### Local/Regional

Letter L1 Santa Cruz Task Force on UCSC Growth Plans

January 11, 2021

Comment L1-1

**NOW IS THE TIME TO ACT**

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

**View The Documents**

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

**Get Involved**

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

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



image reads, "Topics include
Aesthetics
Agriculture and Forest Resources
Air Quality
Biological Resources
Cultural Resources
Energy
Geology, Soils, Paleontology, & Mineral Resources
Green House Gas Emissions
Hazards and Hazardous Materials
Hydrology & Water Quality
Land Use & Planning
Noise
Population & Housing
Public Services and Recreation
Transportation and Traffic
Tribal Cultural Resources
Utilities and Services Systems
Wildfire"

...and more!

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

image reads, "Upcoming Events
February 2021: Draft EIR Public Hearings
Feb 3  5-7 PM
Information for Zoom Meetings will by posted by February 1
Feb 4  5-7 PM
Information for Zoom Meetings will by posted by February 1

Mark Your Calendar

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

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

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

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

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;

2. house any additional students, faculty, and staff on campus, and;

3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing Measure U)

image reads, "What info must UCSC include in the LRDP EIR?
A Project Description
An Environmental Setting Description
An Outline of the Significant Environmental Effects
Describe the Unavoidable Significant Adverse Effects
  The Growth-Inducing Impacts
  The Cumulative Impacts
Mitigation Measures
Alternatives
The Final EIR Contains Response to Public Comments"

image reads, "Tips for Your EIR Comments
Effective Comments are Substantive: 
  They address specific impacts, point out errors, inconsistencies, omissions of data or analyses, conclusions not based on evidence, or failures to provide discussion required by CEQA
Comment should be backed by factual support or personal experience
USCS must respond adequately to substantive comments prior to certification of the EIR

image reads, "USCS must respond to substantive comments before the EIR is certified.
Failure to do so provides basis for legal challenge."

image reads, "Share your comments & concerns with us. 
Email us at info@actonucscgrowth.org with how USCS growth will impact you.

Response L1-1

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

Letter L2 Santa Cruz Task Force on UCSC Growth Plans

January 14, 2021

Comment L2-1

**TIPS TO MAKE YOUR   
COMMENTS ON THE EIR   
MORE EFFECTIVE**

**Get Prepared**

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

**Write Your Comments**

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

**Send Them In!**

Deadline: 5:00 pm on Monday, March 8th, 2021   
Email your comments to eircomment@ucsc.edu

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

Erika Carpenter

Senior Environmental Planner

Physical Planning, Development, and Operations

University of California, Santa Cruz

1156 High Street, Santa Cruz, CA 95064

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

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

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

image reads, "Upcoming Events
February 2021: Draft EIR Public Hearings
Feb 3  5-7 PM
Information for Zoom Meetings will by posted by February 1
Feb 4  5-7 PM
Information for Zoom Meetings will by posted by February 1

**Attend The Public Meetings**

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

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

What We Want

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

1. tie enrollment growth to the development of critical infrastructure, like housing and academic space;

2. house any additional students, faculty, and staff on campus, and;

3. invite additional students, faculty, and staff on campus only when those resources are provided.

(Learn more by viewing Measure U)

Response L2-1

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

Letter L3 Santa Cruz Local Agency Formation Commission

Joe A. Serrano, Executive Officer  
February 3, 2021

Comment L3-1

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

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

Response L3-1

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

Comment L3-2

**1. Conformance to State LAFCO Law and Locally Adopted LAFCO Policies**(Please provide an analysis in the Draft EIR)

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

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

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

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

Response L3-2

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

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

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

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

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

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

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

Further, local Santa Cruz LAFCO policies do not apply to the University in connection with the 2021 LRDP. As noted in Section 3.0.1 on page 3-1 of the 2021 LRDP Draft EIR, the University is a constitutionally created State entity. Therefore, it is not subject to municipal regulations of local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of the university’s educational purposes. While UC Santa Cruz may consider, at its discretion, aspects of local plans and policies of the communities surrounding the 2021 LRDP area, it is not bound by those plans and policies in its planning efforts. Please refer to subsection “2008 Cooperative Settlement Agreement”, Master Response 2 regarding the 2008 Comprehensive Settlement Agreement terms related to LAFCO.

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

Comment L3-3

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

Response L3-3

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

Comment L3-4

**2. Consideration of Governance Options**(Please evaluate the proposed governance options)

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

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

**Table A: List of Potential Governance Options**

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

Response L3-4

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

Comment L3-5

**3. Conformance to the County Urban Services Line (USL)**(Please address the LRDP’s consistency with the USL)

Please include in the Draft EIR an analysis of the LRDP’s consistency with the established USL, which does not appear to be discussed in the Draft EIR. The County of Santa Cruz’s (“County”) General Plan require the County to preserve a distinction between urban and rural areas, to encourage the location of new development in urban areas, and to protect agricultural land and natural resources in rural areas. These policies are supported by the establishment of a rural services line (“RSL”) and the USL to define areas which are or have the potential to be urban and areas which are and should remain rural. The establishment of distinct urban boundaries serves the following purposes:

a) To administer separate urban and rural growth rates and the allocation of residential building permits;

b) To encourage residential development to locate in urban areas and to discourage division of land in rural areas;

c) To develop and apply different policies governing urban and rural development;

d) To provide a basis for a County’s Capital Improvements Program;

e) To coordinate planning for the public services among the County, cities, special districts, and the LAFCO;

f) To ensure that urban development proceeds at a pace consistent with the provision of urban public services; and

g) To limit the extension of urban services to those areas within the rural services line in the Coastal Zone.

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

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

Response L3-5

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

Letter L4 County of Santa Cruz, Board of Supervisors

Ryan Coonerty, Supervisor  
February 12, 2021

Comment L4-1

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

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

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

Thank you for your consideration of this request.

Response L4-1

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

Letter L5 Association of Monterey Bay Area Governments

Heather Adamson, Director of Planning  
February 18, 2021

Comment L5-1

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

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

Response L5-1

This comment includes introductory information and is noted.

Comment L5-2

*Chapter 3.8 (Greenhouse Gas Emissions and Climate Change)*

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

Response L5-2

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

Association of Monterey Bay Area Governments

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

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

Comment L5-3

*Chapter 3.13 (Population and Housing)*

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

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

Response L5-3

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

Growth Projections

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

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

Comment L5-4

*Chapter 3.16 (Transportation)*

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

Response L5-4

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

As part of the 2040 MTP/SCS, AMBAG worked closely with stakeholders to develop a new growth forecast and an updated multimodal transportation network with land use patterns and strategies based on reasonably available revenues. AMBAG developed the 2040 MTP/SCS in close coordination with its three regional transportation planning agencies (RTPAs). Each of the three counties in the Monterey Bay Area has a RTPA responsible for countywide transportation planning and implementation. The three RTPAs consist of the Transportation Agency for Monterey County, the Santa Cruz County RTC and the San Benito County Council of Governments. AMBAG also worked in close coordination with the region’s transit operators, local jurisdictions, Caltrans, the Monterey Bay Area Air Resources District, state and federal resource agencies, local agency formation commissions and other special purpose public agencies. The regional growth forecast expressed and included as part of the 2040 MTP/SCS identifies a growth in student enrollment by 2040 to between 27,000 and 28,000 FTE (AMBAG 2018). The MTP~~T~~/SCS also considers the UC Santa Cruz transit service to be a regionally significant local transit service (AMBAG 2018:2-10)

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

Comment L5-5

*Chapter 4 (Cumulative Impacts)*

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

Response L5-5

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

VEHICLE MILES TRAVELED

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

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

Comment L5-6

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

Response L5-6

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

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

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

Comment L5-7

*Chapter 8 (References)*

* On page 8‐2 in Section 3.3. “Air Quality,” please revise the references to read:
* AMBAG. See Association of Monterey Bay Area Governments.
* Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020‐01/08‐AMBAG\_MTP‐SCS\_AppendixA\_PDFA.pdf. Accessed August 25, 2020.

Response L5-7

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

AMBAG. *See* Association Monterey of Bay Area Governments.

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

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

Comment L5-8

* On page 8‐29 in Chapter 5 “Other CEQA Sections,” revise the references to read:
* AMBAG. See Association of Monterey Bay Area Governments.
* Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020‐01/08‐AMBAG\_MTP‐SCS\_AppendixA\_PDFA.pdf. Accessed August 25, 2020.

Response L5-8

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

AMBAG. *See* Association Monterey of Bay Area Governments.

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

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

Comment L5-9

* On page 8‐29 in Chapter 6 “Alternatives,” revise the references to read:
* AMBAG. See Association of Monterey Bay Area Governments.
* Association of Monterey Bay Area Governments. 2018. 2018 Regional Growth Forecast. Available: https://ambag.org/sites/default/files/2020‐01/08‐AMBAG\_MTP‐SCS\_AppendixA\_PDFA.pdf. Accessed August 25, 2020.

Response L5-9

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

AMBAG. *See* Association Monterey of Bay Area Governments.

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

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

Letter L6 Santa Cruz County Regional Transportation Commission

Ginger Dykaar, Senior Transportation Planner  
March 3, 2021

Comment L6-1

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

Response L6-1

The comment includes introductory information and is noted.

Comment L6-2

* RTC supports the LRDP strategy to provide housing for 100% of the additional FTE students. This is consistent with RTC’s RTP Objective under Goal 1 to *“Improve people’s ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers” and RTP policy 1.5 “Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations.”*
* RTC supports the LRDP strategy to increase on-campus housing opportunities for faculty and staff at both the main campus and the Westside Research Park for up to 25% of the increase in faculty and staff. This is consistent with RTC’s RTP Objective under Goal 1 to *“Improve people’s ability to meet most of their daily needs without having to drive. Improve access and proximity to employment centers” and RTP Policy 1.5 “Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations.”*
* RTC supports the LRDP strategy to provide compact, in-fill and clustered development of academic, administrative, and support facilities in the academic core and student housing around the periphery but close to academic core to provide convenient access and promote pedestrian circulation. This is consistent with RTP Policy 1.5 *“Land Use: Support land use decisions that locate new facilities close to existing services, particularly those that service transportation disadvantaged populations.”*
* RTC Supports the LRDP strategy to develop an improved, more efficient roadway network and to support transit inner campus roadway loop for more efficient transit. RTC staff requests consideration of a transit, bike and pedestrian only infrastructure on the Meyer Drive Extension so as not to increase roadway capacity for automobiles except during emergencies. This is consistent with RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*, Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks,” and Policy 2.3 “Emergency Services: Support projects that provide access to emergency services.”*
* RTC supports the LRDP strategy to promote Transportation Demand Management (TDM) practices to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTP Policy 1.1, *“Expand demand management programs that decrease the number of vehicle miles traveled and result in mode shift.”*
* RTC supports the LRDP strategy to provide infrastructure to optimize trip- and vehicle-miles-traveled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles. This is consistent with RTC Objective under Goal 1, *“Reduce smog-forming pollutants and greenhouse gas emissions”*; RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*; Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks”; and Objective under Goal 2-“ Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit.”*
* RTC supports bicycle and pedestrian infrastructure design that provides for safe travel and reduces the potential for conflict between bicyclists, pedestrians and vehicles. This is consistent with RTP Policy 2.4, *“Reduce the potential for conflict between bicyclists, pedestrians and vehicles”.*
* RTC supports the LRDP strategy to create parking/mobility hubs at peripheral locations with no net new commuter parking for a seamless transfer from one mode to another, promote a walkable campus, enhance alternative transportation opportunities, and increase connectivity within the campus and to the city. This is consistent with RTC Objective under Goal 1, *“Reduce smog-forming pollutants and greenhouse gas emissions”*; RTP Policy 1.3. *“Transportation Infrastructure: Improve multimodal access to and within key destinations”*; Policy 1.4 *“Transportation Infrastructure: Ensure network connectivity by closing gaps in the bicycle, pedestrian and transit networks”; and Objective under Goal 2-“ Improve health by increasing the percentage of trips made using active transportation options, including bicycling, walking and transit.”*
* RTC supports the LRDP strategy to develop adequate transportation infrastructure to allow for quick response to emergencies including wildfires, mud slides and earthquakes. This is consistent with RTP Policy 2.3 *“Emergency Services: Support projects that provide access to emergency services.”*

Response L6-2

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

Comment L6-3

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

Response L6-3

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

Comment L6-4

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

Response L6-4

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

Comment L6-5

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

Response L6-5

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

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

Comment L6-6

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

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

Response L6-6

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

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

| Pollutant | Averaging Time | California Standards2 Primary3 | California Standards2 Attainment Status4 | National Standards1 Primary3 | National Standards1 Attainment Status6 |
| --- | --- | --- | --- | --- | --- |
| Ozone | 1-hour | 0.09 ppm (180 μg/m3) | ~~N~~NT | – | U/A |
|  | 8-hour | 0.070 ppm (137 μg/m3) |  | 0.070 ppm (137 μg/m3) |  |

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

Comment L6-7

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

Response L6-7

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

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

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

Comment L6-8

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

Response L6-8

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

Total Campus VMT

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

As shown in Table 3.16-~~6~~7, the implementation of the 2021 LRDP would result in a decrease in total campus VMT per capita from 9.1 to 7.9 miles, which represents a 13 percent reduction. The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus. However, the project-generated total campus VMT per capita would marginally exceed the significance threshold of 7.7 miles (15 percent below 9.1 miles or 9.1 miles x (1.0 – 0.15) = 7.7 miles) and the project-generated total campus VMT per capita impact would be significant.

It should be noted that the UC Santa Cruz 2017-2022 Campus Sustainability Plan includes a goal to reduce commute VMT by five percent by 2022. While the results in Table 3.16-~~6~~ 7 ~~don’t~~do not measure VMT between the years 2017 and 2022, it does indicate that the proposed 2021 LRDP would support the goal.

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

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

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

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

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| ~~SB 743 VMT Estimates~~**Service Population** | **Land Use1** | **VMT Metric Applied2** | **Calculation** | **2019 Baseline** | **2019 Plus 2021 LRDP** |
| Residents ~~(Resident students + Total Faculty and Staff Household Population)~~ | Resident Students + Total Faculty and Staff Household Population | Residential,  Total Campus | A | 9,939 | 19,795 |
| ~~Employees (Total~~ Employees~~ment)~~ | Total Employment | Employment,  Total Campus | B | 4,297 | 7,520 |
| Students | Total Enrollment | Total Campus | C | 18,518 | 28,000 |
| **Total Service Population  (Residents + Employees + ~~Enrollment~~Students)3** | | | **D  (A + B + C)** | **32,754** | **55,315** | |
| **Total Campus Vehicle Trips (from SCC Travel Model)** | | | **E** | **28,900** | **44,700** | |
| **Average Trip Length in miles~~)~~ (from SCC Travel Model)** | | | **F** | **10.3** | **9.8** | |
| **Total Campus Vehicle Miles Traveled (VMT) in miles (from SCC Travel Model)~~2~~3** | | | **G (E x F)** | **298,000** | **439,000** | |
| **Total Campus VMT per Capita in miles\*** | | | **H (G/D)** | **9.1** | **7.9** | |
| **VMT per Capita Threshold (15 percent below existing)** | | | **2019 Baseline H x (1.00-0.15)** | **7.7 miles** | | |

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

~~1~~2 VMT metric (residential VMT, employment VMT, or total campus VMT) in which each land use is accounted for.

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

~~2~~4 Total campus vehicle trips multiplied by average trip length (rounded to nearest thousand).

~~3~~5 Total campus VMT divided by total service population.

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

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

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

Comment L6-9

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

Response L6-9

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

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

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

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

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

Comment L6-10

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

Response L6-10

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

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

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

Comment L6-11

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

Response L6-11

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

Comment L6-12

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

Response L6-12

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

Comment L6-13

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

Response L6-13

The countywide “Residential VMT/Capita” and “Employment VMT/Capita” were calculated by applying the SCC model to extract the home-based VMT for all residential land uses and home-based work VMT for all employment land uses in the county, and dividing by the total countywide population or employment, respectively. The same methodology was applied for the traffic analysis zones in the model that contain the campus – the residential and employment VMT was extracted and divided by the population and employment.

Comment L6-14

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

Response L6-14

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

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

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

Comment L6-15

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

Response L6-15

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

Comment L6-16

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

Response L6-16

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

Comment L6-17

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

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

Response L6-17

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

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

Morgan Bostic, Advocate  
March 5, 2021

Comment L7-1

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

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

Response L7-1

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

Comment L7-2

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

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

Response L7-2

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

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

Comment L7-3

2. The analysis of the potentially significant impacts of development in the north campus subarea is deeply flawed. The LRDP proposes to locate housing for 3,700 of the 8,500 additional students (43%) as well as 200,000 assignable square feet (asf) (8%) of additional academic support facilities in a State designated high-risk fire hazard area with no new road access provided (page 3.17-30-32). Yet, the DEIR finds that neither the campus Emergency Operations Plan, nor the Campus Evacuation Plan need to be revised in response to this proposal. Further, the potential impact for wildfires is found, without supporting evidence, to be less than significant. The DEIR asserts that simply adopting a vegetation management plan would reduce the potentially significant impact to less than significant. Finally, while the DEIR does consider the potential impacts of not locating development in this area, this option is not considered as a potentially feasible alternative.

Response L7-3

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

Comment L7-4

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

Response L7-4

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

Comment L7-5

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

Response L7-5

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

Comment L7-6

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

Response L7-6

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

Comment L7-7

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

Response L7-7

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

Comment L7-8

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

Response L7-8

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

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

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

Comment L7-9

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

Response L7-9

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

Comment L7-10

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

Response L7-10

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

Comment L7-11

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

Response L7-11

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

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

Comment L7-12

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

Response L7-12

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

Comment L7-13

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

Response L7-13

As stated in Master Response 11, the 2021 LRDP is a planning level document that designates areas of the campus with certain land uses. An overall assumption of development is provided for each land use type based on the number of students that could be accommodated, but no specific buildings have been proposed under the 2021 LRDP. It is a planning-level document and the EIR evaluates the 2021 LRDP at a planning level of detail. As stated in CEQA Guidelines Section 15146, the “degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR...An EIR on a project such as the adoption or amendment of a…plan…need not be as detailed as an EIR on a specific project.” This same response applies to several of the comments provided below concerning the level of detail in the EIR. Further, the infrastructure identified in Chapter 2, “Project Description” of the Draft EIR considered the building program of the 2021 LRDP in determining the potential sizing and location of on-campus infrastructure, as requested by the commenter. The Draft EIR also assesses the potential impacts of those infrastructure needs as part of the overall Draft EIR’s analysis, consistent with CEQA requirements. Please refer to Master Response 9 regarding phasing of development.

Comment L7-14

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

Response L7-14

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

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

Comment L7-15

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

Response L7-15

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

Comment L7-16

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

Response L7-16

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

Comment L7-17

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

Response L7-17

Please see Master Response 11 and Response L7-13 concerning level of detail needed in the Draft EIR. State CEQA Guidelines Section 15124 requires a project description to contain the level of detail needed “for evaluation and review of the environmental impact.” The 2021 LRDP building program is provided on page 2-11 and Table 2-2 of the Draft EIR, including a description of development planned in the north campus area. Further, Figure 2-4 on page 2-12 of the Draft EIR identifies potential development areas on the main residential campus, including the north campus subarea. Therefore, the Draft EIR complies with CEQA requirements.

Comment L7-18

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

Response L7-18

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

Comment L7-19

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

Response L7-19

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

Comment L7-20

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

Response L7-20

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

Comment L7-21

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

Response L7-21

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

Comment L7-22

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

Response L7-22

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

Comment L7-23

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

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

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

Response L7-23

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

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

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

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

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

Comment L7-24

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

Response L7-24

See Response L7-13 and Master Response 11 concerning level of detail evaluated in this EIR. State CEQA Guidelines Section 15124 requires a project description to contain the level of detail needed “for evaluation and review of the environmental impact.” Sections 2.2.1 and 2.2.3 describe the location of the 2021 LRDP area in relation to the City of Santa Cruz boundary. Further, 2-4 identifies potential development areas on the main residential campus, including the north campus subarea. Therefore, the Draft EIR complies with CEQA requirements.

Comment L7-25

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

Response L7-25

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

Comment L7-26

- 2-15 – Land use designations in acreage:

|  |  |  |  |
| --- | --- | --- | --- |
| Land Use Designations | Acreage Under the 2005 LRDP, as Amended1 | 2021 LRDP Acreage | Net  Change |
| Academic Land Use Designation |  |  |  |
| Academic & Support (Academic Core in the 2005 LRDP) | 132 | 163 | 31 (23.5%) |
| Residential Land Use Designations |  |  |  |
| Colleges and Student Housing | 245 | 277 | 32 (13.1%) |
| Employee Housing | 75 | 823 | 7 (9.3%) |

Response L7-26

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

Comment L7-27

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

Response L7-27

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

Comment L7-28

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

Response L7-28

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

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

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

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

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

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

Comment L7-29

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

Response L7-29

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

Comment L7-30

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

Response L7-30

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

Comment L7-31

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

Response L7-31

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

Comment L7-32

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

Response L7-32

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

Comment L7-33

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

Response L7-33

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

Comment L7-34

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

Response L7-34

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

Comment L7-35

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

Response L7-35

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

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

Comment L7-36

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

Response L7-36

In response to this comment, the Draft EIR has been revised to clarify that the policies comprise the 2021 LRDP Physical Planning Principles and Guidelines and were inadvertently included in the “Issues Not Evaluated Further” section of the Draft EIR. As stated on page 3.1-36, the 2021 LRDP Physical Planning Principles and Guidelines articulate the manner in which future development under the 2021 LRDP would be planned, designed, constructed, and maintained. These modifications are also shown in Chapter 4, “Revisions to the Draft EIR”. The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5. As such, recirculation of the Draft EIR is not required.

2021 LRDP Physical Planning Principles

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

A. The Campus Land – Respect and Resiliency

1. Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments -- meadow, ecotone (forest edge), and forest – with architecture that is sensitive to the natural setting.

2. Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.

3. Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.

4. Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.

5. Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.

B. Academic Core Infill and Expansion – Growth from Within

1. Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment

2. Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.

3. Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.

4. Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.

5. Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.

C. Campus Life and Housing – The Expanded Ring

1. Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.

2. Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.

3. Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.

4. Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.

5. Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.

D. Integrated Transportation – Walkable Core

1. Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core

2. Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment.

3. Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner campus loop and interconnected roadway network for improved access.

4. Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.

5. Generate dynamic public gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.

E. Pedestrian Mobility – Web of Pathways

1. Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.

2. Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.

3. Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.

4. Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.

5. Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.

F. Campus and Community – Culture and Connectivity

1. Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.

2. Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.

3. Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.

4. Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.

5. Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.

ISSUES NOT EVALUATED FURTHER

Result in Damage to Scenic Resources within a State Scenic Highway

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

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

~~1. Preserve the integrity of campus landscapes. Buildings shall respond to the varied natural environments -- meadow, ecotone (forest edge), and forest – with architecture that is sensitive to the natural setting.~~

~~2. Respect major natural features. Maintain continuity of wildlife habitats, surface drainage flows, and compatibility of landscaping with surrounding native plant communities.~~

~~3. Minimize disturbance to open space. Retain for research and for its aesthetic values, as well as to honor the character and cultures of this incomparable site chosen for UC Santa Cruz.~~

~~4. Integrate planning for long-term resilience. To the extent possible, include climate adaptive strategies in all development to manage potential long-term and short-term challenges to the campus buildings and infrastructure. Foster conservation and maintenance of the land resource.~~

~~5. Integrate the natural and built environment. In forested areas, buildings should not protrude above the surrounding tree canopy; in visually sensitive areas, interruption of prime viewsheds and viewpoints will be minimized.~~

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

~~1. Grow from within. Focus growth in previously developed areas of the academic core, including infill buildings and opportunities to densify, to minimize impacts on the natural environment~~

~~2. Maintain adjacencies with existing development. Continue compact expansion north of the Academic Core to facilitate connections to new neighboring colleges and student housing.~~

~~3. Sensitively site buildings to protect scenic viewsheds. Extend clustered development south of the Academic Core, maintaining the existing pattern of lower density development to minimize visibility of new buildings and maintain view corridors from existing buildings.~~

~~4. Maintain an open space network within the academic core. Provide spaces for contemplation, reflection and wellness.~~

~~5. Build sustainably and efficiently. Maximize investment in the land by considering long-term life cycle costs and increased building height, where feasible.~~

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

~~1. Continue the pattern of colleges and student housing around the periphery. Optimize access to learning, research, and student support destinations by locating colleges and housing as close to the academic core as possible.~~

~~2. Cluster non-college student housing in infill locations near or adjoining existing colleges. Support the diverse student body with a variety of housing types, located with convenient access to academic and student support services.~~

~~3. Distribute recreational opportunities close to student housing. Complement concentrated college athletic facilities at the Athletics and Recreation area by promoting a diverse array of other opportunities for wellness and exercise throughout the campus.~~

~~4. Enrich the quality of campus life. Provide a variety of public services and student support spaces to help meet basic needs and allow students to thrive.~~

~~5. Provide supportive living / learning communities. Continue to balance the context of a major research university with the more intimate scale in the residential colleges.~~

~~D. Integrated Transportation – Walkable Core~~

~~1. Consolidate parking at the periphery of the academic core. Serve with frequent, direct transit service, and enhanced walking and biking pathways directly connecting to the academic core~~

~~2. Activate the core. Limit routine vehicular traffic flow from internal roadways to prioritize pedestrian connectivity and promote a safe pedestrian environment~~

~~3. Prioritize efficient transit access and routes. Extend Meyer Drive to create an inner campus loop and interconnected roadway network for improved access~~

~~4. Create active building frontages at ground level. Enhance the visual and experiential quality of the pedestrian and connect interior programs visually with exterior surroundings.~~

~~5. Generate dynamic public gathering spaces. Provide gathering spaces shared between buildings and at entries for increased public activity and to foster dynamic interactions between students, faculty and staff.~~

~~E. Pedestrian Mobility – Web of Pathways~~

~~1. Extend the pattern of east-west pedestrian paths. Provide convenient and direct access from new housing at the periphery to academic and social destinations in the core.~~

~~2. Improve existing pathways to reinforce walkability. Designate and prioritize select pedestrian corridors between key destinations throughout campus.~~

~~3. Strive to provide equal access throughout campus. Remove barriers through physical and programmatic improvements.~~

~~4. Expand comprehensive program of Travel Demand Management (TDM) strategies. Continue to expand options and incentives for alternative circulation modes, such as walking and bicycling.~~

~~5. Manage service road access with public circulation. Promote use of service roads to safely accommodate bicycle and pedestrian circulation. Avoid pedestrian and vehicular conflicts where possible and route deliveries and loading docks away from building entries and gathering spaces.~~

~~F. Campus and Community – Culture and Connectivity~~

~~1. Protect historic cultural resources. Maintain the historical integrity of the Cowell Lime Works Historic District and other cultural resources through rehabilitation of structures while embracing opportunities for the area to more actively contribute to campus and community life.~~

~~2. Protect prehistoric, archaeological and tribal cultural resources. In recognition of the history of Indigenous peoples and their relationship to their traditional homeland, partner with the Amah Mutsun Tribal Band in designing land stewardship practices.~~

~~3. Cultivate public programs as community resources. Continue investments in programs serving both the campus and the Santa Cruz communities.~~

~~4. Expand employee housing near campus entries. Cluster development to share resources and infrastructure and locate with ease of access to city destinations and amenities.~~

~~5. Ensure continued collaboration and communication with the greater community. Work together to sustain economic, social and physical health for the region by identifying shared strategies that address common goals.~~

Comment L7-37

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

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

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

Response L7-37

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

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

Comment L7-38

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

Additionally, more detailed information can be found on these upper campus trail map1. Therefore, without this analysis and proposed mitigation(s), this section of the EIR is inadequate and an updated version should be recirculated that includes a detailed analysis of the visual impacts of the 2021 LRDP on the existing visual character or quality of public views of the site from publicly accessible trails, fire-roads, and all other publicly accessible space and vantage points. Because the trails are specifically used for pedestrians, cyclists, and equestrians to access undisturbed natural space, the impact on these cherished visual resources on the existing visual character or quality of public views of the site could not be mitigated by adherence to planning documents that guide development in urbanized areas. UCSC must propose feasible mitigations to prevent the degradation of visual resources in North Campus. If none are available, this impact should be changed to **significant and unavoidable**.

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

Response L7-38

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

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

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

Comment L7-39

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

Response L7-39

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

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

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

Comment L7-40

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

Response L7-40

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

Comment L7-41

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

Response L7-41

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

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

Comment L7-42

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

Response L7-42

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

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

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

Comment L7-43

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

Response L7-43

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

Comment L7-44

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

Response L7-44

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

Comment L7-45

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

Response L7-45

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

Comment L7-46

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

Response L7-46

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

Comment L7-47

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

Response L7-47

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

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

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

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

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

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

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

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

Comment L7-48

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

Response L7-48

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

Comment L7-49

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

Response L7-49

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

Comment L7-50

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

Response L7-50

Impact 3.2-2 of the Draft EIR evaluates the potential for the 2021 LRDP to result in a loss or conversion of forest land to non-forest use consistent with the significance criteria listed in Appendix G of the State CEQA Guidelines. Appendix G of the State CEQA Guidelines serves as “a sample form that may be tailored to satisfy individual agencies’ needs and project circumstances…. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.” UC Santa Cruz, as the lead agency, chose to use the sample questions in Appendix G as the significance determination threshold for assessing impacts that could result from implementation of the 2021 LRDP, including the loss or conversion of forest land to non-forest use. Consistent with PRC Section 12220(g), Impact 3.2-2 defined “forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. As explained on page 3.2-12 of the Draft EIR, UC Santa Cruz would retain an estimated 10 percent or greater tree cover at a given development site such that the project sites would still be considered forest land per PRC Section 12220(g). Maintaining at least 10 percent forested land cover would continue to provide public benefits such as aesthetics, biodiversity, water quality, and recreation, which are essential to UC Santa Cruz’s objectives for the 2021 LRDP and would be consistent with local policy direction of the surrounding county. Therefore, the Draft EIR’s consideration of PRC Section 12220(g) to determine the ultimate significance conclusion of forest resources meets the CEQA requirement for thresholds of significance and substantial evidence.

Comment L7-51

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

Response L7-51

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

Comment L7-52

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

Response L7-52

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

Comment L7-53

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

Response L7-53

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

Comment L7-54

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

Response L7-54

While the programmatic nature of the EIR limits the specificity in analyzing the level of construction activity that would occur over the build out period of the 2021 LRDP, the Draft EIR provides a reasonable analysis of foreseeable levels of construction during the implementation period based upon historic and projected development levels. As noted on page 3.3-17 of the Draft EIR, the programmatic assessment of construction assumes up to approximately 481,100 gsf of construction, which exceeds an amortization of potential building square footage under the 2021 LRDP through the 2040-2041 academic year by approximately 50,000 gsf per year (i.e., assumes about 10 percent more than average amount of development per year). As a result, the Draft EIR’s assessment of potential construction emissions is considered reasonable (not best case or even an average case) and in accordance with CEQA requirements. The assessment of a worst-case analysis is not required under CEQA and would result in unrealistic overestimates of construction emission estimates. Future projects under the 2021 LRDP will be subject to environmental review, which, among other things, will assess whether assumptions in the EIR about the scale and pace of development were accurate. With respect to the potential need to tie enrollment to development, refer to Master Response 9, regarding plan implementation and subsequent environmental review.

Comment L7-55

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

Response L7-55

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

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

Comment L7-56

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

Response L7-56

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

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

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

Comment L7-57

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

Response L7-57

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

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

Comment L7-58

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

Response L7-58

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

Comment L7-59

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

Response L7-59

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

Comment L7-60

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

Response L7-60

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

Comment L7-61

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

Response L7-61

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

Comment L7-62

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

Response L7-62

As stated on page 3.5-31 of the Draft EIR, UC Santa Cruz, as a state agency, is not required to consult with USFWS for nonfederal actions simply by virtue of the fact that a project is within designated critical habitat; critical habitat designations are imprecise, and actual project impacts—including the potential need for consultation with USFWS—are determined based on project-specific surveys and data. UC Santa Cruz would need to consult if its actions resulted in take of a species covered by the federal Endangered Species Act. While much of the area where designated critical habitat for California red-legged frog (federal-listed endangered species) overlaps the LRDP area contains habitat suitable for the species (as shown in Figure 3.5-7 on page 3.5-45 of the Draft EIR) some of these areas of overlap do not contain habitat suitable for the species (e.g., developed areas and other areas where presence of the species is unlikely). Projects under the 2021 LRDP would only require consultation with USFWS if a project was likely to result in take of California red-legged frog, as determined through implementation of Mitigation Measure 3.5-1a on page 3.5-39 of the Draft EIR, regardless of whether designated critical habitat for the species is present. However, as noted in Master Response 12, the campus has initiated discussions with the USFWS to permanently set aside acreage currently designated in the Campus Natural Reserve (CNR) on the main residential campus into a campus-wide HCP.

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

Comment L7-63

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

Response L7-63

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

Comment L7-64

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

Response L7-64

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

Comment L7-65

- 3,5-40ff – Mitigation for Special Status Plants – The mitigation measure in the DEIR only requires replacement of lost vegetation on a 1 for 1 basis. Given the sensitivity of these species, elimination of their natural habitat should require replacement at least on a 2 for 1 basis in order for the mitigation to be adequate. Requiring a 2 for 1 replacement of vegetation in critical habitat is a common and feasible option.

Response L7-65

A 1:1 replacement ratio, or “no net loss” is common for development projects, and a ratio greater than 1:1 is not typically required or recommended by applicable resources agencies (e.g., USFWS, CDFW). Further, under CEQA, mitigation measures must have an “essential nexus” and be roughly proportional to the impact that they cause; this is also consistent with constitutional law on takings. Thus, for the purposes of CEQA, a greater than “no net loss” mitigation is not considered to be consistent with CEQA requirements and is more than needed to mitigate an impact. However, Mitigation Measure 3.5-1b, which starts on page 3.5-40 of the Draft EIR, provides room for agency coordination and ratios (outside of the context of CEQA) by specifying that the compensation ratio will be “…at a minimum 1:1 ratio, considering acreage as well as function and value.” If determined at the project-level by a qualified biologist that a 1:1 ratio would not be sufficient to compensate for the impact of future development under the 2021 LRDP, a project-level environmental analysis would not limit the ratio to 1:1.

Comment L7-66

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

Response L7-66

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

Comment L7-67

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

Response L7-67

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

Comment L7-68

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

Response L7-68

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

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

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

Comment L7-69

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

Response L7-69

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

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

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

* A qualified biologist will conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of habitat suitable for the species identified during the reconnaissance-level survey (e.g., ruderal grassland, successional grassland, scrub habitat with sparse shrub cover) on and within 1,500 feet of the project site. Surveys will be conducted before the start of project activities and in accordance with Appendix D of the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFW 2012, or most current version) (CDFW Staff Report).
* If no occupied burrows are found, the qualified biologist will submit a report documenting the survey methods and results to UC Santa Cruz, and no further mitigation will be required.
* If an active burrow is found within 1,500 feet of pending construction activities that would occur during the nonbreeding season (September 1 through January 31), UC Santa Cruz shall establish and maintain a minimum protection buffer of ~~100~~ 165 feet around the occupied burrow throughout construction. The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan will be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls will not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan will include a compensatory habitat mitigation plan (see below).
* If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows will not be disturbed and will be provided with a protective buffer at a minimum of ~~100~~ 650 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW Staff Report. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW Staff Report.
* If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, UC Santa Cruz will mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW Staff Report, which states that permanent impacts on nesting, occupied and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) will be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. UC Santa Cruz will retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
* Mitigation lands will be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
* If feasible, mitigation lands will be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
* If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and will aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.
* If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan will include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures (e.g., measures required if performance standards and success criteria are not met). Success will be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW Staff Report, will include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

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

Comment L7-70

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

Response L7-70

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

Comment L7-71

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

Response L7-71

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

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

Comment L7-72

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

Response L7-72

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

In order to ensure that the mitigation measures and project revisions identified in the EIR…are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The MMRP is a legally binding instrument to require implementation of mitigation measures identified to reduce project impacts in compliance with CEQA Guidelines section 15126.4(a)(2). Therefore, the evaluation of mitigation measures reasonably assumes UC Santa Cruz compliance with mitigation measures that are adopted for the 2021 LRDP.

Comment L7-73

- 3.5-68 – Significance after Mitigation – The finding of a less than significant level is not supported by substantial evidence that the impacts would be reduced to a less than significant level despite the implementation of the mitigation measures. Therefore, the impact after mitigation should be determined as **significant and unavoidable**.

Response L7-73

The comment does not identify why the evidence provided in the impact analysis under Impact 3.5-3 on pages 3.5-65 through 3.5-68 of the Draft EIR is not sufficient. Thus, a detailed response is not possible. Further, as discussed on page 3.5-68, implementation of Mitigation Measures 3.5-1a, 3.5-1c, 3.5-3a, 3.5-3b, and 3.5-3c would reduce significant impacts on sensitive natural communities and riparian habitat to a less-than-significant level by requiring reconnaissance-level surveys of projects under the 2021 LRDP to determine the likelihood of presence of the habitats, prevention measures for the spread of invasive plant species and Sudden Oak Death, protocol-level surveys for sensitive natural communities and riparian habitat if determined to be likely to occur, implementation of avoidance measures, and compensation for permanent loss of these habitats such that there is no net loss, potentially including a streambed alteration agreement with CDFW.

Comment L7-74

- 3.5-70ff – Impact 3.5-5 – Wildlife Movement Corridors – The DEIR focuses on **construction** related impacts on wildlife movement corridors and nursery habitat and the proposed mitigations only respond to these potential impacts.

Response L7-74

Impact 3.5-5 in Section 3.5, “Biological Resources,” evaluates construction-related impacts as well as operation-related impacts, such as placement and design of buildings and other infrastructure (e.g., fencing, lighting). Thus, further response is not required.

Comment L7-75

- While the DEIR does mention the danger of fencing on wildlife, it does not consider the reduction of wildlife movement corridors by the permanent development in the north campus subarea where the total subarea was identified as part of a larger wildlife movement area (page 3.5-33). Not only will the new buildings reduce the wildlife corridor but the influx of students, faculty and staff will have impacts on movement of wildlife currently using the area. Particularly, with regards to Mountain Lions, recent UCSC studies have proven that mountain lions will abandon killed prey upon hearing human voices. An adequate EIR analysis must consider the potential impacts of the new structures and their population within the wildlife movement corridor.

Response L7-75

The requested analysis is already provided in the Draft EIR. Impact 3.5-5 on pages 3.5-70 through 3.5-73 of the Draft EIR specifically addressed north campus and identifies this area as a wildlife movement corridor. The impact analysis for mountain lion, which starts on page 3.5-60 of the Draft EIR, discusses potential impacts on the species resulting from development under the 2021 LRDP. These impacts were analyzed in the Draft EIR, and further response is not required.

Comment L7-76

- Destruction of nesting habitat will have a devastating effect on birds when they return to destroyed nesting sites during the next breeding season. It is essential to permanently protect already existing habitat for special status bird species, as well as common birds. Because the nests of small birds are difficult to find, habitat suitable for these species within the LRDP should be protected. Habitat is crucial not only for nesting but also for foraging (ex. Black Swift may forage within the LRDP area).

Response L7-76

This comment states that habitat suitable for nesting birds (special-status species and common species) should be protected. Impact 3.5-2 in Section 3.5, Biological Resources,” evaluates impacts to nesting birds. As stated on page 3.5-54, implementation of Mitigation Measures 3.5-1a and 3.5-2f would reduce potential impacts on special-status birds, raptors, and other native nesting birds by requiring reconnaissance-level surveys for projects under the 2021 LRDP to determine the likelihood of presence of nesting birds, focused surveys for the nesting birds if determined to be likely to occur, and implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected. No further response is required.

Comment L7-77

- In general, the impacts and proposed mitigations described in the LRDP do not take into account the overall destruction of habitat for all species in the described area. Construction activities and the resulting permanent changes to the landscape will affect all natural areas and wildlife therein, not just species of special interest. Additional analysis of these issues should be provided in the EIR.

Response L7-77

This comment states that impact analyses and mitigation measures in the Draft EIR do not consider the destruction of habitat in the LRDP area, but does not refer to a specific analysis in the Draft EIR. Table 3.5-4 and Figure 3.5-6 on pages 3.5-36 and 3.5-37 of the Draft EIR, respectively, identify the impact acreage for vegetation communities (i.e., habitat) that would result from implementation of the 2021 LRDP. In addition, Impact 3.5-2 in Section 3.5, Biological Resources,” evaluates impacts to natural vegetation communities where special-status wildlife species could potentially occur, including redwood, grassland, coastal mixed hardwood, northern maritime chaparral, coastal prairie, coyote brush, and riparian woodland and scrub. This issue has been analyzed in the Draft EIR, and further response is not required.

Comment L7-78

- For wildlife, the LRDP focuses primarily on mitigation efforts during the breeding season. There is little effort/planning for long term protection/preservation of habitat for species outside of the breeding season. Additional analysis of these issues should be provided in the EIR.

Response L7-78

The comment is inaccurate in its statement that mitigation for impacts on wildlife in the Draft EIR are focused on the breeding season. Some wildlife species, such as migratory birds, would only be considered sensitive within the LRDP area during the breeding season; thus, impacts would only be expected to occur during the breeding season. Most of the special-status species that could occur in the LRDP area could be present year-round, and the mitigation presented in the Draft EIR is designed to avoid injury and mortality and habitat impacts on these species.

Comment L7-79

- 3.6-12 – This following sentence in the DEIR is unclear and needs to be revised: “The Campus Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES.”

Response L7-79

The comment recommends that the sentence on page 3.6-12 be revised and clarified. The comment refers to the following sentence "The Campus Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES.”

As shown in Chapter 4, “Revisions to the Draft EIR”, this sentence has been revised as follows: "Up to 4 megawatts (MW) of on-campus solar photovoltaic electricity generation, producing an estimated 5,718 MWh/year assuming a yield of 1,448 kWh/kWdc, is also being considered for the Campus under the CES (UC Santa Cruz 2017).”

Comment L7-80

- 3.6-12ff – Impact 3.6-1 – Unnecessary, Inefficient, and Wasteful Energy Use – The DEIR’s determination that the energy impact of the proposed LRDP would be less than significant is inadequate. This finding is based on the fact that development will conform to Title 24 standards and UC energy policy, and that, in most cases, per capita energy use will decline. However, the increased impact on the environment is not only dependent on per capita use but on the total increase in energy demand. The FEIR must include analysis of the total increase in energy demand and analyze its significance under CEQA significance criteria.

Response L7-80

The net increase in building energy and total energy consumption is shown in Table 3.6-3 and Table 3.6-5). There is no evidence, including in this comment, that use the 2021 LRDP’s use of energy, as considered under CEQA, would be wasteful or inefficient. As to the effects of energy use, such as air emissions or greenhouse gas effects, these impacts are considered in Sections 3.3 and 3.8 of the Draft EIR.

Comment L7-81

- As shown in Table 3.6-5, on page 3.6-15, net increase in energy use will be about 67% (the per capita increase will be 16%). The net increase in natural gas use will be about 18%, the net increase in transportation use will be 38%, and the total MMBTU net increase will be about 33%.

Response L7-81

Contrary to statements made in this comment, overall energy use associated with development within the LRDP area would increase under the 2021 LRDP, however, per capita energy use would generally decline. Table 3.6-5 on page 3.6-14 has been updated and relabeled to include the requested information.

Table 3.6-5 Per-Capita Annual Energy Consumption with 2021 LRDP Implementation Compared to Existing Conditions

| Annual Energy Metrics | 2019 Existing | 2040 Net Increase  (with 2021 LRDP) | Percent Change |
| --- | --- | --- | --- |
| Building Electricity Use (kWh) | 48,479,557 | 32,282,652 | ~~NA~~ 67% |
| Building Natural Gas Use (therms) | 4,954,650 | 873,967 | ~~NA~~ 18% | |
| Transportation Gasoline Use (gal)1 | 2,580,660 | 980,939 | ~~NA~~ 38% | |
| Total MMBTU2 | 983,050 | 320,033 | ~~NA~~ 33% | |
| Population | 22,344 | 12,830 | ~~NA~~ 57% | |
| kWh per capita | 2,170 | 2,516 | 16% |
| therms per capita | 222 | 68 | -69% |
| Gasoline gallons per capita | 115 | 76 | -34% |
| MMBTU per capita | 44 | 25 | -43% |

Notes: gal = gallons; kWh = kilowatt hours; MMBTU = million British thermal units

1 Includes both fleet and non-fleet mobile fuel use.

2 Excludes transportation-related diesel, natural gas, and electricity use.

Source: Data provided by Ascent Environmental, Inc. in 2020

The above-listed change does not constitute significant new information, as defined by the State CEQA Guidelines Section 15088.5 because it provides clarification regarding a statement made in the Draft EIR and would not result in new or more significant impacts. As such, recirculation of the Draft EIR is not required.

Comment L7-82

- The DEIR provides no evidence that these increases are necessary and efficient. For example, Executive Order N-79-20 set a statewide goal of 100% zero emission car and truck vehicles by 2035 yet the UC Sustainable Practices Policy, which is used to justify the DEIR’s determination, only requires that 50% of the campus’ light duty vehicles be either zero emission or hybrid by 2025.

Response L7-82

As noted throughout Section 3.6, “Energy,” additional energy use is needed to support the operation of the new land uses under the 2021 LRDP. Further and as noted on page 3.6-12, achievement of LEED Silver building standards, at a minimum, is required by the UC Santa Cruz Campus Standards Handbook and UC Sustainable Practices Policy for all future construction under the 2021 LRDP. In and of themselves, compliance with these standards is considered a measure of efficiency.

The comment also noted that the UC Sustainable Practices Policy regarding campus vehicle purchase requirements are inconsistent with Executive Order (EO) N-79-20. EO N-79-20 requires that 100% of new sales of passenger cars and trucks in the state be zero-emission by 2035. It does not require that 100% of vehicles in current use are 100% zero-emissions. The 2021 LRDP would not conflict with EO N-79-20.

Comment L7-83

- Moreover, the DEIR doesn’t discuss the relationship of the increase in MMBTUs of about 38% to the AB 32 and AB 197 provisions authorizing the California Air Resources Board to achieve a reduction of greenhouse gas emissions by at least 40% below 1990 levels by 2030 (page 3.6-4).

Response L7-83

The 2021 LRDP would result in an increase in overall energy use as required to support the new proposed land uses. Greenhouse gas emissions impacts, including those addressing AB 32 reductions, are evaluated under Impact 3.8-1 (beginning on page 3.8-21 of the Draft EIR) and account for the increased energy use under the 2021 LRDP.

Comment L7-84

- In addition, unlike mitigations included in an EIR, there is are no indication that UC policies are legally binding. The EIR should analyze and disclose what would happen if UCSC is unsuccessful in fully implementing these policies. To ensure full implementation and reduce potential energy impacts these policies, unless legally binding, should be added as mitigation measures.

Response L7-84

All campuses in the UC system, including, UC Santa Cruz, are required to implement the policies set forth for the UC system by the UC Regents, unless those policies grant the campuses discretion. The Draft EIR appropriately considered which policies would represent binding commitments to UC Santa Cruz, including those that provide for exceptions (i.e., the use of natural gas as provided on page 3.6-12 of the Draft EIR).

Comment L7-85

- Finally, there is no evidence in the DEIR for determining that simply applying current UC policies is sufficient to help meet State energy goals and to not represent an inefficient use of energy over the term of the LRDP. The impact determination should be **significant and unavoidable**.

Response L7-85

The 2021 LRDP would be required to comply with Title 24 Building Energy Efficiency Standards. As shown in Table 3.6-2 and discussed on Page 3.6-11, the latest Title 24 building energy efficiency standards are more efficient than the UC Whole Building Performance Target recommended in the UC Sustainable Practices Policy. UC Santa Cruz would thus be subject to the latest Title 24 standards, which are consistent with the State's energy goals.

Comment L7-86

- 3.6-16 – Impact 3.6-2 – Conflict with Policies – The determination that there is no inconsistency with applicable policies is not supported by substantial evidence (see comments on Impact 3.6-1). For example, clearly, implementation of the LRDP as proposed will not meet the goal of 100% zero emission vehicles by 2035. The impact determination here should be **significant and unavoidable**.

Response L7-86

The comment, in stating that the significance conclusion for Impact 3.6-1 is not supported by evidence, refers to the UC Sustainable Practices Policy D 1.a. which states that "By 2025, zero-emission vehicles or hybrid vehicles shall account for at least 50 percent of all new light-duty vehicle acquisitions." The comment also argues that this policy is inconsistent with EO N-79-20. Please refer to the Response L7-82.

Comment L7-87

- 3.7-27 – Impact 3.7-5 – Karst Topography Risk - The DEIR determines that the potential impact will be less than significant because each LRDP project will be subject to a structural analysis and will comply with the CBC and UC policies. However, as a programmatic EIR, the DEIR should consider the potential impacts of the LRDP overall.

Response L7-87

As stated on page 1-1 of the Draft EIR, the EIR was prepared in accordance with the requirements of CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The programmatic analysis of the 2021 LRDP provided in the Draft EIR considers impacts that could result from implementation of the 2021 LRDP within the LRDP area, including those associated with karst topography. Therefore, the Draft EIR is adequate under CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (CCR, Title 14, Section 15000 et seq.). Further response is not required.

Comment L7-88

- In the discussion of Karst Hazard on pages 3.7-17 and 18, the DEIR notes: “One of the principal problems of developing areas underlain by karst is the extreme irregularity of the karst features, and consequently the lack of predictability of subsurface conditions. Because of this unpredictability, some level of risk is inherent in developing in karst regions, as no amount of site investigation can reveal every detail of the subsurface.”

In addition, Figure 3.7-8 (page 3.7-20) identifies and rates karst hazard areas on campus. The EIR should include a map that overlays the proposed development areas on the karst hazard areas to determine the risk level for new development areas and, given the environmental damage that could be caused by subsidence, development in high-risk areas should be recognized as a potentially significant impact with mitigation proposed, including avoidance. Without this, the impact should be considered **significant and unavoidable**.

Response L7-88

Figure 3.7-8 on page 3.7-20 of the Draft EIR identifies development areas and karst hazards zones. Regarding the significance determination, as stated under Impact 3.7-5, all structures constructed or redeveloped would be required to comply with the CBC, UC Seismic Safety Policy, and UC Santa Cruz Campus Standards Handbook, which require site-specific geotechnical studies and soil engineering reports to address potential karst hazard risks. Because project-specific design requirements and conditions of approval would be incorporated for all development pursuant to the 2021 LRDP, the potential for structural damage due to karst topography would be less than significant. Further, consistent with the aforementioned CBC [California Building Code] requirements and taking into account location-specific information provided by geology studies conducted by UC Santa Cruz (e.g., UC Santa Cruz Campus Geology Report [UC Santa Cruz 2005]), full consideration of potential hazards from dolines would include collapse of cavern roofs, settlement of doline fill or low-density soil zones on top of the marble, and failure or sliding of materials adjacent to the cavities. Foundations adjacent to the solution chambers, and not just those overlying the voids or chambers, are therefore potentially at risk and will be evaluated in the site-specific geotechnical studies and soil engineering reports.

This approach of completing site specific studies for specific buildings is typical in regions where geological hazards are ubiquitous. Proposed development in known karst hazard areas since the first campus geology report was issued in 1993 has followed the standard protocol of characterizing the geological hazard and attendant risks to the proposed development and then reducing the risk to an acceptable level where warranted with typical engineering solutions (i.e. spread footings with grade beams to span low-density zones, structural mats and post-tensioned slabs, pier and grade beam foundations with either end-bearing or side-wall friction for support, driven piles, geotextile-reinforced compacted fill, pressure or compaction grouting of underlying sediments combined with the aforementioned footings, and deep dynamic compaction).

Comment L7-89

- 3.8-17 – The DEIR states: “the 2021 LRDP would have a less-than-significant impact if, despite LRDP growth and development, UC Santa Cruz’s 2030 emissions total (including existing and 2021 LRDP sources) are at least 40 percent below 1990 emissions and UC Santa Cruz’s total 2040 emissions are at least 60 percent below 1990 emissions;”

Response L7-89

This comment restates the first greenhouse gas significance criterion on page 3.8-17 of the Draft EIR. No further response is possible.

Comment L7-90

- 3.8-24 – Impact 3.8-1 – Greenhouse Gas Generation - Though this evidence may be in the appendix, the EIR itself should identify the level of reductions due to implementation of the UC policies and from the purchase of carbon credits. It also should discuss why carbon credits aren’t proposed to fully meet the Initiative targets. In addition, the EIR should evaluate the impacts if implementation of the UC policies is not mandatory.

Response L7-90

Carbon offsets, also referred to as carbon credits, are discussed on page 3.8-24 of Section 3.8, "Greenhouse Gas Emissions and Climate Change", as part of an array of solutions, including on-site projects, that UC Santa Cruz can use to meet their Carbon Neutrality Initiative. The comment seems to suggest that carbon credits should be the primary vehicle to meet GHG reduction targets. The UC prioritizes use of plans, programs and policies aimed at reducing GHG emissions on individual campuses, as feasible, before considering offsets (carbon credits). The comment does not explain why this is an environmental issue.

The comment also requests that the EIR evaluate impacts if implementation of the UC policies is not mandatory. Refer to Response L7-84.

Comment L7-91

- 3.8-25 – Mitigation Measure 3.8-1 – Reduce Annual Emissions- Since increased annual emissions are not tied to increases in enrollment growth and the provision of the supporting infrastructure, imposing mitigations that might not be implemented until the end of the LRDP period in order to meet the required targets is not sufficient. The EIR needs to direct compare the implementation of the mitigation measures to increases in enrollment levels in order to ensure that the targets are met on an ongoing basis. In other words, the mitigation measures in the EIR need to include a timeline for when each must be implemented.

Response L7-91

Refer to Response L7-54 and Master Response 9 regarding phasing and steps that would be needed to determine impacts as the campus is built out under the 2021 LRDP. It is important to note that regardless of potential connections between student enrollment growth and other infrastructure, including on-campus housing, the assessment of emissions includes additional factors (i.e., non-housing facilities that would be constructed with or without enrollment growth, such as student support facilities for baseline enrollment and academic facilities improvements that are in line with the university’s academic mission.) As a result, alignment of emissions estimates and mitigation to only enrollment growth would not necessarily alter the conclusions of GHG emissions estimates. The Draft EIR’s assessment of GHG emissions and feasible mitigation as provided in Impact 3.8-1 on page 3.8-25 is based on a reasonable, but conservative estimate of 2021 LRDP implementation, and provides proportionate mitigation to address the impact, in accordance with CEQA requirements.

Comment L7-92

- 3.8-25 – Significance after Mitigation – While the DEIR does provide meaningful and enforceable mitigations, it doesn’t provide evidence documenting the reduction in emissions from them. The statement that the mitigations would reduce emission by 6,907 MTCO2e is conclusory and not adequate under CEQA. Without this evidence, the impact should be considered **significant and unavoidable**.

Response L7-92

Table 3.8-5 on page 3.8-23 of Section 3.8, "Greenhouse Gas Emissions and Climate Change", identifies 6,907 MTCO2e/year as the additional reductions needed to meet State GHG reduction targets. Consistent with CEQA requirements, Mitigation Measure 3.8-1 would require UC Santa Cruz to achieve the remaining reduction, which is established as the performance standard for the mitigation, through a combination of GHG reduction projects and, if necessary, through the purchase of carbon offsets (referred to as carbon credits by the commenter). Consistent with CEQA requirements, the Draft EIR provides a list of measures that can be selected to achieve the performance standard and desired reduction. The measures listed also identify preliminary estimates of the level of reduction that may be achieved.

Comment L7-93

3.8-26 – Impact 3.8-2 – Conflict with Policies - The DEIR determined that because the 2021 LRDP would achieve the targets in the various plans and policies, the impact would be less than significant. However, this is based on the implementation of the mitigation measures specified under Impact 3.8-1 and this should be specified.

Response L7-93

As noted previously, compliance with the UC Sustainable Practices Policy is a requirement for UC Santa Cruz. Mitigation Measure 3.8-1 specifies how UC Santa Cruz will reduce its emissions associated with the LRDP, expressing preference for on-site measures within the LRDP area. Regardless of the conclusions and analysis under Impact 3.8-1, the 2021 LRDP would not hinder or conflict with the applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, including the UC Sustainable Practices Policy. This is evidenced by statements made under Impact 3.8-2, including the following statement on page 3.8-27: “[a]ny remaining GHG emissions that need to be reduced after the physical implementation of the 2021 LRDP to meet UC Santa Cruz’s GHG reduction targets would be abated by purchases of renewable energy credits and verified carbon offset credits by UC Santa Cruz." As such, the conclusion of Impact 3.8-2 is not predicated on implementation of Mitigation Measure 3.8-1, as asserted in this comment.

Comment L7-94

-When considering reductions to wildfire hazards, UCSC proposes the method of prescribed burns to decrease the wildfire risk of the project. The emissions from these burns, as well as the impact on GHG emissions from the reduction in plant life, should be analyzed, disclosed, and mitigated.

Response L7-94

At no point in the Draft EIR does UC Santa Cruz propose the use of prescribed burns. Mitigation Measure 3.18-2 of the Section 3.18, "Wildfire", requires UC Santa Cruz to prepare a Campus-Wide Vegetation Management Plan. However, prescribed/controlled burns are one method of vegetation management. Prescribed burns, if they ultimately are proposed/considered as part of the campus-wide vegetation management plan, would be infrequent and would be required to comply with Monterey Bay Air Resources District (MBARD) regulations, including Regulation IV requirements related to open outdoor fires and smoke management permits and plans. Furthermore, the Draft EIR, on page 3.18-4 and as part of the EIR’s presentation of regulatory context for its assessment of wildfire risk, identifies that any prescribed burn requires extensive planning, including with MBARD. As to GHG emissions, this is a complex and site-specific issue associated with carbon sequestering, burns, and the rate of growth of vegetation following a burn. Because prescribed burning is only an option in the mitigation, it is premature to evaluate the effects of this potential measure at this time, as any analysis would be entirely speculative, and impacts are not reasonably foreseeable. If pursued, the approval of a prescribed burn plan would be evaluated against the 2021 LRDP EIR and as necessary, subsequent CEQA documentation would be prepared to assess the impacts.

Comment L7-95

- Recent legislation has requested the California Air Resources Board to carry out an independent review of the forestry offset programs that are offered through the CA Carbon Offset Program. 36 forestry projects account for 80% of total offset credits issued by the California Air Resources Board. A UC Berkeley study found that, “82% of these credits likely do not represent true emissions reductions due to the protocol’s use of lenient leakage accounting methods”. California assumes a 20% leakage rate. In a policy brief, UC Berkeley Professor Barbara Haya refers to two studies that found leakage rates can reach as much as 80%. “Using an unsupported low-rate results in over-crediting,” Haya writes. Haya states that, “most forest offset projects begin in greenhouse gas debt; project landowners generate offset credits that allow emitters in California to emit more than the state’s emissions cap today, in exchange for promises that their lands will continue to increase their storage of carbon over 100 years”. But to address climate breakdown, emissions need to be reduced now, not at some hoped for point several decades in the future.2” The DEIR should specify which CARB offsets will be purchased to achieve emission targets, and, if they are forest offsets- should incorporate the findings of these studies in order to determine the amount that will need to be purchased to reduce the impact to a less than significant level. If this cannot be done, the impact should be **significant and unavoidable**, despite the offset purchase.

2 https://redd-monitor.org/2019/05/09/californias-lenient-leakage-accounting-means-that-emissions-reductions-from-forest-offsets-may-never-happen/

Response L7-95

Mitigation Measure 3.8-1 requires that UC Santa Cruz prepare an annual report that verifies the carbon the offset credits as real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations Section 95802(a). Any carbon offset credit, including those potential from a forestry offset program, would be subject to this requirement. In addition, the UC’s Carbon Abatement Technical Committee (CATC) is currently advising the development of UC’s offset procurement strategy consistent with the UC Sustainable Practices Policy and to further ensure that any credits pursued by UC, including UC Santa Cruz, are appropriate. Further, the UC Office of the President has engaged Professor Haya, who is referred to in this comment, as the offset strategy development lead of the committee.

Comment L7-96

- 3.9-13 – The DEIR indicates that UCSC is “in the process of updating the DTSC’s records to reflect existing conditions at Westside Research Park.”

Response L7-96

The comment restates information provided on page 3.9-13 of the Draft EIR. No response required.

Comment L7-97

- 3.9.- 21 – Impact 3.9.2 – Release from Known Site - Since the Westside Research Park required cleanup in the past, the EIR should include a mitigation measure requiring the campus to complete the DTSC filing within a specified time period.

Response L7-97

State CEQA Guidelines Section 15126.4(a)(1) requires that the “EIR describe feasible measures which could minimize significant adverse impacts….” As stated on page 3.9-21, Santa Cruz County EHS approved the site closure report for Westside Research Park in 2004, and the site is considered closed. Including mitigation to require UC Santa Cruz to update the DTSC’s records to reflect existing conditions at Westside Research Park would not reduce a significant impact to the environment. Further, implementation of Mitigation Measures 3.9-2a, 3.9-2b, 3.9-2c, and 3.9-2d would minimize impacts related to potential release of hazardous materials from a site of known or potential contamination. Therefore, the Draft EIR’s proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-98

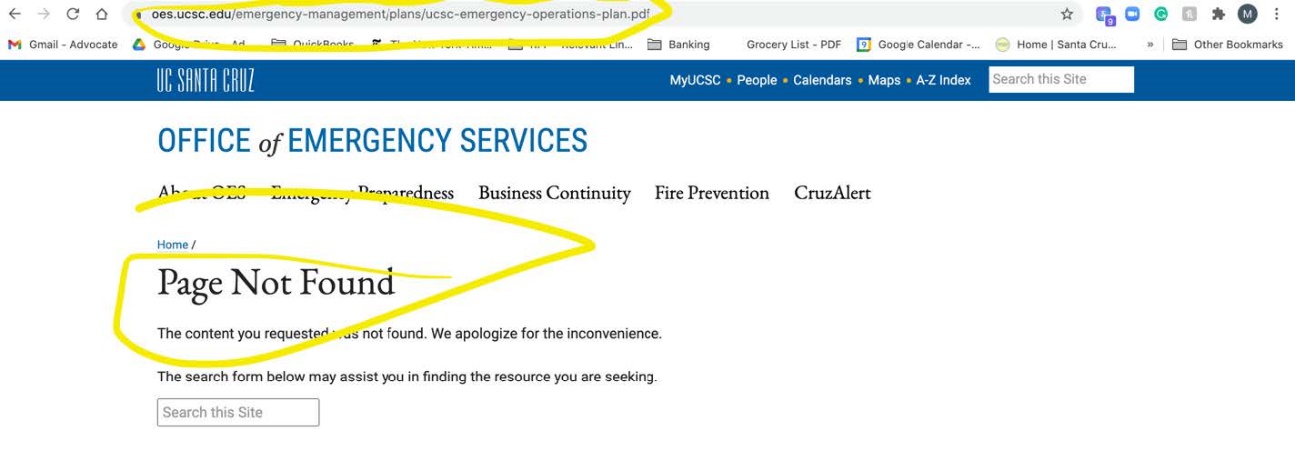
- 3.9-25 – Impact 3.9-4 – Implementation of an Emergency Evacuation Plan - The DEIR only considers short-term, construction related potentially significant impacts of implementation of the draft LRDP on emergency plans. This is inadequate. The draft LRDP proposes at least one new road in the north campus subarea as well as colleges and academic support facilities. Since these developments will occur in a state designated high hazard wildfire area, UCSC’s Emergency Response Plan and Emergency Evacuation Plan need to be revised to reflect the proposed development in this subarea. Simply requiring, as mitigation, site specific but unspecified, traffic management plans is inadequate. A comprehensive review and revision of the plans to reflect the new development is necessary. Without this mitigation, the impact determination after mitigation should be **significant and unavoidable**.

Response L7-98

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development and emergency response.

Comment L7-99

3.9-25- The DEIR states: “The UC Santa Cruz EOP outlines evacuation procedures for building emergencies (stage 1) and for campus-wide emergencies (stage 2).” However, the DEIR does not allow review of these procedures. Contrary to CEQA requirements that material cited in an EIR be available for public review, the document cited in the appendix is not accessible by the link provided. See screenshot image taken on 1-19-2021 below:



Because of the importance of the provisions in the EOP, it was possible outside of the DEIR to track it down. The EOP (found by google search and linked here) does not include any details for procedures during an emergency. It includes management structures and identifies authority during an emergency only. Further, every “Annex” in the plan is currently under revision and no details are provided. The EIR must identify necessary revisions in the EIOP in response to LRDP development and should include the policies for campus-wide evacuation.

Response L7-99

The citation is provided in Chapter 8, “References,” as follows:

Section 3.9, “Hazards and Hazardous Materials”

––––––. 2016d. *Emergency Operations Plan*. Available: [https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf. Accessed August 2020](https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf.%20Accessed%20August%202020).

Section 3.18, “Wildfire”

University of California, Santa Cruz. 2016. *Emergency Operations Plan*. Available: [https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf. Accessed August 2020](https://oes.ucsc.edu/emergency-preparedness/eop-11-2016.pdf.%20Accessed%20August%202020).

Please note that the reference citation includes a period after the link and before the word “Accessed.” To access the UC Santa Cruz Emergency Operations Plan online, the period should be removed before pasting the link in the search bar. Further response is not required. With respect to potential updates to the Emergency Operations Plan, UC Santa Cruz will reevaluate the Emergency Operations Plan, if and when the 2021 LRDP is approved, in order to determine if policy changes/updates are required.

Comment L7-100

- 3.10-11 – Moore Creek Watershed – The DEIR refers to the Arboretum Dam as shown on Figure 3.10-1. An east dam, West Dam, and Arboretum pond are also identified. However, the Figure didn’t seem to include the location of these facilities. Please clarify.

Response L7-100

In response to this comment, page 3.10-11 of the Draft EIR was revised as follows:

The head of the Moore Creek East Fork is located just west of University House and drains the central and south portion of campus from Meyer Drive south to the Arboretum Dam~~, as shown in Figure 3.10-1~~.

Comment L7-101

- The DEIR indicates that the Arboretum Pond was used as a water source by the City until 1948. If it still exists, could it be used to provide non-potable water for the campus?

Response L7-101

As stated on page 3.10-11, the city abandoned the Arboretum Pond for water supply in 1948 after the City determined that up to 750,000 gallons of water per day were being lost to the subsurface due to the presence of sinkholes in the channel of Moore Creek and the West Entrance Fork.

Comment L7-102

- 3.10-33 – Impact 3.10-5 – Impacts on Karst Aquifer -The DEIR lists reasons why development under the draft LRDP could cause potentially significant impacts to the karst aquifer. However, it determines that these impacts would be less than significant in the north and central campus subareas due to existing Post-Construction Requirements. However, no evidence is provided documenting that these requirements successfully achieve their objectives. In fact, the DEIR indicates that UCSC is “considering” better evaluating the effects of these requirements. Given existing uncertainty regarding the effectiveness of the current requirements, a mitigation measure should be added to require the evaluation of the current requirements with performance standards mandating that, if necessary, additional actions be taken to ensure that the standards are met. Without this mitigation, the impact significance should be considered **significant and unavoidable**.

Response L7-102

As stated on page 1-1 of the Draft EIR, the EIR was prepared in accordance with the requirements of CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (CCR, Title 14, Section 15000 et seq.). The programmatic analysis of the 2021 LRDP provided in the Draft EIR is adequate under CEQA, and additional review will be conducted for future projects as they are proposed and considered, tiering from this analysis. Further, implementation of Mitigation Measure 3.10-5a would ensure that campus pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality nor would it affect offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and define average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. In the event that extraction contributes to a net deficit, UC Santa Cruz would terminate or reduce groundwater extraction.

Comment L7-103

- 3.10-36 – Mitigation Measure 3.10-5b – Groundwater Monitoring - The mitigation measure requires the reduction or termination of groundwater extraction if there is a “substantial” decrease in average base flows. This is inadequate. Without a quantitative definition of “substantial,” it will be impossible to determine when the implementation of this mitigation measure would be required. Without providing this definition, the determination of significance after mitigation should be **significant and unavoidable**.

Response L7-103

Contrary to the statements included in the comment, as stated in Mitigation Measure 3.10-5b on page 3.10-36, implementation of this mitigation measure would occur once extraction of groundwater is initiated by UC Santa Cruz. Further, the term “substantial” is defined in Mitigation Measure 3.10-5b as a continual decreasing trend in base groundwater water levels over a 3–5-year period that includes both wetter and drier years coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding rainfall season.

Comment L7-104

- The DEIR states that UCSC will compare flows to historic spring discharge to determine impact. This is inadequate. Flow variation is significant, and therefore UCSC cannot guarantee that the metric used to determine impact significance is sufficient and captures all impacts.

Response L7-104

As stated in Mitigation Measure 3.10-5b on page 3.10-36, in addition to comparing spring flows, UC Santa Cruz would monitor water levels and conduct equivalent monitoring of those springs in the vicinity of the LRDP area shown to be connected to the well via a dye tracing study or other applicable testing method for the duration of groundwater pumping to determine whether there is any long-term decline in water levels or spring discharge. If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs, the campus will terminate or reduce its use of groundwater from the aquifer. The comment does not address the specifics of this measure, so no further response is provided. Also refer to Master Response 10 regarding groundwater conditions and the need for additional data to support the Draft EIR’s conclusions.

Comment L7-105

- 3.11-1 – Coastal Act – The DEIR states: “As UC Santa Cruz is a state agency, campus lands are not included in either of these general plans or LCPs. Nevertheless, UC Santa Cruz must comply independently with the requirements of the Coastal Act.” The EIR needs to clarify the relationship of the LRDP to the Santa Cruz County LCP. The County’s General Plan/LCP Land Use Map includes the Campus lands west of Empire Grade. Generally, once the Coastal Commission approves the LCP for a local jurisdiction these policies are applied to all future applications, including those of state agencies. Is consistency of the LRDP with the County’s adopted LCP required or do only Coastal Act policies apply?

Response L7-105

As stated on page 3.11-1 of the Draft EIR, because UC Santa Cruz is a state agency, campus lands are not subject to either the City of Santa Cruz and County general plans or LCPs developed for those agencies. Consistent with the provisions of PRC Section 30605, consistency with the County’s LCP is not required as part of the LRDP. Further response is not required.

Comment L7-106

- 3.11-2 – The EIR should make clear that the County of Santa Cruz General Plan is also its Coastal Commission approved LCP.

Response L7-106

The Draft EIR acknowledges the County of Santa Cruz General Plan and LCP on page 3.1-1 “In 1990 and 1994, the City of Santa Cruz and County, respectively, combined the LCP with updates to their General Plans.” However, as stated on page 3.11-1 of the Draft EIR, because UC Santa Cruz is a state agency campus lands are not included in either the City of Santa Cruz and County general plans or LCPs. No further response is required.

Comment L7-107

- 3.11-8 – Impact 3.11-1 – Conflict with Plans, Policies or Zoning - - The DEIR’s determination that the draft LRDP would not be in conflict with any local zoning is incorrect and inadequate.

Response L7-107

The comment does not explain why the conclusions in Impact 3.11-1 and incorrect or inadequate. Therefore, no additional response can be provided.

Comment L7-108

- 3.11-11 – The DEIR states that the University, as a state entity, is not subject to municipal regulation. However, it is subject to state agency regulation, which the DEIR ignores. State law requires approval by the Local Agency Formation Commission (LAFCO) before the City of Santa Cruz may provide extraterritorial water and/or sewer outside of its boundaries. The draft LRDP proposal to develop in the north campus subarea without LAFCO approval is in conflict with State law and policy.

Response L7-108

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

Comment L7-109

- This section of the EIR must be revised to recognize this conflict with local and state requirements. Moreover, this conflict represents a potentially significant environmental impact, and a mitigation measure should be included requiring the University to receive LAFCO approval prior to expanding outside the City’s boundaries in the north campus subarea. Without these revisions the impact should be determined to be **significant and unavoidable**.

Response L7-109

Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP. Regarding mitigation, the Draft EIR did not identify an impact related to LAFCO jurisdiction over the project. Therefore, no mitigation is required.

Comment L7-110

- 3.12-4 – The DEIR states: “Equivalent Continuous Sound Level (Leq): Leq represents an average of the sound energy occurring over a specified period. In effect, Leq is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period.”

Response L7-110

The comment restates information included on page 3.12-4 of the Draft EIR. No response is required.

Comment L7-111

- 3.12-17 – Thresholds of Significance – The on-campus construction noise thresholds proposed in the DEIR are the following:

* “Daytime (8 a.m. to 10 p.m.) construction noise levels at or above 80 dB Leq at the on-campus noise-sensitive uses (e.g., student or employee housing).
* Nighttime (10 p.m. to 8 a.m.) construction noise levels at or above 70 dB Leq at on-campus noise-sensitive uses (e.g., student or employee housing).”

- These thresholds seem unreasonable in noise-sensitive areas where students are in class or residing. The EIR needs to provide evidence supporting these thresholds? Table 3.12-1 on page 3.12-2 provide examples of noise levels at these decibels:

* “Diesel truck at 50 feet at 50 miles per hour — 80dB — Food blender at 3 feet, Garbage disposal at 3 feet
* Noisy urban area, daytime, Gas lawn mower at 100 feet — 70dB — Vacuum cleaner at 10 feet, Normal speech at 3 feet”

- The determination that only average noise above these thresholds would constitute a significant noise impact near student housing and classrooms does not seem reasonable. They should each be lowered by at least 10 decibels.

Response L7-111

The commenter’s opinion regarding the thresholds listed in Table 3.12-9 on page 3.12-17 of the Draft EIR is noted; however, the thresholds as presented in the Draft EIR are consistent with criteria implemented by UC Santa Cruz for the purposes of determining significance of impacts to on-campus receptors resulting from ambient noise levels associated with construction activities as set forth in the 2005 LRDP EIR. Furthermore, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals).

Comment L7-112

- 3.12-18ff – Impact 3.12-1 – Construction Noise – The DEIR finds that the impacts of construction noise will be significant and proposes a variety of mitigation measures. Despite the implementation of all the proposed measures, the impact is determined to be significant and unavoidable. However, the mitigation measures are not adequate.

Response L7-112

The comment’s statement regarding the perceived adequacy of the Draft EIR’s mitigation measures is noted. The comment does not provide a basis for its assertion so further response cannot be provided.

Comment L7-113

- 3.12-21 – Barriers are proposed under specific conditions “if deemed to be feasible and effective.” This measure it too vague to be adequate. Feasibility needs to be defined in terms of the potential reduction in decibel levels.

Response L7-113

Within the context of the programmatic evaluation of the 2021 LRDP, there may be instances where barriers (e.g., noise-insulating blankets, temporary plywood structures, etc.) are not considered feasible due to topography, vegetation, or other site-specific considerations. The Draft EIR, in recognition of this potential and in accordance with CEQA requirements, does not universally require or state that such barriers could be applied throughout the LRDP area. Further, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals) during construction activities, which may be achieved through a variety of means. These include, but are not limited to, limiting the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur, requiring the use of properly maintained equipment, alternatively powered equipment, exhaust mufflers, engine shrouds, equipment enclosures, and short-term lodging for residents that would be temporarily exposed to nighttime (after 10 p.m.) interior noise levels that exceed the interior noise standard. The performance criteria are binding and enforceable, as required by CEQA, but can be implemented through various actions, depending on the nature and location of the specific project.

Comment L7-114

- In addition, no rationale is provided for allowing “daytime” construction to continue until 10:00 p.m. Most local jurisdictions limit construction activities to no later than 8:00 p.m. No evidence is included in the DEIR justifying daytime construction to 10:00 p.m. or nighttime construction at all. An additional mitigation should be imposed prohibiting daytime or nighttime construction after 8:00 p.m. at least within 440 feet of a sensitive receptor.

Response L7-114

The thresholds established in the Draft EIR considered UC and local noise regulations. As stated on page 3.12-13 of the Draft EIR, the City of Santa Cruz Municipal Code Section 9.36.010 allows for construction activities to occur between the hours of 8:00 a.m. and 10:00 p.m. As such, the time limits established in the Draft EIR are considered appropriate.

Comment L7-115

- 3.12-22 – Significance after mitigation – The DEIR states: “Additionally, short-term lodging would be offered to residents if they would be temporarily exposed to nighttime interior noise levels that exceed the interior noise standard of 45.” The EIR should provide a full analysis of the impact of this mitigation measure that includes, but is not limited to, the impact on available short term housing options, the impact on student education, VMT, campus emissions, etc. Should students choose not to accept the offer of off-campus accommodation, the EIR should fully analyze the impact of exposure to significant noise on their ability to sleep (and the associated health impacts), study and succeed academically, long-term hearing impacts, etc.

Response L7-115

The short-term lodging to which the commenter refers would be limited to hotels in the Santa Cruz area, but it would be speculative to identify specific locations of that lodging. Refer to Mitigation Measure 3.12-1 on page 3.12-21 of the Draft EIR which states “UC Santa Cruz will offer hotel accommodations to residents who would temporarily be exposed to nighttime interior noise levels that exceed the interior noise standard of 45 Equivalent Continuous Sound Level. Alternative overnight accommodations should be in a location that is not adversely affected by nighttime construction noise.”

Regarding the comments request to evaluate impacts on available short term housing options, page 3.12-22 of the Draft EIR considers the potential impacts and dependency on the acceptance of short-term lodging by affected residents. In general, the Draft EIR includes, where appropriate, an evaluation of the impacts associated with the 2021 LRDP, as well as potential impacts of the proposed mitigation measures.

Should students choose not to accept the offer of off-campus accommodation, the thresholds established in the Draft EIR, and the performance standards set in Mitigation Measure 3.12-1 (as shown on pages 3.12-20 and 3.12-21) are intended to ensure that interior noise levels are maintained at adequate levels to prevent disturbance (e.g., waking of sleeping individuals) during construction activities. These include, but are not limited to, limiting the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur, requiring the use of properly maintained equipment, alternatively powered equipment, exhaust mufflers, engine shrouds, and equipment enclosures. Loss of sleep is not an environmental issue that must be analyzed under CEQA. Further and with respect to issues subject to analysis under CEQA, refer to Master Response 2.

Comment L7-116

- 3.12-22 – Significance after Mitigation – The DEIR states that the proposed mitigation measure “would limit the time periods during which construction activities in the vicinity of nearby noise-sensitive land uses would occur.” This is a misleading statement as nothing in the mitigation measure prevents construction from occurring 24 hours a day. Construction is only limited between 8:00 a.m. and 10:00 p.m. “when feasible.” (page 3.12-21) The mitigation measures in the DEIR need to be revised and strengthened in order to meet CEQA’s requirements.

Response L7-116

The majority of construction under the 2021 LRDP would take place during the day. As noted on page 3.12-20 of the Draft EIR, outdoor construction during nighttime hours would only be pursued if there are no other reasonable options. Because UC Santa Cruz cannot preclude the potential need to conduct construction activities during nighttime hours (e.g., due to site- and project-specific considerations related to concrete pouring, as noted on page 3.12-20 of the Draft EIR, or emergency repairs/corrections during 2021 LRDP development), the Draft EIR properly assessed the potential impacts associated with 2021 LRDP implementation, including the potential for nighttime construction. As acknowledged in the Draft EIR, it is not UC Santa Cruz’s intent to allow for 24-hour construction activities. Furthermore, construction schedules and specific logistics will be determined and considered on a project level as specific projects are proposed. Revisions to the mitigation measures of the Draft EIR are not considered necessary or appropriate for the aforementioned reasons and are to be consistent with CEQA requirements.

Comment L7-117

- 3.12-22 – Impact 3.12-2 – Construction Vibration – Again, the mitigation measure is inadequate. The operation of “construction activities that may require the use of vibration-generating equipment” should be limited to hours of 8:00 a.m. to 8:00 p.m. in addition to the other measures.

Response L7-117

Refer to Response L7-114 regarding the hours applied to thresholds and mitigation measures within the Draft EIR.

Comment L7-118

- The DEIR should fully analyze the impact of excessive noise on animal species, including but not limited to their migration patterns.

Response L7-118

The Draft EIR includes the assessment of potential noise impacts associated with 2021 LRDP implementation and development within Section 3.5, “Biological Resources.” As provided in that section of the Draft EIR, potential impacts associated with “disturbance” would include noise and vibration impacts associated with 2021 LRDP implementation. Revision of Section 3.12, “Noise” of the Draft EIR is not necessary as the requested analysis is already provided elsewhere within the Draft EIR.

Comment L7-119

- 3.13-3 – The DEIR recognizes the City of Santa Cruz code section prohibiting the expansion of water and services beyond its boundaries without the approval of LAFCO. However, this was not identified on page 3.6-16 (Impact 3.6-2 – Conflict with Policies) as a significant inconsistency with a local policy, notwithstanding the contracts signed by the City in the 1960s to provide these services.

Response L7-119

Impact 3.6-2 evaluates consistency with any applicable plan, policy, or regulation adopted for the purpose to mitigate an impact related to energy consumption. The City of Santa Cruz Municipal Code Chapter 16.22 pertains to the expansion of water and sewer services not energy. Therefore, this section of the City code was not referenced.

Comment L7-120

- Measure U – The DEIR’s summary of the policies in so incomplete as to make it inadequate as a public information document. Measure U was not only approved by almost 77% of the City electorate but some of the policies directly relate to Objectives included in the Draft LRDP. The following Measure U policies should be included in the EIR and should be included in every section for which they are relevant, not only the population and housing section:

“a. There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP.

b. If there is additional enrollment growth at UCSC, UCSC should house the net new growth of students, faculty and staff on campus.

c. If there is additional enrollment growth, it will only occur when the on-campus and off-campus infrastructure (including on-campus housing) required to support the growth is provided prior to or concurrent with the growth.

d. The University will legally bind itself to tie the provision of infrastructure to enrollment growth.

e. A Capital Improvement Program identifying on-campus and off-campus infrastructure needs (including on-campus housing), funding and sources needed to carry out the proposed LRDP, shall be prepared concurrently with the LRDP.”

Response L7-120

Section 3.13-3 of the Draft EIR provides a summary of Measure U, and this comment provides additional detail on the City of Santa Cruz measure and its relationship to the 2021 LRDP. The Draft EIR provides an appropriate level of detail in compliance with CEQA. As a City measure, it is not legally applicable to or binding on the UC. However, it is acknowledged that the 2021 LRDP does not align with the restrictions expressed in the measure. This information is provided for consideration by the UC Regents as they consider certification of the 2021 LRDP EIR and approval of the 2021 LRDP.

Comment L7-121

- 3-13-4 – Regional population growth – The DEIR includes population figures for the Santa Cruz County and its jurisdictions between 1990 and 2020 but doesn’t provide similar figures for UCSC growth. This should be included in the EIR as they would a useful comparison when analyzing growth proposed under the draft LRDP.

Response L7-121

State CEQA Guidelines Section 15125 states that the “environmental setting will normally constitute the baseline physical conditions by which the lead agency determine whether an impact is significant.” Section 3.13, “Population and Housing,” provides baseline population and housing estimates to facilitate the evaluation of potential impacts related to population and housing. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA. Refer also to Master Response 2 regarding 2021 LRDP growth projections.

Comment L7-122

- 3.13-5 – The DEIR recognizes that the extremely tight housing market in Santa Cruz County with available housing vacancy rate of about 1.9%. It also identifies UCSC one of the three major economic drivers “behind the tight housing market.” It summarizes that due to the summer wildfires and despite remote teaching at UCSC “a general housing shortage still exists.”

Response L7-122

The comment restates information included in Section 3.13, “Population and Housing.” No response required.

Comment L7-123

- 3.13-8 – Growth projections – The DEIR includes AMBAG population growth projections for the City of Santa Cruz and estimates a change from 2015 to 2040 of 29%. For a meaningful analysis of the impacts of proposed UCSC growth on the City, the DEIR should compare UCSC’s growth with the City’s over a similar time period. Based on the AMBAG estimates, the City’s growth between 2020 and 2040 will be about 20%. The EIR needs provide a direct comparison of this growth with that proposed under the LRDP to adequately analyze the Plan’s significant impacts on Santa Cruz.

Response L7-123

Section 3.13, “Population and Housing,” provides baseline population and housing estimates to facilitate the evaluation of potential impacts related to population and housing. The AMBAG growth projections included on page 3.13-8 of the Draft EIR assumed the growth forecasted in the LRDP. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA.

Comment L7-124

- 3.13-9 – Issues Not Evaluated Further – The DEIR argues that implementation of the LRDP would not “displace substantial numbers of existing people.” However, the DEIR only considers the potential displacement from on-campus students. This is inadequate because the DEIR does not consider the possible displacement of people living in the City of Santa Cruz resulting from enrollment growth should the University not meet the LRDP’s housing objectives.

Response L7-124

As stated on page 3.13-9, no housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people. The 2021 LRDP includes a substantial addition of new housing; if existing student housing is demolished, it would be replaced by an equal or greater amount of new housing. Further, the 2021 LRDP does not propose development on lands owned by the City of Santa Cruz. As described in Master Response 9, the Draft EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on reasonable assumptions. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. Therefore, implementation of the 2021 LRDP would not result in the displacement of substantial numbers of people or housing in the City of Santa Cruz, necessitating the construction of replacement housing elsewhere. Refer also to Response L9-31 regarding housing availability data considered in the Draft EIR. No further response is required.

Comment L7-125

- While an “Objective” of the draft LRDP is to house 100% of the new students and up to 25% of new faculty and staff on campus there is no binding requirement to make this happen. Moreover, there is no requirement that enrollment growth be tied to housing increases. Without mitigation measures requiring the proposed housing additions to occur in sync with enrollment growth, the determination that the draft LRDP will not displace people is unsupported by evidence and inadequate.

Response L7-125

Refer to Master Response 9 regarding the phasing of development. Regarding mitigation, State CEQA Guidelines requires mitigation only for impacts that are significant per Section 15126.4(a)(3). As stated on page 3.13-9, no housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people. The Draft EIR did not identify an impact related to displacement of people or housing. Therefore, no mitigation is required. As described in Master Response 9, the Draft EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on reasonable assumptions. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-126

- 3.13-10ff – Impact 3.13-1 – Directly or Indirectly Induce Substantial Unplanned Population Growth and Housing Demand – On page 3.13-12 – Regarding the impact of the draft LRDP on off-campus housing demand, the DEIR states: “Combined with the projected student demand identified above, the 2021 LRDP may result in an off-campus housing demand for 2,190 residential units within Santa Cruz County.” The DEIR doesn’t make clear that this impact assumes that 100% of the new students and up to 25% of the new faculty and staff will live on campus on the land “set aside” for housing. Again, given that there is no assurance such housing will be provided, the EIR needs to analyze the off-campus impacts should this objective not be met.

Response L7-126

Page 3.13-12 states that the 2021 LRDP would “add up to 8,500 beds” to accommodate the projected increase in student enrollment, which equates to 100 percent of new student enrollment, and provide “housing on campus for 558” employees, which equates to a 25 percent of the increase in employees. As described in Master Response 9, the EIR evaluates the whole of the action. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz’s (or any city’s) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. In addition, as described in Master Response 9, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required. Regarding the evaluation of housing demand off-campus, the Draft EIR evaluates additional demand for housing in the community, including the city of Santa Cruz, on pages 3.13-12 to 3.13-14.

Comment L7-127

- The DEIR assumes that 100% of new students and up to 25% of new faculty and staff will be housed on campus by simply stating: “The 2021 LRDP sets aside an adequate amount of land for housing to accommodate 100 percent of the increase in student enrollment above 19,500 and for 25 percent of the increase in the number of employees, based on demand.” Again, setting aside land for the development of housing is not adequate justification under CEQA for not considering the impacts of the LRDP should the housing not be provided.

Response L7-127

As described in Master Response 9, the EIR evaluates the whole of the action based on reasonable assumptions about the development process. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz’s (or any city’s) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. State CEQA Guidelines Section 15378(a) defines “project” in part as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment….” For the purposes of CEQA the 2021 LRDP is the proposed project. However, as described in Master Response 9, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required.

Comment L7-128

- 3.13-14 – Mitigation Measures – The DEIR states as a mitigation measure: “UC Santa Cruz is planning to provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP,” and “UC Santa Cruz anticipates that it will be able to provide housing to all students projected under the LRDP and the impact associated with student housing demand is expected to be less-than-significant.” These are not adequate mitigation measures under CEQA because they do not change the project to reduce the potential impacts to a less than significant level (see Section 15370 of the State CEQA Guidelines where mitigation is defined). And, in past LRDPs (the 1988 LRDP, for example) that contained significant on-campus housing goals without adequate mitigation measures, these goals were not realized.

**In order to meet CEQA requirements for an adequate mitigation measure, the mitigation measure should read: “UC Santa Cruz shall provide at least 8,500 student housing beds and 558 employee residences under the 2021 LRDP and shall provide housing to all students projected under the LRDP.”**

Response L7-128

State CEQA Guidelines Section 15126.4(a)(1) requires that the “EIR describe feasible measures which could minimize significant adverse impacts....” The language identified is not a mitigation measure, rather it is a summary of the 2021 LRDP. The LRDP is a land use plan to guide future development, if and when it occurs. As noted in Response L7-127, the components of the project, including 8,500 student beds and 558 residential units for employees, are evaluated as a whole and would be subject to project-level and subsequent evaluation under CEQA. The mitigation measure proposed would not change the project but rather reinforces the project as proposed. Also refer to Master Response 2 regarding the manner in which planned development would occur and be subsequently evaluated under the 2021 LRDP.

Comment L7-129

- The DEIR also recognizes (page 3-10) that enrollment growth will occur over time but doesn’t analyze the potential impacts of not directly relating the production of the on-campus housing to enrollment growth. It merely states: “On-campus student enrollment is projected to increase by an additional 9,482 FTE students by 2040–2041, which would equate to an average annual increase of 431 additional students (assuming student enrollment growth occurred linearly; in actuality annual enrollment growth could fluctuate from year to year).”

Without a requirement that ties enrollment growth to the provision of on-campus housing, the proposed mitigation measure would not be adequate to reduce the potential impact to a less than significant level. Even with the mitigation measure proposed above, significant off-campus housing demand beyond what the DEIR anticipates would occur if there were long delays between enrollment growth and the provision of housing to serve it.

**Therefore, the following mitigation measure should be added in order to reduce the potential impact of the proposed on-campus enrollment growth to a less than significant level: On- campus student housing beds and employee housing units shall be available within four years of enrollment growth in excess of 19,500 students.**

There is substantial evidence that these proposed mitigation measures are feasible as based on the fact that the University has successfully complied with essentially the same conditions under the 2005 LRDP’s Comprehensive Settlement Agreement (Section 2).

Response L7-129

The comment’s general statement regarding the need for a requirement that ties enrollment growth to the provision of on-campus is noted. Refer to Master Response 9 regarding the phasing of development. Regarding mitigation, consistent with State CEQA Guidelines Section 15126.4 the Draft EIR includes feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA.

Comment L7-130

- If the EIR does not include these (bolded) mitigation measures, the FEIR must include a detailed analysis of the impact that insufficient housing will have on students, including, but not limited to economic and financial impacts, health (physical and mental) and sanitary impacts, traffic and VMT impacts, etc on additional populations, students, and the environment.

Response L7-130

Refer to Response L7-127 and Master Response 9 regarding the Draft EIR’s evaluation of the 2021 LRDP and timing of development.

Comment L7-131

- The chapter on Population and Housing is inadequate because it does not analyze the induced off-campus impacts of the draft LRDP. The increase in campus population of over 12,000 people will, as documented in the Growth Inducing section of the DEIR, have a multiplier effect on jobs, population growth and housing off-campus. The University functions as a basic industry and, as stated earlier in the DEIR, is an important economic driver in the community. The financial impact of spending in the community by new students, faculty and staff will be significant. It will generate new jobs, population growth and housing demand in the community. These will create potentially significant environmental impacts that must be analyzed in the EIR. Additionally, according to the Systemwide Economic and Social Impact Analysis (2021) commissioned by the University of California, “every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs”. The EIR needs to take into account the job generating impact of adding new staff at UCSC and the effect on the housing market.

Without this analysis, the DEIR is inadequate.

Response L7-131

The Draft EIR evaluates growth inducing impacts of the 2021 LRDP, including population and employment growth, are evaluated in Chapter 5, “Other CEQA Sections.”

Comment L7-132

- 3.14 – The DEIR analysis of the potential impact of the LRDP on public services assumes that the on-campus housing commitments will be met. This further supports the importance of the proposed revised mitigation measures in the Population and Housing chapter for the EIR to be adequate.

Response L7-132

Refer to Responses L7-128, L7-129, and L7-130 regarding evaluation of the project under CEQA and suggested mitigation.

Comment L7-133

- 3.14-2- Impacts on Police Facilities – The DEIR states, “…implementation of the 2021 LRDP could result in the need for additional sworn officers, dispatchers, and support staff…” To address this, the DEIR states, “Funding and planning for additional staff members is carried out through UC Santa Cruz capital planning process…Capital planning is a continuous and iterative process that evaluates capital needs identified and assess alternatives to meet such needs in the context of anticipated capital resources.” However, according to UCSC PD Chief Nadar Oweis’ comments in a 2016 City on a Hill Press article, “Six hundred fifty [extra] people on this campus is a lot of people. With the additional bodies on campus, UCSC PD has taken measures to maintain its presence, including having two extra officers earning overtime on Friday, Saturday and Sunday nights. I wish we had an opportunity to hire more officers,” said Oweis. “But I haven’t been given any more money in my budget to hire [them].” This article shows that with additional students present, UCSC has not always increased police presence on campus. But “the campus has also seen an increase in parking citations, thefts, roommate disputes and traffic incidents including hit and runs, said Oweis”. Given the history of inadequate funding, the EIR should include a detailed analysis of the impacts on students and their property should UCSC not allocate funding for additional police officers, as they have not in the past. Since there is substantial evidence that the proposed enrollment increases will generate the need to provide additional police services, the EIR should include a mitigation tying enrollment growth to increases in additional police personnel and all relevant public services.

Response L7-133

Impact 3.14-2 evaluates the potential for the 2021 LRDP to result in physical impacts associated with the provision of new or physically altered police facilities consistent with CEQA requirements to focus on the adverse physical impacts to the environment. As stated on page 3.14-11, while implementation of the 2021 LRDP could result in the need for additional sworn officers, dispatchers, and support staff, this would not necessitate that need for new or additional police facilities. Further, the Draft EIR coordinated directly with UC Santa Cruz Police Department and relied on information provided by Chief Nadar Oweis in 2020. Therefore, the Draft EIR relied on best available data and evaluated potential impacts to police services consistent with CEQA requirements. Regarding mitigation, the Draft EIR did not identify an impact related to the provision of police services. Therefore, no mitigation is required.

Comment L7-134

- 3.14-10 – Mitigation Measure 3.14-1 – Require new fire equipment and construction to meet fire access requirements - This is an example of an adequate mitigation measure. The “shall” initiate operation of a new campus fire station if demand warrants it.

Response L7-134

The comment states that Mitigation Measure 3.14-1 is adequate and is noted.

Comment L7-135

- 3.14-11ff – Impact 3.14.3 – Impacts on School Facilities – The DEIR is inadequate in the analysis of the draft LRDP’s potential impact on school facilities because it only considers the potential impact from faculty and staff school age children. Since many UCSC students also have school age children the potential impact from school age children of the 8,500 additional students living on campus needs to be analyzed.

Response L7-135

In response to this comment, Impact 3.14-3 was revised as follows:

Under the 2021 LRDP, the number of students and faculty/staff living on campus is anticipated to increase, which could contribute additional primary and secondary students to local school districts. The largest area of potential impact would be the SCCS, because housing would be provided on campus (within the SCCS boundaries) for 558 employees (faculty/staff). While housing would also be provided for students, the number of school-age children associated with enrolled college students is expected to be minimal given their typical age range. However, to be conservative, this Draft EIR assumes that the 140 units dedicated to on-campus student family housing would be occupied by newly enrolled students with children. Based on student generation rates established by SCCS, a new dwelling unit (for faculty/staff and existing student family housing units) would generate 0.273 students for grades K-6, and 0.207 students for grades 7-12 (City of Santa Cruz 2011). As noted above, student enrollment for SCCS schools is anticipated to decrease through the 2024-2025 academic school year.

A total of 558 new dwelling units for faculty and staff housing is expected to generate 153 students in grades K-6 and 116 students in grades 7-12. The existing 140 student family housing units would generate 38 students in grades K-6 and 30 students in grades 7-12. As shown in Table 3.14-1, SCCS schools have a combined available capacity to accommodate 922 students. Even if all children living in on-campus student family housing and ~~of~~ the roughly 1,650 faculty/staff not living on campus lived in the SCCS (resulting in 450 K-6 students and 341 grade 7-12 students), or a total of ~~1,055~~ 1,123 students, they would barely exceed the forecasted capacity of SCCS schools. Realistically, a sufficient percentage of faculty and staff would live outside the SCCS in more dispersed communities, that the capacity of SCCS schools is not expected to be exceeded. Further, SCCS has established procedures for interdistrict transfers to students who would otherwise attend a different district. SCCS existing schools have adequate capacity to serve existing enrollment levels in addition to enrollment generated by the 2021 LRDP. Some percentage of faculty/staff may reside in areas outside the SCCS. Based on the available information noted above, the nearby school districts have available capacity to accept new students and declining enrollment. Given that, only a fraction of the total 1,055 estimated students generated by employees associated with the 2021 LRDP would attend schools in these districts, it is expected that adequate capacity will be available to accommodate these students. Therefore, implementation of the 2021 LRDP would have a **less-than-significant** impacts on schools.

Consistent with State CEQA Guidelines Section 15088.5(a), text edits to Impact 3.14-3, outlined above, do not constitute significant new information because it would not result in a substantial adverse environmental impact that has not already been evaluated in the Draft EIR.

Comment L7-136

- The DEIR is inadequate in its analysis of public service impacts of the LRDP by ignoring a potentially significant impact of the LRDP to public services. As a public agency, the academic and support services it provides it students are public services. Moreover, UCSC students are also members of the public. To the extent, then, that the University in implementing the LRDP provides the physical infrastructure to support increased enrollment, it is providing public services.

The DEIR analyzes the potentially significant impacts on the environment of providing this infrastructure necessary to implement the LRDP but does not consider the environmental impacts if the proposed facilities are not provided. The lack of this infrastructure would reduce the direct environmental impacts of the LRDP but it would cause indirect environmental impacts directly related to social and economic impacts for the newly enrolled students. There is a direct nexus between the lack of infrastructure and these social and economic impacts, and they need to be considered in the EIR and, if potentially significant, mitigated.

The 2005-2020 LRDP has constructed less than 7% of the physical infrastructure included in the Plan. As a consequence, there are overcrowded classrooms, inadequate faculty to student ratios, and insufficient staff support. This has caused significant mental health problems for students as well as negatively impacted their economic opportunities. Unless the 2021 LRDP provides the infrastructure included in the Plan, these social and economic impacts will be even more significant.

The EIR needs to analyze these potential impacts and, if it determines that they are potentially significant, propose feasible mitigation measures to reduce them. One such measure would tie enrollment growth to the provision of the infrastructure needed to support it. The language could be similar to the mitigation measures proposed in the Population and Housing chapter.

Response L7-136

The comment requests that the EIR evaluate impacts if facilities are not constructed to accommodate the increase in enrolled students, but does not suggest what these physical environmental impacts may be, and without this type of information, further response is not possible

Comment L7-137

- 3.15-12 – Impact 3.15-2 – Impacts on Off-Campus Recreation Facilities - The DEIR analysis of the potential impact of the LRDP on recreation assumes that the on-campus housing commitments will be met. This further supports the importance of the revised mitigation measures in the Population and Housing chapter for the EIR to be adequate. The DEIR estimates that 982 students will seek housing off-campus. If the “planned” on-campus housing is not provided, the off-campus demand on recreational facilities would increase by thousands of students.

Response L7-137

Refer to Responses L7-128, L7-129, and L7-130 regarding evaluation of the project under CEQA and suggested mitigation and Master Response 9 regarding phasing of development.

Comment L7-138

- According to the DEIR – “… in recognition of the need for distributed recreational facilities to support increased housing throughout the campus, recreation and athletics facilities have also been included as a supporting use in the Colleges and Student Housing land use designation.” Without the inclusion of specific quantity of additional facilities that will serve additional students, it is impossible to evaluate the adequacy of the additional recreational facilities to serve proposed enrollment growth. All proposed recreation facilities should be specified in the EIR. Without the inclusion of these changes, members of the public are unable to evaluate the adequacy of the recreation infrastructure to support additional students.

Response L7-138

As stated on page 3.5-11 of the Draft EIR, the total acreage of existing recreation and athletic facilities would not decrease under the 2021 LRPD and land would still be available for expansion of recreation facilities in the LRDP area, as needed. In addition, the 2021 LRDP provides for the construction of new recreational facilities including new multi-use pathway corridors to connect key locations on campus, new unpaved multi-use trail networks, and minor/supporting recreation and athletic facilities. New recreation and athletic facilities may include small field houses offering courts and exercise rooms and may also include small playing fields and open areas suitable for informal use. As noted previously, the analysis in the Draft EIR is programmatic, and as a result, specific detail regarding the number and types of recreational facilities are not known at this time. The programmatic analysis of the 2021 LRDP provided in the Draft EIR is considered adequate and appropriate under CEQA.

Comment L7-139

- According to the DEIR – “Although on-campus recreation facilities are heavily utilized, substantial deterioration of those facilities is not apparent.” The FEIR should include evidence of this claim, or, if no evidence is available, it should be removed. Contrary evidence to this statement is provided in a 2016 City on a Hill Press Article3 that says, “Finding money for all necessary maintenance is an issue.”

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

Response L7-139

Regarding the statement from a 2016 article included in the comment, the Draft EIR relied on best available data related to the physical environmental conditions and evaluated potential impacts to recreational facilities consistent with CEQA requirements. As stated on page 3.15-10, recreation facilities at UC Santa Cruz are maintained as needed to prevent deterioration based on the use levels. Continued preventative maintenance in accordance with UCOP Facilities Manual prevents the substantial deterioration of on-campus facilities. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. The issue of funding and how funding is allocated is part of an annual budgeting process, and the quote provided in this comment does not assert anything beyond the budgeting process. As such, it is not considered material to the Draft EIR’s analysis.

Comment L7-140

-3.15-12 - The DEIR states, “The construction of new facilities would occur when warranted by increased demand and when financially feasible.” According to a City on a Hill Press Article, “A lot of our buildings need some really serious repairs,” said Colin Allison (OPERS facilities and operations supervisor). Additionally, the article states, “Even with the Measure 64 and 65, student fees that passed last spring in the campus elections, the sheer amount of people seeking to use Office of Physical Education, Recreation and Sports (OPERS) facilities and services still poses a challenge — and expansion is not in the immediate future.”4 The DEIR should reevaluate the impact of additional enrollment on existing recreation resources in consideration of this evidence.

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

Response L7-140

Impact 3.15-1 evaluated impacts to on-campus recreation facilities that could result from the increase in campus population under the 2021 LRDP consistent with CEQA Guidelines requirements to focus on physical effects to the environment. Further, the 2021 LRDP includes substantial additional administrative and support facilities for students, which is intended to provide additional services (including recreation resources) for potential new students in addition to the existing student body. Reevaluation of potential impacts of the 2021 LRDP is not considered required or warranted.

Comment L7-141

- Moreover, the DEIR inadequately determines, with no substantial evidence, that the imposition of the payment of in-lieu fees on off-campus new development sufficiently “addresses” the potential impacts.

There are two inadequacies with the DEIR analysis. First, students living off-campus in the locally tight housing market could simply crowd into existing units and thus, not generate increased park fees. More important, though, the DEIR does not consider whether existing fees are sufficient to provide the increased facilities needed to adequately meet the increased demand. No evidence is provided justifying the conclusion that in-lieu park fees will be sufficient to develop the additional facilities needed. There is not even an analysis of what additional facilities would be required. The EIR needs to provide a specific analysis of the recreational facilities required to meet additional off-campus demand resulting from LRDP growth and whether the fees generated from housing developments to serve this demand will be sufficient. Without these revisions the impact would be **significant and unavoidable**.

Response L7-141

The comment does not present evidence of overcrowding that is directly attributable to UC Santa Cruz students. As such, the comment’s statement regarding the potential for students living off-campus to “crowd” into existing units is considered speculative and counter to existing federal and state occupancy limits, as established by Section 503(b) of federal Uniform Housing Code and the California Department of Fair Employment and Housing practices/restrictions. In particular, the Uniform Housing Code uses the dwelling size to determine the maximum occupancy rate. Further, the City also has an established Residential Rental Dwelling Unit Inspection and Maintenance Program, as established in Chapter 21.06 of the City’s Municipal Code, that requires the regular (annual) inspection of rental housing to prevent overcrowding.

Regarding in-lieu park fees, the fees referenced on page 3.15-12 of the Draft EIR are established by the local communities (e.g., the City of Santa Cruz.). It is the responsibility of local agencies to ensure they are providing sufficient funding for local services such as parks and local agencies periodically consider updates, as evidenced by a February 21, 2021 presentation to the Santa Cruz County Parks Department regarding an adjustment to its park impact fees (Santa Cruz County 2021). UC Santa Cruz has no regulatory authority to determine whether or not the fees are adequate, but it is reasonable to assume that local entities like the City would amend their fee structure if current fees are inadequate for providing sufficient recreational facilities. The comment provides no evidence to support its assertion that impacts would be significant and unavoidable and is referred to Impact 4.3 on page 4.6-37 of the City’s General Plan 2030 Draft EIR (City of Santa Cruz 2011) related to the expansion of recreational facilities and parks within the facilities within the City. Based on implementation of City policies, including the collection of in-lieu fees, impacts were determined to be less than significant, similar to the 2021 LRDP Draft EIR.

Comment L7-142

- 3.16-30 – Impact 3.16-1 – Conflict with Plan - The DEIR determined that the impact would be less than significant based on the inclusion in draft LRDP of a number of road construction projects – the extension of Meyer Drive, the north entrance at Empire Grade, and the Western Drive Extension. This is inadequate because there is no requirement that these projects will be implemented. In fact, both the Meyer Drive extension and the northern entrance are included in the 2005 LRDP and have not reduced the impacts anticipated in that Plan.

The construction of these projects must be tied to enrollment growth and timelines provided for their completion. Absent these assurances, the EIR must analyze the potential transportation impacts under the assumption that they will not be provided. In addition, the DEIR analysis assumes that on-campus housing will be provided. Without the proposed additional mitigation measures to ensure the provision of this housing, the EIR must analyze the potential transportation impacts assuming that this housing will not be provided.

Without these assurances, the draft LRDP would not be consistent with the local general plans and the impact would be **significant and unavoidable**.

To justify a determination that the impact will be less than significant, the following feasible mitigation measure should be added: **The road construction projects proposed in the LRDP shall be provided in advance of or concurrent with the increased growth they are designed to support.**

Response L7-142

Impact 3.16-1 discusses the 2021 LRDP’s potential impacts relative to the plan’s consistency, including proposed roadway, bicycle, pedestrian, and transit improvements, with relevant non-university plans related to circulation. As discussed in Impact 3.16-1, the proposed improvements are not in conflict with the relevant on-university plans and the impact is less-than-significant. Further, as stated on page 3.16-31 of the Draft EIR, the proposed roadways would reduce congestion on campus and reduce trip lengths associated with VMT. Regarding phasing of development, refer to Master Response 9. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable. Refer also to Response L7-11 regarding the Draft EIR’s analysis of the 2021 LRDP building program.

Comment L7-143

- 3.16-33 – Impact 3.16-2 – Conflict related to Vehicle Miles Traveled - The VMT analysis in the DEIR is based on the assumption that the on-campus housing proposed in the draft LRDP will be provided. The DEIR, thereby, finds that the residential VMT will be below the significance threshold. However, without the recommended mitigation measures to require the provision of the proposed on-campus housing, the DEIR is inadequate because there is no evidence that the proposed housing will be realized.

Response L7-143

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR’s analysis of the 2021 LRDP building program. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-144

- As stated in the DEIR “The reduction in total campus VMT per capita is primarily related to the increase in available housing on campus which would reduce the number of per capita vehicular trips to and from the main residential campus.” The DEIR doesn’t calculate the VMT assuming the proposed housing is not built on-campus, but it is clear, that the VMT would greatly exceed the threshold of significance.

Without the recommended on-campus mitigation measures, there is no evidence that the performance standard of reducing the VMT below the threshold of significance can be met, even with the array of proposed mitigation measures, and the impact will be **significant and unavoidable**.

Response L7-144

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR’s analysis of the 2021 LRDP building program. The LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The LRDP EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Comment L7-145

- 3.16-38 – Significance after Mitigation – The DEIR is also inadequate because it does not analyze the potential VMT increase due to off-campus induced growth based on the economic multiplier effect.

Response L7-145

The impacts of growth are determined by the locations where growth occurs, which is directly tied to the approval of new development. CEQA analyses for new development provide the vehicle for these project-specific analyses. The VMT modeling conducted for the 2021 LRDP used the Santa Cruz County Regional Travel Demand Model (SCC Travel Model) (refer to page 3.16-28 of the Draft EIR), which provides for an assessment of countywide VMT using countywide VMT metrics, including assumed growth factors that include indirect growth. As such and through discussions with City and County staff regarding the appropriate model to use for the Draft EIR’s analysis, the SCC Travel Model is considered to present the best representation of countywide VMT, including indirect growth factors, as requested by the commenter. As a result, the Draft EIR’s analysis is considered adequate, appropriate, and in accordance with CEQA requirements.

Comment L7-146

- 3.16-38ff – Impact 3.16-4 – Inadequate Emergency Access - The DEIR is inadequate in its treatment of this impact because it does not analyze the potential need for emergency access to serve the significant new development in the north campus subarea. The LRDP proposes new colleges and academic support facilities in this high hazard wildfire area but the DEIR does not mention the potential impacts on the provision of emergency access as a result of this development and provides no substantial evidence that emergency access will be adequate. The potential impact may be significant and, absent the required analysis and consideration of mitigation measures, the impact should be considered **significant and unavoidable**.

Response L7-146

The impact assessment is intended to determine whether the 2021 LRDP has the potential to impact emergency vehicle access by creating conditions that would substantially affect the ability of drivers to yield the right-of-way to emergency vehicles, or preclude the ability of emergency vehicles to access streets within the study area. As noted in the Draft EIR, while adequate emergency access within the LRDP area is already provided, the proposed roadway extensions and new streets would provide improved network connections that could supplement existing emergency vehicle access throughout the LRDP area. Any roadway extensions and new streets would be designed and constructed to include bicycle, pedestrian and transit facilities, where physically feasible, and in a manner consistent with the UC Facilities Manual, which notes that the UC system, as a whole and inclusive of UC Santa Cruz, complies with the Title 24 California Building Standards Code, Parts 1-12 and all amendments. UC Santa Cruz would also comply with applicable federal and state regulations related to roadway and transportation facility design, and with local regulations where campus roadways connect to city and county facilities. Thus, the 2021 LRDP was appropriately determined to have a less-than-significant impact with respect to emergency vehicle access.

Comment L7-147

- 3.17-5 – Santa Cruz Water Service Agreements - The DEIR discussion of the water services agreements with the City of Santa Cruz is misleading, incomplete, and inadequate. This analysis fails to serve as an adequate public information document.

Response L7-147

UC Santa Cruz has reviewed the referenced text (specifically, the 2021 LRDP Draft EIR at 3.17-5) and confirmed that the statements are factually correct. Additionally, this comment does not raise a specific concern about the adequacy of analysis of environmental impacts in the Draft EIR, and CEQA requires no further response to this comment. However, the comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment L7-148

- For example, the DEIR is misleading when it states: “The City has not confirmed its obligations and has taken the position that it is only required to provide water to areas of the campus within the service boundary unless otherwise approved under state and local law.” This is misleading because the City is prohibited under State law from providing water and service outside its boundaries without the approval of the Local Agency Formation Commission (LAFCO).

Response L7-148

Please refer to Response L3-2 regarding application of Government Code Section 56133(e)(4) to LRDP development projects outside the current City service boundary.

Comment L7-149

- The DEIR provides no information on the State law requirements that are under dispute. The University may not believe it is subject to the state law requirements but CEQA requires that the public be informed regarding the relevant provisions of state law.

Response L7-149

Please refer to Responses L3-2, L7-14 and L7-148, which provide information regarding the 2021 LRDP Draft EIR’s discussion of the CSA and LAFCO with regard to the 2021 LRDP. Additionally, this comment does not raise a specific concern about the adequacy of analysis of environmental impacts in the Draft EIR so not further response is provided.

Comment L7-150

- In addition, the DEIR neglects to mention or consider the Comprehensive Settlement Agreement provisions, adopted as part of approval of the 2005-2020 LRDP, that required the University to apply to LAFCO for the extraterritorial water and sewer services. Nor does the DEIR indicate that the University may be in violation of this Agreement by not fulfilling its obligations under its provisions. While the University did initially apply for the extraterritorial service, it never completed the process in good faith and allowed the application to languish at LAFCO for over ten years before LAFCO terminated it for lack of action. Without inclusion of this information in the EIR, the document is inadequate in its description of this issue.

Response L7-150

Please refer to Responses L3-2, L7-14 and L7-148, which provide information regarding the 2021 LRDP Draft EIR’s discussion of the CSA and LAFCO with regard to the 2021 LRDP. Section 1.3.1 on page 1-6 of the 2021 LRDP Draft EIR state the obligations in the CSA and that UC Santa Cruz did submit the Sphere of Influence amendment application to LAFCO in 2008. As stated above, information regarding the CSA is provided for background purposes; the parties’ obligations under the CSA do not bear directly on the environmental impacts of the 2021 LRDP or the analysis required under CEQA.

Comment L7-151

- 3.17- 12 – According to the DEIR the City’s water demand in 2035 will exceed the water supply in 2035 by 40 million gallons a year (mgy) assuming a UCSC demand of 308 mgy. On page 3.17-15, the DEIR indicates that in 2018, the per capita water usage was 8.904.88 gallons per year for a total of 167.1 mgy, a slight per capita increase over 2017. On page 3.17-16, the DEIR indicates that the campus policy is to reduce water consumption 20% by 2020 and 36% by 2025 over the earlier average of 13,924 gallons per capita. This translates into a per capita of 11,139.8 gallons per capita in 2020 and 8,911.36 by 2025. If the campus consumption stays at the 2018 rate or decreases further, it will meet the 2025 goal.

Response L7-151

The statements in this comment regarding the City’s water supply and demand in 2035, and the UC Santa Cruz per capita water usage, are acknowledged and are consistent with the information in the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR). No further response is necessary.

Comment L7-152

- 3.17-19ff – Projected Water Demand - There appears to be an inconsistency in the demand figures in the DEIR that needs to be clarified. The total campus demand in 2018 (calendar year) is stated as 167.1 mgy. However, the table on page 3.17-21 showing 2017/18 demand lists the total as 154.5 mgy.

Response L7-152

Water demand values can be different when expressed in calendar year vs. fiscal year because the actual months of data included are different. The 2018 calendar year demand reflects water use from January 1, 2018 through December 31, 2018. The 2017/18 fiscal year demand reflects water use from July 1, 2017 through June 30, 2018. The 2018 calendar year demand is higher than the 2017/18 fiscal year demand, indicating that water demand for the second half of the 2018 calendar year (July 1, 2018 to December 31, 2018) was higher than the water demand for the first half of the 2017/18 fiscal year (July 1, 2017 to December 31, 2017).

Comment L7-153

- In addition, the basis for the Projected 2040 Annual Demand on campus of 289.1 mgy is unclear. From page 2-10 the total campus population in 2040 under the LRDP is projected to be 35,174. Assuming the campus continues the per capita demand achieved in 2018 of 8904.88 gallons per year this demand would be about 313 mgy, which is about 24 mgy more than projected. This totals a net increase in annual demand of 158.6 mgy. The DEIR provides no evidence supporting the 289.1 mgy estimate. The figures in the DEIR either need to be justified or revised as the difference of about 8% is not inconsequential.

Response L7-153

The technical information regarding the projected 2040 water demands within the LRDP area are provided as part of the Draft EIR and its appendices. The basis for the projected 2040 demand for the 2021 LRDP is described in Appendix J of the Draft EIR (Water Supply Evaluation) and is further detailed in Appendix A of the Water Supply Evaluation (Appendix J of the Draft EIR). As described, the projected water demand of 289.1 MGY for the 2021 LRDP was developed based on specific water use categories based on the specific characteristics of the 2021 LRDP facilities, and was not determined by using the current per capita demand applied to the future campus population.

Comment L7-154

- 3.17-22 – Impact 3.17-1 – Impacts on Water Supply - 3.17-23 Sufficiency of Supply – The DEIR uses its unsupported projection of increased water demand under the LRDP of 137.5 mgy in its analysis of the sufficiency of the City’s water supply.

Response L7-154

Table 3.17-9 on page 3.17-21 of the Draft EIR shows the increased demand under the 2021 LRDP. That table shows a slightly different number (134.6 million gallons per year [MGY]) for the increased demand under the 2021 LRDP than the cited 137.5 MGY. The increased demand (134.6 MGY) compares the projected demand for the 2021 LRDP (289.1 MGY) (which is described in the Water Supply Evaluation, Appendix J of the DEIR) to the existing FY 2014/15 demand (154.5 MGY) and results in a net increase of 134.6 MGY.

Comment L7-155

- 3.17-23 – Table 3.17-10 – City projected supply and demand – The DEIR indicates that even in normal years in the City systems’ 2035 demand will exceed supply by 40 mgy. If this deficit carries over until 2040 and the UCSC demand is 24 mgy greater than stated in the DEIR, the water supply deficit in normal years will be about 64 mgy or 60% greater than projected. Again, the DEIR needs to provide evidence to support its analysis.

Response L7-155

The projected UC Santa Cruz demand is not greater than the demand stated in the Draft EIR as indicated in the response to comment L7-153. The City’s 2015 Urban Water Management Plan (UWMP) does show that projected 2035 demand exceeds the projected 2035 supply by 40 MGY; however, this represents only a 2 percent difference between the projected demand and the projected supply. The City’s 2015 UWMP (page 7-8) further states that “operationally the City has sufficient water supply available in normal years to meet demand even though a slight deficit seems to exist in the modelled projections.”

Comment L7-156

- 3.17-24 – The DEIR asserts that the 2021 LRDP water demand would be less than the UCSC projected demand in the UWMP. Without documentation, this finding isn’t supported by the evidence. The UWMP projects a UCSC water demand of 308 mgy by 2035. The analysis above, using 2018 per capita demand figures, indicates that the total demand in 2040 would be 313 mgy not counting the Coastal Marine Campus. UCSC demand, therefore, may exceed the City’s UWMP projection. The impact of LRDP growth on the City’s water supply may be more significant than indicated in the DEIR and, if true, the EIR should reflect this.

Response L7-156

Refer to Response L7-153, which describes why the projected water use under the 2021 LRDP is substantially less than shown in the comment.

Comment L7-157

- The DEIR discusses the “dispute” with the City of Santa Cruz regarding provision of water and sewer service in the north campus subarea without discussing the State law requirements on the City to receive LAFCO approval in order to provide this service. Since the DEIR recognizes a “remote” possibility that the City will have to follow state law, it indicates that a number of alternatives will be analyzed, including the option of “curtailing” proposed LRDP development. Given the importance of the state law requirements, this DEIR decision is prudent.

Response L7-157

The comment’s opinion regarding the Draft EIR’s evaluation of curtailing development under the 2021 LRDP as prudent is noted. Refer to Response L3-2 regarding consideration of LAFCO as a responsible agency with respect to the 2021 LRDP EIR and applicability of LAFCO laws and policies to the 2021 LRDP.

Comment L7-158

- The EIR should include a full analysis of the impact of exposure to drought conditions, water scarcity, and rationing, including but not limited to health impacts, recreational risks, infectious disease, diseases transmitted to animals, food and nutrition, economic impacts, air quality, and hygiene5, etc., on the additional students, faculty, staff, and the entire population that exist within the City’s municipal services district.

5 Information taken from: <https://www.cdc.gov/nceh/drought/implications.htm>

Response L7-158

The comment’s statement regarding the potential effects of a drought and speculates that the 2021 LRDP will increase the exposure of individuals to drought conditions. First and foremost, the 2021 LRDP, as evaluated in the Draft EIR, would not increase water demand beyond the anticipated demand from current planning efforts and agreements. As described in the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR), water use on the UC Santa Cruz Main Campus has dropped dramatically in recent years. In 2008, annual water use on the Main Campus was about 200 MGY, equal to about 13,147 gallons per person per year based on a campus population of 15,278. In more recent years, annual water use on the Main Campus dropped to as low as 151 MGY (in 2009, 2011 and 2014) equal to about 9,104 gallons per person per year based on a campus population of 16,543 in 2014, representing an approximate 25 percent reduction in total water use and a 30 percent decrease in per capita water use, in response to drought conditions and associated water conservation. In 2018, water use was 167 MGY, equal to about 8,902 gallons per person per year based on a campus population of 18,765. This represents a 32 percent decrease in per capita water use from 2008. The downward trend in water consumption has resulted from proactive water conservation, improved water use efficiency, and drought response measures on the campus. Furthermore, the Draft EIR acknowledges uncertainties regarding future water supplies, discusses alternative water sources (to the extent information is known), and discloses the potential environmental impacts of each alternative water source, such that water supplies could be reasonably maintained to prevent adverse conditions. Furthermore, UC Santa Cruz has complied with the provisions of the City’s Water Shortage Contingency Plan and, as required by Mitigation Measure 3.17-1a, would implement further measures that are consistent with the City’s drought emergency measures, to ensure the safety and health of the local population, as it pertains to drought conditions.

Comment L7-159

- 3.17-25ff – Alternative Water Supplies – The analysis of alternative water supplies is inadequate because it doesn’t quantitative projections of the amount of water each of the options would supply and how these would impact future demand. For example, the discussion of the water recycling doesn’t make clear that the project with the greatest potential to increase supply, which is under development by the Soquel Creek County Water District, would not directly increase the water supply to City customers.

Response L7-159

The Draft EIR’s evaluation of alternative water supplies and the potential impacts associated with them was based on available information and quantified, where possible, the level of potential water supplies that could be made available to the City (and, by extension, UC Santa Cruz). Further, the Draft EIR does not speculate as to the level of water supplies where uncertainty regarding water rights, agreements between agencies, and planning and design of facilities has yet to be determined. The Draft EIR appropriately acknowledges throughout Impact 3.17-1 (beginning on page 3.17-22 of the Draft EIR), as well as prior descriptions of current water supply planning efforts beginning on page 3.17-22, the regional context and degree to which water supply planning involves multiple agencies within Santa Cruz County. Consistent with CEQA requirements (CEQA Guidelines Section 15155), the Draft EIR acknowledges uncertainties regarding future water supplies, discusses alternative water sources (to the extent information is known), and discloses the potential environmental impacts of each alternative water source. The Draft EIR also includes a discussion of curtailment of development if uncertain water supplies do not become available. Therefore, contrary to the assertions made in this comment, the Draft EIR is not considered deficient because it does not attempt to quantify uncertain water supplies that may be available but have yet to be determined by other agencies. Regarding the comment’s opinion regarding the water recycling project with the “greatest potential,” it is assumed that the commenter is referring to Pure Water Soquel, which is acknowledged on page 3.17-15 of the Draft EIR. The Draft EIR appropriately acknowledges that the City would coordinate with Soquel Creek Water District (SqCWD) to benefit regional groundwater supplies.

Comment L7-160

- Also, while conservation has played the major role in reducing the threat of droughts to City water customers, it is questionable how much additional reduction in demand is possible through conservation.

Response L7-160

The comment contradicts current City and UC Santa Cruz efforts that are underway, as well as short-term conservation measures provided and historically implemented through the City’s Water Shortage Contingency Plan. Further, the comment does not directly address the adequacy of the EIR’s analysis, and no further response is possible.

Comment L7-161

- 3.17-30 – The DEIR states that “Because many (alternatives) of them are common supplemental supply sources (such as recycled water and more conservation), there is a reasonably high probability that the City will be able to successfully supplement its water sources.” The DEIR provides no quantitative evidence to justify this conclusion. And, given that, as stated above, neither recycling at this time or conservation in the future are likely to prove adequate. The EIR needs to provide data to support its determination.

Response L7-161

The statement on page 3.17-30 of the Draft EIR, as referenced in this comment, was made in reference and deference to efforts by the City, both individually and in cooperation with SqCWD and Scotts Valley Water District. Further, as noted on the City’s website (City of Santa Cruz 2021), the City has incorporated SCWD’s Water Supply Augmentation Strategy into its 10-year Capital Improvement Program (CIP). As water supply augmentation (including improvements to Graham Hills WTP [i.e., “more conservation” as described in this comment”] and the River Bank Filtration Study) has been included as part of the near-term CIP improvements, this is considered evidence in support of the Draft EIR’s statement.

Comment L7-162

- 3.17-30 – The draft LRDP and the Project Description chapter of the DEIR state repeatedly that development under the 2021 LRDP will occur “primarily” in the central campus subarea. Here, finally, the DEIR provides the data related to this: “Approximately **43 percent of housing and 8 percent of academic and support space** under the 2021 LRDP is estimated to be located outside the service boundary.” (i.e., the north campus subarea). This mean that 3,655 student beds are proposed in the north campus subarea. With 43% of the housing beds planned in the north campus subarea, it is incorrect and inadequate for the DEIR to assert that the central campus subarea will be the primary location of increased UCSC growth. This misstatement needs to be corrected.

Response L7-162

Given that 57 percent of housing and 92 percent of academic and support space would occur outside of the north campus subarea of the main residential campus and that development under the 2021 LRDP would involve redevelopment and remodeling of existing space within the central campus, it is accurate to state that development would be primarily located outside of the north campus and focused within the central campus.

Comment L7-163

- The DEIR considers groundwater as one alternative to supply water for development in the north campus subarea. The DEIR reviews a number of potential impacts of such a project but does not make clear that this analysis is presented on a programmatic level. No detailed project is described or potentially significant impacts on the hydrology of downstream springs identified. The EIR should clarify that any proposal to develop this alternative would not only be subject to “additional study” but to full environmental review.

Response L7-163

The development of additional facilities to support groundwater withdrawal within the lower campus subarea of the main residential campus and use by UC Santa Cruz would constitute a later action under the 2021 LRDP. As such and upon further design and planning, it would be subject to independent, project-level review. Additional mitigation measures identified in the Draft EIR that would pertain to this potential alternative water supply would be determined by subsequent project level environmental review, including Mitigation Measure 3.10-5b (as provided on page 3.10-36 of the Draft EIR). Also refer to Master Response 10 regarding groundwater supplies and the need for additional study/data.

Comment L7-164

- 3.17-32 – Air Quality with no north campus development – The DEIR states: “Thus, construction-related air quality impacts would be reduced compared to those under the 2021 LRDP.” Despite this finding the DEIR concludes that the impact will be “similar” to the draft LRDP. Why isn’t it “Less impact”?

Response L7-164

The comment reiterates a statement on page 3.17-32 regarding the air quality finding under the potential environmental impacts associated with no 2021 LRDP development above water service boundary. As stated on page 3.17-32, although construction related impacts would be reduced, it is possible that operational emissions could exceed MBARD operational thresholds. For this reason, the Draft EIR determined that operation-related air quality emissions would result in a similar impact when compared to development under the 2021 LRDP.

Comment L7-165

- 3.17-33ff – Population and Housing with no north campus development – The DEIR assumes that, although enrollment will be reduced, 100% of the additional students will be housed on campus and, thus, the impact will be less than significant. However, this will only be the case with the mitigation measures stating that the on-campus housing **shall** be provided and that it **shall** be tied to increases in enrollment.

Response L7-165

Regarding phasing of development, refer to Master Response 9. Refer also to Response L7-11 regarding the Draft EIR’s analysis of the 2021 LRDP building program. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable.

Comment L7-166

- 3.17-34 – Transportation with no north campus development – The campus enrollment level would decline from 28,000 students by 3,700 to 24,300 students (over 13%) with a concomitant reduction in faculty and staff, as well as in induced growth. These reductions would all lead to decreases in VMT and it, therefore, incorrect for the DEIR to find that the impact would be “similar.” The evidence indicates that the impact will be less.

Response L7-166

As stated on page 3.17-34, decreased development of student housing and academic/administrative and support space would reduce on-site population, such that overall VMT would be reduced. However, similar transportation demand reduction measures to reduce VMT associated with faculty/staff commutes would be necessary in order to ensure a less-than-significant impact. For this reason, the Draft EIR determined that transportation impacts would be similar when compared to the 2021 LRDP.

Comment L7-167

- 3.17-35 – Mitigation Measure 3.17-1b – Water Conservation - While the mitigation measure requires an audit that will include “top priority” measures for implementation within five years, there is no requirement to implement these recommendations, only that “measures determined in cooperation with the City” be implemented. The EIR needs to explain why the mitigation measure shouldn’t require that the top priority conservation measures identified by the audit be implemented. As written, the mitigation measure is unclear regarding whether the cooperation with the City will lead to the implementation of the top priority conservation measures or simply that they be “addressed.” The performance standards for this deferred mitigation are inadequate and need to be revised.

Response L7-167

Mitigation Measure 3.17-1b requires UC Santa Cruz to prepare an audit that identifies both top priority measures and lower priority measures. It further requires that UC Santa Cruz “implement measures determined in cooperation with the City of Santa Cruz to address issues identified in the audit” following the completion of the audit. The measure to be implemented would be clearly outlined in the audit, which as stated previously, includes both top priority and lower priority measures. Therefore, the Draft EIR’s proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L7-168

- The potential impacts of not developing in the north campus subarea compared to the development under the draft LRDP is quite useful. This analysis should also be included in the Alternatives chapter as an additional feasible alternative to the draft LRDP. Though the analysis in the DEIR understates the number of impact areas where not developing in the north campus subarea would reduce the impacts, it determined that impacts overall would be less than if the area was developed as proposed.

Response L7-168

Chapter 6, “Alternatives,” includes an evaluation of projects alternatives that would either exclude or reduce development within the north campus, as requested by the commenter. More specifically, Alternative 3 (Reduced Development Footprint) would exclude development within the north campus, and Alternative 4 (Reduced Campus Growth and Use of UC MBEST Off-Site) would reduce development of Academic and Support uses within the north campus.

Comment L7-169

- The determination that Wildfire impacts with no development in the north campus subarea will be similar to those with development in that subarea is incorrect and inadequate. 3,700 student beds are proposed in the north campus subarea which is part of a high hazard fire danger area. Eliminating development in the area that is most subject wildfire would clearly reduce the potential wildfire impacts of the LRDP. While the implementation of wildfire risk reduction and evacuation procedures would reduce the potential impact of wildfires somewhat, there is no evidence provided that this reduction would be similar to that of not building in this high hazard danger area.

Response L7-169

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-170

- The 2021 LRDP EIR estimates that approximately 43% of the additional housing and 8% of the additional academic and support infrastructure will be located in a CALFire designated HFHSZ. This increases the risk of fire ignition, and, as a result, raises the risk of exposing residents, employees, and visitors to catastrophic wildfires.6 The FEIR must include a detailed analysis that quantifies the most serious health, air quality, greenhouse gas emission consequences of exposure of additional students, faculty, staff, and the entire population of the region to increased risk of wildfire.

6 AG’s Office Motion and comments (above)

Response L7-170

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-171

- 3.18-6 – Regional Setting – Since the LRDP proposes significant development in the north campus subarea, which is located in the unincorporated area of Santa Cruz County, the EIR must include consideration of the provisions of the County’s Local Hazard Mitigation Plan.

Response L7-171

As stated on page 3.18-6 of the Draft EIR, UC Santa Cruz, a constitutionally created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UC Santa Cruz that are in furtherance of its educational purposes. Further, the UC Santa Cruz Emergency Operations Plan (EOP) comprises the entirety of emergency planning activities that govern emergency response and evacuation on the main residential campus and the Westside Research Park.

Comment L7-172

- 3.18-7 – Human Influence on Wildfire – The DEIR provides a strong rationale for avoiding development in areas prone to wildfire. It recognizes “increased development in the WUI” (Wildland Urban Interface) can influence wildfire.” In addition, the DEIR notes that humans are responsible for starting an estimated 95% of wildfires and, “Consequently, areas near human development generate fires at a more frequent rate than very remote or urban areas.” Also, the DEIR provides evidence that climate change has significantly increased the risk of wildfires.

3-18-8 – The DEIR identifies the following approaches for reducing wildfire risk: “some combination of hazardous fuel reduction projects, fire prevention planning, and fire prevention education.” However, the DEIR analysis is inadequate because it doesn’t consider an avoidance approach of not building in areas with a high risk of wildfires. Particularly, since the north campus subarea is located in such an area, the DEIR must consider the potential impacts of avoidance along with the others. The 2020 Lightning Complex fires were an example of the limitations of these other strategies. In addition, the proposed approaches are inadequately vague and non-specific so it is impossible to evaluate the extent to which they would reduce the wildfire risk.

3-18-9 – The DEIR in its description of wildfire risks on campus states: “the northern portion of the campus is largely rated high wildfire severity” and Figure 3.18-1 shows the entire north campus subarea which is proposed to house 3,700 students as well as academic facilities is located in the High Fire Hazard Severity Zone.

Response L7-172

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development, including within the upper campus subarea of the main residential campus.

Comment L7-173

- 3.18-13 – Impact 3.18-1 – Compatibility with Emergency Response and Evacuation Plans  
- The DEIR’s analysis of the potential compatibility the LRDP on UCSC’s emergency plans focuses solely on short term construction and states: “there are no elements in the 2021 LRDP that would interfere with the emergency response and evacuation procedures set forth in the EOP (Emergency Operations Plan).” This finding is inadequate.

Response L7-173

Contrary to statements made in this comment but as stated on page 3.18-13 of the Draft EIR, there are no elements in the 2021 LRDP that would directly interfere with or prohibit UC Santa Cruz from implementing emergency response and evacuation procedures set forth in the EOP. Under the 2021 LRDP, UC Santa Cruz would continue to implement the policies, procedures and an organizational structure for the preparedness, response, recovery and mitigation of disasters outlined in the EOP. The Draft EIR presents a qualitative analysis of development under the 2021 LRDP based on evidence, consistent with CEQA requirements. The EIR’s analysis is adequate and a less than significant impact with mitigation conclusion is considered appropriate and supported by evidence.

Comment L7-174

- Implementation of the LRDP will result in between 4,000 and 5,000 people, with 3,700 residents, occupying the High Fire Hazard Severity Zone in the north campus subarea. Unlike the 2005-2020 LRDP that proposed a loop road to serve proposed development in this area, the 2021 LRDP includes no additional new road access to the area. Moreover, the new roads proposed in the LRDP do not directly serve this area. If the adopted EOP and Emergency Evacuation Plan don’t specifically consider the need to respond to the increased fire danger to the occupants of this area, they must be revised and the LRDP is incompatible with them.

Response L7-174

Page 2-23 of the Draft EIR describes the proposed Northern Entrance under the 2021 LRDP. This roadway would provide a third access and egress point to the main residential campus, which may help facilitate north campus subarea development and emergency access. Regarding the applicability of the EOP to future development in the north campus, as stated on page 3.18-13, new development on the main residential campus and Westside Research Park would be subject to the EOP. In addition, specific projects proposed under the 2021 LRDP will be evaluated at a project level at the time of consideration.

Comment L7-175

- 3.18-14 – Mitigation Measures - The DEIR only proposes a traffic management plan to reduce the short-term impacts. Unless the two plans include adequate consideration of the LRDP’s proposed development in the north campus subarea, the potential impact would be **significant and unavoidable**. Moreover, they would need to be revised even if, as mitigations, the revised plans would not reduce the risk to a less than significant level.

Response L7-175

As stated on page 3.18-13, new development on the main residential campus and Westside Research Park would be subject to the EOP. Further as stated on page 3.9-25, UC Santa Cruz shall prepare and implement site-specific construction traffic management plans for any construction effort that would require work within existing roadways. As such, development within the north campus that would require work within existing roadways would be subject to Mitigation Measure 3.9-4.

Comment L7-176

- 3-18-14 – Impact 3.18-2 – Wildfire Risk of New Development

- The DEIR finds that: “However, in the absence of an adopted Vegetation Management Plan, the wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant.” This determination is partially incorrect, incomplete, and inadequate.

* Proposed development in the north campus subarea would not be “in close proximity to an HFHSZ,” it would be located primarily within an HFHSZ.
* No evidence is presented to document that adoption of the Vegetation Management Plan by itself would adequately reduce the wildfire risk in the subarea.
* The DEIR fails to recognize that locating the development proposed in the LRDP in an HFHSZ by itself significantly increases wildfire risk.
* As documented in the DEIR: “the prevailing trend in California indicates an increase in the severity and frequency of wildfires over time as a result of climate change, modified vegetation regimes, and increasing human influence. Such trends are expected to continue and will pose an increasing threat to wildland areas... regardless of the actions that UC Santa Cruz takes in terms of the adoption and implementation of the 2021 LRDP.” These trends need to be recognized and included as important contributors causes of significant impacts of new development in the north campus subarea.

- While the DEIR recognizes that all the increased development proposed by the LRDP would increase the risk of wildfire, it doesn’t differentiate the degree of risk in the different risk zones or the implications for public safety or wildfire danger of differences in these risks. This analysis should be included in the DEIR for it to be adequate.

Response L7-176

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-177

- 3.18-16 – The DEIR argues that with the implementation of vegetation management measures in the north campus area “would likely result in reduced wildfire risk on the newly developed land.” However, no evidence is presented to support this “likely” conclusion.

Response L7-177

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development and the discussion of a vegetation management measure.

Comment L7-178

- Moreover, the DEIR recognizes that “However, urban encroachment, especially in the northern portion of the campus, could lead to exposure of new development to increased wildfire risks.” This conclusion is disingenuous at best. How could housing 3,700 students and constructing academic facilities in a High Fire Hazard Severity Zone not result in an increased wildfire risk?

Response L7-178

Refer to Master Response 4 regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development.

Comment L7-179

- According to the 2021 LRDP Draft EIR: “The increase in the campus population associated with the implementation of the 2021 LRDP, and the development of buildings to accommodate population growth, by the sheer probability of adding more people to the area, would increase the risk of wildfire on or near the main residential campus and Westside Research Park. Human-caused wildfires tend to be generated by activities such as debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson.” Accordingly, from a wildfire analysis perspective, it is critical to analyze whether the Project itself—in its location and with its land uses, density, topography, etc.—increases the risk of wildfire ignition and spread. The EIR recognizes that “…[T]he wildfire risk associated with placing new development in close proximity to an HFHSZ and proposed changes in land use under the 2021 LRDP would be significant”.

However, the proposed mitigation measure does not include the necessary mechanisms that would reduce the risk of wildfire caused by the Project. The DEIR’s reliance on a Vegetation Management Plan does not fill this deficit. It provides a range of wildfire prevention and response strategies (or, mitigation measures) focused on reducing wildfire impacts on the Project. But this again skips the central requirement of CEQA— to analyze, disclose, and propose feasible mitigations of the **2021 LRDP’s impact** on wildfire risk.

- 3.18-17 – Mitigation Measure 3.18-2 – Vegetation Plan

* - The DEIR requires that a campus-wide vegetation plan be adopted that meets the requirements of State law within two years. The DEIR asserts that adoption of the plan the wildfire risk will be less than significant. However, no evidence is provided to document that such a plan would reduce the risk, especially in the north campus subarea, to a less than significant level and the performance standards for the Plan are inadequately vague. To what extent have such plans worked elsewhere? What is the factual basis for the conclusion reached? Without this documentation the potential impact should be considered to be **significant and unavoidable**.

Response L7-179

Refer to Master Response 4 and Section 3.18, “Wildfire,” regarding the Draft EIR’s evaluation of the 2021 LRDP’s potential to exacerbate wildfire risk due to on-campus development. As stated on page 3.18-17 of the Draft EIR, Mitigation Measure 3.18-2 requires UC Santa Cruz to prepare and, within 2 years, begin implementation of a campus-wide vegetation management plan. Regarding the effectiveness of vegetation management plans, treatments that alter vegetation to reduce fire intensity can aid in wildland fire containment and control, while creating safety zones for fire fighter and citizen safety (CAL FIRE 2021).

Comment L7-180

Moreover, the DEIR is inadequate because it does not consider a potentially feasible mitigation measure of not developing in the High Fire Hazard Severity Zone in the north campus subarea. The Utilities and Service Systems chapter analyzed this option and found that in most environmental impact areas not building in the north campus subarea would reduce the impacts. It is likely that a more detailed analysis will show that, even with a vegetation management plan the wildfire risk to development in the north campus subarea will be significant. Not developing in that area clearly would reduce this risk to a less than significant level.

Response L7-180

Regarding the adequacy of the Draft EIR’s evaluation of wildfire risk, refer to Master Response 4. With respect to development within the north campus, if this area were excluded from development, the project would be fundamentally different and would not achieve the Project Objectives, as it would render the University unable to house 100 percent of students in accordance with the projected enrollment growth under the 2021 LRDP. Furthermore, Chapter 6, “Alternatives,” includes evaluation of projects alternatives that would either exclude or reduce development within the north campus. Specifically, Alternative 3 (Reduced Development Footprint) would exclude development within the north campus, and Alternative 4 (Reduced Campus Growth and Use of UC MBEST Off-Site) would reduce development of Academic and Support uses within the north campus.

Comment L7-181

- 4-40 – Transportation – Vehicle Miles Traveled – The analysis here is a clear example of the importance of the proposed mitigation measures in the Population and Housing chapter that would effectuate the LRDP commitment to house 100% of the additional enrollment on campus and tying this increased growth to the provision of housing. As documented in Table 4-4, Cumulative VMT in 2040 is projected to be 12.3 VMT per capita. Cumulative conditions with the 2021 LRDP will be 12.1 VMT per capita. This reduction in VMT from the LRDP results from the campus successfully meeting its housing commitment. Without the proposed mitigation measures the cumulative impact here and in other environmental areas would be **significant and unavoidable**.

Response L7-181

With respect to the need for phasing or a housing guarantee as mitigation to reduce cumulative impacts, refer to Master Response 9 and Response L7-143 with respect to the Draft EIR’s evaluation of impacts associated with implementation of the 2021 LRDP. The Draft EIR’s evaluation of potential cumulative impacts is considered appropriate, adequate, and in accordance with CEQA requirements in light of the programmatic nature of the evaluation.

Comment L7-182

- 5-1 – Significant and Unavoidable Impacts – the list of impacts in this section is incomplete. The comments contained in this letter provide substantial evidence documenting the need to include an increased number of significant and unavoidable impacts that will result from the implementation of the LRDP.

Response L7-182

This comment is conclusory in nature and no response is required. Where the commenter has suggested that certain impacts be determined significant an unavoidable in previous comments, a specific response is provided.

Comment L7-183

- 5-4ff – Growth Inducing Impacts – The DEIR recognizes that the campus growth proposed under the LRDP will induce economic and population growth off-campus and employs job multiplier, based on a 2019 UCSC study, of 1.23 to project that the 2021 LRDP could result in the indirect increase of an additional 3,568 job in the region (mostly in the City of Santa Cruz but also in the rest of Santa Cruz County).

- The DEIR finds that “the environmental impacts of that growth are not reasonably foreseeable and will be addressed in future environmental review under CEQA.” This is not correct or adequate. It is reasonably foreseeable for the DEIR to provide estimates of increased population growth and housing demand based on the projected induced growth in employment. In fact, the EIR analyzing the impacts of the 2005-2020 LRDP carried out such an analysis.

Response L7-183

The comment incorrectly asserts that the 2005 LRDP EIR’s conclusions with respect to the conclusions of the 2021 LRDP EIR are inconsistent. The commenter is referred to the top of page 6-9 of the 2005 EIR, which states “the magnitude of growth, especially due to the incubator effect, cannot be predicted with much precision.” Furthermore, the 2021 LRDP’s Draft EIR does provide estimates of increase population growth and housing demand on page 5-5, contrary to statements made in this comment. The 2021 LRDP’s Draft EIR correctly determines though that the impacts associated with that development would depend on the location of proposed development (beyond that evaluated within the cumulative context, which is evaluated in Chapter 4, “Cumulative Impacts” of the Draft EIR) and are not reasonably foreseeable or anticipated at this time. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. The Draft EIR is not required to analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. In accordance with CEQA, the analysis of growth does not speculate on the exact locations of where growth may occur, because this decision, as well as the analysis of specific environmental impacts, is the responsibility of those local agencies who would evaluate and ultimately decide on whether to approve growth-induced projects.

Comment L7-184

While the Growth Inducing Impacts section of the DEIR may not be the most appropriate place to analyze these potential impacts of this employment growth, CEQA requires that these indirect impacts be considered. The appropriate chapter to analyze these indirect impacts is in the Population and Housing chapter and it is not speculative to estimate the likely increase in population and housing demand resulting from this increase.

- There is substantial evidence in this DEIR that the 2021 LRDP is indirectly likely to result in an increase of 3,568 new jobs in the County. These jobs will create additional housing demand, which should be analyzed in the Population and Housing Chapter. The EIR will be inadequate without such an analysis.

Response L7-184

CEQA Section 15126.2(e) requires EIRs to consider the effects of growth inducement, and this Draft EIR does so in Chapter 5.3. Within the context of Section 3.13, “Population and Housing” and per the CEQA checklist questions in Appendix G, upon which thresholds were developed (listed on page 3.13-9 of the Draft EIR), the Draft EIR appropriately evaluates the potential for substantial unplanned population growth either directly (i.e., increased enrollment, housing, and staffing) and indirectly (i.e., through the provision of new infrastructure). The potential for indirect growth as evaluated in Chapter 5, “Other CEQA Section” would be regulated by local land use plans and zoning, and would be subject to land use approvals within the surrounding communities. It is reasonable to assume that such development would be evaluated in a manner consistent with applicable land use planning efforts by those jurisdictions. Further, CEQA (refer to Sections 15144, 15145, and 15384 of the State CEQA Guidelines regarding speculation and forecasting) requires that an EIR not speculate regarding conditions that cannot be determined with reasonable certainty at this time, in light of evidence. As a result and contrary to the statements made in this comment, the Draft EIR presents a discussion of potential growth-inducing effects of the 2021 LRDP but does not speculate as to the locations or impacts of that growth, in accordance with CEQA requirements.

Comment L7-185

- 6-1 – The DEIR quotes the CEQA Guidelines requirements for the analysis of alternatives, which includes: “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain **most of the basic objectives** of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives do not need to meet all the basic objectives.

- A related CEQA Guidelines provision includes: “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.” This provision is particularly important in considering the comments below.

Response L7-185

Refer to Master Response 3 regarding consideration of a reasonable range of alternatives.

Comment L7-186

- 6-2 – 6.5.2 - Alternative 2: Reduced UCSC Enrollment

- 5-13 - This alternative would reduce enrollment under the 2021 LRDP to 26,400 students with the same land use plan as proposed. The DEIR asserts that “this alternative would not provide the full additional capacity for 28,000 students, which is based on the state’s 2040 college enrollment projections; therefore, Alternative 2 would only partially meet Project Objective 1 which involves the accommodation of projected increases in student enrollment through 2040 based on statewide public educational needs.”

The DEIR provides no evidence to support the statement that enrollment growth to 28,000 students is based on the state’s 2040 college enrollment projections. None of the references listed in the DEIR seem to relate to this statement. Moreover, if the objective of meeting the referenced state projected need, the DEIR should have included the 28,000 number in the objective language.

Response L7-186

Contrary to statements made in this comment, the 2021 LRDP Goals and Objectives, identified on page 2-8, state that projected increases in student enrollment through 2040 are based on statewide public educational needs, as stated in Master Response 2 and including the Master Plan for Education in California (OPR 2018b). Further, as stated on page 2-9, the 2021 LRDP growth assumptions are based on overall UC and campus population projections, demonstrating need for additional public university capacity in California.

Comment L7-187

Finally, there is no evidence in the DEIR documenting that the LRDP could not meet state’s projected enrollment levels in 2040 with a lower enrollment at the UCSC campus. It is not accurate or adequate, therefore, for the DEIR to assert that a lower student enrollment would only partially meet Objective 1.

Response L7-187

The comment states that it is inaccurate for the Draft EIR to assume that lower projected enrollment rates would not meet the states enrollment levels in 2040. As stated on page 2-9, the 2021 LRDP growth assumptions are based on overall UC and campus population projections, demonstrating need for additional public university capacity in California. Therefore, a proposed decrease in the projected enrollment would not align with statewide public educational needs and additional public university capacity. See also Response L7-186.

Comment L7-188

- 6-17ff – 6.5.3 Alternative 3: Reduced Development Footprint - While this alternative would eliminate development in the north campus, it would not fully reduce the enrollment proposed to be served by development in that subarea and as in Alternative 2 enrollment would total 26,400 students.

- 6-19 – Ability to Meet Project Objectives – As with Alternative 2, the DEIR finds that the alternative would meet most of the project objectives but would not serve the project state projected enrollment needs and, thereby, would not meet objective 1. The objections to this determination are the same as listed above for Alternative 2.

Response L7-188

The comment summarizes statements included in Chapter 6, “Alternatives,” of the Draft EIR. No response is required.

Comment L7-189

- In addition, the DEIR finds that Alternative 3 would not meet Objective 3 which is to provide 2 additional college pairs.

Response L7-189

The comment summarizes a statement included in Chapter 6, “Alternatives,” of the Draft EIR. No response is required.

Comment L7-190

- The DEIR determined that many of the impacts of this alternative would be similar to those resulting from the proposed project, some would be less, and one would be greater as a result of locating more development on the central campus.

Response L7-190

The comment summarizes statements included in Chapter 6, “Alternatives,” of the Draft EIR. No response is required.

Comment L7-191

- 6-33 – Comparison of Alternatives – The DEIR is inadequate in its comparison of alternatives. The CEQA Guidelines require that the alternatives to the proposed project meet most of the basic objectives and **substantially** reduce the significant environmental impacts of the project. The DEIR in comparing the alternatives merely states whether the impacts are lesser, similar or greater than the project. The EIR needs to indicate which impacts the alternatives would reduce substantially.

Response L7-191

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to attain most project objectives and avoid or substantially lessen any of the significant effects of the 2021 LRDP. Chapter 6, “Alternatives,” of the Draft EIR considered and evaluated four alternatives. Several alternatives were developed to aim at reducing impacts associated with the location of project elements, as well as the magnitude of impacts associated with the numbers of students. As stated on page 6-34 of the Draft EIR, each of the evaluated alternatives would result in lesser environmental impacts than the 2021 LRDP to some environmental resources and greater impacts to others with the exception of the No Project Alternative and the Reduced LRDP Enrollment Alternative. Refer also to Master Response 3 regarding consideration of a reasonable range of alternatives.

Comment L7-192

While the DEIR mentions, on page 6-34, that the impacts of Alternative 2 would be less than those in the 2021 LRDP, “it would not altogether avoid the significant and unavoidable with respect to” a number of impact areas. This is unclear and inadequate. To what extent would significant and unavoidable impacts be reduced to a less than significant level, even if they were not totally avoided.

Response L7-192

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to avoid or substantially lessen any of the significant effects of the 2021 LRDP. CEQA does not require the Draft EIR to identify whether an alternative would reduce impacts to a less-than-significant level. Table 6-2 on page 6-33 of the Draft EIR provides a summary of the environmental analyses provided above for the 2021 LRDP alternatives. As shown in Table 6-2, impacts associated with air quality, greenhouse gas emissions, hazards and hazardous materials, and utilities and service systems would be less under Alternative 2 when compared to the 2021 LRDP.

Comment L7-193

The EIR should contain a chart comparing the alternatives that includes impacts after mitigation for each environmental factor.

Response L7-193

Consistent with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates the potential for project alternatives to avoid or substantially lessen any of the significant effects of the 2021 LRDP, compared to the project. CEQA does not require the Draft EIR to identify whether an alternative would reduce impacts to a less-than-significant level. Table 6-2 on page 6-33 of the Draft EIR provides a summary of the environmental analyses provided above for the 2021 LRDP alternatives. Each of the evaluated alternatives would result in lesser environmental impacts when compared to the 2021 LRDP.

Comment L7-194

- Additional Feasible Alternative - The DEIR is also deficient in its consideration of alternatives because it does not include the alternative discussed in Utilities and Service Systems chapter that is similar to Alternative 3 by not developing in the north campus subarea but eliminates the enrollment growth that would be served in that subarea. This is a potentially feasible alternative and should be evaluated.

Under this alternative, total enrollment growth would be reduced by 3,700 students for a total enrollment of 24,300 students rather than 26,400. By not forcing additional growth in the central campus subarea, as would occur under Alternative 3, the impact to the Historic District would be the same as with the 2021 LRDP. Further, the impacts in all the environmental areas would be similar or less than the 2021 LRDP and all the other alternatives except the No Project Alternative. While it might not meet Objective 1, CEQA only requires that an alternative meet “most” of the objectives and, also, as mentioned above, the DEIR provides no evidence that reduced enrollment at the UCSC campus wouldn’t meet state projections for enrollment growth. This alternative would also not meet Objective 3 to provide two sets of new colleges, but this objective is based on the assumption that enrollment would reach 28,000 students. With reduced enrollment, there may not be the same need for the additional college.

It clearly would be the environmentally superior alternative and as a reasonable alternative with substantially fewer impacts, it should be included in the EIR.

Response L7-194

The comment states that the Draft EIR fails to consider an alternative in Chapter 6, “Alternatives” of the Draft EIR that eliminates development in the north campus and reduces enrollment to 24,300 students. This evaluation is provided in Section 3.17, “Utilities and Service Systems.” Refer to Master Response 3 regarding consideration of a reasonable range of alternatives. Moreover, the Draft EIR already includes the requested information, in the water supply discussion (Impact 3.17-1). The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions.

Comment L7-195

In conclusion, while the DEIR includes a great deal of important and relevant regarding the LRDP, as documented in this letter it is currently inadequate in meeting CEQA’s requirements.

Response L7-195

The comment states that the Draft EIR is inadequate in meeting CEQA requirements. This comment does not state specifically what the commenter finds inadequate; therefore, no additional response can be provided.

Letter L8 Monterey Bay Air Resources District

Christine Duymich, Air Quality Planner II  
March 8, 2021

Comment L8-1

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the UC Santa Cruz 2021 LRDP DEIR. The Air District has reviewed the document and has the following comments:

Response L8-1

The comment is introductory and is noted. This comment does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-2

* **Mitigation Measure 3.3-1:** The Air District appreciates UC Santa Cruz’s plan Vehicle Miles Traveled (VMT) reduction measures to maximize emission reductions and for congestion management.  
  The Air District highly supports UC Santa Cruz 2021 LRDP making the project plan area a more bike- and ped-friendly community and encourages UC Santa Cruz’s exploration of and eBike fleet for faculty and staff use as well as a possible campus/regional bikeshare program.

In an effort to further reduce emissions, the Air District would like to suggest inclusion of roundabouts at intersections or if signalizing intersections is selected, then the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design should be employed. *Local annual funding opportunities from the Air District are available for ATCS and roundabout design and construction projects. Please contact Alan Romero, aromero@mbard.org, for more information.*

Response L8-2

Consistent with the comment’s request, Mitigation Measure 3.3-2 in Section 3.3, "Air Quality", includes a similar recommendation to "Reduce campus vehicle speed limits to the extent feasible and install traffic calming or signal coordination to reduce the intensity of vehicle braking and acceleration." Roundabouts and ATCS are forms of traffic calming and signal coordination and would be considered in the implementation of this measure.

Comment L8-3

* **PM 10 and NOx Construction – Related Emissions: (Sections 3.3 and 3.8)**  
  As both construction and operational PM 10 and NOx emissions exceed MBARD’s CEQA thresholds and since mitigation measures cannot reduce emissions below significance thresholds, we request that UC Santa Cruz coordinate with the Air District to develop off-site mitigation measures. Please contact David Frisbey at the Air District office at (831) 647-9411 or dfrisbey@mbard.org.

Response L8-3

Mitigation Measure 3.3-1, "Reduce Construction-Generated Emissions of NOX" would reduce any exceedance of oxides of nitrogen emissions from construction to less-than-significant levels without the need for off-site measures. With respect to operational emissions, only PM10 would still be exceeded even after the implementation of Mitigation Measure 3.3-2. The comment does not suggest specific programs or measures that could be implemented, nor are there measures identified in available MBARD CEQA guidance materials. Furthermore, the feasibility of and quantifiable reductions that could be possible are considered speculative at present. However, UC Santa Cruz, as a regional partner and outside the context of CEQA, will coordinate with MBARD to determine how best UC Santa Cruz may assist in reducing regional emissions, including participation in regional education and/or other programs related to reducing emissions. Nonetheless, the conclusions of the Draft EIR are considered appropriate, adequate, and in accordance with CEQA requirements.

Comment L8-4

* **Mitigation Measure 3.8-1 and 2:** The Air District supports incorporating increasing electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, the Air District suggests including publicly available dual port Level 2 & DC fast-charge charging stations throughout the project area. *Local annual funding opportunities from the Air District are available for EV charging infrastructure. Please contact Alan Romero, aromero@mbard.org, for more information.*

Response L8-4

UC Santa Cruz is committed to expanding support for electrical vehicles. Consistent with the comment’s request, electric charging stations are already part of UC Santa Cruz’s Transportation and Parking Services programs and part of UC Santa Cruz's Campus Sustainability Plan and Energy Efficiency Programs. Level 2 charging stations are currently provided within the Core West Parking Structure and East Remote Parking Lot within the LRDP area. Further, Mitigation Measure 3.3-2 also requires installation of additional electric vehicle charging stations, which (if installed within the next few years) would likely be the type identified in this comment. However, as the 2021 LRDP would be implemented over a period of approximately 20 years, it is considered likely that Tier 2 charging stations and current fast-charge stations may become obsolete during the course of 2021 LRDP implementation. The commenter’s support for additional charging stations is noted and is not considered inconsistent with the findings or mitigation measures provided in the Draft EIR. As appropriate, UC Santa Cruz Transportation and Parking Services will coordinate with MBARD regarding potential funding opportunities for additional EV charging infrastructure.

Comment L8-5

* **Construction Equipment:**The Air District is pleased with UC Santa Cruz’s employment of Tier 3 construction equipment and renewable diesel. To further reduce GHG emissions the Air District would like to encourage the use of Tier 4 construction equipment in addition or in place of the Tier 3 construction equipment.

Response L8-5

The comment expresses support for the Draft EIR's requirement to use Tier 3 construction equipment and renewable diesel and recommends that the Draft EIR further reduce GHG emissions through the encouragement of Tier 4 construction equipment. While all new diesel-powered construction equipment has been required to install Tier 4 engines since 2015, its availability is still limited as construction equipment manufactured prior to this time is still largely in use. This comment has been noted and Mitigation Measure 3.3-1 has been revised as follows:

**Mitigation Measure 3.3-1: Reduce Construction-Generated Emissions of NOX**

Per contract specification requirements, UC Santa Cruz shall require that the contractor(s) develop and implement a plan demonstrating that the off-road equipment used on-site to construct 2021 LRDP projects would achieve a fleet-wide average 45 percent reduction in NOX exhaust emissions, compared to uncontrolled aggregate statewide emission rates for similar equipment. One feasible plan to achieve this reduction would include the following:

* At least 80 percent of diesel-powered off-road equipment operating on the project site for more than two days continuously shall be equipped with engines meeting US EPA emissions standards for Tier 3 engines or equivalent, and use of Tier 4 engines shall be encouraged;
* Use of renewable diesel or other zero emissions alternative (e.g., electric) construction equipment to the degree available and feasible;
* Plan construction projects such that multiple project components (i.e., bridge ~~construction,~~ or roadway construction) will not occur on the same days ~~as other construction activities~~; and
* Alternatively, if UC Santa Cruz can demonstrate through preparation of an air quality assessment report prepared by an air quality specialist that large or contemporaneous 2021 LRDP construction projects would not exceed MBARD thresholds, then the above mitigation requirements may be waived.

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

Comment L8-6

* **2021 LRDP Goals and Objectives:** The Air District supports UC Santa Cruz’s objective of promoting Transportation Demand Management (TDM) and providing infrastructure to optimize trip and vehicle miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.

Response L8-6

This comment expresses support for the 2021 LRDP’s TDM objective that would provide infrastructure to optimize trip-and vehicle-miles-travelled-reduction benefits. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-7

* **Demolition, Grading and Trenching Activities:**If any asbestos piping or asbestos material is uncovered as part of the earth moving, trenching or during any part of the project, Air District rules may apply. Notification to the Air District is required at least ten days prior to renovation or demolition activities. In addition to the 10-day waiting period if any construction work involves renovation or demolition of a structure as well as removal/replacement of a subsurface pipe, the Air District recommends that the building materials/pipe be thoroughly inspected for asbestos prior to any construction/demolition activity.

Air District Rule 424 National Emissions Standards for Hazardous Air Pollutants can be found online at: https://www.arb.ca.gov/drdb/mbu/cur.htm.

Please contact Shawn Boyle or Cindy Searson at (831) 647-9411 for more information regarding these rules.

Response L8-7

The comment provides the MBARD notification process in the event that asbestos material is uncovered during constructions activities that would result from 2021 LRDP implementation. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-8

* **Portable Equipment:**The Air District permits to operate, or statewide portable equipment registration, may be required for portable and/or auxiliary equipment such as engine generator sets and compressors. Please make sure to contact the Air District’s Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for any portable equipment planned to be utilized for this project.

Response L8-8

The comment provides the MBARD permit process for operation of portable equipment such as engine generator sets and compressors. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Comment L8-9

* **Tree Removal:**Please make sure to contact the Air District’s Engineering Division at (831) 647-9411 to discuss if a Portable Equipment Registration is necessary for the woodchipper being utilized for this project.

The Air District appreciates the level of detail and analysis provided in the Draft EIR. Should you have any questions, please contact me at (831) 647-9411 or cduymich@mbard.org.

Response L8-9

The comment provides the MBARD contact information for woodchipper registration. This comment is noted but does not address the adequacy of the EIR analysis. No further response is necessary.

Letter L9 City of Santa Cruz, Planning and Community Development Department

Matthew VanHua, Principal Planner - Advance Planning  
March 8, 2021

Comment L9-1

The City of Santa Cruz (City) continues to value the partnership it has with the University of California, Santa Cruz (UCSC) and the many amenities, opportunities, and benefits that UCSC itself and the larger UCSC community bring to the City. As UCSC considers expansion, the City appreciates the opportunity to offer feedback on how said expansion may impact the City, its residents, and its visitors. The City has reviewed the information provided in the UCSC Long Range Development Plan (LDRP) Draft Environmental Impact Report (EIR) and provides comments as follows.

Response L9-1

The comment is introductory in nature and is noted.

Comment L9-2

The timing of proposed mitigations is imperative to minimize negative impacts of future development. Prior to increasing student enrollment and additional faculty/staff, the EIR should clearly note that the necessary transportation and housing mitigations, along with other infrastructure needs, will be in place prior to said increases, not afterwards, so that negative impacts to the environment, the City, and City residents are minimized. For instance, increasing the number of students, faculty, and staff without a coinciding increase in on-campus housing capacity would have different impacts than those studied under this Draft EIR.

Response L9-2

The comment states that the Draft EIR should require that transportation and housing mitigations, along with other infrastructure needs, should be implemented prior to enrollment increases. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. In addition, regarding phasing of development, refer to Master Response 9.

Comment L9-3

While the project anticipates providing housing for 100% of its FTE students over 19,500 and up to 25% of its additional 2,200 staff and faculty, UCSC does not control where anyone chooses to reside. The DEIR has not studied the impacts under a scenario where less than 100% of new enrollment lives on campus or a significantly smaller portion than 25% of faculty and staff choosing to live off-campus. Additionally, while increases in FTE students, faculty, and staff are analyzed, the number of part time students, faculty, and staff and their impact is unknown. Additional scenarios addressing these issues should be studied. Given this need for further analysis, this Draft EIR should further analyze the impacts of the LRDP on such environmental areas as Air Quality, Hydrology and Water Quality, Population and Housing, Public Services, Recreation, Transportation, and Utilities and Service Systems.

Response L9-3

Refer to Response I76-2 regarding the UC Santa Cruz Housing Policy. Regarding the Draft EIR’s evaluation of campus enrollment and population projections, as stated on page 2-9, the 2021 LRDP planning effort addresses anticipated growth in on-campus student population of 28,000 FTE students and approximately 5,000 FTE faculty and staff. State CEQA Guidelines Section 15378(a) defines “project” in part as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment….” The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions in order to determine what impacts are reasonably foreseeable. Refer also to Master Response 9 regarding planning implementation and phasing of development.

With respect to the use of FTE as an appropriate metric and as stated in Master Response 2, it is important to note that FTE takes into consideration non-full-time students, so as to better project potential impacts and facility needs. Pages 2-10, 3.13-4, 3.13-11, and 3.15-10 of the Draft EIR include the conversion of FTE to headcount. As noted in in Chapter 2, “Project Description,” of the Draft EIR the existing campus population of approximately 22,350 (2018 – 2019 academic year) includes 2,800 three-quarter-average FTE employees, which represents 3,657 headcount employees. Calculations and impact analysis associated with part-time students is considered to be included within the assessment of FTE students, as carried through the Draft EIR’s analysis. Refer also to Master Response 2 regarding level of detail required in the Draft EIR.

Comment L9-4

*Impact-Specific Comments.* The following comments relate to the proposed impact analysis sections.

Response L9-4

The comment is introductory in nature and is noted. This comment does not address the adequacy of the EIR analysis. Further comment is not required.

Comment L9-5

The City’s General Plan states that “views toward Monterrey Bay and the Pacific Ocean provide orientation and strong sense of identity” and that coastal terraces such as the ones home to UCSC “afford panoramic views of the city and Monterrey Bay”. A view looking south from approximately Viewpoint Location #6 is noted in the City’s LCP document (see Attachment 1) as a Scenic View location and should be analyzed further in the EIR to ensure any impacts to this view are considered.

Response L9-5

State CEQA Guidelines Section 15151 provides guidance on the degree of specificity required in the EIR. Specifically, an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. Further, evaluation of the environmental effects need not be exhaustive. Impact 3.1-1 evaluates potential impacts to scenic vistas and includes a discussion of seven viewpoint locations. Therefore, the Draft EIR provides an appropriate level of detail in compliance with CEQA.

This viewpoint was considered; however, due to intervening topography it does not provide a substantially different view than what is already presented in the Draft EIR (refer to Viewpoint 7 as shown on page 3.1-20.) Long distance views from this location are largely precluded with the exception of the southeastern view of development within the City and the Pacific Ocean, which are shown in the distance within Viewpoint 7.

Comment L9-6

As noted above in the general comments, the impacts related to different percentages of students, faculty, and staff living off-campus have not been fully analyzed. If student enrollment increases precede increases in on-campus housing capacity, there would be further impacts also not analyzed in this Draft EIR.

Response L9-6

As described in Master Response 9, the EIR evaluates the whole of the action, evaluating reasonably foreseeable impacts based on evidence-based assumptions. The 2021 LRDP is a land use plan that does not actually propose any specific development or govern enrollment decisions. It would be speculative to assert the sequence of development, much like it would be for the City of Santa Cruz’s (or any city’s) General Plan; therefore, the EIR examines buildout of the 2021 LRDP. Further, if the sequence of development results in any significant impacts that were not evaluated as significant in this EIR, supplemental environmental review would be required.

Comment L9-7

Additionally, the amount of new housing, if any, built at the Westside Research Park is unknown and that may also affect the air quality analysis as this in a separate location from the rest of the main campus studied in the Draft EIR. It would be ideal to maximize employment on this site and house only individuals employed on this site and the Marine Lab campus.

Response L9-7

The 2021 LRDP building program includes 8,500 new student beds and 558 housing units that could be developed within the 2021 LRDP area, including the Westside Research Park. Section 3.3, “Air Quality,” considered full build-out under the 2021 LRDP within the LRDP area, including the Westside Research Park. The programmatic analysis of the 2021 LRDP building program provided in the Draft EIR is adequate and appropriate under CEQA. The Draft EIR’s proposed mitigation is considered feasible, effective, and in accordance with CEQA requirements.

Comment L9-8

One specific comment relates to Mitigation Measure 3.3-2 and electric vehicle (EV) charging. The Plan’s impact on air quality is significant so the Plan should commit to a specific amount of EV charging stations constructed at parking lots and should build all new parking spaces as EV charger-ready. These actions would better support electric vehicles and cleaner air.

Response L9-8

Please refer to the Response L8-4 regarding Mitigation Measure 3.3-2 and EV charging infrastructure.

Comment L9-9

The Plan includes 119.1 acres of Redwoods within the possible development zone which is a high number. There is substantial acreage for other sensitive areas as well. With potentially significant impacts with respect to biological resources, including many sensitive habitats, what analysis was done to minimize development in biologically sensitive areas and maximize development in areas that do not carry the same potential for significant impacts on sensitive habitat?

Response L9-9

This comment inquires about the analysis done to minimize development in biologically sensitive areas, but does not address the adequacy of the EIR analysis. The EIR thoroughly evaluated impacts, on a programmatic level, to biological resources and included mitigation measures to reduce all impact to a less-than-significant level. See Section 3.5 of the Draft EIR. For comments on the 2021 LRDP project, please refer to Master Response 2. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment L9-10

While the report states that the probability of impacting Burrowing Owls is low, the mitigations are not sufficient to adequately address potential impacts. Namely, one mitigation measure calls for providing a 100-foot buffer between active Burrowing Owl sites and development, and that distance is typically larger to ensure that impacts are mitigated. Biologists typically require significantly larger buffers, around 500 feet, so the EIR should increase this buffer to a larger distance in the unlikely event that active Burrowing Owl sites are identified near construction.

Response L9-10

Comment acknowledged. Please refer to Response L7-69 regarding edits to Mitigation Measure 3.5-2e to reflect the requirements of the CDFW Staff Report on Burrowing Owl Mitigation, which requires buffers of at least 165 feet and 650 feet during the non-breeding and breeding season, respectively.

Comment L9-11

Mitigation Measure 3.5-3b in the Draft EIR states that the mitigation would result in no net loss of habitat function and the City agrees that compensatory practices resulting in no net loss of habitat function is a vital mitigation measure. However, one possible mitigation option under 3.5-3b is to preserve existing sensitive natural communities of equal or better value through a conservation easement at a sufficient ratio to offset the loss of habitat function. Further analysis should be included on this mitigation option. Does it relate to both plant and animal life? If so, an environmental easement may work better for some species more than others. An additional mitigation could also include providing funds to non-profit organizations whose work can also directly compensate for habitat loss and impacts.

Response L9-11

As stated in the Section 3.5.2, “Environmental Setting,” on page 3.5-31 of the Draft EIR, sensitive natural communities are native plant communities defined by CDFW as having limited distribution statewide or within a county or region. While sensitive natural communities may support wildlife, preservation of the communities would be focused on the native plants associated with that community. UC Santa Cruz has identified feasible mitigation measures that reduce all impacts related to biological resources to a less-than-significant level, and the measures to compensate for unavoidable loss of sensitive natural communities and mechanisms are generally those accepted by CDFW, the trustee agency.

Comment L9-12

While the DEIR provides a fairly detailed discussion of historic karst geologic and hydrogeologic issues, it is relatively silent on recent developments in natural resource protection planning related to karst. Since the previous environmental review process related to the UCSC LRDP, the San Lorenzo River has been listed for temperature impairment under the Clean Water Act, the City has become obligated to provide additional instream flow for the protection of special-status species, and development of County of Santa Cruz Karst Protection Zone policies has begun.

Specifically, the following issues should be further evaluated in the Final EIR:

Response L9-12

The comment states that the Draft EIR does not reference the City’s obligation to provide additional instream flow for the protection of special-status species and development of County of Santa Cruz Karst Protection Zone policies. Refer to Master Response 10 regarding consideration of the County of Santa Cruz Karst Protection Zone policies. Refer to Responses S1-3 and I69-4 regarding the water rights petition that the City submitted to the State Water Resources Control Board to provide protective flow conditions for coho and steelhead.

Comment L9-13

Relationship of the area proposed for potential groundwater development to the regional karst aquifer dynamics warrants more discussion in Chapter 3.10 of the DEIR. The DEIR states: “the assignment of surface water runoff to a particular watershed is based on topographic features of the main residential campus; however, flows captured by the natural subsurface karst aquifer drainage system or by the UC Santa Cruz storm water drainage system may be transferred from one watershed to another in some cases.” This is a very important and valid point that understandably exacerbates the evaluation of impacts of the proposed project. On a related note, there have been several significant rainfall years (1998, 2017) and surface runoff from the University has likely changed dramatically since the hydrogeologic investigation in 1989. There is the potential that subsurface flow dynamics have also changed since that time. Furthermore, it also appears that the historic hydrogeologic studies did not identify all karst features in the vicinity; therefore, the evaluation of karst-related impacts is incomplete. For example, seeps at the headwaters of Redwood Creek – a significant lower San Lorenzo River tributary – do not appear to be identified. Finally, there were field and mapping studies performed in order to support recent County of Santa Cruz karst protection efforts that may provide additional background on hydrogeologic dynamics in the region (Nolan 2016). Reference to them in Chapter 3.10 should be included, if only for completeness’ sake.

Response L9-13

Refer to Master Response 10 for further information regarding clarifications and supplemental information regarding karst topography and groundwater conditions as they related to the 2021 LRDP. As noted previously, the Draft EIR’s analysis was based on available information. Additional reference to non-LRDP-related studies has been reflected in the Final EIR (as stated in Master Response 10) where appropriate.

Comment L9-14

* Water pollution impacts related to stormwater discharge into the karst aquifer and receiving waters’ water quality and increased stormwater discharge effects on karst aquifer morphology and flow paths warrant further evaluation in Chapter 3.10. The DEIR clearly states that “New development under the 2021 LRDP could potentially cause new runoff to be diverted to sinkholes.” Discharge of any additional runoff could be considered significant in the context of karst protection – especially since some new development is proposed for the area immediately upgradient of the Pogonip Springs. While the DEIR focuses on erosion, additional flow into sinkholes can cause significant changes to flow patterns underground. Communication with surface flow to the karst aquifer is very similar to a surface water system – whereby polluted runoff is effectively directly discharged to receiving waters. Given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts – specifically with regard to the lower San Lorenzo River and its associated beneficial uses – needs further evaluation.

Response L9-14

The Draft EIR presents a programmatic evaluation of the potential environmental impacts that may occur with further development within the LRDP area under the 2021 LRDP. Subsequent analysis will be conducted as projects are considered under the 2021 LRDP that will evaluate site-specific conditions, including that of karst features. Refer to Master Response 10 for further clarification. Further, the commenter’s citation of the EIR is within the context of Impact 3.10-4 (Flood-Related Impacts) on page 3.10-32, which does evaluate surface runoff. However, consistent with the commenter’s request, the Draft EIR’s analysis of hydrology and water quality impacts does include consideration of potential impacts to the San Lorenzo River, as shown on pages 3.10-7, 3.10-10, 3.10-13, 3.10-25, and 3.10-34 (which specifically addresses impacts to groundwater resources within the San Lorenzo River watershed). The Draft EIR’s analysis is considered appropriate, adequate, and in accordance with CEQA requirements.

Comment L9-15

* County of Santa Cruz Karst Protection Zone policies warrant exploration in Chapter 3.11. These policies – while in their infancy – have recently begun to be implemented in the County code and should be evaluated for relevance to the project. For more information please see the following link:  
  http://santacruzcountyca.iqm2.com/Citizens/Detail\_LegiFile.aspx?ID=2578&highlightTerms=kar st

Response L9-15

The comment states that the Draft EIR should consider the County of Santa Cruz Karst Protection Zone policies in Section 3.11, “Land Use and Planning.” Refer to Master Response 10 regarding consideration of the County of Santa Cruz Karst Protection Zone policies.

Comment L9-16

* Potential use of karst-derived groundwater warrants exploration in Chapter 3.11. As the DEIR correctly states repeatedly, karst groundwater often flows through solution channels. Given the stark differences in production potential of the various wells (as reported in the DEIR and also as anecdotally accounted by Dr. Gerald Weber), it is quite likely that monitoring wells identified for groundwater extraction potential on the campus are located within these solution channels. Given that California Water Law requires valid water rights in order to put water that flows through confined channels into beneficial use, the status of the San Lorenzo River and tributaries as a fully-appropriated system (with regard to water rights), and the potential impacts on other, senior water rights holders in areas affected by reduction in flow from the karst aquifer underlying the University (such as the City of Santa Cruz), evaluation of the University’s water rights obligations seems appropriate.

Response L9-16

Within the context of CEQA and based on historic activities within the LRDP area, the Draft EIR assesses the potential physical environmental impacts associated with the possible use of an existing groundwater well in the lower campus subarea of the main residential campus. The commenter is referred to the analysis beginning on page 3.10-35 of the Draft EIR, which focuses on the potential physical environmental impacts of use of the groundwater well. It is acknowledged that, if UC Santa Cruz pursues use of WSW#1 for groundwater extraction, further evaluation of use of the well as a subsequent project under CEQA would be conducted. Also refer to Master Response 10. Regarding water rights, as explained on page 3.10-20 of the Draft EIR:

WSW#1 was drilled and completed under City of Santa Cruz permit in December 1988. Drilling to a total depth of 226 feet encountered limestone/marble, with evidence of karst solution channels and zones of hard intact marble interspersed with abundant open to rubble-filled fractures and void spaces.

As described above, well WSW#1 may either be drawing water from a groundwater basin or from a subterranean stream. Because the source of groundwater extracted by this well could either be a groundwater basin or a subterranean stream, additional examination of its provenance would be needed if the well is dedicated to long-term regular extraction, and this determination would be made during the project-level evaluation described above. The Draft EIR properly evaluates the physical impacts of potential groundwater/subterranean water, as required by CEQA.

Comment L9-17

* Groundwater extraction impacts on lower San Lorenzo River biotic resources warrants further evaluation in Chapter 3.5. Dry season and dry year hydrology, as well as dry season water temperatures in the lower river can be limiting to special-status species such as coho salmon and steelhead trout. Again, given the aforementioned difficulty in understanding subsurface hydrogeologic dynamics and incomplete data on karst features, the analysis of impacts –specifically with regard to the lower San Lorenzo River instream flows and temperature dynamics – needs further evaluation.

Response L9-17

Refer to Response L9-16.

Comment L9-18

* Impacts on the City of Santa Cruz water system related to potential reduction in karst springs discharge to the lower San Lorenzo River also seems warranted in Chapter 3.17. Again, the San Lorenzo River is a fully-appropriated stream (with regard to water rights) during the dry season. Reduction in flow from Pogonip and Redwood Creeks (as well as smaller karst-derived tributary flows to the lower San Lorenzo River) could have negative effects on the City’s ability to divert at our primary diversion at Tait Street (also known as the Tait Diversion or Crossing Street Diversion). While it may be that the proposed use of groundwater on campus is ultimately determined to have negligible effects on San Lorenzo River flows and water quality, it is not clear from the existing analysis that is so.

Response L9-18

Refer to Response L9-16.

Comment L9-19

**Statistical Approach to Water Years**Much of the DEIR’s statistical analysis related to groundwater and surface water monitoring is based on averaging water monitoring data across all years and calculating standard deviations around these comprehensive averages. While averaging available data is useful for comparing annual data to a standard (e.g. rainfall, groundwater levels, stream flow), it is not a good measure of how highly variable systems operate.

Historically, rainfall in California is highly variable from year to year. In the 124 years that the State has collected rainfall data, only two of those years have exhibited “average” rainfall. California precipitation tends to fluctuate between wet water years that recharge groundwater and dry water years where little or no groundwater recharge occurs. Further, climate science research from UC Berkley Lab (and elsewhere) indicates that California’s already variable rainfall patterns are likely to become even more variable in the future.

We recommend the DEIR’s analysis of existing groundwater and surface water monitoring data include additional analysis that is grouped and analyzed by water year (wet, normal, dry and very dry). This additional analysis will provide a more nuanced range of groundwater levels and insight into their interrelationship with surface water by water year types. This more nuanced analysis will provide greater insight into the extremes for rainfall and runoff, greater insight into the management of groundwater levels, and how the management of groundwater pumping changes surface water flows and the habitats that depend on interconnected springs and streams.

Response L9-19

As stated in Master Response 10, the analysis presented in the Draft EIR has been supplemented, based on the commenter’s request, with an assessment of hydrologic conditions by water year type. The inclusion of the supplemental information does not constitute significant new information (per Section 15088.5 of the CEQA Guidelines) and did not identify new or substantially more significant hydrology and water quality impacts. As a result, recirculation of the Draft EIR is not necessary.

Comment L9-20

We also recommend the DEIR’s proposed mitigation measures for groundwater pumping monitoring be revised to rely on these recommended water year calculations. Specifically, we request that any potential groundwater pumping strategy and mitigation monitoring be based on analysis of available historic data by water year type as it corresponds to the current water year (e.g. wet water year pumping is compared to wet water year statistical averages). This will ensure that the analysis of potential groundwater pumping in wet years fits within the standard deviations for wet water years, rather than the artificially low average that incorporates wet and dry years. This will also allow additional pumping in dry water years based on the mean average and standard deviations for dry water years. This revised pumping and mitigation monitoring strategy would be less likely to impact surface water flows beyond what is experienced during natural climate processes. The goal being to ensure that the proposed project incorporates groundwater and surface water monitoring protocols as mitigations that are protective of the natural systems that rely on groundwater, including areas with interconnected surface waters located within the City.

Response L9-20

Refer to Response L9-19.

Comment L9-21

**Impact 3.10-3 Alteration of Drainage Patterns and Increased Runoff**The DEIR provides average rainfall data on p. 3.10-9 but does not include an appendix to support this rainfall analysis. As discussed above, rainfall in California is highly variable and planning for runoff in an average year is different than planning for runoff in a wet year. While flooding is not expected in this area of the City, the DEIR should include its rainfall analysis including the statistical approach used to analyze this rainfall data. More detailed information is needed for wet years to determine more if there is adequate stormwater retention and storm drain capacity to handle wet year flows, especially since climate change is projected to lead to more rainfall variability and more severe storms.

Response L9-21

Refer to Response L9-19.

Comment L9-22

**Impact 3.10-4 Flood-Related Impacts**The DEIR identifies karst geology on the central and lower campus and states that the natural karst sinkholes and swallow holes convey surface flows to off-campus springs. The analysis of potential flooding on campus relies on these natural features to address potential flood impacts and on state required rainfall retention related to new construction to limit runoff. The DEIR also relies on drainage improvements made since above normal rainfall events in 2003 & 2004 to divert storm flows away from certain sinkholes and swallow holes where flooding had occurred on campus during those 2003/2004 storm events.

The DEIR states that additional LRDP related construction on campus will lead to additional storm related runoff. The DEIR goes on to state that, “…regulatory compliance and programmatic elements in place for new development in the LRDP area are designed to reduce runoff, peak flows and impacts to water quality and, therefore, implementation of the 2021 LRDP would result in a less-than-significant impact.”

UCSC is located on a hill within the City of Santa Cruz and is tied into City provided wastewater and stormwater infrastructure. The 40 to 50 sinkholes and swallow holes are also connected to springs and seep fed streams located off campus within the City and unincorporated County. While the DEIR discusses potential impacts on campus, it does not provide information on increased runoff that would flow into the City as surface runoff, into its wastewater or stormwater infrastructure, or to the interconnected springs and streams.

The DEIR should be revised to include runoff projections for storms from wet water years that would allow the City to evaluate the potential impacts in the City from additional runoff related to the proposed project’s potential impact on City infrastructure.

Response L9-22

As noted in Chapter 1, “Introduction” of the Draft EIR and Master Response 11, the analysis of the 2021 LRDP is programmatic in nature and does not provide project-specific analysis, including specific changes in drainage patterns that could result in additional runoff to specific water courses/features. The Draft EIR does include a campus-wide evaluation of potential changes in permeability and increased runoff and provides mitigation that can address the range of environmental impacts. As noted in Impact 3.10-5, compliance with UC Santa Cruz Post-Construction Requirements would involve the retention of runoff to pre-development conditions which would prevent changes in flows to springs and seeps. Any on-site stormwater facilities developed consistent with these requirements would have the capacity to retain/detain flows during wet water years, consistent with the commenter’s request.

Comment L9-23

**Karst Aquifer Management**The DEIR should recommend mitigations that increase the knowledge needed to properly manage any potential groundwater pumping in this karst aquifer: (1) the DEIR should recommend mitigations that will expand understanding of the interrelationship between groundwater and surface springs that would inform and improve resource management, (2) the DEIR should evaluate biological resources that depend on the interconnected springs/streams supported by groundwater and potentially impacted by groundwater pumping both on and off campus, and (3) the DEIR should recommend a process to develop groundwater sustainability standards that are protective of surface water resources. This process should include the City of Santa Cruz and the County of Santa Cruz, where interconnected springs/streams are located. The process should also identify any relevant resource agencies and other partner agencies involved in protecting the identified biological resources.

Response L9-23

This comment offers generalized conceptual ideas regarding evaluation of biologic and hydrologic conditions that could be used to refine regional approaches to groundwater management. The Draft EIR evaluates impacts associated with 2021 LRDP implementation, including those related to groundwater extraction under Impact 3.10-5. Implementation of Mitigation Measure 3.10-5a would ensure that campus pressure grouting practices necessary for stabilizing soft soils at karst building sites would not impact karst groundwater quality nor would it affect offsite spring flows. In addition, implementation of Mitigation Measure 3.10-5b would ensure that UC Santa Cruz monitors water levels and defines average base water levels to ensure that extraction does not contribute to a net deficit in aquifer volume. In the event that extraction contributes to a net deficit, UC Santa Cruz would terminate or reduce groundwater extraction. Outside the context of CEQA and as a partner agency in the region, UC Santa Cruz will coordinate with both the County and City of Santa Cruz to ensure the sustainable management of groundwater in the region.

Comment L9-24

**Groundwater Mitigation Measures**Based the complex geology involved in karst aquifers, the DEIR recommends groundwater and spring monitoring that is inadequate to protect groundwater and surface water resources from potential groundwater extraction related to the proposed project. The DEIR recommends annual groundwater monitoring of the production well only when groundwater is actually being produced.

In karst systems, continuous monitoring is often used to understand water levels, static reserves, and groundwater recharge. If water is extracted from the karst aquifer, the DEIR monitoring program should include continuous monitoring to confirm that any water extracted from the karst aquifer during the dry season (static reserves) is regularly replenished during periods of aquifer recharge. This continuous monitoring is necessary to adequately understand the karst aquifer, groundwater pumping’s effects on static water levels, the sustainability of the karst system to recharge naturally during sustained and/or periodic groundwater withdrawals in order to protect this groundwater resource from depletion. It would also provide information that could be useful to develop the karst aquifer as a storage reserve when excess water is available.

The DEIR should be revised to include continuous groundwater monitoring that is reviewed at least quarterly to increase understanding of the complex karst aquifer system as it responds to potential groundwater pumping and recharge in both wet and dry years.

Response L9-24

The monitoring protocols set forth in the Draft EIR are adequate to protect against over pumping and maintain sustainability based on the 2021 LRDP; additional monitoring could be required on a project level as future development is considered. Refer to Master Response 10.

Comment L9-25

**Spring Monitoring and Interconnected Streams**The DEIR should be clarified to discuss the type and location of ongoing surface water monitoring proposed, should include data collection that address both water quality and water quantity at these interconnected springs. This mitigation monitoring should include biological assessment of the habitat values supported by groundwater at interconnected springs and streams located both on campus and off campus. These mitigations should be based upon statistical information developed based on the separate analysis of data from wet water years and dry water years, as discussed above. This is especially important because the biggest shortfalls are likely to occur during single and multi-year droughts.

Response L9-25

The monitoring proposed as part of Mitigation Measure 3.10-5b, as amended through responses to comments, does not involve surface water monitoring but focuses on the monitoring of existing and potential new wells within the LRDP area to better determine connectivity of groundwater supplies in the vicinity of the LRDP area. The analysis and mitigation presented in the Draft EIR (Mitigation Measures 3.10-5a on page 3.10-35 and 3.10-5b on page 3.10-36 of the Draft EIR) are based upon available statistical information and are adequate and appropriate to reduce the potential significant impacts of the 2021 LRDP. As noted above and in Master Response 10, the analysis presented in Impact 3.10-5, beginning on page 3.10-33 of the Draft EIR, has been amended to reflect data by water year type, as requested by the commenter.

Comment L9-26

**Significance Criteria for Groundwater and Surface Water Depletions**The DEIR’s identified significance thresholds for the depletion of groundwater and interconnected surface water states: “If monitoring of water levels and spring flows indicates that UC Santa Cruz extraction of groundwater is contributing to a net deficit in aquifer volume, *as indicated by a substantial decrease in average base flow water levels in any monitored wells or a substantial reduction of base flows in monitored springs,* the campus will terminate or reduce its use of groundwater from the aquifer. *A substantial decrease shall constitute observations of a continual decreasing trend in base groundwater water levels over a 3-5 year period that includes both wetter and drier years coupled with a decrease in spring base flow conditions, beyond the standard deviation for any given spring, for a corresponding rainfall season.* The average base water levels and base flows in springs will be defined through a statistical analysis of historic data, with consideration of associated seasonal rainfall.” (emphasis added).

The Sustainable Groundwater Management Act (SGMA) provides a comparable legal framework to analyze significance criteria related to groundwater pumping and surface water impacts, which addresses both groundwater and surface water sustainability planning. The SGMA allows for the local identification of significance criteria when defining what is sustainable to protect an identified resource. However, these locally defined significance criteria must actually be protective of the resource(s) in question.

The significance criteria for groundwater and surface water depletions should be linked to the protected resources. For groundwater, water levels are linked to the resources supported, this could be local well users to ensure that their well continue to produce after the university begins pumping the aquifer. For surface water it is related to the human and biological systems that use the water.

Response L9-26

The significance criteria applied for Impact 3.10-5, beginning on page 3.10-33 of the Draft EIR, and Mitigation Measure 3.10-5b (as partially quoted by the commenter) uses a no-net-deficit threshold to ensure the sustainable use of groundwater supplies such that various natural resources, including protected resources, are not significantly affected, consistent with the commenter’s request. Further, the mitigation measure as provided in the Draft EIR and amended through responses to comments would require halting groundwater extraction if a net deficit in groundwater levels over the period defined is noted, regardless of whether the extraction of groundwater by UC Santa Cruz was the determining factor in the deficit. As a result, the thresholds employed for this evaluation are no net change, which is consistent with the intent and requirements of the SGMA.

Comment L9-27

The DEIR should be revised to propose mitigations that will both identify existing water uses and develop significance criteria that protects those uses.

The Biological Resources section of the DEIR provides no information on the plants and animals supported by interconnected springs off campus, in the City and County areas, that could be impacted by on campus groundwater production. Biological mitigations recommend “Project-Level Biological Reconnaissance for Sensitive Species and Habitats Surveys” to understand and protect the sensitive species potentially impacted by the proposed project.

These types of biological surveys should also be included at section 3.10-5b as mitigation to evaluate surface water resources and protect the habitats and species that rely on these interconnected springs. This additional detail is needed to determine if the significance criteria outlined in the DEIR is likely to be protective of the resources in question. This is especially important considering that groundwater extraction is most likely during single and multi-year droughts when surface water resources are least available to natural systems.

Response L9-27

As noted in Master Response 10, Mitigation Measure 3.10-5b has been amended to better reflect the potential interconnected nature of groundwater within and adjacent to the LRDP area. Further, as noted above in Response L9-16, UC Santa Cruz would conduct a project-level analysis, including a subsequent assessment of physical environmental impacts under CEQA, prior to approval of groundwater extraction within the lower campus subarea and at WSW#1.

Comment L9-28

Additional information regarding the University’s commitment to providing housing for faculty and staff is needed. The Draft states that 100% of new students enrolled beyond 19,500 and up to 25% of the 2,220 full time equivalent faculty/staff members will be housed on-campus. Despite the Draft EIR studying these percentages of groups being housed on-campus, it fails to adequately evaluate the impacts of all new students, faculty, and staff being housed off-campus. UCSC does not currently have mandatory on-campus residence requirements, so students, faculty, and staff can live wherever they like despite the analyzed percentages. When students, faculty, and staff are not housed on-campus, they create more impacts in the City on such things as transportation, housing demand/cost, water use, etc. In order to adequately assess the impacts of the project, the percentage of students, faculty, and staff living on-campus will need to be clearly established, such as through on-campus living mandates, or alternative percentages of on-campus residents should be analyzed, which would likely result in new or different impacts.

Response L9-28

As noted in Master Response 2, the 2021 LRDP is a guide for campus development, and the Draft EIR reflects a regional projection of how impacts would occur in light of implementation of the 2021 LRDP, as the project being evaluated under CEQA. The analysis carried forward throughout the Draft EIR is considered a reasonable projection of the potential environmental impacts associated with the project under CEQA. Section 3.13, “Population and Housing” of the Draft EIR assesses the potential impact of the 2021 LRDP on the local housing market and determines that impacts, particularly related to faculty and staff, would be significant and unavoidable. The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

Within Chapter 4, “Cumulative Impacts,” the EIR evaluates project impacts in combination with other development in the area, including additional on-campus housing through Student Housing West, and is able to conclude that, with cumulative development, all of the growth in student enrollment would be accommodated on campus. Refer also to Response I76-2 regarding the UC Santa Cruz Housing Policy and the need for a mechanism to require residence within the LRDP area. Further, based on historic housing data for the campus and typically low vacancy rates within the LRDP area, it is reasonable to conclude that if housing is made available on campus that students, faculty, and staff would attempt to live on campus.

Comment L9-29

The Draft EIR also does not propose tying the development and provision of on-campus housing to increases in students, faculty, and staff. There could be a large gap (possibly many years) between student, faculty, and staff growth and on-campus housing development, and neither the EIR nor the LRDP mandates that housing be built and occupied prior to enrollment growth. This scenario would create impacts to the City of Santa Cruz that have not been analyzed or mitigated. UCSC should commit to providing a specific amount of on-campus housing prior to expansions of students, faculty, and staff members, as this will allow for a more accurate assessment of the project’s impacts.

Response L9-29

Refer to Master Response 9 regarding the phasing of development.

Comment L9-30

The Draft EIR states that proposed and entitled housing development in the City’s pipeline adequately mitigates for the housing demand created by students, faculty, and staff that choose to live off-campus. Some housing developments have been approved for years, but have not been constructed (e.g., the 32-unit, mixed use project at the southeast corner of Soquel and Hageman Avenues was approved four years ago but has not yet pursued building permits). The construction of most projects is out of the City’s control and cannot be guaranteed. While significant percentages of new units produced in the City are affordable (due in large part to City inclusionary requirements coupled with the City’s support for 100% affordable projects), students are not as likely to live in new, market-rate housing due to cost. While some filtering can occur as newly constructed housing becomes available, this process can take years and relies on continuous production of housing both within the City and regionally, something that cannot be guaranteed, so more affordable housing may not be readily available to meet the needs of student growth just because new housing development is in the pipeline. This scenario could place further demand on housing in the City, particularly on the limited supply of affordable housing. An ongoing contribution to the City’s Affordable Housing Trust Fund should be provided to offset the increased housing demand from students, faculty, and staff in the City, particularly to offset the demands for affordable housing stock in the City.

Response L9-30

UC Santa Cruz acknowledges the status of the City’s housing development. This comment does not address the adequacy of the EIR analysis. No further response is necessary. However, please refer to Master Response 2 regarding housing affordability and other socioeconomic considerations. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.

Comment L9-31

The Draft EIR presents conflicting viewpoints on vacancy. Given that the City of Santa Cruz is the closest city to UCSC, using the County-wide 2020 Department of Finance (DOF) vacancy rate of 7.8% does not accurately reflect the housing pressure on the City itself (a lower rate of 5.6% in the same study). That study also does not take into account the loss of approximately 1,000 units in the County due to the CZU Fire Complex. Additionally, HUD data from 2019 is also referenced and shows a vacancy rate of 1.9% in the County. The report states that based on a number of factors including vacation home counting, the DOF vacancy rate is possibly not accurate and that the vacancy rate is likely lower. The current American Community Survey (ACS) data estimates a County of Santa Cruz rental vacancy rate of 2.0% and a homeowner vacancy rate of 0.4%, similarly low as the HUD data provided. The HUD and ACS data shows an extremely low housing vacancy situation that could be given more weight than the DOF vacancy rate in the Draft EIR analysis. The Draft EIR uses the higher DOF vacancy rate to support its position that there is a less than significant impact on off-campus housing when there is lower vacancy data from two other sources. Increases in student, faculty, and staff populations coupled with a low vacancy rate places further pressure on housing, especially when housing that might be available for students may not be affordable. These potential housing shortages could force students to live further from campus, increasing impacts to transportation and air quality. Housing shortages could be further compounded if UCSC does not tie on-campus housing to its enrollment growth, because if it the two are not linked, there could be years where there is no on-campus housing available for new students, despite additional enrollment and associated demand for housing. This would create additional growth pressure in the City.

Response L9-31

Impact 3.13-1 on page 3.13-10 of the Draft EIR explains the various housing availability data considered to evaluate housing demand. This analysis also reflected data from US Housing and Urban Development Department (2019), California Department of Finance (2020), the 911 housing units that were lost due to the CZU Lightning Complex Fire, and units approved by the City of Santa Cruz, and other information in Section 3.13.2. The Draft EIR does not contradict the City’s comment; see the discussion below from page 3.13-12 of the Draft EIR:

According to the City of Santa Cruz 2015-2023 Housing Element, housing affordability, including rental units, is a significant challenge. Students at UC Santa Cruz and Cabrillo College struggle to find affordable housing, and frequently live with several other students in single-family homes. (City of Santa Cruz 2016) The Santa Cruz City Council is actively engaged in strategies to address housing needs in the community, with the Mayor conducting a listening tour, the City Council holding housing study sessions, development of engagement reports, and creation of a Housing Blueprint Committee. This committee developed recommendations, many of which have been adopted by the City to provide for accessory dwelling units, creation of a rental housing task force, other measures (City of Santa Cruz n.d.).

The demand for additional housing would likely contribute to the housing issues facing the City, especially in light of the current extremely low rental vacancy rate.

The Draft EIR attempts to explain the discrepancy between data and on-the-ground experience related to vacancy rates but acknowledges the difficult housing situation being faced in the City of Santa Cruz.

Based on the information presented above, including the number of units that have been approved by the City of Santa Cruz, balanced against information in the City of Santa Cruz Housing Element and other information in Section 3.13.2, and the need to pursue additional housing under existing conditions (e.g., efforts by the Santa Cruz Blueprint Housing Committee), it is likely the 2021 LRDP will result in demand for new housing that would not already be provided. UC Santa Cruz has determined that while the future housing market is not entirely predictable, it is possible that there will not be adequate off-campus housing units to meet the housing demand of additional students and employees in the years leading up to 2040-2041. Therefore, implementation of the 2021 LRDP could further reduce the available housing market in the County and induce unplanned levels of substantial housing demand because of the projected increase in UC and non-UC employees. This impact is **potentially significant**. (Draft EIR, pages 3.13-3.14)

Refer also to Master Response 9 regarding the phasing of development.

Comment L9-32

The increase in students, faculty, and staff will create increased demand for housing off-campus. Most of that demand will fall on nearby cities, especially Santa Cruz. While this demand for housing may generate a housing market response and the construction of new housing, as mentioned above, there will likely be times when housing development and demand are not in sync. These will be times of far greater demand and pressure on the Santa Cruz housing market. This could have impacts on existing residents due to rent increases to meet the increased demand. Rent increases or even the construction of new housing could also cause displacement. These impacts should be addressed in the Draft EIR.

The exact location of the new housing is unknown, so it is difficult to assess specific impacts. For instance, housing located at the Westside Research Park could have different impacts to transportation and parks than housing located on the main campus. Studies also show that employment and housing in closer proximity generates less travel demand. Further, jobs in proximity to transit support transit ridership more so than housing in proximity to transit, due in part to the “last mile quandary,” which speaks to people being able to drive to a transit starting point but having more challenges in navigating the transit-station-to-destination end point. Given the Regional Transportation Commission’s recent vote to support rail transit along the rail corridor and the adjacency of the Westside Research Park to said rail line, the City encourages UCSC to maximize employment opportunities on the Westside Research Park as a means to promote future transit use. If housing is considered at that location in addition to the employment uses, then the occupants should be limited to employees and students who work at or study at the Westside Research Park and the nearby marine lab as a means to maximize active transportation options (biking, walking, etc.) for those residents. Similarly, the provision of faculty and staff housing on-campus that houses greater than 25% of the new faculty and staff growth could result in fewer negative environmental effects experienced by the City and its residents, and the EIR should consider a project or alternative that provides on-campus housing for a higher percentage of its workforce.

Response L9-32

Consistent with this comment, the Westside Research Park proposed land use designation of Mixed Use would allow for the provision of both housing and employment uses. As noted in Master Response 2, the Draft EIR presents a reasonable projection of impacts associated with student enrollment growth and the development of facilities to accommodate the projected growth. Additionally, the high demand for housing and low vacancy rate in the City of Santa Cruz and surrounding communities are described in Section 3.13, “Population and Housing” of the Draft EIR, as well as the potential environmental effects of additional demand for housing. Further, with respect to the level of detail and specificity of housing locations and types under the 2021 LRDP, refer to Master Response 11. As noted in Chapter 2, “Project Description,” the 2021 LRDP includes numerous mobility hubs that are intended to provide greater access to transit and regional connections, including the rail-trail transit corridor that was recently considered by the Regional Transportation Commission, as well as “complete streets” and other improvements to facilitate biking and walking. Refer to “Integrated Land Uses” as described under “Transportation Demand Management Programs” on page 2-30 of Chapter 2, “Project Description” of the Draft EIR for further clarification, including the use of transit-oriented design concepts to capture last mile connectivity between the main residential campus and Westside Research Park, transit stops to final destinations, and proximity to a mix of land uses (e.g., student support and public services.) Regarding the Draft EIR’s presentation of a reasonable range of alternatives, refer to Master Response 3 and Response L12-9.

Comment L9-33

The types of housing to be developed for students, faculty, and staff are not outlined in the Draft EIR either. Mixed-use housing with additional amenities on the ground will likely reduce trips and overall impacts. Even horizontal mixed-use development would allow for an increased relationship between where students, faculty, and staff may live and work. This could be especially true for the Westside Research Park area which is more isolated from many campus amenities. The EIR should clearly specify the details of the potential residential uses, how/by whom they will be used, and the resulting environmental impacts.

Response L9-33

Please refer to Master Response 11.

Comment L9-34

The Draft EIR speaks to analysis of full time equivalent (FTE) students and FTE faculty/staff and a definition of FTE is provided in Footnote 1. However, it is not clear how this definition considers students, faculty, staff who are not full time. Students, faculty, and staff working part time are more likely to live off-campus which may create greater impacts. For instance, two students that are half-time and commuting into the main campus may have generate greater impacts to traffic, air quality, etc. than one student living on campus even though they are both considered 1 FTE. The EIR should clearly identify how impacts from all new students, faculty, and staff are assessed. If the FTE analysis does not address this discrepancy in potential impacts, an alternative measure should seek to quantify the increase in impacts under such a scenario and include an evaluation of the impacts in the EIR.

Response L9-34

Regarding the Draft EIR’s evaluation of campus enrollment and population projections, refer to Response L9-3.

Comment L9-35

As discussed in the Housing and Population section, the Draft EIR should further analyze potential impacts caused by off-campus population increases by students, faculty, and staff of UCSC. While housing may be provided for 100% of new student enrollment over 19,500, it does not address alternatives where fewer than 100% of new students live on campus, as is likely, especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students.

For instance, the Draft EIR only addresses potential impacts to emergency services due to the increase in the number of vehicles on-campus while there could be further impacts off-campus as well. With an increase in campus population and concurrent increase in traffic congestion, emergency vehicle access could be affected and an increase in response times could result. To mitigate this impact, the Public Services section of the EIR should address the following access and response needs:

* All traffic signals installed on campus shall be outfitted with a Santa Cruz City Fire Department compatible Opticom Emergency Vehicle Traffic Pre-Emption (Opticom) system. This applies to future signals as well as the existing traffic signals already in use on campus.
* Bicycle/pedestrian paths should be wide enough and strong enough to support emergency vehicles. Currently there are a number of paths that do not support Emergency Vehicle Access (EVA), which significantly delays emergency response.
* Provide for EVA to all new and renovated buildings. Allow adequate approach and egress routes as determined by the Fire Marshal.
* Ensure elevators installed in new and renovated buildings are large enough to accommodate a medical gurney in the flat/level position along with the emergency response personnel.
* Turnouts, turn pockets, cut outs, lane widths, number of lanes, islands, and lane separators should all be evaluated in terms of emergency vehicle requirements.
* Address the impact of radio coverage and discuss the need for in-building radio and cellular communications for emergency response.

The existing on-campus fire station has reached end-of-life for functionality and will not accommodate additional staffing or equipment. The City does not own the station, nor has a new fire station site been identified on campus. The construction of a new fire station should be tied to specific development and the EIR should address the criteria that will be used for the discussion of mitigating the impacts of development.

Response L9-35

State CEQA Guidelines Section 15378(a) defines “project” in part as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment….” For the purposes of CEQA the 2021 LRDP is the proposed project. It would be speculative to assume the UC Santa Cruz would choose not to implement the project as proposed. The Draft EIR does not analyze every conceivable scenario that could occur during 2021 LRDP implementation, but instead relies on evidence-based assumptions to determine what impacts are reasonably foreseeable.

The comment also states that the Draft EIR should include additional measures to address emergency vehicle access and response times in the Public Services section and will be considered as part of UC Santa Cruz’s continuing coordination with the City. However, the measures presented in this comment are not considered necessary to be included as mitigation to reduce a significant impact. Impacts related to emergency vehicle access are addressed under Impact 3.16-4. As stated on page 3.16-39, implementation of the 2021 LRDP would not result in inadequate emergency vehicle access. Consistent with the first three bullets provided in the comment, future roadway modifications would be designed in a manner consistent with applicable regulations, including those related to roadway widths, turning radii, and emergency vehicle access. In addition, UC Santa Cruz will coordinate with the County to install compatible Opticom Emergency Vehicle Traffic Pre-Emption (Opticom) systems on-campus. With respect to building design measures pertinent to emergency services (e.g., elevator sizing and communications equipment), all new development and renovations under the 2021 LRDP would be subject to applicable building code requirements, including those related to emergency access. Further, potential impacts associated with temporary road closures due to construction activities within the LRDP area are addressed in Section 3.9, “Hazards and Hazardous Materials,” Section 3.16, “Transportation,” and Section 3.18, “Wildfire.” As stated under Impact 3.9-4, implementation of Mitigation Measure 3.9-4 would adequately address any potential conflicts with emergency access or evacuation routes during construction, by requiring the preparation and implementation of site-specific construction traffic management plans.

Further, the Draft EIR assess the potential impacts associated with development of new fire facilities as part of the overall building program of the LRDP, as part of the Facilities and Operation land use designation. Regarding impacts related to emergency response times and when the new fire station should be operational, implementation of Mitigation Measure 3.14-1 would ensure that adequate fire access and facilities are available to serve UC Santa Cruz prior to operation of new facilities/development that would require their use, consistent with the request made in this comment.

Comment L9-36

In addition to world-class education, students, faculty, and staff are drawn to UCSC because of its access to world-class recreation activities. Hiking, beaches, and countless opens spaces are located near the university and many of these facilities are maintained by the City. Whether students, faculty, and staff live on campus or not, an increase in these populations will result in an increase in City park usage. This increase in park usage will have deleterious effects on the park system if this impact is not properly mitigated.

The Draft EIR states that there is a less than significant impact to recreation and that UCSC has no obligation to mitigate any impacts as they would be paid through off-campus development fees. This is not a satisfactory analysis of the impacts. For one, any students living on-campus are still highly likely to use City-maintained parks, especially trails located near campus and beaches, so simply providing additional recreation space on-campus does not mitigate this off-campus impact to City recreation facilities. Additionally, students living off-campus are more likely to establish themselves in crowded living situations beyond the original intent of the housing unit (for instance, two or three individuals to a bedroom). The effect is two-fold: 1) a crowded living situation increases the need for one to seek open space, and 2) any park impact fee derived from off-campus development fails to mitigate for a higher density of people living in a unit than originally intended. The increase in campus population will impact the City park system beyond what the Draft EIR has analyzed and therefore, a more complete analysis in the EIR is required.

Response L9-36

Refer to Response L7-141 regarding funding for local parks. To the extent that the LRDP area and UC Santa Cruz are part of a greater regional network of recreational facilities with the City and other entities, UC Santa Cruz is committed to providing interconnections and appropriate recreational opportunities and looks forward to further coordination with the City regarding ways to improve recreational access and facilities, including shared facilities on campus. Further, over 1,400 acres on-campus are protection from development and open to the public as a recreational resource.

Comment L9-37

Given the importance of properly maintaining parks for UCSC students, faculty, and staff, as well as residents of the City of Santa Cruz, the City has determined that a City park impact fee on new residential development should be required. Funds from this impact fee would be used for a City parks system that serves all residents of the area, including students who live both on- and off-campus.

UCSC should evaluate how an impact fee could be incorporated into student fees or some other manner to support the maintenance of existing parks and services. Students currently pay a recreation fee as part of their tuition. This support on-campus recreational amenities, facilities, and programming (via OPERS or now called Athletics and Recreation). The City would like the opportunity work with UCSC on a Joint Powers Authority (JPA) or similar mechanism that would clearly define the UCSC scope of recreation facilities and services and define the City’s scope. Students currently pay fees to UCSC but use City amenities, perhaps even more than those on campus. Impact fees could help development of new park assets potentially needed for increased park demand. Currently, the real need is funding to maintain the existing park system, which will be used more with an increase in UCSC students, faculty, and staff, so a parks impact fee to the City represents a reasonable mitigation request. Below are some ways this fee could be instituted:

* University of California allows individual campuses to establish unique compulsory fees per the following policy: PACAOS-80: Compulsory Campus-Based Student Fees (ucop.edu). There is a set process similar to a public ballot measure, but within the UCSC system only.
* It is common for universities in California and other states to incorporate a fee for a specific purpose (e.g., building a new rec center or for athletics, etc.). Perhaps it could be deemed an “environmental preservation fee” as part of tuition fees.
* The National Recreation and Parks Association (NRPA) sets standards for Parks and Recreation services: nrpa-agency-performance-review.pdf. If UCSC or the University of California system has parks and recreation standards, a nexus between the population increases and park and recreation service could be more easily determined. The City has parks and recreation service standards that will be affected as the result of increased population and use of City parks.

Response L9-37

Refer to Response L7-141 regarding funding for local services such as parks. UC Santa Cruz, whose on-campus recreational and open space facilities also serve as a resource to the City and who is a partner agency to the City of Santa Cruz, looks forward to greater coordination regarding interconnections between and improvements at recreational facilities for residents both on and off campus.

Comment L9-38

A key transportation goal (M2) in the City’s General Plan is to provide… “A safe, sustainable, efficient, adaptive, and accessible transportation system”. The increase in student, faculty, and staff populations will have impacts on transportation, in a broader environmental sense and on the City’s ability to achieve and maintain that goal.

While SB 743 eliminates Level of Service (LOS) as a CEQA impact, the City still maintains some LOS policies in order to maintain a safe and efficient transportation system. UCSC should coordinate with the City to determine critical intersections impacted by the LRDP and analyze LOS impacts at those critical intersections in addition to the Vehicle Miles Traveled (VMT) analysis. The previous LRDP included mitigation measures in this same way to provide traffic impact fees to the City and institute a monitoring program and should continue to do so.

Response L9-38

LOS is no longer an acceptable measure in CEQA for transportation impacts; thus, only VMT was evaluated. However, UC Santa Cruz agrees that coordination with the City to better understand safe, sustainable, efficient, adaptive and accessible transportation solutions at City intersections would be mutually beneficial.

Comment L9-39

As mentioned in other sections, the impacts of different proportions of increased student population living off-campus has not been adequately analyzed especially if on-campus housing growth is not tied to enrollment and if on-campus living is not required of certain students. The Draft EIR states that providing housing for all new students on campus would reduce traffic concerns. However, the transportation analysis provided indicates that the trip generation rate for resident students is higher than that of commuter students. This is in conflict with the comments made that providing housing for all new students would reduce traffic concerns. The analysis also identified a significant impact in the VMT analysis per worker with TSM mitigation as proposed in response. While the University has done a good job to date implementing strategies to reduce trips, the City believes these measures may have reached their maximum potential. Please provide additional analysis to support the TSM measures as a satisfactory mitigation response.

Response L9-39

Refer to Master Response 9 regarding phasing of development.

While some of the TDM measures identified are those already employed by the campus, Mitigation Measure 3.16-2 in the Draft EIR, identifies additional measures that would help support UC Santa Cruz in mitigating the identified impacts. As shown in Table 3.16-6 the total campus VMT/capita with the 2021 LRDP is estimated to be 7.9 miles with a 7.7-mile threshold. The 7.9 miles represent a 13 percent reduction in 2019 baseline VMT; thus, the campus needs to achieve an additional 2 percent VMT reduction, which is a reasonable target for Mitigation Measure 3.16-2: Implement TDM Program and Monitoring. Further, the 7.9-mile estimate developed with the SCC Travel Model does not fully account for all the TDM measures listed in Mitigation Measure 3.16-2. Further, the mitigation measure includes a monitoring requirement, that will monitor whether the VMT thresholds are achieved regardless of measures identified and implemented.

With respect to trip generation and similar to the way in which employee trips are treated, the potential vehicle trips associated with off-campus students are attributed to their function as residents within the City of Santa Cruz or other nearby community. It reflects an industry standard methodology for quantifying and reflecting off-campus student residents as their trips to and from the LRDP area would more closely resemble an employee travelling to and from work. Other non-campus-related trips are appropriately considered as part of the quantification of trips and VMT for the residence within which the off-campus student resides. Contrary to statements made in this comment, this is not considered to be a conflict but an appropriate way to ensure that VMT and trips associated with County residents, including UC Santa Cruz students, are not double counted.

Comment L9-40

The expansion of students, faculty and staff, as well as facilities, special events (open lectures, sporting events, etc.), and new classes may attract more individuals who enroll/participate in continuing education, who visit those living on campus, who attend the special events, or who otherwise are drawn to the campus as a result of its expansion. The methodology utilized in the EIR should analyze not only the impacts of additional students, faculty, and staff but should also analyze any impacts (e.g., vehicle trips) associated with the above-described potential additional usage.

Response L9-40

The VMT analysis presented in the Draft EIR utilizes the SCC Travel Model, as calibrated using trip count information collected by UC Santa Cruz on an annual basis, which includes visitors. This includes the trips referred to in this comment, as the type of “potential additional usage” represent the types of trips that already occur to and from the LRDP area. Visitors to the campus are captured in the trip rate for on-campus students, since the model was validated to generate the same number of vehicle trips as observed in the counts, so the “incidental” activity is captured as part of the overall VMT and trip generation for UC Santa Cruz. As a result, the Draft EIR and VMT analysis already include the requested analysis.

Comment L9-41

The transportation analysis does not fully consider areas outside of the main campus such as Westside Research Park. In focusing only on the main campus, system-wide travel associated with UCSC growth is not described. It is also not clear whether the employment numbers used in the analysis apply only to the campus or if they reflect the total UCSC employment which is disaggregated to various areas in the County such as at the Research Park, Coastal Science center, and Scotts Valley offices. This shift in employment location has been a major reason why the traffic volumes at the main entrances to the University have been reduced over the years. If the actual employee volume on the main campus is in fact less, then the trip generation rate used for employees would be higher and affect the subsequent analysis.

Response L9-41

Impact 3.16-2 evaluates VMT that could be generated from implementation of the 2021 LRDP within the 2021 LRDP area which includes both the main residential campus and Westside Research Park (as stated on page 3.16-33 of the Draft EIR). As noted on page 1-3 of the Draft EIR, the 2021 LRDP does not include employment numbers for the Coastal Science Campus, which is governed by a separate LRDP, or the Scotts Valley Center offices/campus., which is governed by a lease through 2040. However, to the comment’s concern regarding the consideration of trips from these campuses to and from the LRDP area, the Draft EIR’s calculation of VMT includes consideration of annual traffic count information (see page 3.16-23 of the Draft EIR), which would include trips from other locations, as part of its overall trip and VMT calculation. As such, the Draft EIR’s assessment of vehicle trips and VMT is adequate and conservative.

Comment L9-42

The City has had previous concerns with the trip generation rates established by the University. The transportation analysis in the Draft EIR refers to a 2017 Tool developed by UCSC which established trip generation rates. This tool is not included in the appendices, so the City is unable to review these trip generation rates and determined if they are improved over ones previously used. This information should be included in the EIR. Additionally, a signal is proposed for the intersection of Western Drive and High Street and there is no analysis provided to warrant such a proposal. Please provide this in the EIR.

Response L9-42

The trip management tool, as referenced in this comment, was used in conjunction with the tube counts collected by UC Santa Cruz to assist in the calibration of the SCC Travel Model. Trip generation rates are discussed in the Draft EIR on page 3.16-29 and presented in Appendix I, Table 1. While the trip rates from the trip management tool, as referenced in this comment, were used to refine the SCC Travel Model, it was ultimately the driveway tube counts collected by UC Santa Cruz that was used to in the model calibration. As outlined in the first paragraph on page 3.16-29 of the Draft EIR, based on the initial volume check, the model overestimated observed campus volumes (i.e., tube counts) by 35 to 40 percent. The model trip generation rates for the project were adjusted based on the data from the 2017 tool, and while the model still overestimated the volumes in and out of the campus, it was within ten percent and no further refinements were required. Given that the model generated an appropriate number of vehicle trips with the adjusted trip rates, this demonstrates that the project trip generation rates are within reason and applicable for the VMT analysis. To provide clarifying information, Appendix I of the Draft EIR has been amended, consistent with the commenter’s request. With respect to the potential extension of Western Drive (as shown in Figure 2-6 of Chapter 2, “Project Description”), this roadway segment and associated signal were included as part of the overall analysis of the 2021 LRDP. However, as noted in Master Response 6, LOS and signal warrants related to traffic congestion control are no longer legally valid metrics for assessing transportation impacts within CEQA analyses. The roadway extension, as shown in Figure 2-6 is preliminary and would be subject to subsequent project-level environmental review and further planning and design (which would include additional detail regarding signal warrants) when appropriate, including design and permitting coordination with the City as the signal is proposed within City right-of-way.

Comment L9-43

Finally, the City would like more analysis on whether the LRDP growth in transit demands conflicts with Metro Plans. A near 50% increase in transit demand to the main campus will significantly affect Metro service and coordination is needed to ensure service levels meet the increased demand. The LRDP proposes identification of new trail connections south of the main residential campus to provide access to Westside Research Park and Coastal Science Campus as a proposed improvement and those are not identified in the Draft EIR.

Response L9-43

Potential increases in ridership are acknowledged and would occur as part of implementation of transportation demand management (including through Mitigation Measure 3.16-2). As part of this mitigation measure, coordination with Metro would be required as part of 2021 LRDP implementation. This support of transit services could include but not be limited to additional funding from UC Santa Cruz to ensure that established transit standards are met under existing and future conditions. In combination with potential funding increases, the items listed in Mitigation Measure 3.16-2 include improving “transit service between Coastal Science Campus, Westside Research Park, and the main residential campus” and establishment of multimodal hubs to maximize the efficiency of transit service. These items would assist with adjusting service levels to support increased demand and meet desired service standards.

Regarding the “proposed trail connections” referenced in this comment, as stated on page 2-25, north-south trail networks could connect through the Moore Creek Preserve and the Great Meadow, connecting routes north to the east-west trail network in the north campus. The proposed trail improvements are evaluated throughout the Draft EIR as part of the project.

Comment L9-44

We understand the conclusion of a significant and unavoidable impact to water supply because, although there is adequate water supply from the City’s existing water sources in normal water years, during single and multiple dry water year conditions, there is a potential gap between demand and available supply, which would require the City to secure new water sources. As you are aware, the City is planning for new sources of water and is currently implementing the Water Supply Augmentation Plan that was developed by the Water Supply Advisory Committee. It is important to understand that the City’s need to secure new sources of water is not dependent on growth of the UCSC campus or future projected demand increases. Even if demand were not forecast to increase, new sources of water are needed to address existing potential shortages during dry years. Furthermore, demand associated with this project, or additional growth in local demand, is not a significant factor in sizing of such future projects because sizing of these projects is being primarily driven by climate change and associated uncertainty surrounding future hydrological conditions.

Response L9-44

The comment provides the commenter’s understanding of current water supplies and the need for the City to secure new sources of water to address existing potential shortages during dry years, as well as the reason for the Draft EIR’s conclusions related to water supply impacts. This comment does not address the adequacy of the EIR analysis.

Comment L9-45

Additionally, the City is in the process of preparing the 2020 Urban Water Management Plan which will incorporate demand projections from the 2021 LRDP into overall projected City demands. It is noted that the UCSC demand forecast in the 2021 LRDP is significantly lower than that projected in the 2005 LRDP which was used as the basis of the 2015 Urban Water Management Plan. We appreciate the commitment that University leadership has made to ongoing water conservation, including working with the City water department to develop an engineering analysis to further reduce water demand. We recommend an ongoing and collaborative effort between the City and UCSC to identify the most efficient ways to use, reuse, recycle, and store water so that the proposed project is as water efficient as possible.

Response L9-45

The comment provides an update as to the City’s current water management efforts and studies. The statements in this comment are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance. UC Santa Cruz looks forward to an ongoing and collaborative effort with the City for future water supply planning.

Comment L9-46

The section referring to the “The Water Rights Conformance Project for Water Rights and Entitlements”, should reference the Santa Cruz Water Rights Project. An Initial Study and Notice of Preparation for the Santa Cruz Water Rights Project were released in 2018, and a Draft EIR is expected to be circulated for public review in spring 2021. The scope of this project extends beyond direct diversion for the City’s Felton and Newell Creek water rights. Because the City’s water rights were granted more than 50 years ago, they are out-of-date with current needs and lack flexibility that would ensure the Water Department can provide supply reliability, protect fish populations, and partner with neighboring water agencies to improve regional water supply reliability.

Response L9-46

The comment provides an update on the current status of the Santa Cruz Water Rights Project. The statements in this comment regarding the Santa Cruz Water Rights Project are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance. UC Santa Cruz supports the City’s efforts to improve regional water supply reliability. The Draft EIR also acknowledges competing factors associated with the City’s water supplies, on page 3.17-13 of the Draft EIR, consistent with this comment.

Comment L9-47

**Water Supply Augmentation Plan**The City continues to pursue and make progress on the implementation of the Water Supply Augmentation Plan developed by the Water Supply Advisory Committee. A report detailing progress on implementation of the Water Supply Augmentation Plan is presented quarterly to the City Water Commission, with the most recent quarterly report presented at the Water Commission meeting January 4, 2021. The report can be found beginning on page 15 of the PDF here: https://ecm.cityofsantacruz.com/OnBaseAgendaOnline/Documents/Downloadfile/Water\_Commission\_ 1607\_Agenda\_Packet\_1\_4\_2021\_7\_00\_00\_PM.pdf?documentType=5&meetingId=1607&isAttachment= True.

Response L9-47

The comment provides an update on the current status of the City’s Water Supply Augmentation Plan. The statements in this comment regarding the City’s Water Supply Augmentation Plan are acknowledged.

Comment L9-48

**Water Shortage Contingency Plan**Please note that the City adopted an Updated Interim Water Shortage Contingency Plan in February 2021, replacing the 2009 Water shortage Contingency Plan referenced in the Draft EIR. The Plan is available here on the City’s website here: https://www.cityofsantacruz.com/home/showpublisheddocument?id=83118.

Response L9-48

The comment provides an update on the Updated Interim Water Shortage Contingency Plan, which was adopted in February 2021, following initiation of public review of the Draft EIR. The statements in this comment regarding the City’s updated Water Shortage Contingency Plan are acknowledged. It should be noted that the Draft EIR and Water Supply Evaluation (included in Appendix J of the Draft EIR) reflected information that was available and current at the time of issuance.

Comment L9-49

**Mitigation Measure 3.17-1a: Require Implementation of Measures Consistent with City Drought Measures**The DEIR recommends water conservation and reuse measures to reduce project impacts relate to its demand for potable water from the City of Santa Cruz. However, the DEIR links these proposed mitigation measures to a time, “If and when the City of Santa Cruz implements drought emergency management measures…”

Mitigation Measure 3.17-1a should be revised to tie water conservation, reuse, and recycling measures to project design and implementation, not the City’s implementation of water emergency management measures. Water conservation and water recycling measures are best implemented when incorporated into the facility design stage, when it is easiest to provide water efficient fixtures, sustainable/native landscape materials, and separate pipes to carry potable and recycled water.

Mitigation Measure 3.17-1a should also be revised to provide more detail regarding monitoring and reporting related to development and use of on campus groundwater. Use of the existing groundwater supply well in Jordan Gulch, if undertaken, should comply with the recommendations for biological monitoring at interconnected springs both on and off campus, and groundwater/surface water monitoring protocols discussed at Mitigation Measure 3.10-5b above.

Response L9-49

As noted on page 3.17-29, the university’s Water Action Plan, which was updated in 2017, requires the implementation of on-site water conservation measures during project design and implementation, consistent with the commenter’s request. Mitigation Measure 3.17-1a includes requirements in the event the City declares the need for drought emergency management measures. In addition, Mitigation Measure 3.17-1b requires coordination between the City and UC Santa Cruz to provide an additional campus-wide evaluation of where additional on-campus conservation measures may be feasible and should be implemented, consistent with the commenter’s request.

With respect to the potential use of groundwater supplies in the lower campus subarea, this was included within Section 3.17, “Utilities and Service Systems,” as part of the overall evaluation of alternative water supplies. The potential physical environmental impacts to groundwater supplies are evaluated and mitigated (in a manner consistent with the commenter’s request) in Section 3.10, “Hydrology and Water Quality.” Please also refer to Master Response 10 regarding groundwater resources.

Comment L9-50

**Please see the following comments on the Water Supply Assessment**The DEIR includes a Water Supply Assessment (WSA) to stand in for the WSA that the City would ordinarily be required to prepare as the public water system that will supply [at least a portion of] the proposed project. (Wat. Code § 10910(a)-(c).) WSA’s are required under state law for a variety of development projects that are likely to increase water demand on the public water system serving the project (Wat. Code § 10912(a)). WSA’s are required to assess the projects water demand, available water supplies, and if water is not available for the project, the cost to obtain and develop the additional supplies required to serve the proposed project.

Because a portion of the UCSC campus where development is proposed is outside the City’s existing water service boundary, it is not clear that the WSA was prepared following the law. Under state law, when a proposed project is outside the boundaries of a water service agency the WSA must be prepared after consultation with the Local Agency Formation Commission, and any public water system adjacent to the proposed project site. (Wat. Code § 10910(b).)

The DEIR should be revised to indicate whether and how UCSC consulted with the City, other neighboring water agencies, and the Local Agency Formation Commission in relation to the preparation of its WSA as required when an entity other than the water service provider prepares the WSA for an area outside the boundaries of an existing water system.

This concludes the comments from the City of Santa Cruz. We look forward to working with you to resolve the points contained herein. Feel free to reach out to us should you have any questions.

Response L9-50

The comment requests revisions to the Draft EIR to indicate UC Santa Cruz’s level of compliance with California Water Code Section 10910, also known as Senate Bill (SB) 610. However, the requirements of SB 610 and Water Code Section 10910 are limited to cities and counties; they do not apply to UC Santa Cruz. However, the University elected to prepare the equivalent of a water supply assessment (the Water Supply Evaluation included in Appendix J of the Draft EIR) that meets the overall requirements of a WSA to determine and demonstrate the sufficiency of the City’s water supplies to satisfy the water demand of the planned development under the proposed 2021 LRDP.

Letter L10 Santa Cruz Metropolitan Transit District

Pete Rasmussen, Transportation Planner  
March 8, 2021

Comment L10-1

Thank you for the opportunity to provide comments on the draft UCSC 2021 Long Range Development Plan and draft EIR.

The Santa Cruz Metropolitan Transit District (METRO) has had a long-standing partnership with the University, providing transit service to students, staff, and faculty to and from campus funded primarily by the student transportation fee. METRO transit service is one of the primary tools employed to reduce vehicle trips to and around campus, which is vitally important for preservation of the environment and for limiting traffic congestion in and around a campus that has severely limited access routes.

Response L10-1

UC Santa Cruz acknowledges and appreciates the partnership with METRO. The comment includes introductory information and does not address the adequacy of the EIR analysis.

Comment L10-2

Historically, METRO has increased service to UCSC as enrollment has grown so that the University can continue to limit on-campus parking and limit automobile trips.

However, if the University were to increase enrollment by an approximately 50% from 18,518 to 28,000 FTE students (and associated growth in staff, faculty and student families) by 2040, this would present formidable budgetary and operational hurdles to METRO to scale up service in proportion to UCSC growth.

Response L10-2

The commenter’s opinion regarding potential increases in demand for transit service are acknowledged. It is important to note that due to the location of the net increase in students and employees on campus, much of the potential increased demand for transit is anticipated to be served by UC Santa Cruz Campus Transit. However, as noted in Response L9-43, UC Santa Cruz would be required to coordinate with METRO regarding potential increased demand for service along METRO routes and provide assistance, including potential financial assistance related to increased service, as part of service agreements and in support of the overall TDM program required by Mitigation Measure 3.16-2.

Comment L10-3

**Funding for Operations and Capital Expenditures**The University pays METRO monthly fees based either on the number of passenger trips provided to students/staff/faculty or on the number of vehicle trips to campus (the calculation method has varied over time), but METRO still bears a significant share of the operations and maintenance cost for these trips (subsidy). As an agency that receives a portion of its funding from Federal sources, METRO must comply with the Federal Transit Administration’s regulations regarding Title VI of the Civil Rights Act. Title VI requires that transit agencies provide equitable service across the service area, not just to one area or community, so as UCSC grows, the University will need to contribute a greater share of the cost of providing service to the campus so that METRO can continue to provide service equitably to the County as a whole.

Furthermore, METRO alone has borne the cost of acquisition of buses, other than a short-term articulated bus lease funded by UCSC as a test. As Federal government assistance for bus purchases has dwindled, and as the State of California Air Resources Board (CARB) has instituted requirements for a transition to zero-emissions buses, the cost of acquiring buses has become a major financial hurdle to transit agencies. Zero-emissions buses cost over $1 million each – 55% more expensive than the compressed natural gas buses that are the majority of the METRO fleet, and nearly four times as expensive as the diesel buses that were standard 15-20 years ago.

As student enrollment increases, there will be a need to increase the use of 60-foot articulated buses. This, however, presents a substantial space challenge at the Judy K. Souza Operations Facility (i.e. bus yard), as the yard is currently at capacity with only four articulated buses in the fleet. An expansion of the bus yard, or acquisition of off-site parking may be needed to increase the articulated bus fleet, and there is no funding currently available for that need. Similarly, the maintenance facility will require an expansion if there is a significant expansion of the articulated bus fleet.

How will the University increase its contribution to METRO to cover operating costs and capital expenditures necessary to increase the UCSC service to meet projected growth in demand from the projected campus growth?

UCSC funds METRO service primarily through the Transportation Fee self-assessed by students, but the 2019 increase in the fee sunsets in 2030. How would the University handle the growth in trips if future referenda fail, and UCSC was not able to continue to fund METRO service at a level commensurate with student population growth?

Response L10-3

Regarding potential increases in demand for METRO service, refer to Response L10-2. Additionally, as a partner agency in the region, UC Santa Cruz is committed to assisting and providing a fair share contribution towards future needs, including through continuation and adjustment of the referenced Transportation Fee when warranted. The degree to which specific types of expansions may be necessary is considered uncertain at this time and appropriately acknowledged within the Draft EIR. The use of articulated buses may increase as student enrollment increases, however, the degree to which on-campus residents, with increased campus shuttle service and alternative transportation services within campus, may increase ridership on articulated buses is considered speculative at this point but would be continually evaluated and adaptively managed as part of the UC Santa Cruz TDM Program required by Mitigation Measure 3.16-2. In addition, the 2021 LRDP’s proposed provision of on-site mobility centers may include specific consideration for articulated buses, as suggested by the commenter. As a regional mass transit entity, the commenter is referred to Mitigation Measure 3.16-2, specifically the third paragraph on page 3.16-37 of the Draft EIR, which could involve fair share contributions towards regional mass transit. Furthermore, UC Santa Cruz is required to meet carbon neutrality goals, including transition to a zero-emission transit fleet by 2040 and will continue to partner and coordinate with METRO in support of zero emission buses.

Comment L10-4

**Mitigations**The following mitigations are proposed:

All growth beyond the academic year 2018-2019 baseline of 18,518 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to cover 100% of the annual operating cost of the additional METRO revenue service hours needed to respond to said growth.

* All growth beyond the academic year 2019-2020 baseline of 19,500 full-time equivalent (FTE) enrolled students will trigger a UCSC responsibility to purchase METRO buses for METRO use, as needed to respond to the additional revenue service hours needed beyond the 2018-2019 academic year baseline (last full year prior to COVID-19 service reductions).
* Pursuant to California Air Resources Board regulations requiring METRO to have a 100% zero-emissions bus fleet by no later than 2040, in the event that in-route zero-emissions bus infrastructure (e.g. electric charging) is needed in order to serve UCSC, UCSC will provide a suitable site and charging infrastructure on its property.
* Construction of an on-campus transit center/layover facility (consider the East Remote Lot for a potential location), including restrooms for bus operators, to provide operational flexibility for METRO to better serve the campus.
* Extension of Meyer Drive with a transit-only lane to create an “outer loop” that METRO could utilize instead of the current longer, heavily congested Hagar Drive/McLaughlin Drive/Heller Drive loop. From there, students could either walk or bike to destinations, or ride a TAPS shuttle. This outer loop would shorten each campus trip, thereby reducing operating cost.
* Expansion of on-campus bus stops to accommodate increased use of articulated buses
* Dedicated HOV or transit-only lanes and/or queue jumps at select locations on and around campus
* Transit-signal priority on campus and along campus gateways such as Bay Ave
* Pedestrian channelization, traffic signals, and pedestrian overcrossings, to reduce delays to transit caused by unmanaged pedestrian crossings
* Reduce vehicle trips and vehicle delay on campus by permitting work-from-home for those staff roles for which it is feasible.

Response L10-4

UC Santa Cruz acknowledges and will continue to work with METRO to prioritize transit for campus affiliates as an alternative to single occupant vehicle trips over the next 20 years. UC Santa Cruz appreciates the level of detail and intent of METRO’s proposed improvements, and these suggested improvements would require further project-level feasibility during plan implementation, as UC Santa Cruz considers campus wide circulation and implementation of other projects located off-site of UC Santa Cruz main residential campus and Westside Research Park, where UC Santa Cruz does not have the jurisdiction to implement projects. UC Santa Cruz currently provides a subsidy to METRO to off-set operating costs associated with campus ridership, however UC Santa Cruz is not required to subsidize 100 percent of METRO’s operating costs, nor would such a subsidy be required in the future, as METRO is funded from various other sources, including tax revenues and fares from non-UC Santa Cruz riders. Refer to Responses L10-2 and L10-3 above. As the feasibility of these measures has yet to be evaluated, will require coordination with other jurisdictions and would depend on the overall function of UC Santa Cruz as a campus, taking into consideration the level of pedestrian, bike, and transit activity, inclusion of these specific measures in project-level implementation activities, will be considered. That said, many of the measures suggested are considered to be already required through implementation of the 2021 LRDP and/or Mitigation Measure 3.16-1. For example, the on-campus transit facility identified by the commenter is not considered inconsistent with the proposed mobility hubs (as shown in Figure 2-6 of the Draft EIR and Figure 4.11 on page 134 of the 2021 LRDP and evaluated as part of the overall project within the Draft EIR). Further, the last bullet of the comment is considered to be included as part of the telecommuting requirement of Mitigation Measure 3.16-2 on page 3.16-37.

Comment L10-5

Previous LRDPs have proposed mitigations such as increasing on-campus student housing, but the University has fallen short of delivering the promised housing, causing more and more students to find off-campus housing and commute to campus, creating stress of the transportation system of the campus and the Westside of Santa Cruz. For this LRDP, increases in student population need to be contingent on completing of proposed mitigations, rather than proceeding with growth and having to live with the consequences.

Thank you in advance for review and consideration of these comments.

Response L10-5

Refer to Master Response 9 regarding the need for phasing of development under the 2021 LRDP.

Letter L11 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

Morgan Bostic, Advocate

March 8, 2021

Comment L11-1

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on air quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

Response L11-1

The Draft EIR presents an evaluation of the potential impacts related to wildfire risk and appropriate mitigation in Section 3.18, "Wildfire." As noted in the reference section of the Draft EIR, UC Santa Cruz would implement a campus-wide vegetation management plan (Mitigation Measure 3.18-2) that would reduce fuel loads and maintain defensible space such that development under the 2021 LRDP would not substantially exacerbate wildfire risks. With respect to the potential need to evaluate air quality impacts from increased wildfire risk and as noted in Master Response 4 and because the 2021 LRDP is not anticipated to substantially exacerbate wildfire risks, further evaluation of potential impacts related to catastrophic events is not required. As demonstrated by conditions associated with the 2020 CZU Lightning Complex fire, it is acknowledged that wildfires can temporarily but substantively alter regional air quality conditions and require implementation of emergency provisions to protect the health and safety of local residents, including on-campus residents. In the event of a wildfire, UC Santa Cruz would implement a variety of measures (as summarized in Master Response 4) based on the University of California Air-Quality-Index-based Decision-Making Matrix for Wildfire Smoke Events to reduce the effects of a catastrophic wildfire on the health and welfare of the on-campus population.

Comment L11-2

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus’ air quality.

Response L11-2

The comment suggests that the EIR should address the increased risk of wildlife from the additional population in the North Campus. General wildfire impacts and mitigation are discussed in Section 3.18, "Wildfire". Refer to the Response L11-1.

Comment L11-3

According to the California Air Resources Board, “Extreme fires are a growing threat to public health and safety, to homes, to air quality and climate goals, and to our forests. California is seeing fires that burn larger and hotter on average than ever before... Smoke from extreme fires can occur with little warning, and travel long distances and into urban areas many miles from the flames, negatively impacting public health and degrading quality of life.”

Additionally, “Air pollution from fine particles, known as PM2.5s, was already known to take four months off the lifespan of the average American.” However, “After California’s residents endured a month of orange-brown air filled with dangerous tiny particles, another set of Stanford researchers tracked dramatic increases in hospitalizations for conditions including strokes, heart attacks, and asthma. Bibek Paudel, a postdoctoral researcher at Stanford’s asthma clinic, found that hospitalizations for strokes and related conditions increased by 60% in the five weeks after fires caused by lightning strikes began sending smoke around northern California last August. The number of pregnancies lost also doubled in the weeks after the fires – a startling finding that the researchers are still interpreting. Paudel also found significant increases in heart attacks and youth hospitalization for respiratory illness. “I don’t think that people are aware of the long-term health effects of wildfire smoke,” said Mary Prunicki, the director of research for Stanford’s Sean N Parker Center for Allergy & Asthma Research.”

Specifically, “ [W]hen air pollution of tiny particles called PM 2.5 — for particulate matter 2.5 microns or smaller, so small that 30 of them can line up along the width of a human hair —increased modestly, the number of people admitted to hospitals for respiratory ailments like asthma increased by 1% on average. But when PM 2.5 levels from wildfire smoke went up by the same amount, or 10 micrograms per cubic meter, there was a 10% increase in those hospital admissions.

The tiny particles can penetrate deep into people’s lungs, enter the bloodstream and increase the risk of heart attacks, strokes and other serious health issues.”

Response L11-3

This comment expresses concern related to the public health and safety and air quality impacts related to wildfires and provides supporting references for Comment L11-2. This comment is acknowledged.

Comment L11-4

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that wildfires have substantial public health and air quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

All information for this section is taken from the 2021 LRDP EIR and

https://ww2.arb.ca.gov/our-work/programs/wildfires,

https://www.theguardian.com/world/2021/jan/19/wildfires-air-pollution-western-us#:~:text=Scie ntists%20from%20Stanford%20University%20and,gains%20in%20cutting%20air%20pollution. &text=Air%20pollution%20from%20fine%20particles%2C%20known%20as%20PM2,

https://www.santacruzsentinel.com/2021/03/06/wildfire-smoke-up-to-10-times-more-harmful-tha

Response L11-4

This comment recommends that new structures not be located in the north campus subarea, citing hazards related to wildfires and associated public health and air quality impacts. Refer to Response L11-1.

Letter L12 Santa Cruz County, Planning Department

Kathleen Molloy, Planning Director

March 8, 2021

Comment L12-1

The County of Santa Cruz appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the UC Santa Cruz of California, Santa Cruz’s (UC Santa Cruz’s) Long Range Development Plan (LRDP). Please consider and address the following comments in the Final EIR:

Response L12-1

The comment provides introductory information and does not address the adequacy of the EIR analysis.

Comment L12-2

1. Mitigation Measures to identify and Protect Unknown Archaeological Resources—These measures should include the requirement that a qualified archaeologist be present on site to monitor ground-disturbing activities in areas where an archaeological site has been identified.

Response L12-2

While Mitigation Measure 3.4-1 does address known archaeological sites, the third bullet has been modified for clarity:

**Mitigation Measure 3.4-1: Identify and Protect Unknown Archaeological Resources**

As early as possible in the project planning process for individual projects under the 2021 LRDP, UC Santa Cruz shall define the project’s area of effect for archaeological resources. UC Santa Cruz shall determine the potential for the proposed project to result in cultural resource impacts, based on the extent of ground disturbance and site modifications anticipated for the proposed project. UC Santa Cruz shall also review confidential resource records to determine whether complete intensive archaeological survey utilizing current techniques and practices, including consultation with a culturally affiliated Native American tribe, has been performed on the site and whether any previously recorded cultural resources are present. UC Santa Cruz shall implement the following steps to identify and protect archaeological resources that may be present in the project’s area of effects:

1. For project sites that have not been subject to a prior complete intensive archaeological survey, UC Santa Cruz shall ensure that a complete intensive surface survey is conducted by a qualified archaeologist, who meets the Secretary of the Interior’s Professional Qualification Standards in Archaeology, once the area of ground disturbance has been identified and prior to soil disturbing activities. Additionally, UC Santa Cruz shall notify the Amah Mutsun Tribal Band of the area not subject to an intensive survey and a tribal representative shall be invited to participate. If an archaeological deposit is discovered, the archaeologist will prepare a site record and file it with the California Historical Resource Information System. In the event of a find within the area of potential effects, UC Santa Cruz shall consult with a qualified archaeologist to design and conduct an archaeological subsurface investigation and/or a construction monitoring plan of the project site to ascertain the extent of the deposit relative to the project’s area of potential effects, to ensure that impacts to potential buried resources are avoided. If the qualified archaeologist determines that the archaeological material is Native American in origin and the qualified archaeologist assigned to the surveying and monitoring process is not an authorized representative of the Amah Mutsun Tribal Band, UC Santa Cruz and/or archaeologist shall ~~notify~~consult with the Amah Mutsun Tribal Band in the process of designing a survey and monitoring program ~~the appropriate Native American tribe and extend an invitation for monitoring~~.
2. Where native soils will be disturbed, UC Santa Cruz shall require contractor crews to attend an informal training session provided by UC Santa Cruz prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify UC Santa Cruz if any are found. In the event of a discovery, UC Santa Cruz shall implement item (4), below.
3. If it is determined that ~~the~~ ~~resource~~ a known archaeological site extends into the project’s area of potential effects, UC Santa Cruz shall ensure that the ~~resource~~ site is evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.4. This evaluation may require additional research, including subsurface testing, or avoidance measures, as described in item (5) below. If the archaeological resources is determined to be Native American in orgin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of evaluating the significance and eligibility of the resource. If the resource does not qualify, or if no resource is present within the project’s area of effect, this will be reported in the environmental document and no further mitigation will be required unless there is a discovery during construction.
4. If an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. UC Santa Cruz shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. Mitigation Measure 3.4-1(2) and (3) shall also be implemented.
5. If archaeological material within the project’s area of effects is determined to qualify as a historical resource or a unique archaeological resource (as defined by CEQA), UC Santa Cruz shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or ~~other means~~ more substantial modifications where feasible that will permit avoidance or substantial preservation in place of the resource. If the archeological resource is determined to be Native American in origin, and the qualified archaeologist performing the evaluation is not an authorized representative of the Amah Mutsun Tribal Band, the archaeologist shall consult and partner with the Amah Mutsun Tribal Band in the process of planning a survey program and evaluating the significance and eligibility of the resource. If avoidance or substantial preservation in place is not possible, UC Santa Cruz shall implement Mitigation Measure 3.4-1(6).
6. If avoidance or preservation in place is not possible for an archaeological site that has been determined to meet CEQA significance criteria, before the property is excavated, damaged, or destroyed, UC Santa Cruz shall retain a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards in Archaeology. UC Santa Cruz is aware that the Amah Mutsun Tribal Band (AMTB) maintains a staff of registered professional archaeologists and tribal monitors who engage in cultural resource management through the tribe’s nonprofit organization, the Amah Mutsun Land Trust (AMLT). When selecting a qualified archaeologist for work that relates to archaeological resources on campus lands that are determined to be Native American in origin, UC Santa Cruz will include AMTB/AMLT in notifications regarding forthcoming opportunities and contracts. The qualified archaeologist, in consultation with UC Santa Cruz and Native American tribes as applicable, shall prepare a research design, and plan and conduct archaeological data recovery and monitoring that will capture those categories of data for which the site is significant. UC Santa Cruz shall also ensure that appropriate technical analyses are performed, and a full written report prepared and filed with the California Historical Resources Information System; UC Santa Cruz shall also provide for the permanent curation of recovered materials.

Comment L12-3

2. Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District—This measure should be amended to include the requirement that an architectural historian review any proposed alterations to existing buildings within the historic district for compliance with the Secretary of the Interior Standards. A qualified professional review any significance alterations to the landscape for potential impacts to the historic district.

Response L12-3

Review of modifications to Cowell Lime Works Historic District by an architectural historian are included in Mitigation Measure 3.4-4a. For clarity, the mitigation measure is revised as follows:

**Mitigation Measure 3.4-4a: Protect Cowell Lime Works Historic District**

During project-specific environmental review of development under the 2021 LRDP, UC Santa Cruz shall define the project’s area of effect for historic buildings and structures as early as possible. If the project is located within or adjacent to the Cowell Lime Works Historic District, UC Santa Cruz shall take the following measures into account in project design to preserve the historic visual quality of the historic district:

* ~~New buildings or structures within 500 feet of the district boundaries shall be subject to design review by the Design Advisory Board, to ensure that design is compatible with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.~~
* To the greatest extent feasible, a buffer of at least 200 feet shall be maintained between the boundaries of the Cowell Lime Works Historic District and new building development that would be visible against the backdrop of historic buildings from significant campus viewpoints.
* Any development, including new buildings, structures, access improvements, within a~~the~~ 500-foot buffer or within the district boundaries shall be evaluated by an architectural historian prior to implementation and conducted in compliance with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995).
* New buildings or structures within 500 feet of the district boundaries shall additionally be subject to design review by the Design Advisory Board, to ensure that the design does not interfere with the historic aspect of the district and its buildings with respect to scale, massing, and materials, such that the rural historic visual character of the district is maintained.

Comment L12-4

3. Mitigation Measure 3.4-4b: Protect the Potential Campus Core Discontiguous Historic District

a. Since the existing survey was prepared in 2005, it is recommended any building that is more than 50 years of age, is located within the boundaries of the potential district, and is proposed to be altered or demolished, be evaluated by a qualified architectural historian to determine if it meets criteria for a contributing building. If found to be a contributing building, then the mitigation measures provided would also apply to this building.

Response L12-4

As outlined on page 3.4-3 of the Draft EIR, Mitigation Measure 3.4-4b discusses the need and timing for an architectural historian to evaluate buildings that have been identified as potential contributors to the potential Campus Core discontiguous historic district. Specifically, the third bullet of the mitigation measure states, “For larger exterior repairs, building additions, or demolition of buildings that could be contributors to the potential Campus Core discontiguous historic district, UC Santa Cruz shall retain a qualified architectural historian to determine if the building, or group of buildings, could be contributors to the potential historic district.”

Comment L12-5

b. In addition, it is recommended that significant alterations to the landscape and landscape features be evaluated to determine if these alterations would affect the significance of the potential historic district. If found to affect the significance of the district, then appropriate mitigation features should be considered such as modifications to the proposed design to reduce the impacts to a less than significant level.

Response L12-5

The 2005 survey concluded that the potential Campus Core discontiguous historic district could be significant as a potential historic district under NRHP/CRHR Criterion C/3 (architecture), as an exceptional example of the Bay Region Modernism movement. Landscape features were not identified as potential contributors within the context of the 2005 study but may be considered in future evaluations in and near potential contributing structures through implementation of 2021 LRDP mitigation. Mitigation Measure 3.4-4b requires that a qualified architectural historian evaluate buildings that could be contributors to the potential Campus Core discontiguous historic district prior to and before large exterior repairs, building additions, or demolition. This evaluation by a qualified architectural historian would include an assessment of integrity, which consists of location, design, setting, materials, workmanship, feeling, and association. Integrity of setting refers to the physical environment surrounding a property that informs the characterization of the place.

Comment L12-6

4. Impact 3.10-5: Impacts to Karst Aquifer Supply, Recharge and Groundwater Quality—Surface water runoff that is infiltrated into the ground typically goes through both physical and biological treatments in the vadose zone which diminishes risks of contaminating groundwater with pollutants. The karst features that dominate the campus topography lack much of this natural filtration, and therefore typical stormwater management activities may be insufficient to ensure the minimization of pollution into the water systems. Due to the nature of the karst topography of the campus, it is vital that any changes in surface runoff quantity of quality be fully evaluated and mitigated.

The County Board of Supervisors has emphasized the importance of karst protection and has required that karst protection zone standards be considered. More details can be found at:   
http://santacruzcountyca.iqm2.com/Citizens/Detail\_LegiFile.aspx?ID=2578&highlightTerms=karst

The EIR does not provide sufficient analysis of which new measures to address impacts of new development particularly on water quality will be implemented and where. It states “UC Santa Cruz is also engaging in planning that would be implemented to provide a comprehensive, integrated, and consistent approach to maintain the health and functionality of the existing karst system. This planning would also take into consideration development envisioned under the 2021 LRDP, current water infrastructure planning, campus projects currently under development, and UC Santa Cruz’s goals and aspirations for watershed health, water sustainability and resilience to further ensure that net deficits or increases to the karst aquifer would not occur. As a result, impacts would be less than significant.” This explanation is not sufficient to assess impacts. Further analysis in Section 3.10 is recommended.

While UC Santa Cruz is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by the University we hope that UC Santa Cruz will embrace the County’s concerns for protection of karst systems on campus for the benefit of downstream users of that water.

Response L12-6

Refer to Master Response 10 regarding impacts to groundwater and karst aquifer supply.

Comment L12-7

5. The County of Santa Cruz is currently preparing its Sustainability Policy and Regulatory Update, a substantial revision to its 1994 General Plan and County Code to encourage more sustainable and compact urban development within its Urban Services Line and to plan for growth in the unincorporated County. The Sustainability Policy and Regulatory Update is based primarily on the Sustainable Santa Cruz County Plan, a conceptual planning study approved by the Board of Supervisors in 2014. Changes are proposed to all the General Plan policies listed in section 3.11.1 of the LDRP EIR. Public drafts of the revised General Plan, County Code, and associated EIR are in progress but are not yet available. The County understands that UC Santa Cruz is not subject to municipal regulations of surrounding local governments. Nevertheless, it is suggested that the EIR should recognize Santa Cruz County’s upcoming regulatory changes as part of the regulatory setting discussed in section 3.11.1 of the LRDP EIR. Additional information on this project can be found at: https://www.sccoplanning.com/sustainabilityupdate.

Response L12-7

The County’s efforts regarding its Sustainability Policy and Regulatory Update are acknowledged. However, within the context of the Draft EIR, including Section 3.11, “Land Use and Planning,” amendments to the Draft EIR’s analysis or regulatory setting are not considered necessary at this time as the information presented within the Draft EIR generally reflects existing conditions at the time the NOP for the 2021 LRDP EIR was issued, and the proposed changes to the General Plan have not been adopted

Comment L12-8

6. The EIR anticipates growth from 18,500 students and 2,800 faculty and staff (2018-2019 academic year) to 28,000 students and 5,000 faculty and staff by the 2040- 2041 academic year. Student growth would be accommodated on-campus with the Student Housing West, Kresge Housing, and Crown College Major Maintenance Projects, as well as future housing development indicated in the LRDP. Employee growth would be partially accommodated with housing at the University’s Westside Research Park and in the lower campus portion of the main campus in a location that is currently part of the Ranch View Terrace Habitat Conservation Plan (HCP) area.

The EIR states that although the overall housing vacancy rate of 7.8% indicates some availability in the housing market, other indicators point to a market that is, in reality, quite constrained. Vacancies may represent housing that is not available for sale or rent due to housing that is in disrepair or in use as vacation homes, and the vacancy rate in the rental market is much lower than the for-sale rate, at just 1.9%. The EIR notes that this already tight housing market has tightened further due to the pandemic as well as the CZU Lightning Complex fire. As a result, the EIR identifies a potentially significant impact on population and housing.

Santa Cruz County is in agreement regarding the tight market and the potentially significant impact on housing availability and affordability from increased demand from UC Santa Cruz students or employees. Both the supply and affordability of housing continues to be a problem, the extent and severity of which are far greater than they were in 2005. In fact, EIR section 3.13.2 should take note of additional factors related to the tight market, such as homelessness and overcrowding of housing units. Section 3.13.2 should also take note that the Association of Monterey Bay Area Governments is preparing for an updated Regional Housing Needs Allocation (RHNA), and it is anticipated that housing production requirements could be increased as much as 1.5 to 3 times the current allocation, with new restrictions on the types of sites that may be counted toward fulfilling RHNA requirements. EIR section 3.13.2 should acknowledge these anticipated near-future housing requirements faced by local jurisdictions. Housing projects that are currently planned and recently completed in the City of Santa Cruz, Santa Cruz County, and other local jurisdictions will not serve to meet the updated RHNA allocation requirement.

Response L12-8

The comment states that the Draft EIR should acknowledge additional factors related to a constrained housing market including homelessness, overcrowding, and the RHNA currently being preparing by the Association of Monterey Bay Area Governments. However, this information is already addressed, as responded to in Response L9-31 above, which acknowledges that a variety of factors affect housing availability in the local area.

Comment L12-9

The County is not in agreement with the statement in EIR section 3.13.3 that the potential LRDP impact on population and housing is unavoidable and there is no feasible mitigation for this impact. The LRDP proposes to provide housing for only 558 of the 2,550 additional employees anticipated over the next 20 years, creating a demand for up to 1,992 off-campus residences. Mitigation measures for this impact should be included and could include options such as:

* Identify additional locations for employee housing could be considered on UC Santa Cruz property, including locations outside of the HCP area or other environmentally protected areas that face fewer hurdles to development.
* Plan for higher density housing to accommodate more employees where housing is already planned on the UC Santa Cruz main campus or at the Westside Research Park property.
* Assess housing development potential on other UC Santa Cruz-owned parcels. If no other University parcels are viable for housing development, purchase additional land for production of multifamily employee housing project(s).
* Pay a negotiated mitigation fee to Santa Cruz County and/or other local jurisdictions based on the anticipated local demand for 1,992 housing units.
* Given market uncertainty over the next 20 years, consider a phased approach whereby every five years, a housing market study and coordination with local jurisdictions is conducted to determine the maximum number of employees without on-campus housing for the next five-year period that would be less than significant or could be mitigated with payment of mitigation fees.

Response L12-9

The suggested measures have been considered, however, they would either not directly reduce population and housing impacts or would substantially alter the project such that it would be considered an alternative to the 2021 LRDP. The first three bullets would either necessitate the densification of planned uses or the purchase of additional property, which would not be dissimilar to the alternatives considered in Chapter 6, “Alternatives” (refer to Section 6.4, specifically). The alternatives presented therein, beginning on page 6-5 of the Draft EIR, include the further development of off-campus property and the development of higher density housing. As such, the first three measures provided in this comment are not considerably different from those already analyzed in the Draft EIR. Further, the suggested measures would require the development of additional areas and could result in greater environmental impacts for the majority of CEQA issue areas (e.g., aesthetics, air quality, biological resources, cultural resources, tribal cultural resources, greenhouse gas emissions, hydrology and water quality, geology and soils, hazards and hazardous materials, noise, public services, and utilities), which would not fulfill the requirements of mitigation or alternatives under CEQA.

With respect to the fourth and fifth suggested measures, neither measure would provide additional housing but would be limited to funding provisions to an outside agency or a market study. As such, these two measures would not feasibly reduce physical environmental impacts to less than significant. In summary, the suggestions provided in this comment have been considered but would not further reduce the impacts of the 2021 LRDP, as proposed, and as such are not included as part of the Draft EIR as feasible mitigation measures.

Comment L12-10

7. Minor text edit suggestions:

* Table 3.13-11 (Baseline and Projected On-Campus Housing Capacity and Demand): The total “Demand Not Provided on Campus” appears to be a typo. This number should be the sum of 982 student beds and 1.992 employee residences.

Response L12-10

The comment identifies a text edit in Table 3.13-11. Table 3.13-11 was revised as follows:

Table 3.13-11 Baseline and Projected On-Campus Housing Capacity and Demand

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | New Housing Under 2021 LRDP (Compared to 2018–2019) | Projected Housing Demand | Demand Not Provided on Campus | Would All of the Increased Housing Demand Be Accommodated On-Campus? |
| Student Housing (beds) | 8,5001 | 9,482 students | 982 beds | **No** |
| Employee Housing(homes) | 558 | 2,550 employees | 1,992 residences | **No** |
| **Totals** | **9,058** | **12,032** | **2,974 ~~12,032~~** |  |

Source: UC Santa Cruz 2020a

Comment L12-11

* Page 3.13-12, “Additional Housing Demand” third paragraph states “an additional 2,550 employees would be provided with housing on campus.” This statement is incorrect.

Response L12-11

The comment requests that a statement on page 3.13-12 be revised to correct an error. Page 3.13-12 of the Draft EIR was revised as follows:

Moreover, an additional 558 housing units ~~2,550~~ for employees would be provided ~~with housing~~ on campus ~~for 558~~ ~~in~~ under the 2021 LRDP. Assuming all employees would be new residents, which is an overstatement, this would create a demand for an additional 1,992 residences, assuming each employee lives in their own residence. This is an oversimplification of potential demand, as it would be expected that some employees already live in the region, some may share residences with others, etc., but it would be speculative to specify more refined estimates of demand for residences over the next 20-year period.

Comment L12-12

* Page 3.13-12, “Additional Housing Demand” fourth paragraph states: “This could create additional demand for housing in the community, including the City of Santa Cruz.” Suggest changing the end of this sentence to state “City of Santa Cruz, Santa Cruz County, and other neighboring jurisdictions.”

Response L12-12

The comment requests an editorial change to the Draft EIR, however, the requested edit is not necessary for the purposes of providing an accurate assessment of the potential physical environmental impacts of the 2021 LRDP as “Santa Cruz County and other neighboring jurisdictions” are considered to be included within the term “community” provided on page 3.13-12 of the Draft EIR. As a result, no change to the Draft EIR is made in response to this comment.

Comment L12-13

8. Figure 3.16-6 and the text above it classify Uber/Lyft or transportation network companies (TNCs) in the same mode share category as carpools. Additionally, the LRDP section “Transportation Demand Management” references them as a trip and a strategy to reduce vehicle miles traveled (VMT). Yet TNC vehicles create additional trips as they pick up passengers between rides. Classifying a TNC as a carpool does not fit the purpose of a carpool, particularly if there is one rider in the TNC as one person is arriving to campus in a vehicle with anUber/Lyft driver who then leaves the campus. The purpose of a carpool is to eliminate trips: when a single person uses a TNC without other users they would have generated less VMT by driving alone from their starting point. Are all TNCs arriving to campus carrying more than one passenger? How are TNC trips between passengers account for? Please clarify what assumptions were made for TNC trips for the VMT analysis. If they were counted as carpools this would result in an understatement of VMT attributable to TNCs.

Response L12-13

The comment requests that the Draft EIR clarify what assumptions were made for TNC (e.g., Uber/Lyft) trips for the VMT analysis. For clarification, the 2021 LRDP states that TNCs can be used to reduced VMT if they are properly managed. This includes designation of drop-off and pick-up areas, co-located with mobility hubs. The campus can explore options, such as surcharges and geo-fencing, to manage this emerging technology. This would increase the ability for campus to more frequently and reliably accommodate transit service, reduce trip numbers and VMT, and reduce vehicle/pedestrian conflicts to promote a more pedestrian-friendly campus.

The legend referring to “Carpool” in Figure 3.16-6 has been revised to be consistent with the text and now reads “Carpool/Multi-Occupant Vehicle.” The mode shares in the figure refer to person trips and are based on observed vehicles and the number of persons in each vehicle. The text states carpools and multi-occupant vehicles (such as Uber/Lyft) account for 21 percent, however these observed counts were unable to distinguish between a carpool and a TNC vehicle with two or more occupants. Therefore, TNCs have not been classified as a carpool in the context of the data supporting Figure 3.16-6. Furthermore, the data presented in Figure 3.16-6 is representative of data collected on one day in May 2019 and was not a direct input into the VMT calculations.

The SCC model is the best tool available to develop VMT estimates and was initially developed in 2016 consistent with the regional travel model developed by the Association of Monterey Bay Area Governments (AMBAG). Santa Cruz County updated the model to 2019 existing conditions. The SCC Model determines vehicle (driving alone and carpool), transit, bicycle and pedestrian trips only, to establish vehicle trip distance or VMT, but does not include TNCs as a separate mode. The SCC model estimates the probability of driving based on auto ownership, household income, and other variables; however, available travel data used to develop the original model, including 2012 California Household Travel Survey (CHTS), 2012 Santa Cruz Metro on-board survey, and EPA’s Smart Location Database, do not directly account for TNCs.

While the model does not separately account for TNCs, the SCC model was validated for use of the campus VMT estimates based on tube counts at the campus access points, so to the extent there are TNC trips in the counts, the model is replicating them in the trip generation. To that end, there is no reason to suggest that TNC use would diverge in the future from the trends reflected in the hose count data.

The model estimates the number of vehicle trips for the existing condition and in 2040 and assigns a trip distance to those vehicle trips to establish VMT. This information is then used with the project service population to estimate VMT for each of the three VMT metrics. In addition, the campus is required to implement Mitigation Measure 3.16-2: Implement TDM Program and Monitoring, which will monitor VMT annually and allow the campus to adjust their TDM strategies to address changing travel behavior over time.

Comment L12-14

9. The CAPCOA guidance cited for percent reductions throughout the transportation section of the EIR also contains a global maximum VMT reduction of 15% (or 20% with neighborhood electric vehicles) due to transportation measures for suburban areas, which is inclusive of land use/location factors. Transportation Demand Management (TDM) program expansion is cited as a mitigation measure, along with proximity of housing, telecommuting, parking management and transit funding. The EIR notes a 15% reduction of VMT due to these measures, but UC Santa Cruz has a robust TDM program, high parking prices, and a high frequency of transit service.

Response L12-14

The comment is correct about CAPCOA guidance and maximum VMT reductions; however, as shown in Table 3.16-6 the total campus VMT/capita with the 2021 LRDP is estimated to be 7.9 miles with a 7.7-mile threshold. The 7.9 miles represent a 13 percent reduction in 2019 baseline VMT; thus, the campus needs to achieve an additional 2 percent VMT reduction, which is a reasonable assumption based on the data presented for Mitigation Measure 3.16-2: Implement TDM Program and Monitoring. The employee VMT needs to be reduced by approximately 30 percent from 12.5 VMT to the threshold of 8.9 VMT. While this is greater than the 20 percent global maximum from CAPCOA, it is not unreasonable to expect the campus to reach the employee VMT thresholds. The VMT estimates developed using the Santa Cruz County travel model does not fully account for all the TDM measures listed in Mitigation Measure 3.16-2. In addition, the CAPCOA global maximum is theoretical maximum that indicates you should not expect to achieve reductions higher than 20 percent; however, robust TDM Programs, such as those for major tech employers in Silicon Valley, have shown reductions much greater than 20 percent. In addition, TDM measures are most effective for employees because an employer has greater influence on employee travel behavior than for students or visitor. Further, the mitigation measure includes a monitoring requirement, that will monitor whether the VMT thresholds are achieved, regardless of measures identified and implemented.

Comment L12-15

Additionally, the proximity of housing is a component of the project and therefore should already be accounted for in the calculation of project VMT: it cannot be counted again as a mitigation. This claim of a 15% reduction does not consider the fact that the UC Santa Cruz is already employing many of these measures, in effect taking credit for measures already in place or exceeding the maximum reduction that CAPCOA documentation observes in these suburban land use contexts. Additionally, a 15% reduction to the per capita employee VMT of 12.5 would not meet the stated threshold 8.9 miles per employee. If the reduction of 15% when applied to total VMT results in less than or equal to 8.9 miles per employee, then the calculation demonstrating such a reduction to total employee VMT divided by the number of employees should be shown, and this reduction should be attributable to mitigation measures not already in use by UC Santa Cruz, or the EIR should provide evidence that UC Santa Cruz can exceed the typical global maximum cited by CAPCOA.

Response L12-15

Refer to Response L12-14.

Comment L12-16

10. As mitigation monitoring occurs, the monitoring program should include a mechanism to guarantee that UC Santa Cruz does not shift vehicle trips to other University-owned properties that are not included in this LRDP, such as the Scotts Valley campus or the Coastal Science Campus, effectively increasing VMT on County and City roadways.

Response L12-16

Both properties identified in this comment have specific functions, and in the case of the Coastal Sciences Campus, a separate LRDP, including mitigation monitoring of transportation, and for Scotts Valley Center a lease agreement through 2040 with limited office spaces. Furthermore, and as noted in Chapter 6, “Alternatives,” the Scotts Valley campus is limited in form and function as the allowable space is limited by existing lease requirements. As such, inclusion of the suggested mechanism is not considered necessary, as it would not be feasible to “shift” vehicle trips as suggested by this comment.

Comment L12-17

11. Currently, people often drive to the city or close to UC Santa Cruz and take shuttles or transit to get onto campus to avoid parking pricing, which does not achieve the purpose of truly decreasing trips or VMT, but does reduce trips as counted by tubes. Will the cellphone or “big data” collected by UC Santa Cruz be able to do a complete accounting of trip length to account for people who park off campus to avoid a “no net new commuter parking” policy? Instead of completely eliminating parking, the University should consider remote lots with shuttles that could also serve as park and rides off campus at locations that are conveniently accessed off of highways.

Response L12-17

The suggested measure is already provided as part of the TDM program under Mitigation Measure 3.16-2 (see the 13th bullet on page 3.16-36). “Big data” would not be able to capture drivers that park at sporadic/random places within the City to avoid parking on campus, as the data collected would be for trips that only begin or end on campus and Westside Research Park, however UC Santa Cruz is willing to work with the County to determine what anonymous cell phone data options there are available to better understand this type of trip characteristic and determine what TDM program measure could potentially address it.

Comment L12-18

12. On page 3.17-3, the EIR states: “In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin.” This information is out of date. The Soquel-Aptos Groundwater Management Committee was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016. The MGA is the Groundwater Sustainability Agency designated to oversee management of the renamed Santa Cruz Mid-County Groundwater Basin. The MGA was created under a Joint Powers Agreement.

Response L12-18

In response to this comment, the fourth paragraph on page 3.17-3 has been amended to reflect the Santa Cruz Mid-County Groundwater Agency, as follows:

On December 15, 2014, DWR announced its official “initial prioritization” of the state’s groundwater basins for purposes of complying with the SGMA, and this priority list became effective on January 1, 2015. The Soquel-Valley Groundwater Basin (Basin Number 3-01) was identified by DWR as one of 21 groundwater basins to be reclassified as critically overdrafted. In September 2015, the Soquel-Aptos Groundwater Management Committee was formed which includes representatives from the County of Santa Cruz, Central Water District, Soquel Creek Water District (SqCWD), the City of Santa Cruz, and private well owners. This group was superseded by the Santa Cruz Mid-County Groundwater Agency (MGA) in March of 2016, through a joint powers agreement to oversee management of the basin. ~~is a joint exercise of powers entity with interest in management of the Soquel-Aptos groundwater basin.~~

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

Comment L12-19

13. On page 3.17-3, the EIR states: “The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin (which includes the Soquel-Valley Groundwater Basin), and the westerly area is within the Santa Margarita Groundwater Basin.” This information is incorrect and out of date. The Santa Margarita Groundwater Sustainability Plan does not cover any part of the City of Santa Cruz or the UC Santa Cruz campus. The City does own assets within the Basin, including part of Loch Lomond and the Felton Lift Station. The author likely is confusing the Santa Margarita Basin with the West Santa Cruz Terrace Basin, which includes part of the city and the campus. West Santa Cruz Terrace is not required to write a Groundwater Sustainability Plan. The Soquel-Valley Groundwater Basin no longer exists; it was superseded by the Santa Cruz Mid-County Groundwater Basin.

Response L12-19

In response to this comment, the fifth paragraph on page 3.17-3 has been amended as follows:

The City of Santa Cruz receives a minor amount (5 percent) of drinking water from groundwater basins. The easterly area of the City is located within the Santa Cruz Mid-County Groundwater Basin ~~(which includes the Soquel-Valley Groundwater Basin)~~, and the westerly area is within the West Santa Cruz Terrace Basin~~Santa Margarita Groundwater Basin~~.

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

Comment L12-20

14. On page 3.17-9, the EIR states: “The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.” The groundwater agencies do not serve the city. This should say: “The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.”

Response L12-20

In response to this comment, the third paragraph on page 3.17-9 has been amended as follows:

The City of Santa Cruz relies on groundwater for 5 percent of its potable supply. ~~Two groundwater agencies serve the City of Santa Cruz, the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.~~ The City of Santa Cruz participates in groundwater sustainability planning for two Groundwater Sustainability Agencies—the Santa Cruz Mid-County Groundwater Agency and the Santa Margarita Groundwater Agency.

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

Comment L12-21

15. On Page 3.17-9, the EIR states: “The Santa Margarita GSP, covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz, is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020).” As previously mentioned, the Santa Margarita Basin does not include any part of the City of Santa Cruz or UC Santa Cruz.

Response L12-21

In response to this comment, the fifth paragraph on page 3.17-9 has been amended as follows:

The Santa Margarita GSP~~, covering much of North Santa Cruz County including the westerly area of the City of Santa Cruz and UC Santa Cruz,~~ is currently in preparation, with a planned completion data of 2022. (Santa Margarita Groundwater Agency 2020).

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

Letter L13 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

Morgan Bostic, Advocate

March 8, 2021

Comment L13-1

Given the increased development and population proposed for North Campus, and the direct implications that these changes have on increasing the risk of wildfire, the 2021 LRDP EIR must evaluate the potentially significant indirect impact on water quality that could potentially occur as a result of wildfire in the subarea, which will be increased by the development and inhabitation of North Campus.

The draft 2021 LRDP proposes to develop 43% of the student housing and 8% of the academic and support space in North Campus, which is in a designated high fire hazard severity zone by the State. Because human beings are a primary cause of wildfire, the addition of a minimum of 3,700 people to this vulnerable area will dramatically increase the risk of wildfire in a region that was previously unpopulated. The EIR should also include an analysis and propose mitigations for reducing the impact of wildfire on the campus’ water resources, particularly the San Lorenzo Valley Watershed.

Response L13-1

As noted in Master Response 4 and Response L11-1, the Draft EIR presents an evaluation of the potential impacts of the 2021 LRDP related to wildfire risk and appropriate mitigation consistent with CEQA requirements within Section 3.18, "Wildfire." As noted in the reference section of the Draft EIR, UC Santa Cruz would implement a campus-wide vegetation management plan (Mitigation Measure 3.18-2) that would reduce fuel loads and maintain defensible space such that development under the 2021 LRDP would not exacerbate wildfire risks. The policy framework for managing fuel loads would also include management practices for reducing human activities that may contribute to wildfire risk. With respect to the potential need to evaluate hydrology impacts from increased wildfire risk and as noted in Master Response 4 and because the 2021 LRDP is not anticipated to exacerbate wildfire risks, further evaluation of potential impacts related to catastrophic events is not considered appropriate within the context of the EIR.

Comment L13-2

As Figure 3.10-1 Watersheds and Sub-Basins on UC Santa Cruz Campus shows, the “...northeastern and eastern boundary of the main residential campus is drained mainly by a series of hillslope drainages within the San Lorenzo River watershed. In general, the San Lorenzo – Pogonip watershed drains much of the eastern portion of the main residential campus east of Hagar Drive from north of the Crown-Merrill Apartments south to the southern boundary of the campus and borders the City of Santa Cruz’ Pogonip Park to the east of campus.”

Additionally, “Eight sub-watersheds comprise the larger area that are associated with a number of west-east trending gullies (Gullies A through H) that drain to the east (see Figure 3.10-1).”

“ Gully H is located in the northeastern corner of the campus with an on-campus drainage area of approximately 40 acres. Existing UC Santa Cruz development that contributes runoff to this gully includes Crown Merrill Apartments, Crown College and three large parking lots. The erosion conditions previously documented in this Hydrology and Water Quality UC Santa Cruz 3.10-14 2021 Long Range Development Plan EIR gully include actively migrating knickpoints, incised channel, and eroding slope gullies. Concentrated runoff is the primary cause of these conditions (Kennedy/Jenks Consultants 2004).” Channel conditions in the San Lorenzo–Pogonip watershed vary from location to location but are in general fair to poor.”

After rains drenched the areas where the CZU Fire occurred, Boulder Creek residents experienced “their water running black for a few days and “[f]or weeks, residents in Boulder Creek, Ben Lomond, and Felton were without drinking water. In some areas — particularly those close to Big Basin Redwoods State Park, and served by the smaller Big Basin Water District —residents didn’t get water back until early January.”

Fires leave behind, “an array of incinerated plastics, lead, pesticides and other toxic particles that have the potential to contaminate water supplies.” Additionally, “[b]urnt piping and equipment, as well as potentially contaminated supplies, were largely to blame for the water shortage.” Scorched landscapes, “add to the risk of mudslides, blocking access for water district workers.”

Response L13-2

This comment provides background information on runoff and pollution caused by runoff from the CZU Lighting Complex fires but does not address the contents of the EIR; no further response is provided.

Comment L13-3

In conclusion, the DEIR documents that the north campus subarea is in a State designated High Hazard Severe Fire Zone, that human activities in a high hazard fire zone increases the risk of wildfires, that 3,700 new student housing beds are proposed to be constructed in that subarea. The substantial evidence provided above documents that the north campus subarea is within the San Lorenzo River watershed and drains into the river and that wildfires in water supply watersheds potentially have significant water quality impacts. Therefore, the EIR must analyze these impacts and incorporate feasible mitigations, including not locating new structures in the subarea.

*All information for this section is taken from the 2021 LRDP EIR and https://www.latimes.com/california/story/2021-02-13/wildfire-santa-cruz-boulder-creek-residents -fear-water-quality*

Response L13-3

Refer to Response L11-1. The location of development within the north campus subarea is largely located within a high wildfire severity zone and the risk of wildfire associated with locating new structures is acknowledged in Impact 3.18-2 starting on page 3.18-14 of the Draft EIR, however the 2021 LRDP has reduced north campus development areas compared to the 2005 LRDP. The north campus subarea is 776 acres, 93 percent of which is protected as open space. The remaining 7 percent of land that would not be protected as open space, would allow for 53 fewer acres allowed for development compared to the 2005 LRDP. The 2021 LRDP would include some student housing and a small amount of academic and support space within this area. However, the vast majority of the north campus subarea would remain undeveloped as part of the campus reserve for habitat protection, research, and recreation. Through the restriction of available fuel material and enforcement of defensible space as required by Mitigation Measure 3.18-2, which would reduce fuel loads and maintain defensible space. UC Santa Cruz would limit the potential increase in wildfire risk such that impacts, including impacts associated with hydrology and water quality, would be less than significant.

Letter L14 Santa Cruz City-County Task Force on UC Santa Cruz Growth Plans

March 8, 2021

Comment L14-1

The release of the Draft UC Santa Cruz Long Range Development Plan (LRDP) for 2021-2040 presents a critical opportunity to come together as a community and envision what development and infrastructure will be essential to the success of future UCSC students, faculty, and staff over the next 20 years. In that spirit, and on behalf of the Santa Cruz City-County Task Force on UCSC Growth Plans and the constituents of the City and County of Santa Cruz, we are appealing to you directly in an effort to ensure that policies centering the needs of future students, our community-at-large, and our cherished environment are implemented under the 2021 LRDP.

Response L14-1

The comment provides introductory information and does not address the adequacy of the EIR analysis.

Comment L14-2

The Santa Cruz City-County Task Force on UCSC Growth is requesting consideration of the following policies for the 2021 Long Range Development Plan:

1. Consistent with Measure U, the 2021 Long Range Development Plan will include a legally enforceable commitment to house all additional students, faculty, and staff beyond 19,500 on campus.

2. The 2021 Long Range Development Plan will tie the increase of the campus population to additional infrastructure, with infrastructure provided prior to or concurrent with enrollment.

3. UCSC will designate the UCSC Campus Natural Reserve as a permanent reserve, ineligible for development in perpetuity, except to support the uses of recreation, research, environmental conservation, and scientific education.

4. The 2021 LRDP will prioritize areas with low endemic biodiversity for development in order to protect the most biodiverse habitats on the campus and areas that have undergone substantial regeneration.

5. UC Santa Cruz will adhere to or exceed the strictest greenhouse gas emission targets and air quality standards, whether they be statewide, regional, and/or UC-specific.

6. Given the increasing severity of wildfire due to climate change and the urban-wildland interface, it is imperative that the University adequately analyze and mitigate the increase in wildfire risk that the 2021 LRDP will impose on the campus and, by extension, the community.

In closing, we are grateful for this opportunity to collaboratively envision the future of our community and campus.

Response L14-2

The comment requests that the 2021 LRDP be revised to include suggested policies and does not address the adequacy of the EIR analysis. The University looks forward to continued collaboration with the community over the next 20 years under the 2021 LRDP. No further response is necessary. However, refer to Master Response 9 regarding plan implementation and phasing of development. Refer to Master Response 12 regarding long-term habitat protection and preparation of a campus-wide HCP. Regarding the request to cite development in areas of low biodiversity, all future buildings, as part of the UC Santa Cruz Design Review Process, Campus Standards Handbook requirements, and Physical Design Framework guidelines, would include landscaping and other features consistent with existing environmental and site conditions, which would soften the visual interface between new development under the 2021 LRDP and existing campus structures and surrounding landscape. In addition, as discussed further in Master Response 12, approximately 789 acres of the main residential campus would be designated as Campus Natural Reserve under the 2021 LRDP, an increase from the 379 acres designated as part of the 2005 LRDP. The 2021 LRDP, as proposed, comports with the comment by emphasizing the placement of development within the areas suggested in this comment.

Regarding GHG emissions, consistent with the UC Santa Cruz's Campus Sustainability Plan, implementation of Mitigation Measure 3.3-2 would require UC Santa Cruz to implement measures to reduce emissions related to implementation of the 2021 LRDP. These measures include the use of zero emission or low emission vehicles, installation of electric vehicle charging stations, reduction of campus vehicle speed, and the use of zero-VOC products. Further as explained in Master Response 4 and Section 3.18, “Wildfire,” on page 3.18-17, Mitigation Measure 3.18-2 would require UC Santa Cruz to prepare and implement a campus-wide vegetation management plan to address any potential wildfire risk associated with new development and changes in land use as proposed under the 2021 LRDP. The comment is included in the record, which will be considered by the UC Regents in their deliberations over potential approval of the 2021 LRDP.