| L4 | County of Santa Cruz, Board of Supervisors  Ryan Coonerty, Supervisor | February 12, 2021 |
| L5 | Association of Monterey Bay Area Governments  Heather Adamson, Director of Planning | February 18, 2021 |
| L6 | Santa Cruz County Regional Transportation Commission  Ginger Dykaar, Senior Transportation Planner | March 3, 2021 |
| L7 | Santa Cruz City-County Task Force on UCSC Growth Plans  Morgan Bostic, Advocate | March 5, 2021 |
| L8 | Monterey Bay Air Resources District  Christine Duymich, Air Quality Planner II | March 8, 2021 |
| L9 | City of Santa Cruz, Planning and Community Development Department  Matthew VanHua, Principal Planner - Advance Planning | March 8, 2021 |
| L10 | Santa Cruz Metropolitan Transit District  Pete Rasmussen, Transportation Planner | March 8, 2021 |
| L11 | Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans  Morgan Bostic, Advocate | March 8, 2021 |
| L12 | Santa Cruz County, Planning Department  Kathleen Molloy, Planning Director | March 8, 2021 |
| L13 | Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans  Morgan Bostic, Advocate | March 8, 2021 |
| L14 | Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans | March 8, 2021 |
|  | ORGANIZATIONS |  |
| O1 | League of Women Voters of Santa Cruz County  Barbara Lewis, President | February 23, 2021 |
| O2 | Springtree Home Owners Association  Ron Goodman, Board Member | March 2, 2021 |
| O3 | Valley Women’s Club, Environmental Committee for the San Lorenzo Valley  Nancy Macy, Chair | March 3, 2021 |
| O4 | Campaign for Sustainable Transportation  Rick Longinotti, Co-chair | March 2, 2021 |
| O5 | UC Santa Cruz, History of Consciousness Department  James Clifford, Professor Emeritus | March 6, 2021 |
| O6 | Sierra Club, Santa Cruz County Group of the Ventana Chapter  Micah Posner, Executive Committee Chair | March 8, 2021 |
| O7 | Habitat and Watershed Caretakers | March 8, 2021 |
| O8 | Coalition For Limiting University Expansion | March 8, 2021 |
| O9 | Santa Cruz Waldorf School  Nadia Peralta | March 7, 2021 |
| O10 | Amah Mutsun Tribal Band of Costanoan/Ohlone Indians  Valentin Lopez, Chairman | March 8, 2021 |
|  | INDIVIDUALS |  |
| I1 | Susan Arnold | January 7, 2021 |
| I2 | Jesse Brennan | January 7, 2021 |
| I3 | Benjamin H. Garner | January 7, 2021 |
| I4 | Craig Hunter | January 7, 2021 |
| I5 | Cliff Nelson | January 7, 2021 |
| I6 | David | January 8, 2021 |
| I7 | Matt Lumadue | January 9, 2021 |
| I8 | Dianne Brumbach | January 10, 2021 |
| I9 | Marisa Herzog | January 13, 2021 |
| I10 | James Lee Jones Jr | January 18, 2021 |
| I11 | Amber Yale | January 20, 2021 |
| I12 | Matt Lumadue | January 23, 2021 |
| I13 | Michael A Riepe | January 25, 2021 |
| I14 | Geoff Lightfoot | January 27, 2021 |
| I15 | Sabra | February 2, 2021 |
| I16 | Tsim Schneider | February 2, 2021 |
| I17 | Faye Crosby | February 3, 2021 |
| I18 | Alex Krohn | February 3, 2021 |
| I19 | Janelle Maguire | February 3, 2021 |
| I20 | Mary McMillan | February 3, 2021 |
| I21 | Jarmila Pittermann | February 5, 2021 |
| I22 | Leonna Heavens | February 8, 2021 |
| I23 | Lisa Segnitz | February 12, 2021 |
| I24 | Matty Lums | February 23, 2021 |
| I25 | Christopher Gentry | February 20, 2021 |
| I26 | Matty Lums | February 23, 2021 |
| I27 | Adam Millard-Ball | February 28, 2021 |
| I28 | Maria Borges | March 1, 2021 |
| I29 | Joanne Brown | March 1, 2021 |
| I30 | Mark F Massoud | March 1, 2021 |
| I31 | Karen Holl | March 5, 2021 |
| I32 | Daniel Schmelter | March 2, 2021 |
| I33 | Karen Stout | March 2, 2021 |
| I34 | Chris Wilmers | March 2, 2021 |
| I35 | Haley Burrill | March 3, 2021 |
| I36 | Greg Gilbert | March 3, 2021 |
| I37 | Alex Krohn | March 3, 2021 |
| I38 | Andrew Mathews | March 3, 2021 |
| I39 | Ingrid Parker | March 3, 2021 |
| I40 | Kelly Pettit | March 3, 2021 |
| I41 | Ronnie Lipschutz | March 4, 2021 |
| I42 | Ronnie Lipschutz | March 3, 2021 |
| I43 | Michael Loik | March 4, 2021 |
| I44 | Chad Noyes | March 3, 2021 |
| I45 | Janet Parkins | March 4, 2021 |
| I46 | Tsim Schneider | March 4, 2021 |
| I47 | Elaine Sullivan | March 4, 2021 |
| I48 | Tiffany Theden | March 5, 2021 |
| I49 | Martha Brown | March 7, 2021 |
| I50 | Mark Carr | March 7, 2021 |
| I51 | Dan Costa | March 7, 2021 |
| I52 | Jennifer Gonzalez | March 7, 2021 |
| I53 | Kathleen Kay | March 7, 2021 |
| I54 | Bonnie Stibbe | March 7, 2021 |
| I55 | Rachel Aichele | March 8, 2021 |
| I56 | John Aird and Ted Benhari | March 8, 2021 |
| I57 | Bijan Ashtiani-Eisemann | March 8, 2021 |
| I58 | John Balawejder | March 8, 2021 |
| I59 | Sandra Baron | March 8, 2021 |
| I60 | Sarah Bennett | March 8, 2021 |
| I61 | Fay Bohn | March 8, 2021 |
| I62 | Mark Boolootian | March 8, 2021 |
| I63 | Amanda Cameron | March 8, 2021 |
| I64 | Ryan Carle | March 8, 2021 |
| I65 | Jennifer Chebahtah | March 8, 2021 |
| I66 | Christian Cormier | March 8, 2021 |
| I67 | Eduardo Izquierdo | March 8, 2021 |
| I68 | Kiran Favre | March 8, 2021 |
| I69 | David Fierstein | March 8, 2021 |
| I70 | Jacob Ferrall | March 8, 2021 |
| I71 | Litzia Galvan | March 8, 2021 |
| I72 | Hunter Gieseman | March 8, 2021 |
| I73 | Maria Gitin Torres | March 8, 2021 |
| I74 | Courtney Golts | March 8, 2021 |
| I75 | Gillian Greensite | March 8, 2021 |
| I76 | Eric Grodberg | March 8, 2021 |
| I77 | Brett Hall | March 8, 2021 |
| I78 | Virginia Jansen | March 8, 2021 |
| I79 | Jazmine Jensen | March 8, 2021 |
| I80 | Brian Johnson | March 8, 2021 |
| I81 | Elise Knittle | March 8, 2021 |
| I82 | Chris Lay | March 8, 2021 |
| I83 | Athena Lynch | March 8, 2021 |
| I84 | Lucy Malamud-Roam | March 8, 2021 |
| I85 | Julie Mascarenhas | March 8, 2021 |
| I86 | Jack Mazza | March 8, 2021 |
| I87 | Alayne Meeks | March 8, 2021 |
| I88 | Melissa | March 8, 2021 |
| I89 | Mariam Moazed | March 8, 2021 |
| I90 | Gabriela Navarro | March 8, 2021 |
| I91 | Veronica Ness | March 8, 2021 |
| I92 | Sophie Noda | March 8, 2021 |
| I93 | Kelsey Pennington | March 8, 2021 |
| I94 | Kristen Sandel | March 8, 2021 |
| I95 | Ajay Shenoy | March 8, 2021 |
| I96 | Daniel Simoni | March 8, 2021 |
| I97 | Jenna Sparks | March 8, 2021 |
| I98 | Kelly Trombley | March 8, 2021 |
| I99 | Matthew Waxman | March 8, 2021 |
| I100 | Matthew Waxman | March 8, 2021 |
| I101 | Claudia Webster | March 8, 2021 |
| I102 | Zoe Arkin | March 9, 2021 |
| I103 | Ecology and Evolutionary Biology Graduate Students, including the undersigned: Jessie Beck, Theadora Block, Tim Brown, Melissa Cronin, Beth Howard, Niko Kaplanis, Miranda Melen, Mark Morales, Calvin Munson, Rachel Pausch, Regina Spranger, Daniel Wright | March 8, 2021 |
|  | PUBLIC HEARINGS (ONLINE) ON THE DRAFT EIR |  |
| PH1 | February 3, 2021 | — |
| PH2 | February 4, 2021 | — |

## Master Responses

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

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

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

### Master Response 1: Baseline

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

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

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

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

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

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

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

#### 2021 LRDP Planned Development

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

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

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

As explained on page 163 of the 2021 LRDP, “[w]hile the LRDP identifies land use areas for academic, housing, and other uses, project implementation will continue to be guided by the Physical Design Framework and the Capital Financial Plan. The campus typically conducts area studies, which investigate specific regions of the campus to provide planning guidelines and test the capacity for development, to guide future planning of individual projects. All future projects will continue to be reviewed by the UC Santa Cruz Design Advisory Board, a group of design professionals and campus staff appointed by the Chancellor.”

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

#### 2021 LRDP Growth Projections

The 2021 LRDP’s growth assumptions are based on campus population projections, demonstrated need for additional public university capacity in California, and an understanding of campus needs and goals beyond current enrollment levels, inclusive of the projected enrollment of 19,500 full-time-equivalent (FTE) students under the 2005 LRDP.[[1]](#footnote-2) The 2021 LRDP planning effort addresses anticipated growth in on-campus student population from an estimated 18,518 FTE students (on-campus, fall-winter-spring [FWS] three-quarter average) for the 2018–2019 academic year to a potential enrollment of 28,000 FTE students (on campus, FWS three-quarter average) by the 2040–2041 academic year. UC Santa Cruz faculty and staff are also anticipated to increase from approximately 2,800 FTE (three-quarter average) to approximately 5,000 FTE (three-quarter average) in the same timeframe.[[2]](#footnote-3) UC Santa Cruz plans to provide on-campus housing for 100 percent of the increase in student enrollment beyond 19,500 FTE students and up to 25 percent of the additional anticipated 2,200 FTE faculty/staff members. To accommodate the increased campus population, the 2021 LRDP proposes the renovation of existing facilities and the construction of an additional 3.1 million assignable square feet of academic and support building space.

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

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

Other commenters disputed the existence of a State mandate to accept undergraduate enrollment. The California Master Plan for Higher Education (originally adopted by the Legislature in 1960 and periodically reviewed) assigns UC the primary mission of providing undergraduate and graduate instruction in the liberal arts, sciences, and professional education. The Master Plan directs UC to draw its entering freshmen from the top one-eighth (12.5 percent) of public high school graduates and to accept all qualified community college students. Such students are considered “eligible” for admission to UC as a whole, but are not guaranteed admission to any particular campus. Consistent with this direction, even during challenging budget times, UC has continued to offer a seat on at least one of its nine undergraduate campuses to every California resident undergraduate applicant who meets the UC’s minimum requirements. In years when enrollment growth is funded in the State budget, UC spreads its California resident enrollment growth across all campuses of the UC, rather than concentrating it on campuses that are in less demand from out-of-state students. In fall 2016, through an agreement with the State, UC enrolled more than 7,400 additional California residents, the largest year-to-year jump in California resident enrollment since the end of World War II. Those students were allocated amongst the individual campuses, including UC Santa Cruz. The allocation of California resident enrollment takes place on an annual basis, and results from a year-long iterative process between University of California Office of the President and the campuses, wherein the parties engage in a collaborative effort to develop annual and multi-year enrollment projections, based on input by the State and the UC Regents around systemwide resident enrollment targets. These projections ultimately result in offers of admission by UC Santa Cruz to individual students, 50 percent of which are anticipated to be accepted (the large majority of which are expected to attend in the fall). The campus publishes its annual fall census each year in October, 5 weeks into the semester.

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

#### Housing

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

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

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

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

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

#### Public Engagement Opportunities and Participation

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

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

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

With respect to the LRDP Executive Committee, a range of interested parties provided input, including the president of Student Union Assembly and the president of Graduate Student Association. Their responsibilities included bringing information back to their respective student groups for feedback throughout the process. The Executive Committee met approximately 14 times throughout the planning process.

In addition to the formal committees, multiple outreach events were conducted as public workshops and open houses. These were all held during the academic year, in various locations that would be convenient for a diverse group of stakeholders, including locations on campus so students could attend easily. Students provided feedback on preliminary land use scenarios, circulation, housing, sustainability, and infrastructure through participation on committees, during open houses and public workshops, and online visioning activities. A list of these events is included in the appendix of the 2021 LRDP.

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

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

#### Housing Affordability and Other Socioeconomic Considerations

##### Social and Economic Considerations

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

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

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

##### Housing Affordability

With respect to student housing, in particular, several comments were received regarding the inability of students to afford on-campus housing due to perceived high rental rates. To the extent that this could be considered a physical environmental impact, displacement of students from on-campus housing as a result of high rental rates would need to occur such that additional housing was necessary elsewhere (refer to thresholds of significance identified in Section 3.13, “Population and Housing,” of the Draft EIR). High vacancy rates on campus would reflect that this type of problem was occurring. This is not the case; based on recent data, on-campus housing has an occupancy rate of 96 percent, which represents effectively full occupancy. Further, as of September 2021, there is currently a waiting list for on-campus housing. With respect to how on-campus rental housing prices are set, UC Santa Cruz establishes on-campus rental rates based on a number of factors, including demand, housing affordability, and programming and operational costs. That is not to suggest that housing affordability may not be a concern to some students or to UC Santa Cruz, however the potential economic effect of on-campus rental rates is not resulting in direct or indirect physical environmental effects, as that housing is fully utilized. The high demand for housing and low vacancy in the City of Santa Cruz and surrounding communities are described in Section 3.13, “Population and Housing,” and the potentially associated environmental effects of high demand for housing are evaluated in Section 3.13.

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

#### Adherence to Local Policies

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

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

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

#### 2008 Cooperative Settlement Agreement

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

As noted on page 1-6 of the 2021 LRDP EIR, the CSA was entered into in 2008 by UC Santa Cruz, the City of Santa Cruz, the County of Santa Cruz, and a variety of other parties to resolve several lawsuits challenging the 2005 LRDP EIR. (See City of Santa Cruz et. al. v. Regents of the University of California et. al. Santa Cruz County Superior Court Case No. CV155571, consolidated with Case No. CV155583.) Among other things, the CSA addressed enrollment, capping on-campus FWS three-quarter average undergraduate enrollment at 17,500 FTE and projecting a total on-campus three-quarter average enrollment (undergraduate and graduate) of 19,480 FTE by the 2020-2021 academic year. The CSA was specifically tied to the projections of the 2005 LRDP and required UC Santa Cruz to provide 7,125 beds for enrollment up to 15,000 FTE and beds for 67 percent of new student enrollment above 15,000 FTE. In 2018/2019, UC Santa Cruz provided 1,291 beds in excess of requirements under the CSA. Therefore, UC Santa Cruz is exceeding its housing obligation under the CSA. In addition, and with respect to other conditions under the 2008 CSA, UC Santa Cruz used 167.1 million gallons per year (mgy) in 2018, less than the 206 mgy permitted under the 2008 CSA. UC Santa Cruz (in cooperation with Santa Cruz Metro Transit District) also provided four reticulated buses onto campus routes, which factored into the reduction in average daily trips generated by the campus being well below the 28,700 trip-limit established in the 2008 CSA.

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

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

### Master Response 3: Alternatives

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

#### Consideration of A Reasonable Range of Alternatives

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

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

An overarching consideration is that alternatives must be potentially feasible. Feasible is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines Section 15364). Note that an EIR can consider potential feasibility, but the determination of whether an alternative is, in fact, feasible, is up to the decision makers. Another important consideration is the degree to which selection of an alternative would reduce or eliminate significant environmental impacts. As noted in the Executive Summary of the Draft EIR, 11 significant and unavoidable impacts (including cumulative impacts) associated with implementation of the 2021 LRDP were identified, including air quality, historic resources, noise, population and housing, and utilities (water supply) impacts. Additionally, the EIR identified mitigation that would be required to reduce several other impacts to less than significant levels.

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

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

### Master Response 4: Wildfire

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

#### Wildfire History in Santa Cruz County

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

The CZU Lightning fire also represents 77 percent of the total acreage burned in Santa Cruz County since 1954. Other major events included the CZU Lockheed fire in 2009 (which burned 7,800 acres) and the SCU Summit fire in 2008 (which burned almost 4,000 acres). No other fires since 1960 exceed 1,500 acres. In addition, 95 percent of the total wildfire acreage within Santa Cruz County has occurred within high or very high fire hazard areas.

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

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

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

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

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

#### Potential for 2021 LRDP to Exacerbate Wildfire Risk

UC Santa Cruz has reduced the amount of land for development in the North Campus by approximately 53 acres in comparison to the 2005 LRDP. Although, the majority of the North Campus will remain undeveloped in the 2021 LRDP as part of the Campus Natural Reserve, the designation of new land use areas as part of a university campus within a high or very-high fire hazard zone could have the potential to exacerbate wildfire risks. The Draft EIR appropriately evaluates the potential additional risk associated with adding development to the campus. The degree to which fires have been associated with university uses and fires have occurred within or adjacent to the LRDP area, as well as existing programs, practices, and requirements to reduce wildfire risk, are considered as part of the Draft EIR’s assessment of the potential for the 2021 LRDP to exacerbate wildfire risk to campus and other nearby residents and uses. The Draft EIR, as explained in Impact 3.18-2 provided a detailed assessment of existing programs and policies and considered the location of the LRDP area with respect to historic fires. These included measures implemented by the UC Santa Cruz Environmental Health and Safety department, the responsibilities and actions of the Designated Campus Fire Marshall (as they pertain to the proper storage of potential combustible or otherwise flammable materials), compliance with applicable erosion control standards, the UC Santa Cruz Emergency Operations Plan evacuation procedures for Stage 1 (building) and Stage 2 (campus-wide) emergencies and Standardized Emergency Management System, and CruzAlert (the UC Santa Cruz emergency notification system). Refer to pages 3.18-14 through 3.18-16 of the Draft EIR for further clarification. Furthermore, the potential development and improvements associated with the 2021 LRDP would occur within the LRDP area, as currently envisioned. No offsite improvements that could contribute to additional wildfire risk are anticipated as part of the 2021 LRDP.

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

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

1. **UC Santa Cruz Wildland Fire Response Procedures.** As part of UC Santa Cruz’s Emergency Procedures, which are managed and implemented by the Office of Emergency Services, UC Santa Cruz provides numerous sources of information and notifications for the on-campus population, including those of the local community departments, as well as procedures in the event of an evacuation and/or shelter in place. In addition, UC Santa Cruz provides guidance for the campus population, especially on-campus residents regarding personal emergency kits and available on-campus respirators. In August 2021, UC Santa Cruz released a new application for students and in-person trainings for staff and faculty to continue to educate the on-campus population about wildfire prevention and response, as well as other emergency procedures in the event of an earthquake or active shooter.
2. **Title 19 Inspections.** As part of its obligations under California Fire Code, the Office of Emergency Services also conducts Title 19 inspections for vegetation near structures and other facilities and provides reports to UC Santa Cruz Grounds Services, who then addresses any necessary vegetation removal/trimming to adhere to California Fire Code requirements.
3. **CalFire Vegetation Management.** In July 2021, UC Santa Cruz renewed its agreement with CalFire to provide vegetation management services within the LRDP area, especially within the north campus subarea. UC Santa Cruz also maintains existing fire roads and a hydrant system within the north campus, as well as the fire breaks that were established by CAL FIRE during the CZU Lightning Complex fire in 2020. Along Empire Grade, CalFire provides and maintains shaded fuel breaks through the removal of dead and smaller vegetation by hand on a year-round basis to reduce the potential for vehicular traffic to contribute to wildfire risks.
4. **Other Vegetation Management**. Additionally, UC Santa Cruz regularly engages with a local cattle rancher to provide and manage cattle for on-campus grazing of certain areas of campus as part of its commitment to vegetation management. Cattle are typically present on campus beginning in mid-July through November before moving off campus to other locations.
5. **Design and Construction of New Facilities.** Existing development within the campus was constructed using fire-resistant building materials, and new development would continue to implement the same (and updated) standards. This includes the design and construction of Class A roof coverings, per the American Society for Testing and Materials standards, which represents the highest rating achievable and are considered effective against severe fire exposure.
6. **UC Santa Cruz Emergency Operations Center.** UC Santa Cruz also maintains an Emergency Operations Center (EOC) that is responsible for managing and maintaining communications, response, and recovery during major events and emergency situations, including wildfires. The on-campus EOC also provides a consistent point of contact to the Santa Cruz County EOC for resource needs outside of the campus to both Santa Cruz County and UC EOC.
7. **Secure in Place Locations, Largely Proximate to Existing Housing Areas.** In the event that certain students, staff, residents, and other visitors may not be able to evacuate the LRDP area, UC Santa Cruz offers several shelter-in-place locations across campus, and campus population are directed to generally seek locations without windows but with reinforced walls (e.g., concrete versus drywall). Campus also offers several assembly locations throughout campus to which on-campus population may be directed, including the Core West Parking Structure, Performing Arts Parking Lot, OPERS and the East Meadow, and the West Remote Parking Lot.
8. **University of California Air-Quality-Index-based Decision-Making Matrix for Wildfire Smoke Events.** In May 2019, UC formed the Systemwide Air Quality Protocol Working Group to evaluate operational- and health-related issues and develop recommendations for how UC campuses should respond to various conditions and potential unhealthy air quality due to smoke from wildfire events. The working group compiled an air quality index (AQI) based decision matrix for wildfire smoke events, which was recommended for implementation at all UC campuses. As evidenced by procedures implemented as part of UC Santa Cruz’s response to the CZU Lightning Complex fire, UC Santa Cruz implements the decision matrix and stages the level and type of response/requirements, based on AQI values (UC Santa Cruz 2021).
9. **National Significant Wildland Fire Potential Outlook – National Interagency Coordination Center.** UC Santa Cruz regularly reviews predictive data provided regarding the potential for wildfires in the area and considers the need to adjust wildfire procedures/preparedness based on information provided by the National Interagency Coordination Center.

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

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

### Master Response 5: Greenhouse Gas Emissions and Mitigation

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

As described in Impact 3.8-1 of the Draft EIR, UC Santa Cruz has committed to meet and exceed State-mandated GHG reduction goals and meet UC sustainability goals (as established by the UC Sustainable Practices Policy) of net zero GHG emissions by 2050, and the 2021 LRDP will comply with these mandates. With respect to comments regarding the requirement to comply with UC policy, UC sustainability goals and the measures identified in the UC Sustainable Practices Policy were reviewed during preparation of the Draft EIR. Based on the wording (i.e., the use of shall and will versus could and may) of specific measures, the EIR determined which measures would be considered requirements and which were considered good practice/guidance or had exceptions and therefore could not be relied upon. For example, UC policy generally requires that new development would be all-electric, however, UC policy also allows for exceptions to be determined on a project-by-project basis. Therefore, the Draft EIR, as noted on page 3.6-12, assumes that some projects under the 2021 LRDP could pursue the allowable exceptions. The Draft EIR appropriately assesses whether mitigation measures would be required in addition to UC policy (and other plans, policies, and requirements) based on the specific wording of the policy or measure in question.

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

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

As UC Santa Cruz implements the 2021 LRDP, the university will continue to monitor its level of implementation of Mitigation Measure 3.8-1 and its compliance with the UC Sustainable Practice Policy. In the event that onsite measures do not achieve the identified performance standard (of 6,907 metric tons of carbon dioxide equivalent) (MTCO2e), UC Santa Cruz (as required by Mitigation Measure 3.8-1) shall purchase carbon offsets for the remaining GHG emissions, either through the California Air Resources Board’s (CARB’s) Cap-and-Trade Program or through the purchase of other credits that are real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations Section 95802(a). As drafted, this mitigation commits UC Santa Cruz to reducing emissions by a specified amount, prioritizes on-site reduction efforts, and provides specific criteria and protocols that must be met with respect to offsets purchased. This mitigation is consistent with recent case law (see *Golden Door Properties, LLC v. County of San Diego* [2020] 50 Cal.App.5th 467) as it requires the purchase of real, permanent, additional, quantifiable, verifiable, and enforceable credits and approval of the purchase by a CARB-accredited verification entity.

### Master Response 6: Transportation

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

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

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

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

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

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

### Master Response 7: Water Supply

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

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

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

Consistent with Section 15155(f), the 2021 LRDP EIR identifies uncertainties surrounding the long-term availability of water supplies, especially under drought conditions in Section 3.17, “Utilities and Service Systems” of the Draft EIR. As a result, the EIR also discloses and evaluates the potential environmental impacts of curtailing development if sufficient water is not available and the impacts of alternative water sources, including pumping of available groundwater supplies (e.g., via the existing groundwater well within the lower campus area of the main residential campus.) As a result, the EIR’s evaluation of potential water supply impacts associated with the 2021 LRDP is considered appropriate and in accordance with CEQA requirements, even though not specifically applicable to UC Santa Cruz.

### Master Response 8: Student Housing West

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

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

### Master Response 9: Phasing and Implementation

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

#### Plan Implementation

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

As an institution of higher learning, UC Santa Cruz is committed to the development of new housing, academic, and support facilities to support its teaching, research, and public service missions. This commitment is carried forward into the project objectives expressed on page 2-8 and 2-9 of the Draft EIR. Implementation of the 2021 LRDP would result in the expansion and improvement of on-campus facilities in response to anticipated increased enrollment. Outside of privately funded (i.e., P3) projects within the LRDP area, funding for various campus efforts is determined by the Capital Financing Plan (CFP), which reflects a prioritization of current campus needs and is approved by the UC Regents. As shown in the most recent CFP (2020-2026), UC Santa Cruz has prioritized seismic, safety, and infrastructure projects with the balance of the capital need for student services and housing (UCOP 2020a), in further demonstration of the campus’s commitment to improving on-campus facilities. As part of that physical expansion, UC Santa Cruz has also committed to providing substantial additional on-campus housing, equivalent to or exceeding the anticipated net increase in student enrollment through 2040. UC Santa Cruz is also committed to providing annual updates to its adjacent partners (i.e., the City and County of Santa Cruz) regarding how implementation of the 2021 LRDP is proceeding with respect to these targets.

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

#### Phasing

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

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

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

### Master Response 10: Hydrology and Water Quality

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

#### Impacts to Water Quality from Construction and Post-Construction Stormwater Runoff

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

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

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

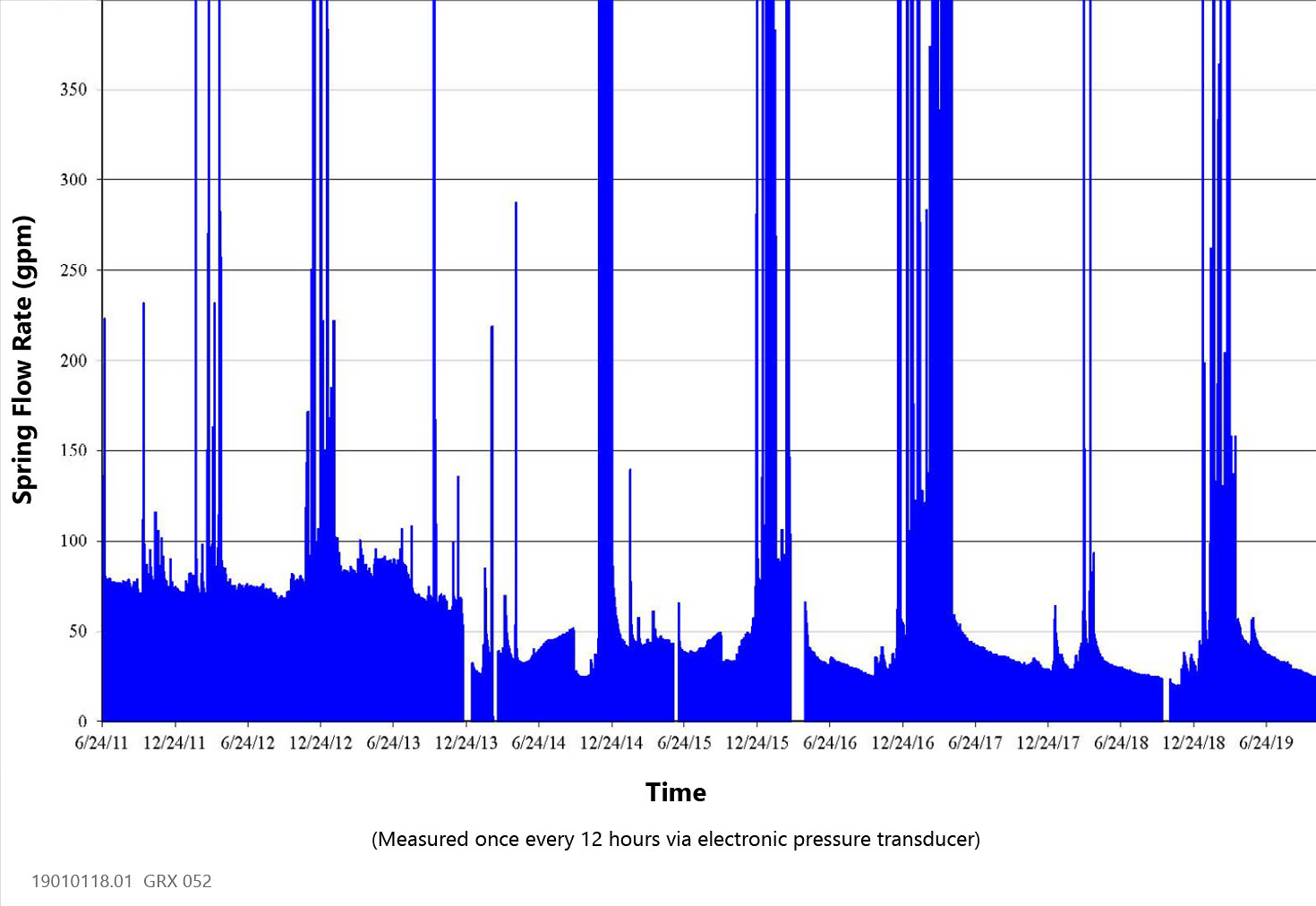
#### Consideration of County of Santa Cruz Karst Protection Zone Standards

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

#### Groundwater Resources

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

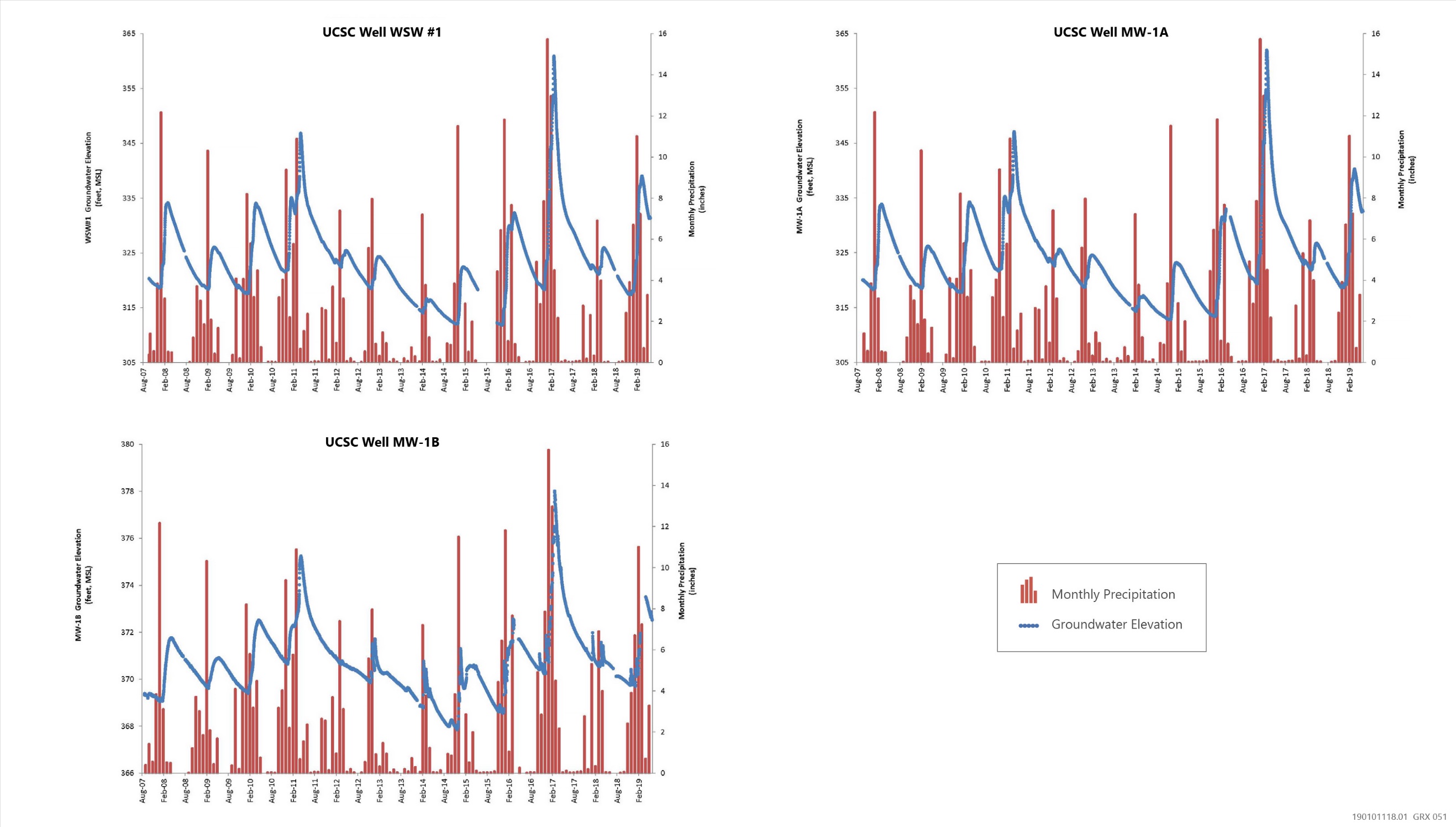
As noted on page 3.10-26 of the Draft EIR, there are thirteen recognized springs, seeps or spring fed streams linked to the karst aquifer that have been mapped to outcrop on- and off-campus. Monthly to semi-annual monitoring of flows from these surface water locations has been conducted by UC Santa Cruz since 1984; currently, nine are being monitored for flow monthly. In 2011, UC Santa Cruz obtained permission from the City of Santa Cruz Water Department (Water Department) to access and retrofit an existing weir that has been used by the Water Department to measure Bay Street Spring flow rates since 1980. The weir is housed inside a manhole on Water Department property just east of Bay Street, adjacent to, and upstream of the Bay Street Spring monitoring station that had been monitored since 1984. The weir was retrofitted with a stilling well and an electronic pressure transducer was installed and secured to the inside of the stilling well. The transducer is calibrated to record the height of water flowing over the 90-degree V-notch weir once every 12 hours to obtain high resolution spring flow monitoring data. A histogram of the continuous monitoring data that has been collected since June 2011 is shown on Figure 2-1. The high-resolution spring flow data confirms an almost immediate response to individual precipitation events and a strong seasonal trend of increased flow through the wet season, followed by a slow and steady period of reduced flow through the rest of the year during the drier months to base flow levels. Base flows are generally higher during wetter years and lower during the drier years. We note that construction related to the Bay Street Reservoir Replacement Project in 2013 (located ~500 feet north of the weir manhole) had periodically and briefly affected observed spring flow at the weir manhole location due to brief diversions of the sub-drain system that delivers the spring water to this location. Following a mid-December 2013 diversion of the sub-drain system that was conducted in connection with the Bay Street Reservoir Replacement Project flows at the weir manhole dropped by more than half of the historic base flow rate (i.e., from about 65 gallons per minute (gpm) to less than 30 gpm). This is observed on Figure 2-1. It is suspected that when the sub-drain was plugged for downstream retrofitting the backpressure likely ruptured the historic piping resulting in upstream flow loss to the subsurface. All data collected following this incident appears to be erroneous with respect to the long-term record; however, strong seasonal trends are still observed.



Source: Data provided by 2NDNATURE in 2021.

Figure 2-1 Bay Street Spring Flow Data

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



Source: Data provided by 2NDNATURE in 2021.

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

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

### Master Response 11: Level of Detail

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

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

(1) Geographically,

(2) As logical parts in the chain of contemplated actions,

(3) In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways.”

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

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

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

It is premature to consider any specific development proposal on a project-specific level at this time, as these projects have not yet been sited or designed, access routes have not been determined, and other key project components that would influence potential environmental impacts have not yet been determined. Accordingly, it would be speculative to conduct a project-specific analysis at this juncture. As discussed on page 2-8 of the Draft EIR, the programmatic analysis provided in the Draft EIR may be used during consideration and evaluation of project-level analysis of specific projects identified in this EIR. If, and when, individual projects are proposed for development, additional project-level studies and CEQA review will be conducted, as necessary. This may include the development of “within-the-scope” findings pursuant to State CEQA Guidelines Section 15168(c), tiered initial studies or EIRs, or other supplemental/subsequent environmental analysis, consistent with CEQA requirements. All subsequent analysis would require consideration of project-level impacts and consideration of alternatives and additional mitigation, where appropriate.

### Master Response 12: Long-Term Habitat Protection

Several comments were received regarding the need for long-term habitat protection within the main residential campus of the LRDP area. As noted on page 2-19 of the Draft EIR, approximately 789 acres of the main residential campus would be designated as Campus Natural Reserve under the 2021 LRDP, an increase from 379 acres under the 2005 LRDP. The primary purpose of the Campus Natural Reserve is to preserve landscapes in their natural state; construction would be prohibited except as required for maintenance of the area as a teaching, learning, and research reserve. As a result, these lands (under the 2021 LRDP) would be considered protected habitat that would not be developed with academic, administrative, or housing uses. Further, as of July 2021 and as presented as part of an information item for the July 2021 UC Regents meeting, UC Santa Cruz intends to pursue a campus-wide habitat conservation plan (HCP), which was noted as a potential strategy for incidental take coverage under Mitigation Measure 3.5-2a. Development of a campus-wide HCP would further ensure the long-term protection of sensitive habitat within the LRDP area. UC Santa Cruz is currently coordinating with the U.S. Fish and Wildlife Service (USFWS) regarding their expectations for a campus-wide HCP, which would permanently set aside acreage currently designated in the Campus Natural Reserve (CNR) on the main residential campus. The HCP would conserve habitat for federally listed species, including the Ohlone Tiger Beetle and the California Red Legged Frog. As part of the HCP process, the campus will evaluate how to preserve areas with the Campus Natural Reserve for the conservation of wildlife species, research activities and for the preservation of tribal cultural resources. Once the determination regarding a campus-wide HCP is made and further coordination with USFWS has occurred (including a determination as to whether participation I the UC Systemwide Natural Reserve System would create conflicts with HCP implementation), UC Santa Cruz intends to consider whether the protected lands, as designated in the 2021 LRDP and to which the HCP would apply, could be independently designated as part of the UC Systemwide Natural Reserve System. However, the designation of Campus Natural Reserve lands as part of the UC Systemwide Natural Reserve System would not change the future and long-term protection of this acreage under the 2021 LRDP, as currently proposed.

## Individual Comments and Responses On the Draft EIR

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

### Federal

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

Leilani Takano, Assistant Field Supervisor

Feb 25, 2021

Comment F1-1

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

Response F1-1

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

Comment F1-2

As discussed on a phone call between UCSC and U.S. Fish and Wildlife Service (Service) staff on January 4, 2021, the DEIR inaccurately characterizes the extent of suitable California red-legged frog (Rana draytonii) habitat in the LRDP area. Although existing campus infrastructure may reduce the potential for California red-legged frogs to disperse to portions of the campus that are completely isolated, we believe the majority of undeveloped terrestrial habitats within the LRDP area provides suitable upland or dispersal habitat for the California red-legged frog. This belief is due to the existence of a California red-legged frog breeding pond within the LRDP area, the large extent of suitable and unsurveyed habitat north of the LRDP area, and the ability of California red-legged frogs to disperse distances of well over a mile. Based on this information, UCSC should include a California red-legged frog mitigation measure stating that UCSC would coordinate with the Service prior to any development occurring within the LRDP area, so that we may provide technical assistance on measures to minimize any adverse impacts to CRLF and its habitat.

Response F1-2

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

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

California Red-Legged Frog

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

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

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

Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the nonbreeding season and typically do not move more than approximately 500 feet into upland refugia habitats (Bulger et al. 2003; Fellers and Kleeman 2007). All known California red-legged frog observations on the UC Santa Cruz campus have been within 300 feet of aquatic habitats (Biosearch Environmental Consulting 2020). However, during migration to other suitable ponds in the region, California red-legged frogs may ~~travel~~ disperse long distances from aquatic habitat (i.e., greater than 1,600 feet) and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). California red-legged frogs breeding within the Arboretum Pond are expected to migrate to aquatic habitat suitable for the species within and outside of the LRDP area because the Arboretum Pond is not perennial (Biosearch Environmental Consulting 2020). California red-legged frog migratory and dispersal movements from the Arboretum Pond to other aquatic habitats are expected to be primarily along Moore Creek both upstream and downstream, and overland to the southwest, west or northwest to aquatic habitats in the Wilder Creek watershed (Biosearch Environmental Consulting 2020, Figure 3.5-7). Movements to the east of the Arboretum pond are not as likely to occur ~~likely would not occur~~ due to the lack of aquatic habitat suitable for California red-legged frog in Jordan Gulch, the City of Santa Cruz, and the lower San Lorenzo River watershed, and the presence of developed areas which would likely impede movement (Biosearch Environmental Consulting 2020, Figure 3.5-7). Additionally, developed areas of the UC Santa Cruz campus contain numerous potential barriers to overland movements (e.g., buildings, retaining walls, decorative walls, parking lots, roads, paths), and while frogs may be able to cross roads, paths, and parking lots, the cumulative barriers and hazards presented by developed areas reduce the likelihood that California red-legged frogs would be present within these areas (Biosearch Environmental Consulting 2020).

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

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

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

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

* A qualified biologist will conduct a site-specific habitat suitability verification analysis to confirm the likelihood of the species to be present. To be qualified, the biologist will: 1) be knowledgeable in California red-legged frog life history and ecology, 2) be able to correctly identify California red-legged frogs and habitats, 3) have experience conducting field surveys of relevant resources, 4) be knowledgeable about state and federal laws regarding the protection of special-status species, and 5) have experience using CDFW’s CNDDB. The habitat assessment will include, but will not be limited to:
* Identification or verification of the vegetation communities present in the project site.
* Consideration of known occurrences within the LRDP area;
* Description of the project, including proposed project construction activities;
* Analysis of the type and likelihood of impacts on California red-legged frog as a result of project implementation; and
* Potential project modifications or additional measures that may avoid and minimize mortality, injury, and disturbance of California red-legged frog and habitat.
* Results of the site-specific habitat suitability verification analysis will be submitted to UC Santa Cruz for review and consideration.
* Based on the results of the site-specific habitat suitability verification analysis, a qualified biologist will determine if any of the following would occur: injury or mortality of California red-legged frog; or disturbance of individuals or adverse effects on California red-legged frog breeding, upland refugia, or dispersal habitat.
* If a qualified biologist determines that the individual project would have no substantial adverse effect on red-legged frog or its habitat and would not result in any injury or mortality, implementation of that individual project may proceed.
* For those areas where adverse modification of critical habitat or disturbance, injury, or mortality of California red-legged frog cannot be avoided, UC Santa Cruz shall, in consultation with USFWS, implement impact minimization for construction-related impacts (e.g., installation of exclusion fencing around the project construction site) and compensatory actions for habitat impacts, including purchase of credits at a conservation bank or creation of additional habitat at a minimum 1:1 mitigation ratio, as well as adaptive management strategies to ensure long-term conservation of mitigation lands. No actions that could adversely affect California red-legged frog will be allowed if adverse effects would result, unless consultation with USFWS is completed and additional measures are implemented.

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

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

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

The above-listed revisions do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment F1-3

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

Response F1-3

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

Comment F1-4

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

Response F1-4

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

Comment F1-5

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

Response F1-5

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

### State

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

Gregg Erickson, Regional Manager  
March 1, 2021

Comment S1-1

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

**CDFW ROLE**

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

**REGULATORY REQUIREMENTS**

*California Endangered Species Act*

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

*Lake and Streambed Alteration Program*

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

Response S1-1

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

Comment S1-2

**PROJECT DESCRIPTION AND LOCATION**

The 2021 Long Range Development Plan (LRDP) would serve as the long-term planning document that guides physical campus growth through 2040 on two of the three UC Santa Cruz campus properties located in the City of Santa Cruz: (1) the UC Santa Cruz main residential campus and (2) the Westside Research Park, located at 2300 Delaware Avenue. Together, the main residential campus and Westside Research Park constitute the LRDP area or plan area for the 2021 LRDP. It does not address planning or growth on the third campus property, the Coastal Science Campus, which is governed by a separate Coastal LRDP (State Clearinghouse No. 2001112014). In addition, the LRDP area does not include the Scotts Valley Center, the Silicon Valley remote satellite campus, nor the UC Monterey Bay Education, Science, and Technology Center (MBEST), which was transferred to UC Santa Cruz by the U.S. Army and is located approximately 26 miles south of the main residential campus.

**COMMENTS AND RECOMMENDATIONS**

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

Response S1-2

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

Comment S1-3

**COMMENT 1:** Pertains to Section 3.10 Hydrology and Water Quality

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

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

**Recommendation:** CDFW recommends expanding the discussion already provided in Section 3.10 and addressing whether project could transmit hydrologic or water quality impacts to the San Lorenzo River, and if impacts to Coho Salmon and steelhead trout could result. The Project draft EIR should further address whether contaminants stemming from LDRP could enter the karst aquifer and be transmitted to the San Lorenzo River as 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.

Response S1-3

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

Further, as noted by the commenter, it is understood that the City, which provides water to UC Santa Cruz, uses the Confluence Water Resource Planning Model as part of its assessment of current and future water supply system operation and is currently working with USFWS, CDFW, and National Marine Fisheries Service regarding necessary flows to ensure that significant impacts to coho salmon and steelhead do not occur. In January 2021, the City of Santa Cruz initiated a water rights change petition to the State Water Resources Control Board to improve flexibility to ensure that the City can meet the water needs of the community while providing protective flow conditions for Coho and Steelhead as agreed upon between the state and federal agencies. The City released a Draft EIR in June 2021 that evaluates the water rights change petition.

Comment S1-4

**COMMENT 2:** Pertains to Section 3.17 Utilities and Service Systems

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

Response S1-4

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

Comment S1-5

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

**Issue:** The draft EIR identifies that Project tree removal activities could impact monarch butterfly overwintering colonies or suitable overwintering habitat. Mitigation measure 3.5-2h proposes tree removal will be delayed until monarchs have left the areas, as determined by a qualified biologist. In addition, UC Santa Cruz will prepare and implement a site-specific plan for the monarch overwintering colony, following feasible recommendations from Protecting California’s Butterfly Groves Management Guidelines for Monarch Overwintering Habitat (Xerces 2017). It is unclear from the Project draft EIR which recommendations would be considered feasible. Recommendations include replacing removed trees with native trees in strategic locations to provided additional wind protection.

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

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

Response S1-5

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

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

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

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

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

* To minimize the potential for loss of monarch overwintering colonies, project activities that include vegetation removal within suitable overwintering habitat (e.g., coniferous forest, eucalyptus forest) will be conducted from April through September to avoid the overwintering season (October through March), if feasible. If project activities are conducted outside of the overwintering season, no further mitigation will be required.
* Within 14 days before the onset of project activities that include vegetation removal between October 1st and March 31st, a qualified biologist familiar with monarchs and monarch overwintering habitat will conduct focused surveys for monarch colonies within habitat suitable for the species in the project site and will identify any colonies found within the project site.
* Monarch overwintering colonies that are identified within a project site will be demarcated with flagging or high-visibility construction fencing to prevent removal of the stand of trees containing the overwintering colony and encroachment by heavy machinery, vehicles, or personnel. Monarch overwintering colonies shall be protected throughout the duration of their presence within a project site. ~~Removal of the tree or stand of trees that contains the overwintering colony will not occur until the monarchs have left the area, as determined by a qualified biologist.~~
* If modification or removal of a stand ~~that contains an~~ where overwintering monarchs have been identified ~~overwintering colony~~ is required for project implementation, and the project cannot be redesigned to avoid modification or removal of the stand, ~~vegetation management purposes,~~ then UC Santa Cruz will prepare and implement a site-specific plan for the stand with the goal of maintaining habitat function for the monarch overwintering colony, following ~~feasible~~ recommendations from *Protecting California’s Butterfly Groves Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017). Examples of management strategies that could be considered include:
* remove or trim hazard trees;
* selectively remove or trim trees to create a heterogeneous habitat that provides access to sunlight and shade for monarchs;
* maintain suitable wind protection in the stand; and
* replace removed trees with native trees in strategic locations to provide additional wind protection.

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

Comment S1-6

**ENVIRONMENTAL DATA**

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

Response S1-6

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

Comment S1-7

**FILING FEES**

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

Response S1-7

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

Comment S1-8

Thank you for the opportunity to comment on the Project’s draft EIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or [wesley.stokes@wildlife.ca.gov](file:///\\sacnetapp2a\BIGVOL1\NDrive\UniversityOfCalifornia-\SantaCruzLRDP-\2021%20LRDP%20Admin%20Final%20EIR\wesley.stokes@wildlife.ca.gov); or Mr. Craig Weightman, Environmental Program Manager, at [craig.weightman@wildlife.ca.gov](file:///\\sacnetapp2a\BIGVOL1\NDrive\UniversityOfCalifornia-\SantaCruzLRDP-\2021%20LRDP%20Admin%20Final%20EIR\craig.weightman@wildlife.ca.gov).

Response S1-8

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

Letter S2 University of California, San Diego

Richard D. Norris, Director

March 1, 2021

Comment S2-1

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

Response S2-1

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. Refer to Master Response 12 for additional information regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S2-2

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

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

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

Response S2-2

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. However, the comment does not address the adequacy of the Draft EIR analysis, and no further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S2-3

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

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

Response S2-3

UC Santa Cruz acknowledges the opinions expressed by UC San Diego on the project, the 2021 LRDP. Refer to Master Response 12 for additional information regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Letter S3 University of California, Santa Cruz Natural Reserves

Alex Jones, Campus Natural Reserve Manager  
March 6, 2021

Comment S3-1

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

Response S3-1

This comment includes introductory remarks and does not require a response pursuant to State CEQA Guidelines Section 15088(a). The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-2

**DLRDP 4.3 p.122-123 & DEIR p. 2-19**I strongly support the expansion of the Campus Natural Reserve and see its proposal as a strong indication of the UCSC planners and consultants support of campus education, research, and stewardship. In addition to the areas noted in the 2021 DLRDP land use designation map, I advocate for the inclusion of the portions of the Great Meadow classified as Natural Space to be reclassified as Campus Natural Reserve. This will allow these areas to explicitly be prioritized for education, unobtrusive research, and careful land stewardship.

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

Response S3-2

UC Santa Cruz acknowledges the advocacy for expansion of the Campus Natural Preserve and the importance of the Campus Natural Preserve for UC Santa Cruz. Refer to Master Response 12 for additional information regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-3

**DEIR Mitigation Measures 3.5-3b7 & 3.5-7**Permanent protection of the Campus Natural Reserve could be one avenue to pursue when seeking to mitigate for unavoidable loss of sensitive natural communities and /or to replace Inclusion Area D and amend the Ranch View Terrace Habitat Conservation Plan to allow for the construction of proposed Employee Housing.

Response S3-3

Refer to Master Response 12 regarding long-term habitat protection and the intent of the campus to prepare a campus-wide HCP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-4

**DEIR Mitigation Measure 3.5-2a/2i**I strongly support the creation of a comprehensive, campus-wide Habitat Conservation Plan that would prescribe avoidance and minimization measures for impacts to Ohlone tiger beetle and California red-legged frog, monitoring requirements, and biological goals and objectives for the conservation and adaptive management of each species.

Response S3-4

UC Santa Cruz acknowledges the support for a comprehensive HCP, as discussed in Section 3.5, “Biological Resources.” Refer to Master Response 12 regarding the intent of the campus to prepare a campus-wide HCP This comment does not raise an issue with the analysis in the EIR; therefore, no additional response is required. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-5

**DLRDP 2.2 p.61**“This condition is variable throughout the campus and is a geological feature unique to the State.” There is karst elsewhere in the state, and definitely elsewhere in the world.

Response S3-5

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

Comment S3-6

**DLRDP 2.2 p.65 & 4.5 p.150; DEIR Impact 3.10-5**On the issue of potential groundwater extraction from the karst aquifer system in the central and lower portion of campus: The biological component of the karst system below campus has not been studied in detail but very well could include the same (and possibly other) rare, endemic, and special status species found in Empire Cave, including the following aquatic species: Empire Cave amphipod (*Stygobromus imperialis*), Mackenzie’s amphipod (*Stygobromus mackenziei*), and rare isopods *Caecidotea* n. sp. and *Calasellus californicus*). This should be studied and evaluated prior to any attempt at pumping groundwater from karst systems on campus and appropriate related mitigation measures should be established to reduce potential impacts on sensitive aquatic karst and cave biota.

Response S3-6

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

Comment S3-7

**DEIR Mitigation Measure 3.5-2g**The “fencing” mentioned in this mitigation measure should be a bat-friendly cave gate, which should be implemented as soon as possible to protect the sensitive cave ecosystem from rampant vandalism and disturbance, as well as the safety of students and the general public. The LRDP should identify funding for the construction, installation, and maintenance of this gate. Empire Cave has been identified as the 3rd most biodiverse cave in California, but by far the most impacted (Elliot et al. 2017). A local caver has measured CO2 levels upwards of 4% within the cave, which exceeds safe conditions (M. Davies pers. comm.), and the entrance ladder, combined with the substances people ingest as they party in the cave, presents a clear and present safety issue.

Response S3-7

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

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

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

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

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

Coastal Prairie

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

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

The above-listed revisions do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment S3-8

**DLRDP 2.2 p.46**Second paragraph, left column: “fire and maintenance trails”—are you calling these trails and not roads because they are not paved? I would suggest calling them roads.

Response S3-8

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, page 46 of the 2021 LRDP document has been revised to incorporate the edit. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-9

**DLRDP 3.2 p.92**Objective 4: I applaud this objective and hope to be an active participant in actualizing it. In order for UCSC to provide meaningful protection for habitats, sensitive species, outdoor classrooms, and field research areas, however, significantly more resources must be allocated to these ends. Providing permanent funding and personnel for stewardship programs and coordination, as well as proactive initiatives related to forest/other vegetation management and recreation management, will facilitate reaching this objective.

Response S3-9

UC Santa Cruz acknowledges the commenter’s support for Objective 4, as listed in the 2021 LRDP. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary.The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-10

**DLRDP 4.2 p.112**4. Integrate planning for long-term resilience: As part of this, UCSC should fund development and implementation of a recreation management plan and forest/other vegetation management plan (as in Mitigation Measure 3.18-2 for the latter), including necessary associated permitting that would enable vegetation management work. Without these plans and the means to support them, which would also include personnel, UCSC will not be able to adequately steward its lands in the long-term.

Response S3-10

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

Comment S3-11

**DLRDP 4.4 p. 138**Bicycle trails second paragraph: yes. UCSC should support this planning process and fund the implementation of a resulting recreation/trail management plan.

Response S3-11

UC Santa Cruz acknowledges the support for a recreation/trail management plan as part of the 2021 LRDP. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary.The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-12

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

Response S3-12

Regarding the potential increased use of undesignated trails, UC Santa Cruz acknowledges the commenter’s issues with trails in the upper campus. Page 138 of the Draft 2021 LRDP outlines this issue by stating: “There are also a number of undesignated trails throughout the campus, some of which are used by bicyclists. The LRDP integrated transportation strategy recommends better managing the fire roads and existing campus bike paths and identifying key through-campus routes to connect the lower, central, and upper campus to adjacent parks. This on-going planning process balances pedestrian access for student research areas, recreation and wellness with the need for protecting environmental resources to ensure the health of the natural landscape while providing regional bicycle trail connectivity.” Chapter 2, “Project Description,” of the Draft EIR, specifically Section 2.6.6, Pedestrian Trails, further states, “Existing trail networks could be improved, and new connections provided within campus and to adjacent public lands surrounding the campus. Unpaved multi-use trail networks could include east-west connections in the north campus from Wilder Ranch State Park to Henry Cowell State Park via Pogonip City Park. North-south trail networks could connect through the Moore Creek Preserve and the Great Meadow, connecting routes north to the east-west trail network in the north campus. Additional trail improvements could include connecting the Spring Trail to Spring Street, and Highway 9. Trail corridors that provide access to campus research areas could be limited to pedestrians only, such as Red Hill Road gravel fire road in the north campus.”

Comment S3-13

**DEIR Mitigation Measure 3.18-2**A campus-wide Vegetation Management Plan needs to include dedicated funding for continued management activities, as well as the necessary permits to conduct particular kinds of vegetation removal (such as Timberland Conversion Permits for removing certain tree species from northern maritime chaparral, Timber Harvest Plans, and/or a Programmatic Timberland EIR). Without funding for those permits, we will be unable to do certain vegetation management prescribed within a campus-wide Vegetation Management Plan.

Response S3-13

The Draft EIR represents a programmatic evaluation of the 2021 LRDP and presents feasible mitigation consistent with CEQA. CEQA does not require identification of funding sources; however, funding for preparation of a campus-wide Vegetation Management Plan would be determined after consideration of the 2021 LRDP by the UC Regents and if the 2021 LRDP and its associated mitigation measures are adopted. However, as noted in Master Response 9, upon adoption, the mitigation measures identified in the EIR become binding commitments, including dedication of funds to implement.

Comment S3-14

**DLRDP 4.5 p. 151 and DEIR Mitigation Measure 3.5-1c**The Stormwater management at Emergency Response Center photo-----this area is now revegetated and has been colonized by invasive weeds. Large projects like these not only need invasive species BMP during construction (as outlined in DEIR Mitigation Measure 3.5-1c) but should include funding for longer term vegetation management to ensure we do not continue to allow post-construction landscapes to become invasive weed infestations that can spread to adjacent non-project related lands.

Response S3-14

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

Comment S3-15

**DLRDP 4.4 p. 130-131 & DEIR p. 2-23**Proposed roadway: “Northern entrance”: As mapped, the proposed roadway leading from the North Perimeter parking lot to Empire Grade is sited south of the existing Fuel Break Rd (western extension) fire road (look at the proposed road with an aerial photo basemap). This would result in a need for serious earthwork and the removal of hundreds of trees. If this road is desired, it should follow the existing fire road alignment just north of the proposed road. It also doesn’t precisely follow West Rd (fire road), which it should. Those things said, if this road is built I believe it should be gated and only used for emergency purposes. The road corridor and existing topography would only accommodate one-way traffic in most areas, and making it two-lane would have significant impacts on adjacent slope wetlands, Cave Gulch tributaries and upland habitats supporting California giant salamander (CA Species of Special Concern), redwood forest, and potentially northern maritime chaparral. For these reasons I do not believe this is a viable regular use vehicle corridor.

Response S3-15

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

Comment S3-16

**DLRDP 4.4 p.131 & DEIR p. 2-21**East-West Extension of Meyer Drive—The alignment of this road, as mapped, follows along the southern edge of the paved portion of the East Remote parking lot to its terminus at Coolidge Dr. This alignment would pass over or very near a sinkhole and erosion gully. If you were to realign this road to the south you would pass near more karst hazards and also overwintering burrowing owl habitat.

Response S3-16

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

Comment S3-17

**DLRDP 4.4 pp.136-137 & DEIR pp. 2-27, 2-28**Proposed Bicycle Route: North connection segment of East-west connections—There are problems with this alignment that would become apparent if it is actually considered. There is severe erosion near the western end of the path, which itself appears to pass through areas of the Seep Zone. If this is built, careful siting to a) use exiting 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.

Response S3-17

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

Comment S3-18

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

Response S3-18

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

Comment S3-19

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

Response S3-19

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

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

Coastal Prairie

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

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

The above-listed revisions do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

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

Comment S3-20

**DLRDP 4.5 p.158**The UCSC Upper Campus area has very spotty cell service. When considering expansion of telecommunications services, UCSC should seriously consider broad coverage that would cover all Upper Campus. This is a safety issue for the general public and our UCSC student community.

Response S3-20

UC Santa Cruz acknowledges the commenter’s opinion regarding on-campus cell service. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary.The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-21

**DLRDP 3.2 p.92 (& 3.3 pp.95-96/3.4 pp.100-105)**Objective 1: During the 2005 LRDP period, the 19,500 FTE student enrollment figure identified in the 2005 LRDP was nearly reached and significantly outpaced the implementation of development identified in the plan that would enable UCSC to deliver on its mission of education and research. As a result, there has been a lack of classroom buildings, dormitory space, and other student resources that has impacted the quality of the UCSC student experience. A lack of funding and other resources has also led to increased impacts on campus natural lands, including the Campus Natural Reserve. Karen Holl, UCSC Professor of Environmental Studies, has proposed creating enrollment thresholds that are tied to specific development implementations and resource allocation, without which no further enrollment can occur. I support this idea and strongly encourage the campus to not grow its enrollment beyond its ability to support it---both with infrastructure and with the funding necessary to support programs that can ensure the sustainability of University support operations and effective land stewardship.

Response S3-21

UC Santa Cruz acknowledges the commenter’s support for the establishment of enrollment thresholds as part of the LRDP. This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary. However, please refer to Master Response 9 regarding plan implementation and phasing of development. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-22

**DLRDP 1.0 p.29**Minor correction: Alex Krohn’s job title is Assistant Director, Ken Norris Center for Natural History

Response S3-22

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

Comment S3-23

**DLRDP 2.0 p.36**Aerial photo doesn’t include the northern portion of Upper Campus (zooming out would allow for that). It would be useful to include the campus boundary on the image.

Response S3-23

This comment is noted but does not address the adequacy of the Draft EIR analysis. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-24

**DLRDP 2.1 p.37**Capitalize “Tribal Band” at end of first paragraph, right column. The Land Acknowledgement is buried in this location and would be better to highlight earlier and larger.

Response S3-24

Page 37 of the 2021 LRDP document has been revised to include the requested edit. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-25

**DLRDP 2.2 p.45**Figure doesn’t include Landels-Hill Big Creek Reserve, though I understand including it would dramatically change the scale of the map.

Response S3-25

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

Comment S3-26

**DLRDP 2.2 p.51**Second paragraph, left column: “Campus Natural Reserve” (strike the “s” from Reserves).

Response S3-26

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, the 2021 LRDP document was revised to include the requested edit.The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-27

**DLRDP 2.2 p. 53**First line right paragraph: There is a period missing after “(Festuca perennis)]”

Response S3-27

This comment is noted but does not address the adequacy of the Draft EIR analysis. No further response is necessary; however, page 53 of the 2021 LRDP document was revised to include the requested edit. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-28

**DLRDP 2.2 p.60**Figure 2.16—in the Legend it says “Quarts Diorite (Graphite Rocks)” but I’m pretty sure it should say “Quartz Diorite (Granitic Rocks)”

Response S3-28

Page 60 of the 2021 LRDP document has been revised to include the requested edit.The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S3-29

**DEIR p. ES-48**5th bullet point---“As noted in Mitigation Measures 3.5-2a and 3.5-2h”—it should say 3.5-2i, not 2h.

Response S3-29

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

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

The above-listed revision does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment S3-30

**DEIR p. 3.5-21**Latin name for bank swallow is Riparia

Response S3-30

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

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

The above-listed revision does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment S3-31

**DEIR p. 3.15-11**

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

Response S3-31

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

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

Page 2-25 was also revised for consistency:

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

The above-listed revisions do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration of the 2021 LRDP by the UC Regents for certification.

Comment S3-32

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

Response S3-32

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

Letter S4 University of California, Santa Cruz Natural Reserves

Gage Dayton, Admin Director  
March 8, 2021

Comment S4-1

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

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

Response S4-1

UC Santa Cruz acknowledges the commenter’s opinion on the project, the 2021 LRDP. See Master Response 12 regarding long-term habitat protection. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-2

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

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

Response S4-2

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

Regarding the potential increased use of undesignated trails, refer to Response S3-12. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-3

**3.16 Transportation**

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

Response S4-3

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

Comment S4-4

**3.17-7 UC Santa Cruz Campus Sustainability Plan**

Campus sustainability plan Strategy 1.2 Action 1.2.B and 5. l .B for 2017-2022 specifically mentions creating a campus land use management plan. This plan is critical for a holistic approach to managing campus lands and I am glad to see it included in the DEIR. The plan needs to be campus wide and identify specific actions and methods for achieving them.

Response S4-4

UC Santa Cruz acknowledges the commenter’s support for inclusion of Strategy 1.2 Action 1.2.B and 5.l.B of the Campus Sustainability Plan. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-5

**3.18-9 Vegetation Management**

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

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

Response S4-5

UC Santa Cruz acknowledges the commenter’s support for Mitigation Measure 3.18-2. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-6

**General comment about Arboretum and Campus Natural Reserve MOU**

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

Response S4-6

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

Comment S4-7

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

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

Response S4-7

UC Santa Cruz acknowledges the commenter’s support for coordination with USFWS in the event that campus pursues development of faculty/staff housing at Inclusion Area D. UC Santa Cruz is in the process of coordinating with USFWS regarding potential areas of campus that may have higher conservation value. Refer to Master Response 12 regarding long-term habitat protection and UC Santa Cruz’s intent to prepare a campus-wide HCP. This comment does not address the adequacy of the Draft EIR analysis of potential impacts associated with implementation of the 2021 LRDP. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-8

**Section 3.4-1: Tribal and cultural resources**

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

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

Response S4-8

UC Santa Cruz acknowledges the commenter’s support for Mitigation Measure 3.4-1 and avoidance of sacred tribal cultural sites that may occur within the LRDP area. Please refer to responses to the comments from the Amah Mutsun Tribal Band (Letter O10) regarding Mitigation Measure 3.4-1 and the potential for tribal cultural resources within the LRDP area. Refer also to Master Response 12 regarding long-term habitat protection. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-9

**3.5 Biological Resources Impact**

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

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

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

Response S4-9

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

Comment S4-10

**Mitigation Measures 3.5-2e**

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

Response S4-10

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

Comment S4-11

**Section 3.5.2 - Vegetation Communities**

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

Response S4-11

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

Comment S4-12

**Permanent protection of the Campus Natural Reserve**

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

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

Response S4-12

UC Santa Cruz acknowledges the commenter’s opinion that the Campus Natural Reserves should be permanently protected. Refer to Master Response 12 regarding long-term habitat protection. This comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-13

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

Response S4-13

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

Comment S4-14

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

Response S4-14

UC Santa Cruz acknowledges the commenter’s support for the protection of archaeological and tribal cultural sites that may occur within the LRDP area. Refer to Response S4-8. This comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-15

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

Response S4-15

UC Santa Cruz acknowledges the commenter’s support for preservation of open space for passive recreation opportunities. This comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S4-16

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

Response S4-16

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

Letter S5 California Coastal Commission

Colin Bowser, Coastal Planner  
March 8, 2021

Comment S5-1

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

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

Response S5-1

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

Comment S5-2

**Westside Research Park**

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

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

Response S5-2

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

Comment S5-3

**Main Campus**

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

Response S5-3

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

Comment S5-4

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

Response S5-4

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

Comment S5-5

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

Response S5-5

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

Comment S5-6

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

Response S5-6

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

Letter S6 California Department of Transportation, District 5

Chris Bjornstad, Associate Transportation Planner  
March 8, 2021

Comment S6-1

The California Department of Transportation (Caltrans} appreciates the opportunity to review the DEIR for the UC Santa Cruz LRDP. The LRDP projects up to 28,000 Full-Time Equivalent (FTE) students and 5,000 FTE faculty, construction of an additional 3. l million assignable square feet {asf) of academic and support building space, and approximately 2.5 million asf of student and employee housing space by 2040.

Response S6-1

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

Comment S6-2

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

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

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

Response S6-2

UC Santa Cruz acknowledges Caltrans’ support for the LRDP’s consistency with State planning priorities and, incorporation of multimodal transportation enhancements, including a potential partnership with Santa Cruz Metro Transit District. This comment does not address the adequacy of the Draft EIR analysis. No further response is necessary. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment S6-3

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

Response S6-3

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

Comment S6-4

3. The only mitigation measure listed in the transportation section is implementing a TDM program and monitoring the program in order to lower project VMT below the significance threshold of 15% below baseline total VMT. However, the threshold is not guaranteed to be met even with the TDM program. Therefore, additional mitigation measures pertaining to project safety and operational impacts to the State Highway System {SHS} could be required.

Response S6-4

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

Comment S6-5

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

Response S6-5

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

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

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

Comment S6-6

5. Please consider contributing funding to projects that will lead to fewer impacts along State Route (SR) 1 intersections based upon local concerns at the DEIR Scoping Sessions. The intersections with known operational issues were located at Bay Street, High Street, and Western Drive. Examples from the RTP designed to reduce congestion on SR l include Bus Rapid Transit and the Hwy 1-West Area Alternative Access project.

Response S6-6

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

Comment S6-7

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

Response S6-7

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

Comment S6-8

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

Response S6-8

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

1. An FTE student is a three-quarter average (Fall, Winter, and Spring quarters) measure of (1) an undergraduate student who enrolls for 45 credit hours per academic year; or (2) a graduate student (master’s level or doctoral student not yet advanced to candidacy) enrolled in 36 hours per year; or (3) a graduate doctoral student who has been advanced to candidacy. The LRDP campus population forecast accounts for students studying at the main residential campus and the Westside Research Park. [↑](#footnote-ref-2)
2. An FTE faculty/staff member is defined as the three-quarter average (Fall, Winter, and Spring quarters) of one on-campus position, continuously filled for the entire period and which may be comprised of a combination of part-time positions or one full-time position. [↑](#footnote-ref-3)