SANTA CRUZ COUNTY GROUP

 Of The Ventana Chapter

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To: Director of Campus Planning

Physical Planning and Construction

University of California, Santa Cruz

From: Sierra Club

Attn: EIR Comment on Student Housing West Project

May 11th 2018

The Sierra Club has serious concerns about this project’s impact on the environment. Many impacts cannot be mitigated. Many of the proposed mitigations are inadequate for the task. The draft EIR contains a number of these shortcomings, which we detail below. We request a response to each of the concerns raised.

As a general statement we question the need for such a dense development on the Heller site. If as is stated, this 3000 bed-space project is to fulfill requirements under the 2008 CSA (Comprehensive Settlement Agreement) plus overfill and not for future growth, then a far smaller project would suffice. Sixty seven percent on- campus housing is required for the remaining one thousand additional students up to the 19,500 maximum under the CSA. This, plus approximately 900 additional beds to accommodate the current overfill of dorms and lounges gives a total of 1570 beds, far smaller than the project and more in line with Alternative 2.

We oppose any development on the East Meadow.

Student Housing West Impacts:

**Aesthetics**

We note the conclusion of the dEIR that the project’s impacts on scenic resources are significant and unavoidable and that the project will degrade the visual character and quality of the East Meadow for the Hagar site and also are significant and unavoidable. These conclusions alone should render alternatives to the project as more viable choices.

The dEIR understates the impact on the East Meadow via visuals that are chosen to minimize the height and scale of this project from the two adjacent roads. New visuals, without foreground subjects to distort the scale of the buildings should be made available. How high above grade will these buildings be situated? We request that a view from grade level such as someone walking up the footpath be included in the final EIR.

AES-4: The dEIR states that “the impact of the proposed project would not result in a substantial adverse effect related to light and glare” with no mitigation required. A project of this size will undoubtedly increase light and glare to a substantial degree. Specific, detailed mitigations in line with current IDA standards need to be included in the final EIR.

**Biological Resources**

***T****he State CEQA Guidelines and the 2005 LRDP EIR states:*

*Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;*

Quote: *3.0-37*

*Although sensitive natural communities have no legal protective status under FESA and CESA, they are provided some level of protection under CEQA. The CEQA Guidelines identify potential impacts on a sensitive natural community as one of six significance criteria. As an example, a discretionary project that has a substantial adverse effect on any riparian habitat, native grassland, valley oak woodland, or other sensitive natural community would normally be considered to have a significant effect on the environment.Quote: pg. 4.3.27 4.3.3.3 2005 LRDP, and include the following.*

*Respect major landscape and vegetation features. Development will be sensitive to preservation of UC Santa Cruz’s distinctive physical features, including ravines, major grasslands, chaparral, and areas of redwood and mixed evergreen forests.*

*Maintain continuity of wildlife habitats. To the extent possible, development will minimize interruption of wildlife movement and fragmentation of habitats.*

*In the* ***3.5 PROPOSED LRDP AMENDMENT*** *mentions that*

*“The approximately 17.3-acre Hagar site is located within a larger 20-acre area north of Hagar Drive that is currently designated as Campus Resource Land (CRL) in the 2005 LRDP.”*

*“As part of the proposed SHW project, the Campus will request an LRDP amendment to change the land use designation of the 17.3-acre area from CRL to Colleges and Student Housing.”*

*On pg. 4.3-47* ***4.3.6 CUMULATIVE IMPACTS AND MITIGATION MEASURES*** *is stated*

*“The development of the Hagar site was not foreseen or analyzed in the 2005 LRDP EIR, and the development of the Hagar site would result in the loss of approximately 17 acres of the lower East Meadow, which supports purple needlegrass grassland and provides foraging and movement habitat for wildlife.”, which is enforced by “Hagar site would permanently impact up to 17.1 acres of purple needlegrass grassland and temporarily impact approximately 0.5 acre within the proposed off‐site utility alignments.”( pg. 4.3-32 -****4.3.4.3 Project Impacts and Mitigation Measures)***

*The substantial loss of the 17.3 17.3-acre Hagar site within a larger 20-acre area north of Hagar Drive will effect the adjacent habitat ecosystems, consequently the biodiversity of the area and thus doesn’t sustain the statement “...although the acreage of the meadow would decrease by approximately 17 acres, the proposed development would not fragment any grassland habitat within the East Meadow. The impact on wildlife movement at the Hagar site would be less than significant. “(pg. 4.3-49 SHW Impact BIO-11)*

*In reviewing these statements the* ***Biological Resources*** *Mitigation Measures are failing adequately assess the threshold of the Projects long range, cumulative impact on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*

*Furthermore the Revised dEIR does not disclose if the Campus has adequate locations available for “the event that restoration is the chosen mitigation” for the potentially necessary Mitigation Measures.*

*The question if the previous LRDP Mitigation Measures have been successfully carried out warrants an answer.*

 *The Mitigation Measures for the* ***Biological Resources*** *are excluding the environmental impacts of*

*duration of 3 yrs construction activities*

*removal of 10,000* cubic yards of excess material from the Heller Site

amount of cubic yards of excess material from Hagar site unknown

*The impact of permanent loss for various wildlife nurseries*

BIO-7: The proposed projects are located in the Pacific migratory Flyway and are foraging habitats for a wide variety of bird species, and hunting grounds for raptors and falcons. The findings are compromised due to the lack of baseline data for wildlife inventory. This prevents a measurable assessment of the cumulative impact on the fragmented habitats that will result from the project.

BIO-8: Biological surveys for the Hagar site are inadequate. The project biologist LSA conducted only one burrowing owl survey within 2 hours of dusk on 12/7/17. The dEIR admits that “LSA did not conduct a protocol level barn owl survey which includes multiple surveys” because they didn’t expect to find their nests in the site’s grasslands. A proper survey of burrowing owls, which are known to nest nearby, should be conducted and included in the final EIR.

A preconstruction survey for burrowing owls is too late. If nests are present, this fact should be known before construction on the site is approved so it can be adequately weighed. The statement that “if burrowing owls are found, all active burrowing owl sites will be avoided **to the extent feasible** (emphasis added) is not an adequate mitigation. Please revise this mitigation to achieve avoidance of all burrowing owl sites.

There were no protocol level surveys conducted for all the other species for the Hagar site. This hasty study is not adequate for CEQA compliance. The final EIR should include protocol level surveys for all species within and migrating through the project site.

Bio-12: Impact of outdoor lighting on nocturnal fauna is stated as less than significant although the mitigation to bring it to that level is not detailed. The notation that “**if necessary** (emphasis added**)** dimmer lights; motion sensors and late night off periods” may be implemented is not an adequate mitigation for a development in a currently dark habitat. Please address this in the final EIR.

Under 3.6.2 regarding lighting for the Hagar site, the only entry is that LED lighting will be used. This is inadequate detail for a potentially serious environmental pollutant. Similarly, under 3.6.1 for the Heller site, the entry states only that “light fixtures and lighting systems would be selected based on performance and aesthetics” a wholly inadequate response regarding lighting impacts for an environmental document. Please update with IDA approved lighting standards and elements.

The proposed architecture on the Heller site shows a high amount of glass, which is a major cause for deadly bird collisions, resulting in the estimated loss of 300 million to 1 billion North American birds each year. The Biological Resources mitigated measures do not address any Bird Safe Design (BSD) Standards for the proposed development. Various Bay Cities have shown their environmental stewardship priority by adopting these BSD Standards into their Planning Departments permits.

[Bird-friendly\_Building\_Guide\_WEB.pdf](https://abcbirds.org/wp-content/uploads/2015/04/Bird-friendly_Building_Guide_WEB.pdf)

*The Sierra Club acknowledges that the Revised Draft EIR addresses the Bird-safe Design Standards(BSD) on* pg. pg.3.0-11 **3.4.2.3 Project and Building Design.**

*It is worth noting that the proposed BSD is replicating items 2&3 in* San Francisco ‘Exceptions & Specifications’ on pg. 32 [Standards\_for\_Bird\_Safe\_Buildings\_7-5-11.pdf](http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird_Safe_Buildings_7-5-11.pdf)

*San Francisco is reevaluating their BSD currently due to undesired bird collision issues resulting from applying contiguous glazing at least 24 square feet in size and within 40 feet above grade.*

*Further BSD information contact:* Christine Sheppard, Ph.D.*Director, Glass Collisions Program*

American Bird Conservancy [collisions.abcbirds.org](http://collisions.abcbirds.org/) office  *646 661 1862  cell     914 261 8277*

*The Revised dEIR states that the BSD will be installed at the Heller site and doesn’t mention the Hagar site.*

*On pg. 4.3-50 SHW Mitigation BIO‐11B states: “The Campus shall review the final designs of the buildings at the Heller and Hagar sites to ensure that appropriate bird safety designs have been effectively incorporated to reduce potential impacts to birds. Significance after Mitigation: Less than significant.”*

*The Revised dEIR should address this inconsistancy and mitigate the BSD issue accordingly. Please include this in the final EIR.*

 **Hydrology and Water Quality**

This impact is noted by the dEIR as potentially significant and that the Hagar site project could substantially degrade surface or groundwater quality. As mitigation it is proposed to “direct the remainder of the runoff to Jordan Gulch.” The EIR for a previous project, Colleges Nine and Ten noted that there should be no additional run-off allowed into Jordan Gulch post-project.

***On*** *pg 3.0-23* ***3.4.3 Hagar Site*** *is stated****:***

*“The excess recycled water would be conveyed off site via a pipeline and discharged into Jordan Gulch south of Hagar Drive. An estimated 1 million gallons of recycled water would be disposed each year until use for the excess recycled water can be found on the campus near the site. During the times that recycled water is discharged into Jordan Gulch, the disposal rate would be about 30 gallons per minute.*

*….would be detained and metered into a storm drain that would cross under Hagar Drive and run in a southerly direction to discharge into Jordan Gulch south of the Hagar site.”*

*The Revised dEIR is not assessing the environmental impact of “an estimated 1 million gallons of recycled water would be disposed each year” on Jordan Gulch south of Hagar Drive. Furthermore there is no time line for best management plan in place to evalute the potential impact.*

Please assess this mitigation more thoroughly and provide alternatives.

**Transportation and Traffic**

TRA-1: The dEIR states that the project will not result in significant, cumulative traffic impacts. That it will not increase traffic volume nor degrade existing on-campus intersection levels of service at the Heller site. This conclusion is hard to believe with 2,652 students added to the current student population within the vicinity. A proper traffic study should be conducted.

TRA-6: with an additional 2700 students living near Heller and having to cross that street to catch a shuttle, it is careless to assess that impact by concluding that, “ circulation on Heller Drive will be monitored and **if warranted (emphasis added)** the crossing guard program may be extended.” Re-assess and think, pedestrian overpass.

 4.11-2 states that the project will have no off-campus traffic impacts without data or analysis to support this claim. An off-campus traffic study is required to assess this conclusion.

4.11-19 states that a traffic study of the two campus entrance intersections is “not warranted”. The basis for such a questionable conclusion should be included in the final EIR. Since only 15% parking is being planned for the Heller site, the impact on off-campus parking should be analyzed and included. If reliance is made on 2005 EIR data, this new development concentrated on the West of campus needs updated studies for validity.

The impact of 3000 additional students on the Metro system should be included in the final EIR

Thank you for your attention to the above assessment of the dEIR. We look forward to your comments and responses to these issues and concerns in the final EIR.

Sincerely,

Gillian

Gillian Greensite, Chair

Sierra Club, Santa Cruz Group