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To: Director of Campus Planning
Physical Planning and Construction
University of California, Santa Cruz

From: Sierra Club
Regarding: Revised DEIR, Comments on Student Housing West Project, SCH No. 2017092007

The Sierra Club supports the mission of the University of California and recognizes its many academic achievements. We also support the efforts by UCSC to provide additional housing for its student population. Historically, the UCSC administration has carefully balanced new development within the parameters of a sensitive, unique natural environment, which in itself is a learning laboratory. The Student Housing West (and East Meadow) Project is a radical departure from this history. Reasonable alternatives that would achieve the same goal have been dismissed in favor of the most environmentally impactful and widely unpopular site choices.

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 Revised Draft EIR (Revised DEIR) contains a number of these shortcomings, which we detail below. We request a response to each of the concerns raised.

We believe that the "detailed study" in the Revised DEIR is unreliable based on the past 50 years of student on and off campus living preferences. 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 1000 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 strongly oppose any development on the East Meadow.

Student Housing West Impacts:

Aesthetics

We note the conclusion of the Revised 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 Revised 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.

Biological Resources

The Revised DEIR does not respect the vision and intention of the 2005 LRDP EIR, which states:

“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.”

Both CEQA Guidelines and the 2005 LRDP EIR state that development should not 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. The LRDP also states that, “To the extent possible, development will minimize interruption of wildlife movement and fragmentation of habitats.” We do not believe that these guidelines are being followed in the choice to develop at the Hagar site. We urge you to consider development of the family housing at any of the alternate sites.

Regarding SHW Impact BIO-11, the mitigation measures fail to adequately assess the threshold of the Project’s long range, cumulative impact on the movement of any native resident or migratory fish or wildlife species, or on established native resident or migratory wildlife corridors, or on impeding the use of native wildlife nursery sites. Furthermore, the Revised DEIR does not disclose if the UCSC Campus has adequate locations available for “the event that restoration is the chosen mitigation” for the potentially necessary mitigation measures. We question whether the LRDP mitigation measures have been successfully carried out.

The mitigation measures for the Biological Resources do not include the environmental impacts of three years of construction activities. This cannot be assessed properly without knowing the quantity of cubic yards of excess material taken from Hagar site or the impact of permanent loss for various wildlife nurseries at that site.

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 Revised DEIR admits that “LSA did not conduct a protocol level burrowing 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.

We acknowledge that the Revised Draft EIR addresses the Bird-safe Design Standards (BSD) on page 3.0-11. Please note that the proposed BSD replicates items 2 and 3 in the San Francisco “Exceptions & Specifications” section on page 32 of [Standards for Bird Safe Buildings 7-5-11.pdf](#). San Francisco is reevaluating their BSD due to undesired bird collision issues resulting from applying contiguous glazing at least 24 square feet in size and within 40 feet above grade. For BSD information, contact: Christine Sheppard, Ph.D., Director, Glass Collisions Program, American Bird Conservancy. Also reference [Bird-friendly Building Guide WEB.pdf](#).

Page 3.0-11 of the Revised DEIR states that the BSD will be installed at the Heller site but doesn’t mention the Hagar site. On page 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 inconsistency and mitigate the BSD issue accordingly. Please include this in the final EIR.

Transportation and Traffic

Because one-third of the new bed space of the Project is to relieve current overcrowding in dorms and lounges, about 2,000 new bed spaces will result. These new students on campus will have visitors with cars, so a conclusion of “less traffic” in the traffic study is unrealistic. Although the effect on traffic might be less than significant, “less traffic” is an untenable conclusion. In addition, these new students will use the Metro and the impact on Metro should be analyzed.

On page 4.11-22, the Revised DEIR concludes that no new study is required for off campus traffic effects as this traffic is assumed to be less. 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 LRDP Final EIR, this new development concentrated on the West of campus needs updated studies for validity.

The impact of 2000 additional students on the Metro system should be included in the final EIR.

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.

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

Sincerely,

Gillian

Gillian Greensite, Chair
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