

To: UCSC Planning Department

From: Karen Holl, Professor of Environmental Studies

Date: 4 May 2018

RE: Comments on the Student Housing West Project Draft EIR

p. 2.02-03 – 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 Regent 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.

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 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. So, what opportunity was there for input prior to moving forward with a face paced planning process where an EIR has already been drafted? I received a Notice of Preparation for the EIR and a revised Notice of Preparation, but those did not allow comment on where to site the housing, but rather just about what should be included in the EIR.

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, then how is it going to be possible to house the thousands of additional students proposed under the 2020 LRDP?

Figure 4.1-9. This figure is quite misleading as far as the visual impacts of the construction. The figure shows large trees (that appear to be oaks) shielding the view of the buildings. Oaks would take a minimum of 20 years (and likely substantially longer) to grow to that size given the low nutrients and water holding capacity of the soils at the site (Hayes & Holl, 2003), which are typical of grassland soils. Given the type of soil and native habitat in this area, trees are unlikely to substantially block the view of the buildings. Moreover, I do not see where the entrance road is illustrated in this rendering.

p. 4.3-19. There is a typo in California oatgrass grassland.

p. 4.3-29-32. As noted in the 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 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).

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

1. SHW Mitigation BIO-1A. The management and monitoring plan for California oatgrass grassland 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. SHW Mitigation BIO-1B. Given the low success rates of past California grassland restoration efforts, the campus should permanently protect at least 15 acres of existing purple needlegrass grassland rather than attempting restoration as a mitigation. If restoration is attempted then, as described above, the plan should be reviewed by a qualified restoration ecologist. If the quantitative success criteria are not reached and sustained for at least three years, then the restoration should be started again and monitored for a similar amount of time. Achieving restoration targets in a single year do not guarantee the long-term success of a restoration project.

p. 4.3-33. The plan says that the project would not introduce noxious weeds, which could reduce the abundance of native plants and sensitive communities. However, 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.

On a related note, at the May 3, 2018 draft EIR public meeting it was stated that landscaping would be used that would be compatible with the surrounding habitat. But, the landscaping shown around the building is shrubs and trees, whereas this site is grassland habitat.

p. 4.6-28. Rooftop photovoltaics are proposed for the Heller Site. Why are they not included at the Hagar Site to help mitigate energy usage? There is plenty of area on those roofs.

p. 4.7-5 – The discussion refers to College Eight here and multiple other times in the document. The name of this college was changed to Rachel Carson College over 1.5 years ago. This should be corrected throughout the document.

Table 4.11-4 – This table estimates that the student population will grow at UCSC by nearly 2,000 students by 2023, but that there will be no increase in faculty and staff working on campus. Who is going to support the additional 2000 students? These numbers seem like they need to be corrected.

p. 5.0-1 – It is unclear to me how these six project alternatives were selected and then reduced to three options given that there are several potential areas that are currently designated for College and Student Housing under the 2005 LRDP that would not require a land-use designation change.

p. 5.0-11 – The DEIR says that the Heller Site and North Campus alternative was ruled out because there are no roads or utility infrastructure in the vicinity. But, there are sites in upper campus that are near roads and utilities (e.g. near the camper park). And, the Hagar Site would also require extension of roads and utilities.

The DEIR notes on p. 5.0-26 that alternative 3 would result in “similar and significant and unavoidable impact” to aesthetics and would avoid the significant and unavoidable impacts on the Hagar Site. associated with construction”. And, on p. 5.0-35 it says that “In summary, impacts on visual resources would be reduced under this alternative compared to the proposed project, but the significant and unavoidable impact on scenic views from the Porter Knoll and the West Entrance would not be avoided.” But, then the final conclusion on p. 5.0-42 says that “Of the other alternatives evaluated in this EIR, Alternative 3 (Heller Site Development only) would have greater visual impacts than the proposed project”, which contradicts both the prior statements. In other words, the conclusions throughout the EIR are not consistent. It seems clear to me that constructing at both sites would have greater significant and unavoidable impacts than Alternative 3, yet the aesthetics argument is used to justify why the proposed project is a superior alternative. The main argument to justify building at the Hagar Site is that it would be more expedient for relocating family student housing (p. 5.0-31) but there are certainly other alternatives to house 140 families temporarily while the Heller Site construction is underway. Alternative 3 would also result in higher density housing, but if the campus is going to continue to grow as proposed higher density housing is unavoidable.

Literature cited

- Godefroid S, Piazza C, Rossi G, Buord S, Stevens A-D, Aguraju 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 Vanderborcht T (2011) How successful are plant species reintroductions? *Biological Conservation* **144**:672-682
- Hayes GF, and Holl KD (2003) Site-specific responses of native and exotic species to disturbances in a mesic grassland community. *Applied Vegetation Science* **6**:235-244
- 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