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November 1, 2018

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Dear Alisa and the Student Housing West team:

I submit this public comment to the Revised Draft Environmental Impact Report (R-DEIR) for the Student Housing West project. Thank you for the opportunity to provide public input. I look forward to seeing a final EIR that addresses in detail each of the following comments.

My bottom line is that the R-DEIR – like the DEIR before it – fails to analyze feasible alternatives that involve moving only the Hagar site. The plan for the Hagar site, not the Heller site, has already generated the supermajority of environmental problems and complaints. Below you will find additional comments.

1. The R-DEIR fails to represent the environmental impacts of simply moving the Hagar portion of the project to another location, without changing other parts of the project. The Hagar site represents a huge portion of the total land devoted to the project, but only 5% of the total beds. Thus, **the final EIR must provide adequate analysis of all feasible alternatives that involve moving only the Hagar site to another location.**
2. The R-DEIR fails to adequately disclose and analyze all other feasible alternatives. Thus, **the final EIR must provide an adequate analysis to support the claim that the Heller-only alternative (or simply moving the Hagar site elsewhere) would be inconvenient or add cost**, particularly as temporary housing or rent subsidies for student families may be cheaper and have less environmental impact than the current proposal. The final EIR must provide analysis of temporary housing options to support the R-DEIR's assertion that it would be too expensive.
3. The R-DEIR asserts there would be a “parking loss,” which prevents feasible alternatives from going forward. But “parking loss” is not a known environmental impact. If anything, the loss of parking, if any, could be an environmental gain, as people move to sustainable modes of transit. All references to “parking loss” must be removed from the final EIR.
4. The R-DEIR authors seem to have strategically selected unreasonable and infeasible alternatives, which are unlikely options from both an environmental and a financial

standpoint, such as developing on the campus periphery or far from existing services. Thus, **the final EIR must analyze why each site identified with CSH designation by the Long Range Development Plan is an infeasible alternative.** The alternatives that the final EIR must consider include, and are not limited to, the following: (a) higher density on the Hagar site, using only a part of the site, (b) moving Graduate or Family Student Housing to the 2300 Delaware site, owned and managed by UCSC; (c) moving the child care center to Parking Lot 116, as proposed by the 2011 Child Care Task Force at UCSC; (d) infill development on West or East Remote parking lots, (e) infill development on any other campus parking lot/structure; (f) the Village.

5. The R-DEIR fails to adequately analyze the “Heller Site and East Campus Infill Alternative” and the “Heller Site and Kresge Lot Development Alternative.” **The final EIR must provide justification to support the claim that Kresge parking lot is too small to construct a feasible project that is aesthetically pleasing and has outdoor space.**

6. The R-DEIR makes statements about how building heights and densities impact aesthetics. **The final EIR must explain how building heights and densities impact aesthetics and the environment, including differences between inherent impacts (e.g., rising above tree lines) and architectural design impacts.**

7. The R-DEIR fails to discuss or mitigate the environmental impact of the low density and sprawling nature of the Hagar site design, and this design’s impact on land-use policies. This design also contravenes the letter and spirit of the UC Santa Cruz design framework to “reduce building footprints and increase building height, where feasible.” **The final EIR must adequately analyze the environmental impact of building a sprawling, car-oriented housing project at the Hagar site.**

8. The R-DEIR and DEIR before it shrouds itself in suggestions of LEED certification as a strategy to attempt to show less environmental impact, but it fails to show how the alternatives, if also LEED certified, would have greater environmental impacts. **Thus, the final EIR must explain the environmental impacts of LEED certification in each feasible alternative, including each feasible alternative mentioned in comment (1) and comment (3) above.**

9. R-DEIR renderings misrepresent the aesthetic impact of the Hagar site design, including failing to render roadway access from the site and parked cars, which will be visible from Hagar and Coolidge. **The final EIR must include accurate visual renderings of roadway access points, parked cars/parking lots, and impacts on existing bicycle lanes and pedestrian walkways running along Hagar and Coolidge.**

10. The R-DEIR fails to discuss the environmental impacts on transit riders and bicyclists for the proposed project. Simply averaging load factors over the day does not account for peak-hour capacity constraints on Metro and campus shuttles. Thus, **the final EIR must analyze the environmental impacts of the proposed building project on bicycle and pedestrian transit, including Metro capacity, campus shuttle capacity, how to avoid bus pass-bys (particularly just before class periods begin), crosswalk capacity and safety measures, and pedestrian routes. The final EIR must also explain the**

**environmental impacts of a paved, accessible, and safe pedestrian pathway from the Hagar site to the main entrance.**

11. The R-DEIR fails to provide detail as to the design and location of bicycle parking on both the Heller and Hagar sites, whether it will be usable, and its environmental impacts. **Thus, the final EIR must analyze the design and location of bike parking on both sites, whether the bike parking will be safe and usable, and its environmental impact at each site.**

12. The R-DEIR proposes to add an access to the Hagar site from Coolidge Drive. Given that downhill bicycles on Coolidge attain high speeds, this access roadway would present a serious environmental, health, and safety hazard to bicycles, which is not analyzed in the R-DEIR. **Thus, the final EIR should eliminate the Coolidge access roadway, or add protected bike lanes (e.g., with a physical barrier between bicycles and motor vehicles) to reduce the clear and present safety, health, and environmental risks involved in the proposal.**

13. The R-DEIR fails to adequately analyze the environmental impacts of a net increase in campus parking, not least given that parking is the main constraint on vehicle trip generation. **The final EIR must analyze how extra parking will impact trip generation and the environment, by fueling new vehicle trips by residents and non-residents. For the Hagar site, the final EIR should adjust trip generation rates to account for the site's isolation, by using trip generation rates from adjacent Employee Housing as a model.**

14. The R-DEIR fails to analyze adequately the environmental impacts of adding 120,000 square feet of parking to the campus (approximately 400 spaces at 300 square feet per space). **Thus, the final EIR should adequately analyze the specific environmental impacts of the parking components of the proposal.**

15. The R-DEIR claims that the Heller Only Site Alternative would avoid all traffic impacts at Hagar, as this was the densest housing alternative. **Thus, more alternatives need to be properly analyzed to reduce the traffic impacts and the final EIR should include a mitigation measure to reduce the level of parking provided.**

16. The R-DEIR fails to adequately analyze the environmental impacts of the excess parking proposed for the child care facility. The number of proposed spaces (a ratio of 3.18 per 1,000 square feet) is almost identical to the ratio for child care facilities with little or no transit or pedestrian access (*see* Institute of Transportation Engineers' *Parking Generation* report). **Thus, the final EIR should explain the environmental impacts of this excess parking, or reduce or eliminate the childcare center parking in order to mitigate its environmental impacts and its conflict with UC Santa Cruz policies related to alternative transportation. The final EIR should also adequately analyze the alternative of employees parking in the lot on Coolidge (Lot 116), which is no further from the childcare facility than the closest bus stop, or parking at the East Remote Lot on Hagar.**

17. The R-DEIR fails to disclose the environmental impacts of the proposed parking areas at the Heller and Hagar sites. This valuable ground space used for parking will increase traffic and greenhouse gas emissions, and the impervious surface will cause deep environmental damage. **Thus, the final EIR should consider reducing parking and building more densely, not least as mitigation measures for stormwater runoff.**

Thank you for your attention to the above public comments on the R-DEIR for the proposed Student Housing West Project.

Yours sincerely,

/s/

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