

Comments on REVISED Draft EIR for Student Housing West Project October 22, 2018

My name is Joanne Brown. I am a resident of Santa Cruz County and I have a Master's Degree in Ecology with an emphasis in plant ecology. I have family members who currently live at Family Student Housing, so I've had many opportunities to explore Porter Meadow and other natural areas on campus and observe the abundance and diversity habitats and wildlife there.

The natural beauty of this campus is a rare and priceless treasure. Native plant communities and wildlife on the UCSC campus offer students a wonderful opportunity to connect with nature and provide places where students and their families can experience nature first hand. I know how much my own grandchildren are benefitting from spending many hours every week exploring nature in Porter Meadow, the California Bay Forest and the redwood groves. The remaining natural landscape of UCSC needs to be preserved and protected. The unique and diverse plant communities on campus are ideal for long term ecological research projects--an irreplaceable opportunity.

Having spent lots of time visiting my children and grandchildren at Family Student Housing, I understand that the current family student housing definitely needs to be renovated and upgraded. However, I am opposed to the environmental destruction that would result from new construction at the proposed Hagar or North Remote sites.

If additional housing is needed, I would support Alternatives 2, 3, 5 or 6, placing all proposed housing within the already established sites, thus hopefully avoiding most of the environmental degradation, habitat destruction and negative impacts on wildlife that would result from construction at the Hagar site or the North Remote site.

My comments are in response to information provided in the Revised Draft EIR as well as informational meetings that I have attended.

In response to the Revised Draft EIR:

"As this Revised Draft EIR replaces in full the previously published Draft EIR, reviewers are requested to submit new comments on this Revised Draft EIR."

I request that comments received for the previous Draft EIR be considered and addressed. None of my concerns regarding potential negative impacts on plant communities, wildlife corridors or wildlife in general have been addressed in the Revised Draft EIR. I am concerned that many people who submitted comments for the previous Draft EIR will assume that their comments are being taken into consideration already, and not comment on the Revised EIR. I request that all comments for the previous Draft EIR be taken into consideration and addressed.

In response to the Revised Draft EIR:

“One of the project objectives includes embracing the important legacy of the site by retaining key character-defining elements such as the relationship to the natural environment, the existing site organization and landscape features, and the majority of existing buildings.”

I find it ironic that such careful attention is given to the proposed Kresge College project, while there is little thought of the long term consequences of habitat destruction at the Hagar site or the North Remote site.

“The development of student housing on the Hagar site would require an amendment of the 2005 LRDP to change the land use designation from Campus Resource Land to Colleges and Student Housing.”

Who makes the decision regarding this change of designation?

I am opposed to redesignation of the Hagar site from resource land to land for student housing.

Although my concerns span a variety of issues (including air quality, aesthetics, light pollution, noise pollution and potential cultural resource destruction), I’ve focused on the negative effects the proposed projects will have on plant communities, wildlife corridors and wildlife on the proposed sites.

Plant Communities

It is likely that the proposed mitigations for the loss of plant communities at the Hagar and Heller sites will not be effective. For the permanent loss over 17 acres of purple needlegrass grassland at the Hagar site, proposed mitigation includes restoring or planting the same amount of purple needlegrass grassland elsewhere on campus. “If purple needlegrass restoration does not meet the success criteria after 5 years, restoration shall be remedied (e.g., replanting) or restoration will be attempted on a new, more suitable site.”

Mitigation cannot replace or replicate the diversity and complex interactions within the sensitive grassland communities at the Hagar site and in Porter Meadow (Heller site). These grassland communities include the purple needlegrass grassland and the California oat grass prairie.

The Hagar site supports stands of purple needlegrass along with native California poppy and coast tarweed (*Madia sativa*). *All associations within this alliance are considered sensitive natural communities by CDFW.*

The California oat grass (*Danthonia californica*) prairie occurs within portions of Porter Meadow. “In addition to California oat grass, the prairie supports other native grasses, including purple needlegrass (*Stipa pulchra*) and meadow barley (*Hordeum brachyantherum*). . Two additional native forbs, yellow Mariposa lily (*Calochortus luteus*) and Ithurriel’s spear (*Triteleia laxa*), were also present within the California oat grass prairie. *All associations within this*

alliance are considered sensitive natural communities by the California Department of Fish and Wildlife (CDFW)."

"Most rare plants are restricted to their known locations because they have specialized, poorly understood, habitat requirements. Creating the exact environmental conditions that these plants require may not be possible." (<https://www.cnps.org/wp-content/uploads/2018/04/mitigation.pdf>)

Also from the Draft EIR:

Sensitive Natural Communities: The California oat grassland (coastal prairie), California Bay Forest, and purple needlegrass grassland on and near the Heller site and the utility corridor and the purple needlegrass grassland at the Hagar site and the utility corridor are considered to be **sensitive natural communities by CDFW.**

After reviewing the "virtual tour of the Hagar Site", it is obvious that the grassland community at this proposed site would be destroyed and replaced with buildings, roadways, lawns, and people.

Purple Needlegrass Grassland is a sensitive natural community that occurs in the Porter Meadow to the north of the Heller site, in the area where the Heller site utility corridor is proposed, and it occurs throughout the Hagar site **both** where **the housing development** is proposed and where **utility corridor and storm drain** are proposed. The proposed development at the Heller site would temporarily impact approximately 0.1 acre of purple needlegrass grassland within the **proposed utility corridor**, while the proposed development at the Hagar site would permanently impact approximately 15 acres of purple needlegrass grassland

The estimated destruction of 17+ acres of grassland at the Hagar site does not begin to include the negative effects on adjacent grasslands, including the further introduction of non-native species as a result of construction activities and subsequent human impact. Proposed mitigation efforts do not take into account this added destruction to adjacent grassland habitat at the Hagar site. Furthermore, insufficient attention has been given to the negative impacts that will result from ongoing damage to the grassland communities on the Hagar site, as well as those that border the Hagar site, from hundreds of people living in this ecologically sensitive area.

Coastal prairie grassland is rare and irreplaceable. **"Less than one percent of California's native grassland is still intact today.** The northern coastal prairie, which extends into Oregon, is the most diverse type of grassland in North America."
(<https://www.nps.gov/pore/learn/nature/prairies.htm>)

Wildlife Concerns

The only wildlife concern that was mentioned by the presenters during past public meetings was for the California red-legged frog. The adverse effects on other wildlife and habitats were not

even mentioned, even though “47 special-status animal species were evaluated for their potential to occur on or in the general vicinity of the project sites”. I am concerned about the loss of habitat for **all** these species, as well as the other species of wildlife that utilize the areas under consideration.

The California red-legged frog is a Federally Threatened species and California Species of Special Concern [SSC]. The construction of multistoried buildings, wide concrete pathways, pavement and the addition of thousands human inhabitants on site cannot possibly be beneficial to this Federally Threatened species.

The “utility corridor” described in the Draft EIR will adversely affect habitat within Porter Meadow. This proposed utility corridor for the Heller Site cuts right through red legged frog upland and dispersal habitat.

“The proposed utility corridor, which extends north from the Heller site, occurs within mostly natural vegetation communities.” (Biological Resources 43).

From the Draft EIR:

“The utility corridor, which would extend in a north-south direction through Porter Meadow would be approximately 9-12 feet wide and 2,300 -feet long.”

I am concerned about habitat destruction that could negatively affect the California giant salamander.

From the Draft EIR:

“This salamander could occur at the Porter Meadow and forest habitat within the proposed utility corridor for the Heller site.”

Both Hagar and Heller have habitat important to a number of Special Status species. I am concerned that habitat destruction at the sites under consideration will adversely impact these species. I’m including information provided in the original draft EIR to emphasize the potential adverse effects on these species. The Draft EIR lists twelve Special Status bird species that occur in the area:

Special-Status Birds. Several special-status bird species are known to or could occur near the Heller and Hagar sites, including the golden eagle (*Aquila chrysaetos*; California Fully Protected), northern harrier (*Circus cyaneus*; SSC), white-tailed kite (California Fully Protected), short-eared owl (*Asio flammeus*; SSC), long-eared owl (*Asio otus*; SSC), loggerhead shrike (*Lanius ludovicianus*; SSC), Vaux’s swift (*Chaetura vauxi*; SSC), black swift (*Cypseloides niger*; SSC), olive-sided flycatcher (*Contopus cooperi*; SSC), grasshopper sparrow (*Ammodramus savannarum*; SSC), tricolored blackbird (*Agelaius tricolor*; SSC), and burrowing owl (*Athene cunicularia*; SSC). Golden eagles, white-tailed kites, long-eared owls, Vaux’s swifts, and olive sided flycatcher could nest in the forest habitats, loggerhead shrikes could nest in the trees and shrubs, and northern harriers, short-eared owls, burrowing owls, and grasshopper sparrows could nest in the grassland habitats on and adjacent to the sites. Vaux’s swift, black swift, and tricolored blackbird could forage on or adjacent to the sites. Burrowing owls could winter and/or forage in the grassland habitat on or adjacent to the sites. **Currently, burrowing owls are known to winter within the upper East Meadow south of the east remote parking lot and north of the Hagar site (CDFW 2017).**

Special-Status Bats. The Townsend's western big-eared bat (*Corynorhinus townsendii townsendii*; SSC), pallid bat (*Antrozous pallidus*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), western red bat (*Lasiurus blossevillii*; SSC), long-eared myotis (*Myotis evotis*; Western Bat Working Group [WBWG] - Medium Priority), fringed myotis (*Myotis thysanodes*; WBWG - **High Priority**), long-legged myotis (*Myotis volans*; WBWG - **High Priority**), and yuma myotis (*Myotis yumanensis*; WBWG - Low-Medium Priority) **may periodically fly or forage over the Heller and Hagar sites.**

San Francisco Dusky-footed Woodrat. The San Francisco dusky-footed woodrat **could build woodrat houses within the California bay forest, redwood forest, and coyote brush scrub habitat at or near the Heller site.**

American Badger. The American badger (*Taxidea taxus*; SSC) occurs in grassland habitat where prey species, such as small mammals, occur. **This species could occur at or near the Hagar site...**

From the Revised Draft EIR:

"The proposed project could result in a substantial adverse impact (i.e., loss or degradation of habitat) on **cave invertebrates**, including the Santa Cruz telemid spider, Dolloff Cave spider, Empire Cave pseudoscorpion, or Mackenzie's Cave amphipod. The proposed development at the Heller site would add more students to the western portion of the campus compared to the number of students analyzed for this portion of the campus in the 2005 LRDP EIR. Therefore, the potential for increased trespass would be greater than previously analyzed. Furthermore, based on observations by the Campus Natural Reserve (CNR) Manager, despite the implementation of LRDP Mitigation BIO08 by the Campus, the cave continues to be visited heavily by students and others, and the quality of the habitat continues to be degraded by unauthorized activities conducted in the cave. The addition of about 2,900 resident students to the western portion of the campus would likely further increase the potential for unauthorized student visitation of the cave, and degradation of habitat would worsen. This indirect potential impact of the proposed project would be significant. Mitigation is set forth below to address this impact."

The proposed mitigations for potential damage to the cave invertebrates would
"Require mandatory stewardship training for residents of the proposed Heller site housing (either online or in person) designed to bring awareness to sensitive environments. to reduce impacts to the cave resources."

Although stewardship training sounds like a good idea, this does not address the negative environmental impact of having 2,900 more people on that part of the campus.

Wildlife Corridors

I am concerned about the loss of wildlife corridors resulting from habitat destruction and fragmentation at both the Hagar and Heller sites.

Information from the Draft EIR:

Wildlife Movement Corridors and Wildlife Nursery Sites--Wildlife such as black-tailed deer (*Odocoileus hemionus columbianus*), raccoons (*Procyon lotor*), coyotes (*Canis latrans*), gray foxes (*Urocyon cinereoargenteus*), bobcats (*Lynx rufus*), reptiles, amphibians (including CRLF), birds, and occasionally mountain lions (*Felis concolor*) move through the grassland, forest, and coyote brush scrub habitats at the Heller and/or Hagar sites (Figures 4.3-1 and 4.3-2). Within the vicinity of the Heller site, wildlife movement corridors are present within the grassland in the Porter Meadow north of the existing FSH complex, the California bay forest west of the FSH complex, the ball field south of the FSH complex, and within a narrow stretch of habitat that extends in a north-south direction between the FSH complex and Heller Drive. The Porter Meadow between the FSH complex and Porter College supports an important wildlife movement corridor that provides a linkage between the habitat north and west of the Heller site to the habitat to the east, including habitat associated the West and East Branches of Moore Creek. In regards to CRLF movement, most of these areas provide suitable dispersal habitat for CRLF with the exception of the north-south corridor between the FSH complex and Heller Drive, which provides minimal dispersal habitat for CRLF due to its relatively narrow width (Figure 4.3-3). The Hagar site is situated in the lower-most portion of the East Meadow and is bordered by grasslands within the East Meadow to the north... *The proposed project could interfere with the movement of wildlife species or with established native resident or migratory wildlife corridors.*

Contrary to findings in the Draft EIR, I believe that destruction of 17+ acres of habitat and the addition of buildings, pavement, and ongoing human activity within the Hagar site **will** fragment wildlife habitat.

Information provided in the Revised EIR indicates that a biologist visited the Hagar site **only once** in July to provide additional input for the Revised Draft EIR. This is an entirely inadequate amount of time for observation and sufficient data collection to determine wildlife patterns of utilization (day and night as well as throughout the seasons).

Having participated in a Long Term Ecological Research Study on plant communities, I know that a study site needs to be monitored and data collected over a sustained period of time for results to be valid and relevant. I do not believe that sufficient time was put into studying the complex species interactions at the Hagar site.

UCSC Campus Policies

Environmental destruction at the Hagar site and the North Remote site are in opposition to following UCSC Campus Policies:

4.3.3.3 Local Plans and Policies

The Campus's policies for the protection of biological resources are set forth in the 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.**

According to the definition of “significant impacts”, construction at the Hagar or North Remote sites, as well as destruction of habitat at the Heller site, would be considered significant as defined by the criteria below:

4.3.4.1 Significance Criteria

The impacts of the proposed project on biological resources would be considered significant if they would exceed the following significance criteria, in accordance with Appendix G of the State CEQA Guidelines, UC CEQA Handbook, and the 2005 LRDP EIR:

- **have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;**
- **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...**

In closing, I urge that the utmost efforts be made to protect wildlife, habitats and preserve the natural beauty of the UCSC campus for future generations.

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