

James E. Pepper
116 Nash Creek Lane
Bozeman, MT 59715
jepepper@earthlink.net

May 10, 2018

Alisa Klaus, Senior Environmental Planner
UC Santa Cruz, Physical Planning & Construction,
1156 High St , Barn G,
Santa Cruz, CA 95064

via email to eircomment@ucsc.edu

Re: Public Comment Letter on Draft Environmental Impact Report on the
Proposed Student Housing West Project, University of California at Santa Cruz
SCH #2017092007

To Whom It May Concern;

I write to comment on the Draft Environmental Impacts Report (DEIR) prepared on the proposed Student Housing West (SHW) project.

A. Background and Qualifications as a “Commentor”

History matters. Thus let me first introduce myself, as my comments embody not only academic and professional credentials but also twenty-five years as a Professor of Environmental Studies at UC Santa Cruz (1971-1996). During my tenure at UCSC I was the only faculty member with professional degrees in the environmental design fields¹, and as a result, in addition to my normal academic teaching responsibilities² and creative/professional work, I was frequently, indeed repeatedly appointed by the various Chancellors to serve on many committees relevant to the built environment, as well as in other advisory and professional capacities.³

¹ Bachelor Degree in Architecture, Montana State University 1959; Masters of Landscape Architecture, UC Berkeley 1970, Masters of City and Regional Planning, UC Berkeley 1971.

² Over my 25-year academic career at UCSC I taught a number of courses concerned with architecture and environmental assessment, frequently integrating the campus landscape and/or projects into my course work. Most notably were environmental assessment reports prepared with assistance from students, as well as a course on Resource Conserving Architecture taught in the early 1980s.

³ Search Committees for Project Architects; Building Committees; LRDP Preparation and Review Committees; Primary author of 1981 Campus Academic Plan; Created the UC Santa Cruz Environmental Assessment Group within PPC R1982, with Graham Bice); Primary author of three major Environmental Impact Reports, including DEIR on Proposed Long Marine Laboratory (1976; first EIR prepared by/for UC), DEIR on Proposed Dark Sky Observatory at Junipero Serra Peak (1977), Environmental Assessment on Proposed Research and Development Center (1985).

B. Familiarity with Origin Campus Vision and Evolution of UCSC Physical Planning

During my graduate studies at UC Berkeley (1969-71) I became acquainted with UC Santa Cruz Campus, initially with campus planning by virtue of close association with my major advisor, Professor Robert Twiss (Landscape Architecture), who authored one of the first documents concerned with environmental planning for the campus.⁴ In this important study, Twiss set forth an ecologically-based analysis and evaluation of the campus natural environment, and defined the ecological structure of the larger landscape as the foundation and scale for subsequent planning and design as well as recommending the establishment of a Campus Natural Reserve.

Twiss's work followed shortly after the completion of the initial campus LRDP⁵ and expanded upon the highly influential memorandum prepared by Landscape Architect Thomas Church which called for a development pattern subordinate to the campus landscape. The Church memo is introduced, memorialized and expanded upon in a beautifully illustrated book by UC Santa Cruz Professor Emeritus James Clifford (History of Consciousness)⁶.

The Church memo and the Twiss study were influential in the abandonment of the open grassland meadows designated for development in the initial 1963 LRDP. Notably, all subsequent LRDPs subscribed to this basic principal, namely confining campus development for the forested areas of the site, and maintaining the open grasslands as an ecological and aesthetic resource.

Upon joining the UC Santa Cruz faculty in 1971, I soon found myself involved in physical planning issues, initially with planning and design of the Long Marine Laboratory proposed for Terrace Point. Noted Bay Area architect Joseph Esherick, who had designed Stevenson College in 1966, had been selected to design the proposed marine lab. Esherick and I soon became professional colleagues, he as my mentor. Our ongoing association at UC Santa Cruz covered nearly a quarter of a century, beginning with the design of the Long Marine Lab, Esherick's subsequent design of the Science Library, Colleges 9 and 10, as well as responsibility for site planning for the proposed UCSC Research and Development Center (1987). Moreover, Esherick served as Executive Architect for UCSC for many years; his many contributions are apparent throughout his 30-year association with the campus.⁷

⁴ "Natural Resources Study for the Santa Cruz Campus of the University of California", prepared for the Office of Physical Planning and Construction, Robert Twiss, 1966.

⁵ The initial Campus LRDP, issued in 1963, set forth an extensive development pattern that covered most of the open grasslands. Several studies immediately followed, challenged this development pattern and recommending a pattern that concentrated development in the forested areas and that protected the open meadows.

⁶ "In The Ecotone: The UC Santa Cruz Campus, James Clifford, 2012.

⁷ Esherick's major role is well documented in an oral history publication: "Growth and Stewardship: Frank Zwart's Four Decades at UC Santa Cruz", prepared and edited by Irene Reti, 2012.

My direct role in the Long Marine Laboratory consisted of preparation of the DEIR for the proposed project, as well as the subsequent Final EIR which led to the successful approval of the project. Notably, the EIR on Long Marine Laboratory was the first environmental document prepared for the entire University of California, since it was the first university project to fall under the provisions of the California Environmental Quality Act of 1971 (CEQA).⁸ My pioneering work in environmental impact assessment methodology at UC Berkeley provided me with a new area of professional expertise which was brought to bear in this initial project.

As such, I am intimately familiar with the guiding planning and design philosophy held by the campus founders, most notably Chancellor McHenry and the key planning and design professionals – Landscape Architect Thomas Church, Landscape Professor Robert Twiss, and Architect Joseph Esherick. Moreover, I continued to be directly engaged in the planning, design, and development of the campus for 25 years until my retirement in 1995.

Through this longstanding familiarity with campus planning and development, I can categorically state that the proposed Student Housing West project is completely at odds with the founding and sustaining vision of the UCSC campus. The founders noted above would all have vigorously opposed this ill-conceived project, as would the entire complement of on-campus planning and design professionals with whom I worked over my long association with the campus.

The balance of this comment letter set forth the reasons for my personal opposition to the proposed project. I limit my comments to four areas:

1. Compatibility with Campus Visual Character,
2. Architectural Character of the Proposed Project,
3. Aesthetic Impacts and Mitigation Measures, and
4. Alternatives to the Proposed Project.

C. Notes and Comments on The Proposed Project

1. Compatibility With Campus Visual Character

Visual Character

The DEIR summarizes the Visual Character of the campus as follows (*Vol 1, page 4.1-2*)

The visual character of the campus varies widely depending on which portion of the campus is in the viewer's viewshed. Grassland landscapes dominate the views in the lower portions of the campus, with large meadows rising from the main entrances. These meadows then transition to

⁸ The "action forcing mechanism" of this landmark legislation was the requirement of preparation of an Environmental Impact Report (CEQA) for California project or an Environmental Impact Statement (NEPA) for Federal projects.

primarily second growth forest in the central and upper portions of the campus; therefore the views of the central and upper campus are dominated by dense forest landscapes. Deep forested ravines run north-south through central and lower campus. The bulk of campus buildings and colleges are located in the forested central campus: most structures in this area are not visible from the lower campus because they are located in forested areas and screened by trees. Buildings have deliberately been designed not to extend above trees. By contrast, the lower campus is largely open space, dominated by the Great Meadow, East Meadow, and the large meadow to the west of Empire Grade Road (UCSC 2006).

Pepper Comments

As set forth in the introductory section of this letter, since the time of the founding of UC Santa Cruz, maintaining the quality of the magnificent Campus Landscape has been a central objective of campus planning and development. There is a considerable body of literature, including professional studies and reports, photographic collections, handbooks, and campus documents attesting to the centrality of this landscape to the core identity of the campus. For example, consider this statement from the 2005-2020 LRDP:

The site selected for the new campus was a 2,000-acre portion of the historic Cowell Ranch overlooking Santa Cruz and the Monterey Bay. Expansive meadows at the campus's main entrance gradually transition to the rugged redwood forests of the Santa Cruz mountains, providing an incomparable natural setting. Often called the most spectacular university site in the world, the campus landscape has played a vital role in shaping UCSC's physical and academic development. (Final Draft 2005-2020 LRDP, page 4)

Virtually all of the environmental professionals involved in the early planning and development of the campus – architects, planners, landscape architects – concurred that the campus landscape was an asset of great value, including, but not limited to Landscape Architect Thomas Church, Ecologist Stanley Cain, Environmental Planning Robert Twiss, Photographer Ansel Adams, Architect Joseph Esherick. And once the initial LRDP was revised to eliminate development from the grasslands, campus planning and development has generally respected this understanding that campus visual character matters greatly, and that maintaining the fullest extent of open grasslands is central to this visual character.

During my tenure on the campus, development proposals were generally very attentive to maintaining this foundational objective of maintaining the essential quality of the campus landscape. Notably, this required careful site selection, sensitive site planning, and high quality architecture sensitive to the specifics of each site. Further, each proposed project was attentive to its role in maintaining the overall “sense of place” that makes UC Santa Cruz unique within the many campuses which makeup our country’s institutions of higher education: this “crown jewel” of university campuses. As such, each new element must respect the whole of the campus landscape, not simply the boundaries of its particular site or building envelope. The proposed Student Housing West Project clearly violates this key principal of campus physical planning, creating a dramatic incompatibility with the visual character of the campus.

Why is this open grassland so important in the structure of the campus landscape, of the essential and unique campus character? Most university campuses are wholly consumed by buildings, as are most cities and towns. Many of the world's great cities have created a natural refuge from the urban pattern, such a Central Park in New York City and Golden Gate Park in San Francisco. Thus the campus meadows provide a refuge – organic, physical, visual, psychological, and indeed metaphysical, from the demands of academic life, just as the great city parks serve their human populations. Here at UC Santa Cruz, these open spaces also provide a powerful contrast with the densely enclosed canopy of the redwood forest landscapes, and thus have an important liberating, indeed calming effect on the mind. The dense, darker redwood forest can be rather gloomy, and these open meadows provide an important contact with the sky. This effect is even more accentuated by the presence of Monterey Bay and the Pacific Ocean as the backdrop.

The meadows also provide a remnant reminder of the Cowell Ranch, thus connecting us back to the early history of the settlement period; equally important, they provide a wholly different habitat for a variety of wild species, providing the campus with a diverse natural landscape setting, highly unusual for a major university.

In sum, the Hager element of the proposed project would destroy an essential quality of the primary campus entrance and campus landscape, namely the Hager/Coolidge Meadow which extends from the east campus core to the southern boundary of the campus. The Heller element would destroy the landscape and architectural scale of the west entrance landscape. Neither element of the proposed project should be approved.

2. Architectural Character of Proposed Project

Project and Building Design

The DEIR describes the Project and Building Design as follows:

Heller Site (DEIR, page 3.0-10)

The Heller site housing has been designed to address the housing needs of the campus while remaining within the area currently occupied by the FSH complex in order to minimize impacts to the habitat that surrounds the site. The project layout and design has been developed keeping in mind the surrounding landscape, other buildings on campus, the vision of the Student Housing West Design Guidelines, 2005 LDRP, and UC Santa Cruz Design Framework.

To minimize visual impacts and respect the human scale, the site plan has been developed so that the taller buildings would be located in the western and northern portions of the site, away from Heller Drive and adjacent to the redwood forest edge, whereas the buildings in the southern and eastern portions of the site would be shorter, and more compatible with other campus development across Heller Drive from the project site.

The tall modern-style buildings would have flat roofs to permit the installation of rooftop solar panel systems. Some buildings would have glass door entryways and expansive windows looking into the indoor common areas. The proposed exterior material palette would employ variations in material, texture, and color to create a variegated exterior envelope and provide the necessary articulation to reduce the visual scale of the project. Exterior plaster would be utilized for many of the exterior surfaces. The plaster would be juxtaposed with other surfaces having more color and texture, such as metal siding painted in a range of colors, colored cement board, cast in place concrete, and acetylated wood panels. At the tallest buildings for undergraduates along the south site's forest edge, verticality would be accentuated by full height slots for glazing to recall the character of the tall trees beyond. Vertically oriented metal siding in variegated forest colors would also lend to the verticality, while articulated sun shades at the upper floors would suggest a forest canopy and provide scale to the top of the buildings.

The two graduate student housing buildings on the lower part of the site would be clad in plaster and painted metal siding to contrast with adjacent buildings clad in plaster. These two buildings would be joined by an open-air bridge at each level. The bridges are envisioned as painted steel clad in a wood lattice, to provide security and act as an articulated wood element.

Hagar Site (DEIR, page 3.0-20)

The Hagar site housing has been designed to provide the needed housing without developing the site densely and keeping buildings low profile in order to minimize visual impacts. The project layout and design has been developed keeping in mind the development's prominent location, surrounding landscape, and UC Santa Cruz Design Framework.

The two-story townhouses would be of modern design, which emphasizes functionality, simplicity, and efficiency. For sustainability and assist in meeting triple net zero (water, energy and waste) performance goals of the project, the buildings would have flat roofs for installation of photovoltaic panels, solar thermal and rainwater harvesting. The proposed exterior material palette would employ variations in material, texture, and color to create a variegated exterior envelope and provide the necessary articulation to reduce the visual scale of the project. Exterior surfaces would include cementitious walls combined with a secondary system of vertical wood panels or planks, referencing the neighboring barns. Decks, stairs and canopies would be made of metal or metal framing with high performance coatings, both for durability in the coastal marine condition and for an expressive quality appropriate to the semi-rural site.

Pepper Comments

Ironically, neither of the two elements of the proposed project has apparently been subjected to the rigors of a carefully formulated, detailed site plan or buildings designed by professional architectural firms of appropriate distinction. Rather the entire analysis in the DEIR appears to be based on schematic drawings prepared by unknown entities, intended only for the purposes of building area and massing, and, no doubt generalized cost estimating.

Given the locations and high visibility of these elements, it is inconceivable that UCSC would propose a "project" that is still in such a schematic phase, wholly lacking the levels of detail necessary to evaluate a development of this scale and sites of this significance. The attention to building materials in the absence of an actual design suggests a very superficial effort to convince the public that building design will be aesthetically appealing.

The “tall, modern-style” 7-10 story buildings proposed for the Heller Site hardly “minimize visual impacts and respect the human scale” as claimed by the DEIR authors, particularly since they are only 500+ feet from the three-story buildings of Rachel Carson College, and 600+ feet from three-story Porter College buildings.

Two clusters of “modern” two-story prefabricated townhouses, emphasizing “functionality, simplicity, and efficiency”, particularly at the main entry to the central campus is antithetical to the outstanding natural beauty and critically acclaimed architecture of UCSC. The emphasis of functionality, simplicity, and efficiency suggests “Lego-Land” not UC Santa Cruz. I am also concerned about the rationale for buildings constructed of “prefabricated building components ... constructed out of state”; this seems like an unnecessary, damaging, radical departure from UC Santa Cruz architectural excellence. Moreover, the term “modern-style” adds confusion to the description. Modern architecture emerged in the first half of the last century, and became dominant after World War II. Modern is not a singular “style”, but rather a group of styles as reflected in the current architectural expressions found on the US Santa Cruz Campus. The visual simulations discussed below hardly instill confidence that the architectural character of the proposed project will meet the standards embodied in the existing campus buildings.

In sum, based on the information provided in the DEIR, the architectural character of the proposed project falls far short of the standards set by and for the UCSC campus. No amount of rhetoric can disguise the fact that the architectural character of the two elements of the proposed project are wholly inappropriate for the campus as well as their respective sites.

3. Aesthetic Impacts and Mitigation Measures

Visual Simulations

See DEIR text and series of Visual Simulations as shown in Figures 4.1-1 through 4.1-11:

Heller Site

In summary, Heller site development would adversely affect scenic vistas as viewed from the Porter College knoll and Empire Grade near the West Entrance, and the Hagar site development would affect scenic vistas as viewed from the intersection of Hagar and Glenn Coolidge Drives. No mitigation is available to address the project’s impact on scenic vistas from the Porter College knoll because the Heller site is constrained and the proposed buildings cannot be reoriented to provide view corridors through the site of the ocean to the south and east. Similarly no mitigation is available to address the impact to the view from Empire Grade Road near the West Entrance. Mitigation for the impact on scenic vistas from the Hagar and Glenn Coolidge Drive intersection is not feasible because the project is already sited and designed to be as low as possible in its vertical profile.

Mitigation Measures: No mitigation is feasible.

Significance after Mitigation: The impact on scenic vistas would be significant and unavoidable.

SHW Impact AES-2: Implementation of the proposed project would substantially damage scenic resources. (*Significant; Significant and Unavoidable*)

Hagar Site

There are no officially designated state scenic highways in the vicinity of the Hagar site. However, the Hagar site is a part of the East Meadow, which is considered a scenic resource by UC Santa Cruz. Consistent with LRDP Mitigation AES-3B, the proposed development at the Hagar site has been clustered and designed to minimize the impact on the East Meadow. Nonetheless, while the vast majority of the East Meadow would remain unaffected by development, the development of the proposed FSH complex would significantly alter the southern portion of the Meadow. This impact is significant.

Mitigation Measures: No project-level mitigation measures are available to minimize the impact on scenic resources from the development of the proposed project.

Significance after Mitigation: The impact on scenic resources from Hagar site development would be significant and unavoidable.

SWH Impact AES-3: Implementation of the proposed project would substantially degrade the visual character or quality of the Hagar site. (*Potentially Significant ;Significant and Unavoidable*)

Pepper Comments

Consider first this statement from the 1963 memorandum from Landscape Architect Thomas Church:

Among all the natural features which make the site both provocative and difficult, it is the size of the redwood groves which must concern us the most. These towers of trees are “out-scale” and related to the rugged knolls and deep ravines than they are to an academic landscape. They are, therefore, to be thought of less as trees to enhance, screen and shelter buildings (although this they do), but more as great vertical elements of the topography having form, mass and density against which to compose the architecture.

Clearly the 7-9 story residence halls proposed for the Heller Site violate this basic tenant of Church’s memo, as they tower over the adjacent redwood groves. This is particularly objectionable since this destroys the scale of the built and natural environment defining the west entrance to the campus, a significant adverse aesthetic impact.

While I generally concur with the findings of this important section of the DEIR, I must note that the Visual Simulations warrant comment. First and foremost, the simulations of the Heller Site fail to incorporate an adequate field of view, focusing too narrowly on the new facilities to the exclusion of adjacent elements of the built environment. For example, Figures 4.1-2 and 4.1-3, and Figures 4.1.4 and 4/1-5, fail to incorporate any Rachel Carson College buildings, some 500 feet to the east. As such, the dramatic scale difference between these two developments is not adequately illustrated. This contrast in scale would surely lead to the conclusion that more

than aesthetics is involved – the Heller Site project would simply dwarf and overpower Rachel Carson College, significantly diminishing the quality of the academic and residential setting of the college. Note that even the 9-story UC Berkeley Dorms located on Channing Avenue near the Telegraph Avenue business district in central Berkeley are significantly out of scale with the residential and commercial neighborhood to the south and east.

Similarly, Porter College would no longer enjoy an unencumbered connection to Monterey Bay or the larger landscape to the west of Empire Grade, diminishing its relationship to the larger landscape.

The Hagar Site simulations are too limited. An additional viewpoint or two taken from Cowell and Stevenson Colleges would have also been instructive, illustrating the relationship of the Hagar Site development to the sweeping views across the lower portions of the campus, notably the East Meadow with Monterey Bay and the Pacific Ocean backdrop. In this case, night lighting of the Hagar Site Development would constitute a significant change in the sense of place for these east colleges.

4. Alternatives to the Proposed Project

I note with some relief that Alternative 4: Heller Site and North Remote Development may solve the issues identified above. I strongly urge the selection of this alternative:

Alternative 4: Heller Site and North Remote Development Alternative

Under this alternative, the Heller site would be redeveloped to provide 148 apartments for students with families, about 200 beds for graduate students, and about 1,150 undergraduate student beds. An expanded childcare facility would also be constructed. About 1,500 undergraduate beds would be provided in apartment buildings constructed on the North Remote site, such that, similar to the proposed project, this alternative would provide a total of 3,000 beds. The Hagar site would not be used for the proposed housing. (DEIR, page 2.0-7)

Pepper Comment

Again a background comment. As noted in the background section, in 1985 I directed the preparation of a DEIR on the Proposed UC Santa Cruz Research and Development Center⁹ (R&D Center). At that time, Graham Bice¹⁰, a former student at UC Santa Cruz was working as staff in the Office of Physical Planning and Construction, and served as the primary staff on the project. Architect Chuck Davis, one of the principals at Esherick, Holmsey, Dodge and Davis, directed the site planning effort.

⁹ Environmental Impact Assessment on the proposed Research and Development Center, University of California, Santa Cruz : UC Santa Cruz Environmental Assessment Group, May 1985.

¹⁰ Bice subsequently served in several professional positions within OPPC, culminating his appointment as Director of Physical and Environmental Planning - University of California Monterey Bay Education Science and Technology Center, from which retired in 2017.

The R&D Center was proposed by the campus administration, led by Chancellor Robert Sinsheimer. The proposed project consisted of laboratory and office buildings, which would employ faculty, graduate students, and off-site employees, while also expanding the research capacity of the UCSC faculty, primarily in the hard sciences, but also a component from the social sciences.¹¹

The proposed R&D Center site was located in the vicinity of sites identified as “College and Student Housing”, and “Employee Housing” in the current LRDP.¹² Although the site was contained wholly within the UCSC campus, a portion of the site was located in the San Lorenzo River watershed upstream from the City of Santa Cruz domestic water supply intake.

The proposed Research and Development Center would require the use, transport, and disposal of both toxic and radioactive materials, an issue that proved to be the Achilles Heel of this proposal. The impacts of this issue were deemed significant with no acceptable mitigation measures. Growing opposition from on campus as well as from the City of Santa Cruz led to abandonment of the project.

The proposed Student Housing West project does not involve the use or disposal of toxic/radioactive waste, thus removing a “significant adverse impact” that crippled a previous development proposal for this site. I thus urge the UCSC Office of Physical Planning and Construction, along with the Campus Administration, to conduct the appropriate detailed environmental analyses for Alternative 4 and correspondingly to prepare the requisite Draft Environmental Impact Report for public review and comment.

Pepper Comment – Add Alternative 5: Scattered Site Housing for Undergraduate Students

In addition I propose another alternative, one that could be used in combination with Alternative 4. This alternative would approach campus-wide growth that was more consistent with the campus vision, and that likely prove more sustainable, would be to distribute modest increments of growth at all, or at least most existing colleges. At an overall campus average of 32.5 students per floor¹³, the 2652 additional undergraduate student beds would require 81.6 floors of residence hall space, 8 floors per college, or an average of two new four-story buildings per college. Since the colleges would naturally vary considerably in terms of additional site capacity, some colleges might accommodate three new buildings, others only

¹¹ Although many science faculty supported the proposal, there was substantial opposition from faculty in the humanities and social sciences.

¹² See DEIR figure 4.8-1, LRDP Land Use Designations

¹³ The residence halls (often referred to as dorms or dormitories), include both shared and private rooms; they typically house 15 to 50 students per floor and have common bathrooms. (based on data from UC Santa Cruz Housing: <https://housing.ucsc.edu/residence-hall/index.html>)

one. This alternative would clearly be more costly in terms of initial investment, but might prove far more efficient and cost effective over time, as well as reinforcing rather than conflicting with the basic academic and social benefits of the UC Santa Cruz College System.

Pepper Summary Comment

Let me conclude with a note of caution regarding the scope and rate of growth envisioned in the SHW proposal. The highly regarded, classic childrens' book "The Lorax"¹⁴ might be consulted as a warning to the impulse to grow ever bigger and faster at the expense of the environment. Perhaps "bigger" is not the only avenue for UC Santa Cruz growth. Of particular concern is the cluster of five building mid-rise residential housing complex proposed for the Heller Site. The proposal to add 2652 undergraduate beds is a dramatic increase in total units, representing a 30% increase in total beds over a four-year period.¹⁵ Moreover, concentrating 2652 undergraduate beds in an area roughly equivalent to the Kresge College residential area represents an astronomical increase in residential density. If the campus has not already done so, I urge you to investigate the social and psychological effects and costs associated with undergraduate residential housing at such densities. Obviously this type of project is antithetical to the residential college concept set forth at UC Santa Cruz.

Thank you for the opportunity to comment.

Very truly yours,

James E Pepper

James E. Pepper, Professor Emeritus
Board of Environmental Studies
University of California at Santa Cruz
Santa Cruz, CA 95064

Cc: George R. Blumenthal, Chancellor
Traci Ferdolage, Associate Vice Chancellor, PPDO
Felix Ang, Campus Architect
Interim Campus Planner, Jolie Kerns
James Clifford, Professor Emeritus, History of Consciousness

¹⁴ The Lorax is a 1971 widely acclaimed children's book written by Theodor Seuss Geisel (Dr. Seuss). The fable chronicles the attempt of the Lorax, a delightful mythical character who "speaks for the trees", as he confronts the plight of an [environment](#) under attack from the forces of greed ("biggering and biggering and biggering") which are naturally "biggering" their money. The book subsequently became controversial in some quarters as a result of its perceived attack on corporate greed.

¹⁵ Data from Student Housing Market Study, Report prepared for University of California, Santa Cruz, Brailsford & Dunlavey, 2014.