



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 overflow 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 overflow 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

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](#)

The dEIR should have addressed and mitigated this issue. 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. 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

