To: UCSC Planning Department

From: Karen Holl, Professor of Environmental Studies, Restoration Ecologist

Date: 25 October 2018

RE: Comments on the Revised Student Housing West Project Draft EIR

General comments

p. 2.0-3 – The draft EIR notes that constructing family student housing at the Hagar Site would require a change in land use designation of that site from Campus Resource Land to Colleges and Student Housing. I realize that a change in land use designation from the 2005 LRDP is allowable with UC Regents Approval, but such a change undermines the value of the entire LRDP process.

I served as a faculty representative on the 2005 LRDP committee and am serving again on the 2020 LRDP committee. During the 2005 LRDP proceedings, we discussed at length whether to designate the Hagar Site as a land use that would allow for building construction, and after careful deliberation of all the land use tradeoffs on campus decided against this alternative, in large part because of the unmitigable aesthetic impacts that are documented multiple times in the current draft EIR. These impacts are in direct conflict with the UCSC Physical Design Framework that went along with the 2005 LRDP, such as "to site building so as to protect visually and ecologically significant landscape features". SHW impact LU-1 says that "The proposed project would not conflict with the UC Santa Cruz 2005 LRDP once amended", but it conflicts with multiple of the LRDP Physical Design Framework guidelines such as the principle that ""interruptions of prime viewsheds will be minimized".

I have spent many, many hours in meetings and reviewing documents for both committees. I find it incredibly frustrating that I, and many others, spent extensive time on careful considerations during the 2005 LRDP only to have the campus move forward with redesignating the land for another use without broad campus consultation. This happened despite the fact that there are several areas of land designated for Colleges and Student Housing under the 2005 LRDP that have not been used yet for this purpose. The EIR states that conditions have changed since the 2005 LRDP, which certainly is true. Given this point, this housing project could have been considered as part of the comprehensive 2020 LRDP planning process so at to think more systematically about where to site housing in the context of future development, but the 2020 LRDP committee was told explicitly that we were not allowed to discuss this change in land use designation in the 2020 LRDP committee meetings. It disingenuous for the campus to be in the midst of what is supposed to be a participatory, 2-yr comprehensive land planning process and not include this project as part of it.

Alternatives – I appreciate that the revised DEIR considers additional alternatives. According to Table 2.0-3 some of which these, such as alternative 5 and 6, have less negative environmental impacts than the chosen alternative. The main case that is made against the alternatives is that (1)

they would take too long to implement given the Comprehensive Settlement agreement and (2) that the existing alternative is the only one that would results in cost-effective housing. I find both of these arguments to be problematic.

(1) The Comprehensive Settlement Agreement was finalized in 2008, and we are now in 2018. There has been a housing crisis on campus for several years. If the campus was that concerned about meeting the Settlement Agreement in a timely manner then why did the planning for this project not start earlier? The difference in the timelines for completion are only a matter of about one or two years, whereas a decade has elapsed since the Settlement Agreement. So I find the timing delay to be non-compelling. I realize that planning construction on the UCSC campus takes a few years, but this could have all started much earlier so that the construction was underway by now and there wouldn't be such a rush.
(2) The argument is made that building in the East Meadow is the only financially-viable option for housing construction at this time. The 2020 LRDP is currently considering an increase in the allowable student enrollment to 28,000 students with the campus housing somewhere between 50-70% of these new students. If there is no alternative of where to put 140 units within the area of land designated for College and Student Housing in the 2005 LRDP that is financially feasible, then how is it going to be possible to house the thousands of additional students proposed under the 2020 LRDP at a cost that is feasible? These two planning processes are contradictory in what is being stated.

<u>Compatible landscaping vegetation for the Hagar Site</u>

Throughout the document, it is stated that landscaping vegetation will be used at both sites that is compatible with the surrounding habitat. But, the landscaping shown around the buildings at the Hagar site is shrubs and trees (section 3.4.3.4), whereas this site is grassland habitat. It is questionable how well trees would survive and grow on this site, and they would likely have higher evapotranspiration demand. In figure 4.1-16b and 20b, it appears that there are a number of conifers would that are not found in this habitat type.

Likewise, p. 4.8-13 says the project would "incorporate…climate adaptive landscaping, comprising low-growing native plants, climate adaptive ornamental shrubs, and groundcovers would be used at both sites". But the Hagar site drawings shows some tall trees. So, what is stated and drawn in the rendering is inconsistent.

I did not see any requirement for native landscaping in the Hagar site description. Many non-native landscaping plants, including some that are currently used on campus, can spread into natural areas. There should be a requirement for native landscaping. In summary, I do not find that the landscaping described is compatible with the surrounding habitat.

Grassland mitigation

p. 4.3-29-32. As noted in the revised DEIR, the Hagar site project would result in the loss of two sensitive natural communities – California oat grass grassland and purple needlegrass grassland. The DEIR notes that these impacts would be mitigated to a less than significant impact by seeding or planting native species elsewhere in the Great Meadow. As a professional restoration ecologist with more than 20 years experience in California grassland restoration, I am concerned that the proposed methods will not result in successful establishment of these plant communities elsewhere on campus. Rare plant mitigation efforts have low success rates generally (Godefroid et al., 2011), and in California grasslands specifically (Holl & Hayes, 2006).

p. 4.3-33 – It says that "purple needlegrass grassland is a more common sensitive natural community than coastal prairie and purple needlegrass when seeded in restored grasslands performs well." In my experience, sometimes purple needlegrass (*Stipa pulchra*) seeding efforts are successful and sometime they are not. More generally, the success of grassland seeding efforts is highly variable and often unsuccessful. Therefore, a minimum of a 2:1 mitigation ratio should be required.

p. 4.3-34 – The method of restoring California oatgrass grassland is not described. *Danthonia californica* has notoriously low germination and establishment rates and should be planted from plugs for there to be any chance of success.

p. 4.3-35 – A minimum 2:1 ratio for mitigation should also be used for creeping rye grass turfs given the highly unpredictable nature of transplanting efforts.

To improve the likelihood of successfully mitigating the loss of the two sensitive habitats I recommend the following:

1. The management and monitoring plans for the various habitat mitigation projects should be reviewed by a qualified restoration ecologist who is not the Consultant implementing the project, since that would be a conflict of interest. As written, any one on the campus could review the plan, regardless of whether they have appropriate expertise.
2. I appreciate that the revised DEIR notes that if after 5 years the habitat mitigation efforts have not met the stated goals that restoration efforts will be attempted elsewhere. If that happens then management and monitoring at the new site should continue for at least five years. Achieving restoration targets in a single year do not guarantee the long-term success of a restoration project.

Other comments

Figure 4.1.14b makes it look like the development is quite distant and small from the Hagar and Coolidge intersection but in fact the aerial photo show that distance to only be about 200 ft at most. It seems like the perspective is not correct and serves to make the visual impact less than it would be in reality.

Section 4.3.16 Ohlone tiger beetle. A note that Tara Cornelisse mapped all populations of the OTB as part of her dissertation, and no OTB were found in the East Meadow (Cornelisse, 2013).

Figure 5.0-1 – Rachel Carson College is not identified correctly in Fig. 5.0-1

Table 7.2-9 shows a slight decline in the total number of faculty/staff between 2003-2004 and 2020-2021 at the same time that the campus student population has increased substantially. I realize that the faculty to student ratio has gone up but it doesn't seem correct that the faculty and staff to support 14,000 students in 2003-2004 would be the same as 20,000 or more in 2020-2021.

Literature cited

Cornelisse TM (2013) Conserving extirpated sites: using habitat quality to manage unoccupied patches for metapopulation persistence. Biodiversity and Conservation **22**:3171-3184

Godefroid S, Piazza C, Rossi G, Buord S, Stevens A-D, Aguraiuja R, Cowell C, Weekley CW, Vogg G, Iriondo JM, Johnson I, Dixon B, Gordon D, Magnanon S, Valentin B, Bjureke K, Koopman R, Vicens M, Virevaire M, and Vanderborght T (2011) How successful are plant species reintroductions? Biological Conservation **144**:672-682

Holl KD, and Hayes GF (2006) Challenges to introducing and managing disturbance regimes for *Holocarpha macradenia*, an endangered annual grassland forb. Conservation Biology **20**:1121-1131