

Matthew Waxman
Porter College Councilor - UCSC Alumni Council
UC Santa Cruz 2006 | Harvard GSD 2012
waxman.matt@gmail.com

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Re: Comments on Draft Environmental Impact Report (Draft EIR) for UC Santa Cruz's "Student Housing West" project Hagar and Heller Sites.

To Whom It May Concern,

I respect and acknowledge the need for housing at UCSC and within the city of Santa Cruz. The Student Housing West (SHW) project attempts to address this with the addition of approximately 3,000 beds to be added on campus. The housing is meant to address both an existing housing shortage, as well as accommodate additional enrollment growth. What is at issue with the SHW project is not that it aims to address housing in rote. Instead what is a problem is that the process has been deeply flawed and opaque, and the resulting project has a flawed approach to site selection and design. This must necessitate UCSC to evaluate alternatives for site selection and design.

A major problem is UCSC never did an actual study of the whole campus to vet alternative scenarios in advance, which is what would have been expected for a project of this scale. With respect to the project represented in the Draft EIR, the CEQA process is about analyzing a project that has already been decided upon. In our case, this process was not synchronized with implicit planning assumptions about the UCSC campus -- campus planning norms that have historically been front and center, shaping the values and legacy of the campus as a remarkable environment with a unique student experience characterized by the intimacy and educational role of colleges -- and thus the Draft EIR is in the most basic sense corrupted. These planning assumptions have been expressed within the planning and design direction of prior LRDPs and other planning documents. Yet even more, these planning assumptions have been carried out through implicit ways of working, historically cultivated as values in the office of the Campus Architect and Campus Planning office, the University's Design Advisory Board, and past upper Administrations. This was a culture of campus norms.

The problem in our case is that as a whole, the process has been overly opaque, and with an outside developer, P3 financial contracts, and a timeline designed to be expedited, there have been decisions made to not properly articulate those campus planning norms, and therefore not sufficient study the campus pre site-selection. While there was a 2015 West Campus Housing study, there was a massive rift between its bed quantity assumptions (it capped out at about 1,000 beds), financial assumptions, and sensitive, transparent process of study, and the Student Housing West process which has operated out of view and at a scale three times the size but on a smaller land area.

What's more, the SHW process has systematically been shaped to disempower and dismantle the legacy values of the College system. Prior planning at UCSC has been clear about reflecting a mutual benefit of academics, social experience, and residential life -- a synergistic, intersectional approach to the life of a University. This idea has been in-line with the norms and planning goals and principles of the UCSC 2010 Design Framework, the 2005 LRDP, the 1988 LRDP, and all prior long range planning documentation. SHW's focus on unaffiliated housing instead of College housing -- with no study process putting all types of housing, college or otherwise, on the table -- emphasizes a siloed approach to understanding the

campus, and a bias toward pre-rationalized outcomes. It is a travesty and just plain silly that a wider array of options and ideas, sites and methods, have not been acknowledged as offering something. It is also of concern that SHW may significantly counter the valuable benefit for students that exists when academics, student resources, social and public spaces, and housing, are planned in dialogue with one another. It is not sufficient to simply place retail and commercial spaces, privatized wellness, and study spaces into SHW as “amenities”. A holistic conception of design is missing -- one that can only be achieved with a planning process that acknowledges the varied aspects of the campus as a whole, and studies as many avenues as possible. Furthermore, the fact that the 2020 LRDP process has been intentionally divorced from the SHW process, even though they proceed concurrently, is evidence of this problematic approach to planning being used.

Thus, we have an EIR that has two sites -- 'Heller' on the west, and 'Hagar' on the east -- violating things fundamental for alumni and those who have been around UCSC's campus for many decades.

The landscape architect Thomas D. Church, instrumental in the design of UCSC -- it was his idea to weave a large campus meant to feel small into the natural fabric -- summarized his thoughts about the campus site in the memo "Random Notes on the Site" from 1962. In it, he writes:

"Instead of remaking the land, the land must remake our standard conceptions of building and plaza and parking lot.

"The past is not without monumental examples of man having built with a full realization of the grandeur of his site and a knowledge of how to build to enhance or glorify it as well as meet a specific program. The pyramids, the Greek temples, medieval castles, Tibetan monasteries and gothic spires attest to this.

Reverse examples are also plentiful. If the Victor Emanuel Monument is too obvious, consider the man who dared to plunge the Campanile into the Piazza San Marco. Contrast the serenity of the domed cyclotron in the Berkeley hills to some of the more recent buildings being erected there. Look what happened to the Golden Triangle in Pittsburg -- one of the most talked of sites in the country ten years ago. How could anyone have crowded Wright's Museum into a block of dull buildings when light and air and trees were just across the street? The University of Mexico may be controversial but courage was not lacking."

This is a remarkable passage that resonates with the campus as it has been, and the norms and practices of campus planning for UCSC in the past. Contextual responsiveness is not about superficially making something that looks like a site or continues aesthetically what's there; rather it is making something beautiful that stands out *in the way* it fits in. But SHW, at Heller and Hagar sites, as planned and designed, does not adhere to the advice of Thomas D. Church. Instead SHW simply stands out *because it does not* fit in.

The SHW project takes a conventional approach, one of "standard conceptions", to on-campus University housing being used by developers at this scale for P3 projects at other universities. They are using a conventional approach that will be "remaking the land" but that does not, so says Church, allow the land to "remake our standard conceptions of building and plaza and parking lot."

What follows are two sections. The first evaluates and contrasts the Developer Proposal with a range of Alternatives. The second illustrates Views that must be studied in the EIR for the Heller and Hagar sites.

I. THE DEVELOPER PROPOSAL VERSUS ALTERNATIVES

The East Meadow Hagar site: it is not necessary to build there in order for the University to advance its housing goals because there are practical alternative sites, such as either moving family student housing on to the Heller site or combined to other sites such as the North Remote above the Trailer Park or the East Campus Infill site (articulated further below). I am concerned the construction will set a precedent that it is ok to build in the meadows. There needs to be thoughtful planning that honors values about place and identity. It would be a travesty to set such a precedent. Building there will damage the aesthetic quality of the campus gateway for future generations of students. One thing that is lost in the larger conversation of campus growth is the question of quality of education. I believe in educational access and adapting things to make education accessible. Yet the students of today and tomorrow deserve a high quality education and campus experience that is on par with the one delivered to students in the past. I do not agree with the notion that more students means quality must be compromised.

The East Meadow site is also very poorly utilized in the developer proposal. On page 54 of the Draft EIR it notes the Heller site is 13 acres, whereas the Hagar site is 15 acres. In terms of a very generic concept of land area efficiency, we are looking at a 13 acre site with 2,875 beds, but a 15 acre site with 148 beds. I do not believe the East Meadow should be built out, either in dense or low density, but rather the site strategy for the East Meadow site in SHW is ultra-low density and is a poor approach to site planning and University resources.

Additionally, on page 17 of Draft EIR, it notes the East Meadow Hagar site will hold "approximately 148 student beds..." within "...approximately 37 two-story pre-fabricated townhomes." Compare this with page 54 of Draft EIR, which acknowledges the Heller site is built on top of, and is replacing, the existing FSH. The existing FSH "complex includes 199 two-bedroom townhomes in 42 two- and three-story apartment buildings." Therefore the campus is losing 51 family student beds with the SHW project. Where are these missing FSH beds going? If students with families argue the only way they will have a place to live is if UCSC builds the East Meadow Hagar site, then something doesn't make sense when in the end there will be even fewer FSH beds. Answering scarcity with even more scarcity doesn't make any sense.

With respect to the west-campus Heller site: the project is completely out of scale with the campus as a whole. 10 story buildings that create Walls, holding 2,875 students, is absurdly dense and insensitive to the landscape and the lives of the students who would live there. And like the East Meadow site, it is just not necessary to pack all 2,875 students there in order to meet the University housing goals. In fact, within the Draft EIR, the alternatives show that the Heller site could hold about 1,500 beds while other sites could take on the other 1,500. Additional sites would be the North Remote Site above the Trailer Park, and the East Campus Infill site on and around the parking lot of Crown/Merrill Apartments (articulated further below). Both of these alternate sites are mentioned in the Draft EIR -- the former as a realistic and viable alternative, and the latter oddly dismissed even though it is the most practical and approved by the campus and regents in 2009. These two other sites utilized intelligently, the Heller site could be half as dense, the buildings less tall, and their scale more appropriate to the rest of the campus. Additionally, by breaking up the Heller site among other viable sites, it would allow the combination of the sites and their buildings to not overshadow so grossly the colleges and their social and academic roles.

And while I would not advocate for it, it is documented in the Draft EIR that an additional viable alternative could be to put the entire project, including the Family Student Housing, all on the Heller Site completely, making it unnecessary to build on the East Meadow anyway. The only caveat in such an instance is that

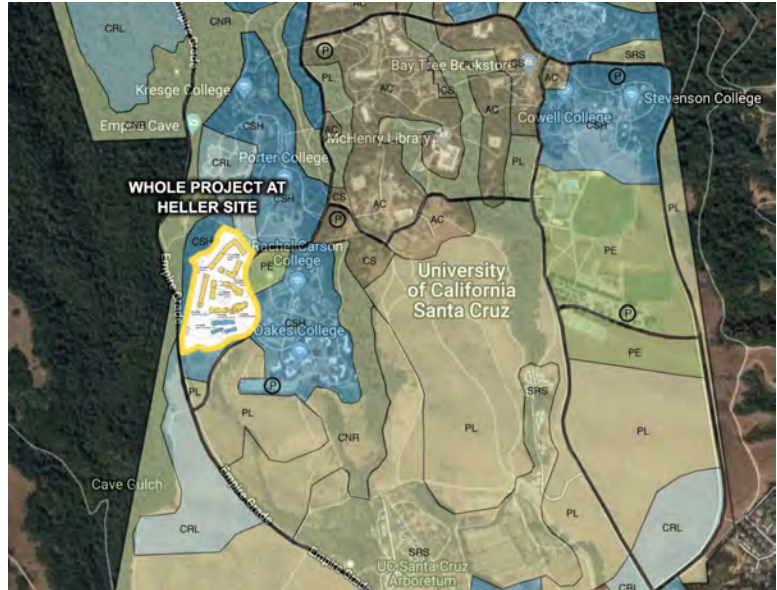
for a partial duration of the construction schedule, UCSC would have to find temporary housing for a portion of the current family student housing residents, either on or off campus. This could be achieved with trailers or temporary hotel accommodations such as how the University Inn was used, or other creative strategies that can be studied.

What are these alternatives, and how would they work?

A. Draft EIR Alternative #3: Whole Project at Heller Site

Heller Site: Alternate #3 in Draft EIR, pp 21, 518-523. All 3,000 apartment beds on one site. Does not decrease negative impact of this site. 2,675 for upper-division undergraduates, 200 for graduate students, 148 for students with families -- are satisfied. Buildings up to 9 stories tall. Includes private-provider childcare center, parking, wastewater treatment plant.

Occupies already developed site. Close to academic core. Require temporary re-location of some of the existing family student housing and childcare facilities to another location during construction.

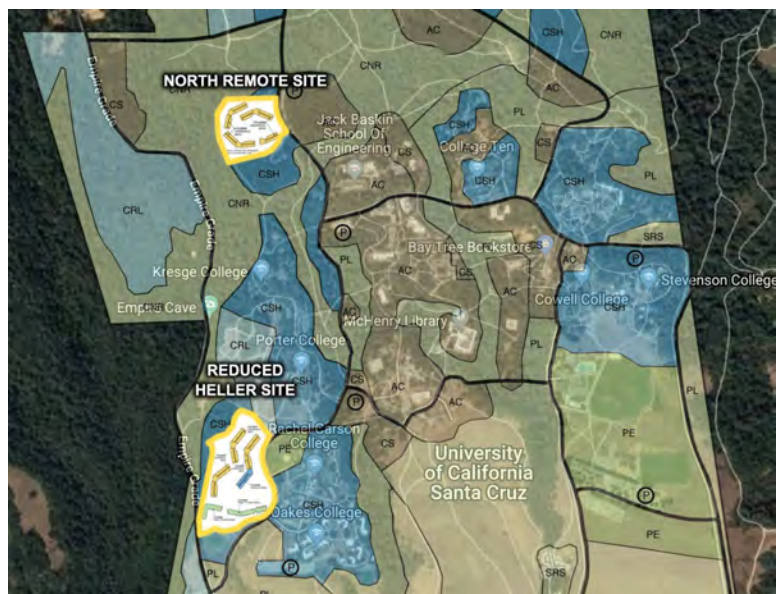


B. Draft EIR Alternative #4: Reduced Heller Site + North Remote

North Remote Site: Alternate #4 in Draft EIR, pp 22, 523-533 1,500 upper-division undergrad beds. All housing close to academic core. Buildings up to 6 stories tall. North site includes parking, retail space, convenience store, fitness center, support, social and student service space, wastewater treatment plant.

A dining hall would also benefit in the North Remote Site, better allowing that community to grow as an identifiable place for years to come.

The location also serves well the potential additions of future academic and student life service facilities to the immediately adjacent east area designated in the



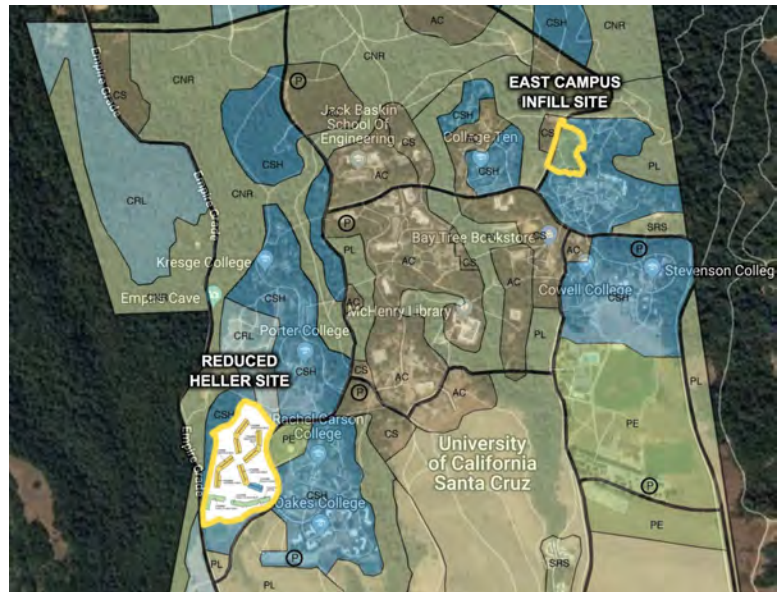
2005 LRDP as Academic Core, as well as infill within the residential community to create one to two future colleges. Furthermore, according to the plans in the Draft EIR, there is enough space within the land designated for Colleges and Housing in the 2005 LRDP to locate half the desired bed count above the Trailer Park, thus respecting that beloved community and preserving it.

Reduced Heller Site: Holds 1,150 upper-division undergrad beds, 200 graduate beds, 148 family student housing beds. Close to academic core. Buildings up to 6 stories tall. Site includes parking, retail space, convenience store, fitness center, support, social and student service space.

C. Combination Draft EIR Alternative #2 Reduced Heller Site + East Campus Infill

East Campus Infill: This solution is dismissed in the Draft EIR, but should be considered as a viable alternative given its realistic and practical applicability and strengths.

Approved in 2009 by UCSC and UC Regents for apartments, but was cancelled due to financial and market concerns at the time. Project had 600 apartment beds. Uses an already developed site that's part of the Crown-Merrill apartments community, and close to academic core.



This is a rational site in terms of enabling the new housing community to benefit from a close proximity to both colleges and to existing apartment-style, on-campus but independent living environment of the Crown-Merrill Apartments.

Reduced Heller Site: Alternate #2 in Draft EIR pp 20, 511-518. Holds 1,752 upper-division undergrad beds, 200 graduate beds, and 148 family student housing beds. All housing close to academic core. Buildings up to 6 stories tall. Site includes parking, retail space, convenience store, fitness center, support, social and student service space.

D. Combination Draft EIR Alternative #2 Reduced Heller Site and the 2300 Delaware Site

2300 Delaware: This is not a site analyzed within the Draft EIR, but is a site that should be included. Under 2008 agreement with city, UCSC can build up to 340 beds off-campus -- this would be nearly all the



designated Family Student Housing beds and graduate beds. Thus if that agreement is kept, then there can be 230 beds at the 2300 Delaware site. 2300 Delaware site is level, already owned by the University, already with utilities, and near the Marine Sciences campus. Short shuttle services up Western Ave to academic core would need to be provided.

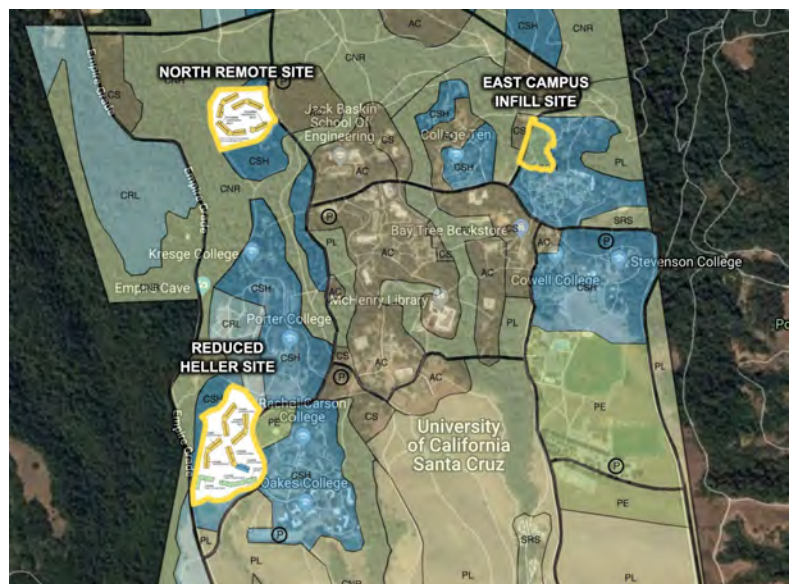
Reduced Heller Site: Similar to Alternate #2 in Draft EIR pp 20, 511-518 but holding only the 2,675 upper-division undergrad, as the rest would be located at 2300 Delaware. Close to academic core. Buildings up to 6 stories tall. Site includes parking, retail space, convenience store, fitness center, support, social and student service space.

E. Combination of Reduced Heller Site and Both North Remote Site and East Campus Infill Site.

North Remote Site and the East Campus Infill Site: 1,500 upper-division undergrad beds would be divided between these two Alternate sites. All housing close to academic core. Buildings up to 6 stories tall. North site includes parking, retail space, convenience store, fitness center, support, social and student service space, wastewater treatment plant.

A dining hall would also benefit in the North Remote Site, better allowing that community to grow as an identifiable place for years to come.

The location also serves well the potential additions of future academic and student life service facilities to the immediately adjacent east area designated in the 2005 LRDP as Academic Core, as well as infill within the residential community to create one to two future colleges.



It is also relevant to acknowledge this site was studied in the 1970s for the original site of College 8. The proposal at that time was a design by architect Edward Larabee Barnes.

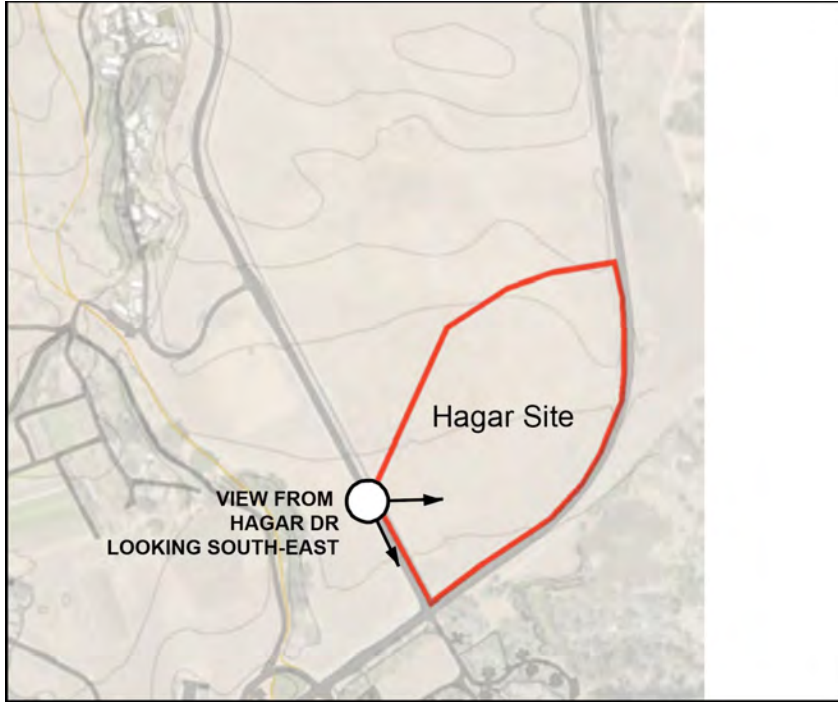
Reduced Heller Site: Could be similar to Alternate #2 in Draft EIR pp 20, 511-518 but with approximately 1,500 upper-division undergrad beds, graduate beds, and family student housing beds. All housing close to academic core. Buildings up to 6 stories tall. Site includes parking, retail space, convenience store, fitness center, support, social and student service space.

II. AESTHETIC VIEWS THAT NEED TO BE EXAMINED AND INCLUDED IN THE EIR

Listed below -- with illustrative drawings -- are views that I request the EIR study and provide visual analysis through perspective site images. Show the aesthetic impact to views from the following **5** Hagar locations and **3** Heller locations.

Hagar View Study 1.

Please show view from Hagar Drive looking south east. See point indicated in drawing.



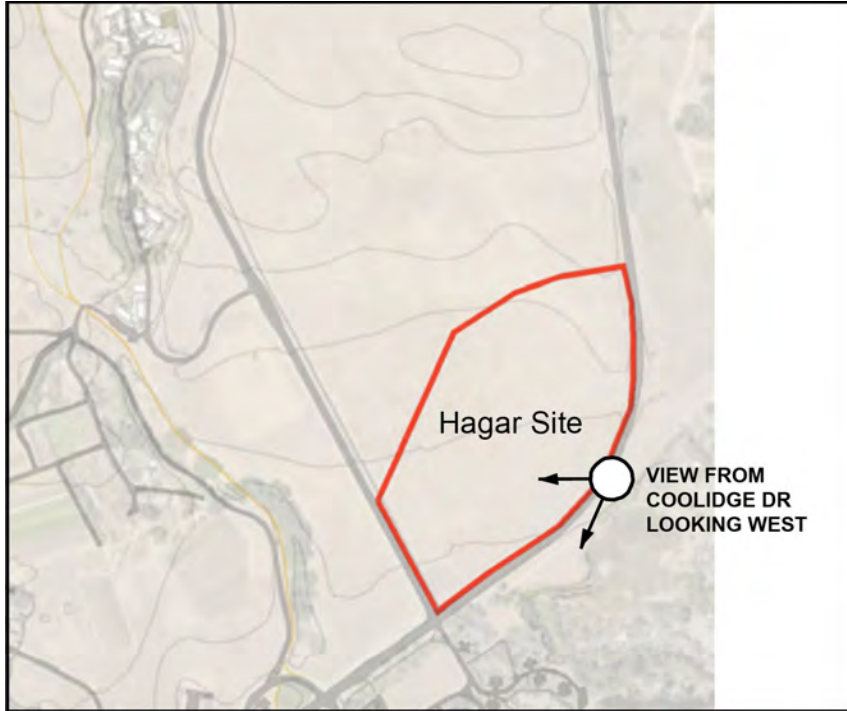
Hagar View Study 2.

Please show view from Coolidge Drive looking south. See point indicated in drawing.



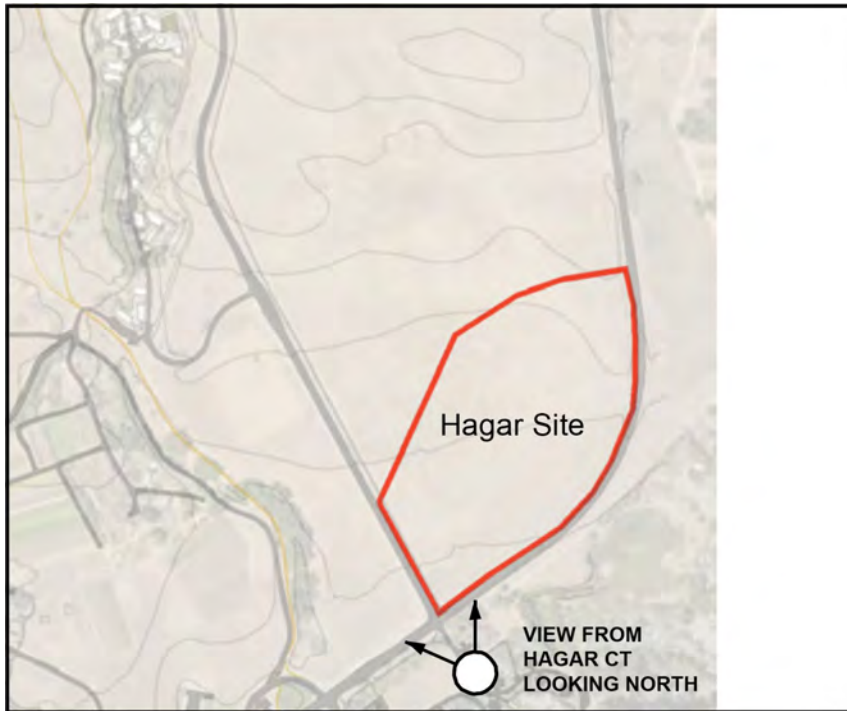
Hagar View Study 3.

Please show view from Coolidge Drive looking west. See point indicated in drawing.



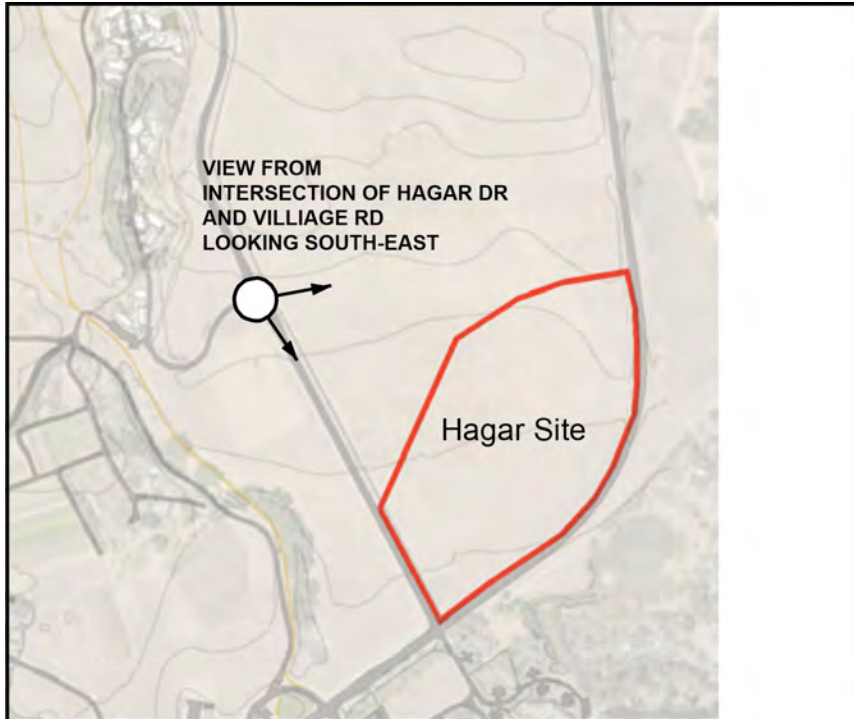
Hagar View Study 4.

Please show view from Hagar Court looking north. See point indicated in drawing.



Hagar View Study 5.

Please show view from Intersection of Hagar Dr & Village Rd. See point indicated in drawing.



Heller View Study 1.

Please show view from the field below Heller Site, looking north-east. See point indicated in drawing.



Heller View Study 2.

Please show view from Heller Rd looking south-west. See point indicated in drawing.



Heller View Study 3.

Please show view from middle point of Porter Meadow. See point indicated in drawing.

