

# Campaign for Sustainable Transportation

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## Comments on the Draft EIR for UCSC's 2021 Long Range Development Plan

The Campaign for Sustainable Transportation, organized in 2002, advocates for policies that reduce auto dependency in order to improve the sustainability and social equity of our community. The 2021 Long Range Development Plan would allow growth in student enrollment and number of employees that would result in significant increases in auto travel. Accordingly, our organization is concerned that the Draft EIR does not accurately analyze a reasonable range of alternatives to the LRDP that would result in lower environmental impact. We advocate that the EIR formulate legally binding mitigations of significant impacts such that enrollment growth envisioned by the LRDP is contingent on fulfillment of those mitigations. We propose that UCSC fulfill prior commitments to provide adequate classroom space and infrastructure for the current level of students as a condition for increasing enrollment.

### **Population and Housing**

#### **P&H 1. The Draft EIR's analysis of housing demand impact should account for the economic multiplier effect**

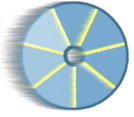
According to the *Systemwide Economic and Social Impact Analysis (2021)* commissioned by the University of California, "every one job directly supported by General Campuses supports an additional 0.5 indirect and induced jobs". The EIR needs to analyze the effect on the housing market of the job-generating impact of adding new staff and students at UCSC.

#### **P&H 2. The Draft EIR's analysis of displacement is inadequate**

The Draft EIR acknowledges "the project would result in a potentially significant impact on population and housing if it would...displace substantial numbers of people." However, the Draft EIR denies that displacement will occur as a result of implementing the LRDP and does not further evaluate displacement:

"No housing would be permanently removed through implementation of the 2021 LRDP, nor would there be any actions that would displace substantial numbers of existing people."

The Draft EIR's narrow definition of displacement (removing housing) misses the substantial displacement of economically stressed households that will occur with the increased housing demand due to increased population of students, staff and job-holders in induced jobs. The US Dept. of Housing and Urban Development explains, "Displacement can happen in many ways:



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direct displacement, in which residents are forced to move out because of rent increases, building rehabilitation, or a combination of both...”<sup>1</sup>

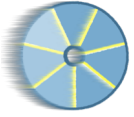
CEQA case law maintains that the statutory goals of the EIR process are thwarted when the failure to include relevant information precludes informed decision-making and informed public participation. The EIR needs to present adequate information on the housing crisis in the Santa Cruz area. The following claim in the Draft EIR suggests that adequate analysis of the housing crisis in Santa Cruz has not been conducted:

“Existing data on vacancy rates, as well as planned development nearby, suggest that housing is generally available or planned to be available within the county and city of Santa Cruz to accommodate the additional students, faculty/staff, and non-UC employees for whom on campus housing would not be accommodated.”

The Draft EIR does not describe the vacancy rates or provide references. Nor does it analyze factors that might influence vacancy rates other than housing supply.

The EIR needs to more thoroughly analyze *the impact of additional demand from UCSC population growth on existing residents as well as new residents*. The following are some resources to begin to analyze that question.

- According to the *Out of Reach Report (2019)*<sup>2</sup>, Santa Cruz is the least affordable small city in the US.
- According to reports from Apartment List over the last seven years, an average 60% of renter households in Santa Cruz County are cost-burdened (spending over 30% of household income on housing).
- *No Place Like Home*, a research project of UCSC Professors Miriam Greenberg and Steve McKay, indicates that the rent burden is even worse for households in proximity to UCSC: 73% for the Westside; 68% for Downtown; and 76% for Beach Flats/Lower Ocean.
- State legislation capping rent increases of 5% plus inflation will not prevent displacement. In the four years ending in December 2020, the consumer price index for the San Francisco Bay Area has risen on average between 2%-3%. At a 7% annual increase, the rent of a unit will double in ten years. Few households will experience a doubling of income. Some households will decide to relocate out of the area. Other households will double up in overcrowded units. HUD reports, “Overcrowding is associated with a range of negative outcomes, including for physical and mental health; personal safety and well-being; and childhood growth, development and education.”
- For years many UCSC students have coped with unaffordable housing by living in their cars or camping in the woods. Students from low-income households are especially stressed in trying to meet the cost of housing on campus and off campus. The EIR needs to analyze the affordability of on campus housing for low-income students.
- Chapple, et al, [Developing a New Methodology for Analyzing Potential Displacement](#)



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In summary, the EIR needs to analyze the extent to which area housing is unaffordable to large sectors of the community, including UCSC students, and how increased demand resulting from the 2021 LRDP may affect the housing market.

## **P&H 3. The EIR Needs to Formulate an Enforceable Mitigation for the LRDP's Impact on Housing Demand**

The Draft EIR concludes that:

“The total on-campus population increase accommodated by the 2021 LRDP may directly or indirectly induce substantial housing demand in the region. This impact would be significant.”

However, the Draft EIR fails to propose a mitigation of this significant impact:

“No feasible mitigation measures are available to reduce the anticipated impact.... Lesser development and/or lesser enrollment could reduce the potential impacts associated with population growth but would not achieve the anticipated necessary level of development consistent with UC and UC Santa Cruz policy direction.”

In formulating a mitigation for the impact of housing demand, the EIR should take into account the principles developed by the Community Advisory Group that the University convened to meet with the Chancellor and take input into development of the LRDP. The first principle (published in the Draft 2021 LRDP) called for “a binding commitment to housing 100 percent of net new on-campus student enrollment.” While the LRDP articulates a goal of housing 100 percent of new students, the LRDP makes no legally binding commitment to meet the goal. Nor is there a mitigation in the Draft EIR that would bind the University to the goal. Without mitigations requiring the University to provide the housing that is proposed or tying enrollment growth to the provision of housing, the analysis of the impacts and mitigation measures proposed are inadequate under CEQA.

Similarly, the LRDP intends to “increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus.” That is not a binding commitment to provide the housing, only a vague goal to “allow up to” 25 percent of new staff to be housed. The goal is further weakened by the contingency, “based on demand”.

The Draft EIR is deficient because it solely analyzes environmental impacts as if the goals for housing students and staff will be met. The assumption of meeting housing goals cannot be substantiated by the terms of the LRDP or any mitigation in the Draft EIR. Nor does the history of performance on past LRDP goals suggest that the housing goals of the 2021 LRDP will be met. The 1988 LRDP set a goal of housing 70% of undergraduate students, 50% of graduate students,



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and 25% of faculty and staff. Actual performance never approached that goal. For decades, the actual percentage of students housed on campus has hovered around 50%. According to the Draft EIR, there are currently enough beds on campus to house 50% of the student population (9283 student beds; 18,518 student population (2018-19 baseline). There are 270 on-campus housing units for a faculty and staff population of 2800.

There are formidable structural obstacles to meeting the goal of housing 100% of new students and 25% of new staff. The principle obstacle is the cost of housing on campus. With a dorm room shared by three students costing above \$4000/month (over \$1333/mo. per student), students are motivated to find cheaper (but still expensive) housing off campus.

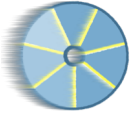
The DEIR does not describe how providing housing that would be more affordable to students can be accomplished. To the contrary, it fails to include or analyze extensive existing data and information from both the Campus Community Rentals Office and the April 2018 Student Housing Demand Report associated with the proposed Student Housing West Project (SHW) that demonstrate just the opposite: that the University's student housing is not affordable to a large sector of students or competitive with off campus housing.

According to the Campus Community Rentals Office data, average student rental rates are between \$500-\$1,000 per month (as of 2017), less than half of campus rates. On February 7, 2020, during the last pre-pandemic academic quarter, City On A Hill Press reported that according to the University's Associate Director of Colleges, Housing and Educational Services, there were 711 vacant beds on campus, while at the same time there were over 9,000 students living off campus. Proposed rents for SHW units show an increasing disparity between campus and off campus rates. For examples: 2 Bedroom/1 Bath unit with four students, no kitchen, \$5,580/month; 2 Bedroom/2 Baths, four students, small kitchenette, \$5,880/month; 5 Bedroom/2 Bath, 6 students, \$10,020/month. Without including or analyzing this essential data, the DEIR fails to accurately describe or analyze housing demand and impacts.

Without a credible plan to provide affordable housing, it can be assumed that meeting the housing goal is infeasible. In the absence of an enforceable means of achieving housing targets, the EIR would need to analyze the impacts of the more likely scenario in which the housing goals of the LRDP are not met. However, since it is feasible to mitigate the housing impacts of expansion by limiting enrollment growth, we propose the following mitigation:

*Each incremental step in campus enrollment growth shall be contingent on UCSC actually housing 100% of new students and 25% of new faculty and staff.*

## **P&H 4. The EIR Needs to Further Mitigate the Impact on Housing Demand**



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The Draft EIR concludes that there may be a significant impact on housing demand even though it makes the speculative assumption that 100% of new students and up to 25% of new staff will be housed on campus. If a commitment to house 100% of new students and 25% of new staff were made legally binding, this would not alter the Draft EIR's conclusion that a significant impact on housing demand remains. Hence there is a need for additional mitigation.

Given the housing crisis in Santa Cruz, we propose an additional mitigation that would require 100% of new students and new faculty and staff to be housed in UCSC facilities. This mitigation would be enforced by a freeze on enrollment growth whenever new student and staff actually housed on campus falls beneath 100%.

Based on the multiplier effect of additional job creation, we conclude that a significant impact on housing demand is likely to exist after implementing this proposed mitigation. To prevent this and other significant and unavoidable impacts, we advocate that the EIR name the No Project Alternative as the preferred alternative. See below.

## Alternatives

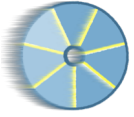
### **Alts 1. The Draft EIR Fails to Substantiate that the Alternatives Examined Will Not Meet Project Objectives**

The Draft EIR examines a No Project Alternative in which enrollment would not grow beyond the 19,500 student cap set by the Comprehensive Settlement Agreement (2008). The concept of no new growth was approved by 77% of Santa Cruz City voters approving Measure U in 2018, which read: "There shall be no additional enrollment growth at UCSC beyond the 19,500 students allowed by the current 2005 LRDP."

The Draft EIR concludes that the No Project Alternative "would potentially meet" project objectives 2, 4, 5, and 7, and does not meet project objectives 1, 3, 6, 8, 9, and 10. Below we list in italics the project objectives that the Draft EIR considers unmet by the No Project Alternative, followed by our critique in regular type.

- 1. Expand campus facilities and infrastructure to allow for projected increases in student enrollment through 2040 based on statewide public educational needs and to support the academic mission, including housing for 100 percent of the additional FTE students (above the 2005 LRDP total of 19,500 FTE students) in both colleges and student housing developments, and commensurate academic and support space.*

CEQA law prohibits the formulation of project objectives that are so specific as to disqualify alternatives that could meet the goals of the project. Expanded enrollment at UCSC is not the only strategy available to accommodate projected increases in statewide student enrollment. Other strategies that would meet statewide enrollment goals include:



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- Expansion of the UC Merced campus beyond the 15,000 enrollment in 2030 anticipated by its 2020 LRDP. There is a large amount of land under UC ownership for this purpose.
- Establishment of a new campus. The University of California has established only one new campus since 1965, UC Merced, which was approved by the Regents in 1995.
- Increasing enrollment at satellite campuses
- Increasing the ability of students to spend a quarter or more taking online courses.

2. *Potentially met*

3. *Provide for establishment of two new college pairs at the main residential campus to provide academic services and a close-knit intellectual and social environment.*

CEQA law prohibits the formulation of project objectives that are so specific as to bias the alternatives analysis in favor of the project. Objective 3 is so specific as to unnecessarily disqualify otherwise worthy alternatives.

4. *Potentially met*

5. *Potentially met*

6. *Increase on-campus housing opportunities for faculty and staff at the main residential campus and the Westside Research Park, to allow up to 25 percent of the increase in faculty and staff, based on demand, to be housed on campus.*

A No Project Alternative should be formulated so as to allow more housing for faculty and staff on campus.

7. *Potentially met*

8. *Develop an improved, more efficient roadway network to support transit with peripheral parking and mobility hubs.*

This project objective is solely formulated for the purpose of supporting the proposed growth envisioned by the LRDP. The LRDP's proposed additions to the roadway network and additional parking facilities are unnecessary if the campus enrollment does not grow. Therefore an alternative should not be disqualified on the basis that it does not allow more growth in parking and streets.

9. *Promote Transportation Demand Management (TDM) and provide infrastructure to optimize trip- and vehicle-miles-travelled-reduction benefits and efficiency of transit, bike, and pedestrian access to, from, and within the campus to reduce the use of single-occupancy vehicles.*

A No Project Alternative should be formulated so as to allow more TDM programs.

10. *Foster long-term physical and social resilience, including a response to climate change through climate resiliency and adaptation strategies and integrating sustainability leadership into campus teaching, learning, research, design, and operations.*



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A No Project Alternative should be formulated so as to foster long-term physical and social resilience, etc.

In summarizing this list, the Draft EIR fails to substantiate that statewide enrollment goals cannot be met through a variety of strategies. The LRDP fails to formulate a No Project Alternative that would allow housing a higher percentage of staff on campus; measures to reduce vehicle miles traveled; and measures to improve physical and social resilience. The LRDP formulates objectives that are so specific as to unnecessarily bias the analysis towards rejection of viable alternatives.

The Draft EIR further elaborates why the No Project Alternative does not meet project objectives:

The transportation improvements described in Chapter 2, “Project Description,” would not be implemented within the LRDP area, which would impede UC Santa Cruz from providing a close-knit intellectual and social environment and improving means of active and alternative transportation within the campus.

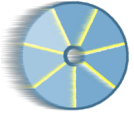
The Draft does not explain how *not adding* new roads, parking, and transit stops to the campus would impede UCSC from providing a “close-knit intellectual and social environment”. Nor does it explain how the proposed additional transportation infrastructure will improve means of active and alternative transportation. Without credible explanations, these grounds for dismissal of the No Project Alternative are unpersuasive.

The Draft further explains why the No Project Alternative does not meet project objectives:

Additionally, because this alternative would provide a lesser amount of new academic/administrative space, it would limit the ability for UC Santa Cruz to continue to create a dynamic environment for learning and discovery through the provision of new academic programs and disciplines.

While it is reasonable to conclude that more academic/administrative space would increase the breadth of programs and disciplines, the Draft EIR does not explain why those programs should not be made available at a new campus or satellite campuses. The EIR makes an unexamined assumption that larger size and more programs equate to a more “dynamic environment for learning and discovery”. The EIR offers no research or analysis of the relationship between the size of enrollment and the quality of education.

The EIR needs to take into account the research on alienation associated with large institutions. UCSC’s founding Chancellor Dean McHenry wanted UCSC to be a major research university, yet his vision for the small colleges was to encourage intimacy.



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## **Alts 2. The Draft EIR is invalid under CEQA since the decision on assigning enrollment growth among campuses in the UC System has not been subject to environmental review.**

It is not legal under CEQA to segment a project so that the cumulative impacts of the total project are not subject to environmental review. The prior UC decision allocating statewide enrollment growth among the UC campuses means that UCSC's 2021 LRDP is a segment of a larger master plan.

The Draft EIR asserts that the No Project Alternative does not meet the UC system's goal of enrollment growth to serve California students:

Student enrollment would be limited to 19,500 FTE students approved under the 2005 LRDP, which would be considered counter to the overarching goal of the UC to provide a dynamic learning environment for residents of California...

Because the 2005 LRDP does not reflect the current planning goals of UC Santa Cruz or the State of California's public education plans and policies, this alternative would not provide the best framework for growth and development within the LRDP area.

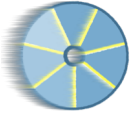
The Draft EIR's assumption is that the University of California's decision to allocate a portion of system-wide enrollment growth to UCSC is indisputable and beyond the scope of the EIR. This sidesteps the CEQA requirement to examine a full range of reasonable alternatives to the dramatic growth in population proposed for the Santa Cruz campus. If UC's policy for distributing enrollment growth had been subject to an environmental impact report, the UCSC's 2021 LRDP would be tiered from that EIR. Since no EIR exists for the UC System's enrollment plan, the EIR for UCSC's 2021 LRDP is not compliant with CEQA.

## **Alts 3. An Environmental Impact Report on enrollment growth in the UC system is needed**

The assumption that the UC system needs to increase enrollment needs to be reconciled with the latest [projections for high school graduation rates](#) conducted by the Western Interstate Commission for Higher Education. California's high school graduation rates are expected to peak in 2024 followed by a steady decline. By 2026 the number of high school graduates will be lower than the number who graduated in 2019. (See the graph below taken from the report.)

The EIR on UC's enrollment plan should account for this decline in high school graduation rates. It should also explain UC policy on admitting out-of-state and foreign students and the impact of that policy on growth projections.





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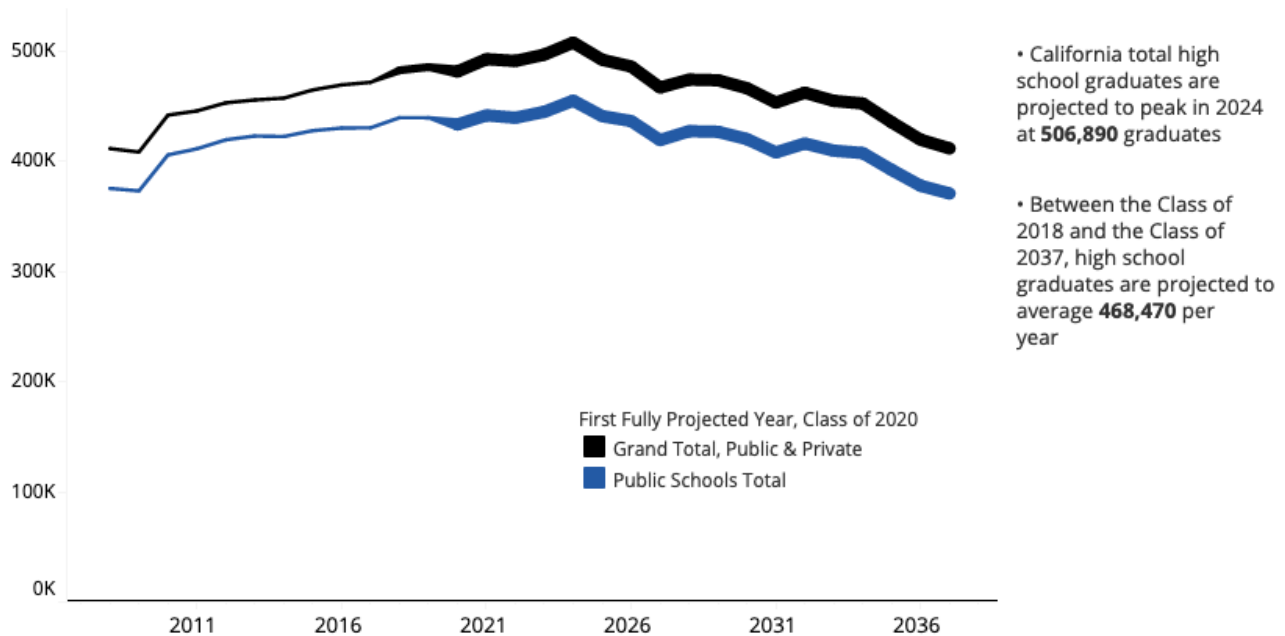
## High School Graduates Profile for

California



Projected values are displayed as either thicker or darker in the profile charts. See the notes for more details.

### Total & Public High School Graduates, Class of 2008 to 2037



#### **Alts 4. The Draft EIR Lacks a Reasonable Range of Alternatives**

The Draft EIR names the No Project Alternative as the environmentally superior alternative. All impacts that the EIR considers significant and unavoidable for the 2021 LRDP would be rendered less than significant in the No Project Alternative. The Draft EIR considers three alternatives besides the No Project Alternative. None of those three alternatives have been designed to eliminate the water, housing demand, and other impacts that the EIR names as significant and unavoidable. The EIR should correct this deficiency and formulate alternatives that significantly reduce or eliminate those impacts.

Among the alternatives considered, but dismissed from further consideration is an expansion of UC's MBEST facility at Fort Ord. The reasons for dismissing this option are not substantiated. The Draft EIR states:

The development of a full university campus at MBEST and the addition of another UC campus to the UC system is not considered feasible at this time, given State fiscal constraints.



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CEQA case law requires that an EIR must provide substantial evidence why it is not fiscally feasible to pursue an alternative. In this case, this evidence must reconcile this claim of fiscal infeasibility of a new campus or expanding the MBEST campus with the fiscal feasibility of building an additional 5.6 million square feet of building space on the UCSC campus, which is 1.5 times the amount of new building space as currently exists on campus.

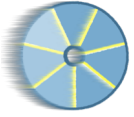
## Transportation

### **Trans 0. The Draft EIR's choice of VMT per capita as a performance standard is not consistent with state and UC goals for greenhouse gas emissions reduction**

California has set a goal of reducing greenhouse gas emissions 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 (SB 32 and AB 32). While lead agencies are given leeway in choice of performance standards for a project's transportation impacts, the Draft EIR's choice of vehicle miles traveled per capita serve to mask large increases in total greenhouse gas emissions that will result from the project. The EIR should plainly state the estimated total increase in vehicle miles traveled and greenhouse gas emissions resulting from the project. Failure to do so prevents the public from understanding the large amount of ghg emissions that contribute to a cumulatively significant climate change impact.

The California Air Resources Board's 2017 Scoping Plan states, "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." The Scoping Plan does not require net zero emissions. However, it places the burden on a project that does not achieve net zero emissions to "develop evidence-based numeric thresholds (mass emissions, per capita, or per service population) consistent with this Scoping Plan, the State's long-term GHG goals, and climate change science." The Draft EIR fails to meet this requirement. There is no evidence that the per capita emissions targets will result in reduced ghg emissions commensurate with state goals as legislated in SB 32. The EIR must be able to prove that the choice of per capita emissions does not mislead the public that this project will not create a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

The University of California has signed the American College and University Presidents Climate Commitment (ACUPCC). Each signatory commits to completing an inventory of GHG emissions within one year, and to developing, within two years, an institutional plan to achieve carbon neutrality as soon as possible. This EIR should incorporate UCSC's plan for carbon neutrality. It should be noted that even if all projects in the State of California adopted a goal of carbon neutrality, we would fall short of the SB 32 goal of reducing ghg's 40% by 2030. Nevertheless, a carbon neutrality goal for UCSC transportation is an achievable and worthy goal. We therefore propose that an achievable mitigation most aligned with state and UC goals would be: *Achieve net*



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*zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.*

## **Trans 1. The Draft EIR fails to analyze the vehicle miles traveled impact of new roads on campus**

CEQA requires that agencies must analyze:

- Direct, indirect and cumulative effects of the transportation project (CEQA Guidelines, § 15064, subds. (d), (h))
- Near-term and long-term effects of the transportation project (CEQA Guidelines, §§ 15063, subd. (a)(1), 15126.2, subd. (a))
- The transportation project's consistency with state greenhouse gas reduction goals (Pub. Resources Code, § 21099)34

The Draft EIR describes the plan for additional roads on campus, including a new northern entrance to campus. The Draft EIR fails to analyze the increased Vehicle Miles Traveled that would result from the additional roadways. This would require a traffic study. The Draft EIR should use current methods of estimating induced travel resulting from new roadway mileage.

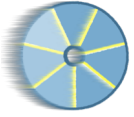
## **Trans 2. The Draft EIR fails to analyze the impact on the transit system of new roads on campus**

CEQA requires an analysis of the impact of the transportation project on the development of multimodal transportation networks (Pub. Resources Code, § 21099)

The Draft EIR does not analyze the potential for a negative impact on the bus transit system of adding roads to campus, which would necessitate additional loops in transit service. Transit planners understand how adding a forking branch to a bus line diminishes transit frequency downstream of the branch (as bus service is split between branches). This has an adverse impact on travel time and ridership. See *Human Transit*, by Jarrett Walker

Instead, the Draft EIR makes the claim that the new roadway system and transit stops will increase the efficiency of the transit system. The EIR should either drop this claim, or substantiate it by demonstrating how transit service will operate.

## **Trans 3. The target for reduced vehicle miles traveled is inconsistent with goals of the Campus Sustainability Plan**



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The Draft EIR claims that Mitigation Measure 3.16-2 “is in alignment with the goals outlined in the UC Santa Cruz 2017-22 Campus Sustainability Plan, including reducing commute VMT by five percent and reducing per capita parking demand by ten percent by 2022.”

This statement is not accurate. This mitigation measure intends to “reduce the total campus VMT per capita to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average.” Reducing VMT *per capita* is not the same as reducing total commute vehicle miles traveled.

Goal #3 of the *Campus Sustainability Plan 2019 Update* calls for “reducing Scope 3 commuter greenhouse gas emissions 10 percent by 2022. The Draft EIR does not address this goal. Nor will it be possible to achieve this goal with the implementation of the 2021 LRDP, which will result in increased commuter trips to campus.

## **Trans 4. Mitigation Measure 3.16-2 needs to be made enforceable regarding parking goals.**

Mitigation Measure 3.16-2 includes, “Establish ‘no net new commuter parking’”. The EIR should further define net new commuter parking or how it would be measured. It should also articulate consequences should the goal not be met, such as a moratorium on enrollment growth.

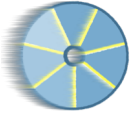
## **Trans 5. New parking planned in the 2021 LRDP is inconsistent with Mitigation Measure 3.16-2 and the UC Sustainable Practice Policy**

The LRDP’s proposal “to provide some new commuter parking for staff, faculty and students,” runs counter to the goal of no net new parking demand. You cannot simultaneously provide more parking and reduce parking demand. A [recent study by Adam Millard Ball et al](#) demonstrates that the provision of parking induces additional vehicle ownership, and results in more driving.

The *University of California Sustainable Practices Policy* states:

Each location shall develop a business-case analysis for any proposed parking structures serving University affiliates or visitors to campus to document how a capital investment in parking aligns with each campus’ Climate Action Plans and/or sustainable transportation policies.

The Draft EIR does not explain how the capital investment in parking aligns with the *Campus Sustainability Plan* or other campus sustainable transportation policy.



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## **Trans 5.1 The Draft EIR does not incorporate the goals of the UC Sustainable Practices Policy**, which states:

- Each location shall strive to reduce its percentage of employees and students commuting by single occupancy vehicle (SOV) by 10 percent relative to its 2015 SOV commute rate and have at least 4.5 percent of commuter vehicles be ZEVs by 2025.
- Each location shall strive to have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV and have at least 30 percent of commuter vehicles be ZEVs by 2050.

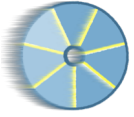
The Draft EIR should explain how these goals will be implemented, and what the consequences will be for failing to reach the goals.

## **Trans 6. The Draft EIR lacks essential information about parking and commute trips to campus**

The Draft EIR acknowledges the importance of parking policy to achieve goals for reducing VMT. Yet the neither the LRDP nor the Draft EIR specifies the number of additional parking spaces proposed.

The Draft EIR presents the number of vehicle trips to campus for one year, spring 2019. The Draft should include information about prior years in order to observe the trend of vehicle trips to campus. The graph below shows the history of trips to campus (blue bars) compared to student enrollment (red bars). It shows that vehicle trips increased to a peak in 2003-2006, and subsequently declined until 2013. Since 2013, vehicle trips to campus are growing at a faster rate than student enrollment.

The EIR should analyze whether this disproportionate growth in vehicle trips results from longer student and staff commutes as a result of the lack of affordable housing near campus. The EIR should present any other information available on the distance commuters are traveling.

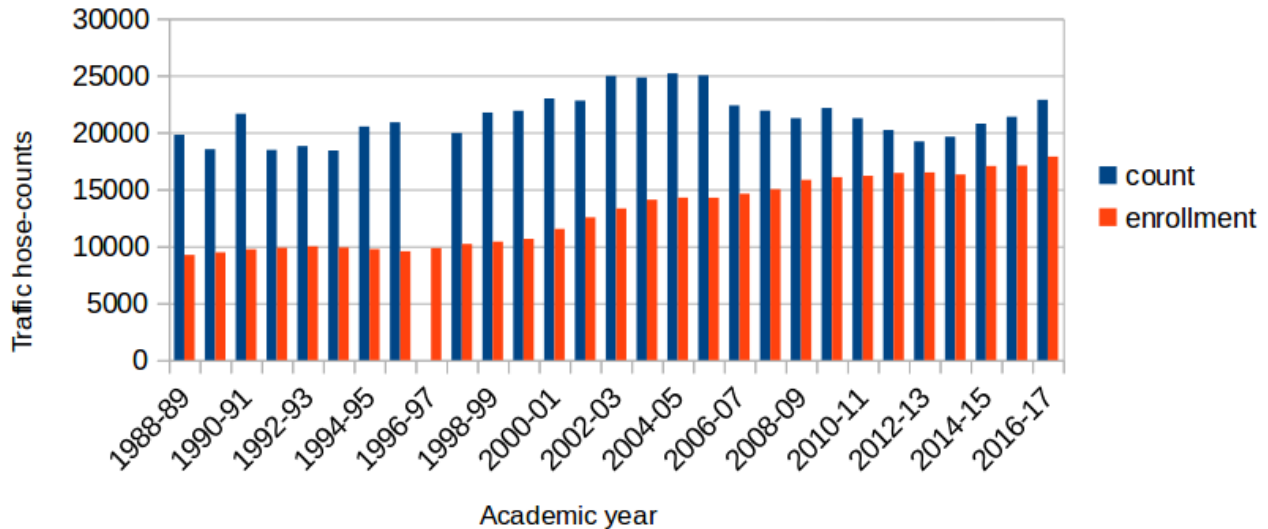


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## Term Weekday Vehicle Traffic through Both UCSC Entrances: Academic Year Ave

Larry Pageler, UCSC TAPS Created: October 27, 2017



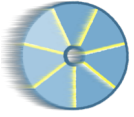
### Trans 7. Mitigation Measure 3.16-2 fails to be legally binding and enforceable

CEQA Guidelines require that mitigations be legally binding and fully enforceable.

This mitigation measure is intended to reduce the impact of increased vehicle miles traveled (VMT) to a less than significant level. It calls for implementation of a Transportation Demand Management Program, intended to reduce total campus per capita vehicle miles traveled to 15 percent below baseline campus average and the total employment VMT per employee to 15 percent below the countywide average. As currently drafted, the mitigation measure imposes no consequence for failing to achieve the performance standards for reduced VMT, other than the following:

“an outline of additional TDM measures (i.e., a corrective action plan) to be implemented in subsequent years should the VMT performance standard of at least 15 percent below baseline VMT levels is not reached.”

Note that there is no timeline for implementation of corrective measures other than the vague “in subsequent years”. Without language to make this mitigation measure enforceable, such as a moratorium on increases in student enrollment until the VMT performance standards are met, it is quite possible that the campus will never achieve the performance standards.



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## **Trans 8. Mitigation Measure 3.16-2 lacks simple and transparent performance criteria and a monitoring program that can be independently evaluated.**

The Draft EIR proposes a mitigation to reduce vehicle miles traveled and a monitoring program to report performance. However, the method for calculating VMT reductions is so highly complex as to be inaccessible for independent review. Likewise, the cell phone data necessary to make those calculations is inaccessible to the public. No agency or members of the public will be able to independently assess the University's adherence to their performance criteria. Consider the complexity of measuring performance described by the Draft EIR:

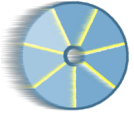
The VMT metrics presented in this chapter were developed using the SCC Travel Model, while the annual monitoring would occur using data collection. Based on current technologies, the campus' VMT performance could be most effectively monitored by using hose counts to measure the number of trips and anonymous cell phone data, which is "big data" that aggregates trip data using cellphones and navigation divides, to determine trip lengths. Since current technologies, including anonymous cell phone data, do not allow the tracking of employment trip lengths separately from the trip lengths generated by other campus uses (i.e., residential trips), the TDM Program shall develop a performance standard for the employment VMT threshold that is a weighted average of VMT generated by campus commuters and other campus users.

The Draft EIR gives no indication of how any agency or member of the public would be able to access anonymous cell phone data. And reliance on a travel model can result in gross inaccuracies, as the Draft acknowledges:

The Santa Cruz County Model overestimates by approximately 200 to 400% the number of trips generated by resident students and by both the resident and commuter faculty compared with the UCSC tool. The model also underestimates by 90% the trips generated by commuter students.

CEQA Guidelines allow the use of a travel model to estimate vehicle miles traveled from a project. And a lead agency "may revise those estimates to reflect professional judgment based on substantial evidence." The Draft EIR fails to provide substantial evidence that the revisions that were made in the model can accurately assess vehicle miles traveled in future years. No substantial evidence will be available for several years, since such a complex model is a work in progress, needing continual revision to match existing conditions. The Draft EIR lists revisions to the model that diverge extremely from the model's original assumptions, e.g.:

- The SCC Travel Model's commuter student trip rate was increased from 0.22 trips per commuting student to 1.83 trips per commuting student and the resident student trip rate was decreased from 6.31 trips per student to 2.06 trips per resident student
- Campus employees in the SCC Travel Model were estimated at 6.88 daily person trips per employee. This was reduced to 1.8 trips per employee.



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The DEIR transportation analysis assumes that 100% of additional students will be housed on campus, but does not offer any analysis of how VMT calculations, resultant impacts, and necessary mitigations will vary in relation to percentage of students actually housed on campus. Not reaching the goal of housing 100% of additional students on campus is a reasonably foreseeable event based on both the past history of campus student housing percentages and the relatively high price of campus housing.

Given the Draft EIR's a) failure to analyze impacts associated with actual percentages of students housed on campus; b) inability of the revisions in the model to be empirically evaluated at this time and c) the inability of the public to independently assess UCSC's compliance with vehicle miles traveled performance, this mitigation fails to be enforceable. We propose a mitigation where monitoring is simple and can be carried out by the City of Santa Cruz:

*Proposed Mitigation: Achieve net zero increase in vehicle trips to campus from the 2019 baseline. A failure to meet this goal would result in a freeze on enrollment.*

Capping the number of vehicle trips to campus would achieve the goal of reducing VMT per capita below significant levels, since growth in person-trips would not result in increased vehicle trips. We know it is feasible to prevent an increase in vehicle trips due to growth through the experience of Stanford University. In 2000, Santa Clara County conditioned Stanford growth on achieving zero new peak hour vehicle trips to campus. Since 2001, periodic traffic counts at each entrance to campus confirm that Stanford has complied with this condition. During the following 14 year period, 5000 additional people commuted to campus, but peak hour vehicle trips did not increase, according to the former Director of Stanford Parking and Transportation Services.

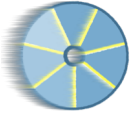
See the attached article *Getting to Zero New Vehicle Trips for the LRDP* for further discussion of how this mitigation could be implemented.

## **Trans 9. The EIR should analyze and recommend complete neighborhood strategies for trip reduction.**

Under the heading, *Complete Neighborhoods*, the City of Santa Cruz General Plan states, "Residents...need stores nearby so that they don't have to drive across town to do laundry or buy a few groceries." The Draft EIR assumes a high number of vehicle trips due to on-campus residents traveling off campus to meet their needs. The LRDP should designate areas for on-campus food shopping, hair salons, and other amenities.

## **Trans 10. The EIR should analyze the structural obstacles to implementing transit improvements and propose solutions**





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*Transit costs fall on students disproportionately compared to other campuses.* Stanford uses parking revenue to pay all public transit costs for students and staff. At UCLA there is no student fee for transportation. Instead, parking revenue subsidizes bus passes available to students at \$33 per quarter (2018). At UCSC there is no parking revenue used for student transit. Students pay for METRO passes and the campus shuttle through a quarterly fee.

*The cost burden on students sets a practical limit on expansion of bus service* Under the current manner of financing transit, UCSC students will need to vote a fee increase, just to maintain current levels of service. In Spring 2018 a fee increase measure did not pass due to student voter turnout lower than the required 25%. Due to the failure to raise revenue, UCSC has cut back on campus shuttle service. Given the steepness of the fee increases proposed in the 2018 measure, it is unlikely that a student vote to increase fees can be counted on to fund the expanded METRO service envisioned by the Draft EIR.

The EIR should analyze a policy of using parking revenue to substantially support transit and TDM programs.

## **Trans 11. Additional TDM measures for inclusion in the EIR**

The Draft EIR's Mitigation Measure 3.16-2 enumerates a number of Transportation Demand Management Measures that UCSC could utilize to reduce vehicle trips to campus. Based on research on the effectiveness of TDM policies, we conclude that the most effective measure on this list may be:

- Replace monthly/annual parking fee with “pay at exit” use-based, daily or other alternative, dynamic payment mechanisms and parking fee policies that encourage off-peak travel.

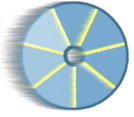
We note that this measure is listed for “Implementation level 2”. Since this is a policy that could be implemented immediately, we recommend that it be designated for level 1 implementation.

Additional TDM measures could include:

- UCSC collaboration with a private vendor for a bike-share and/or scooter/share program
- Collaboration with the City of Santa Cruz in placement of a fee for ride-share trips (e.g. Uber & Lyft)
- Exploration with the City of Santa Cruz of a congestion pricing program and/or City tax of on-campus parking to pay for transit and active transportation improvements in the City.

## **Greenhouse Gases**

As explained in section Trans 0, above, the choice of the per capita VMT at the s



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## Water

### **W1. Mitigation measure for water impact needs to be strengthened**

The City of Santa Cruz is heavily dependent on surface water sources and hence is vulnerable to drought year shortages. Storage of water for use in drought years is diminished by growth in water demand. The City's report, *Adequacy of Municipal Water Supplies to Support Development (2004)*, offers an explanation that is just as relevant today as when it was written:

“It is important to note that, even in normal water conditions, three of the four major sources [North Coast streams, San Lorenzo River, Live Oak wells, and Loch Lomond] are presently being utilized at maximum capacity for a significant portion of the year...What this means operationally is that any future increase in seasonal or annual demand for water will be felt through greater and greater withdrawals from Loch Lomond reservoir.”

The Draft EIR acknowledges this impact of growth on the City's water reliability:

“UC Santa Cruz's remaining water demand with implementation of the 2021 LRDP would contribute to the need for the City to further restrict water deliveries or secure a new water source for multiple dry water year conditions... The 2021 LRDP would therefore result in a significant impact.”

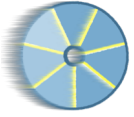
In order to reduce this impact, the Draft EIR proposes a mitigation that would reduce campus water use through various conservation measures. However, the impact remains significant after the mitigation.

The mitigation measure needs to be strengthened. For example, although the Draft EIR acknowledges that UCSC growth would contribute to the need for a new water source, the mitigation does not include a financial contribution towards developing a new water source. CEQA recognizes that fair-share mitigation fees can ameliorate impacts. When other new development occurs in the City's water service area, developers pay a system development charge. As part of previous LRDP's, UCSC has paid a system development fee to the City.

### **W2. UCSC should agree to seek LAFCO approval for water service outside of City service area**

The Draft EIR states,

“UC Santa Cruz does not believe that further compliance with state or local laws, including approval by the Local Agency Formation Commission (LAFCO), is required for the campus to receive increased service for the development of those portions of the campus that lie in unincorporated Santa Cruz County.”



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The EIR must go beyond describing what UC Santa Cruz “believes”, and offer an independent judgment about the legal responsibilities of the University. The EIR should acknowledge that under CEQA, LAFCO is the Responsible Agency for proposed expansion of utility service areas and clarify that UCSC must seek LAFCO approval for such expansion.

### **W3. Mitigations should comply with LAFCO policies**

The EIR should create a mitigation for the impact of extending water service outside of the City’s service area that complies with LAFCO’s policies including the following:

“In cases where a basin is overdrafted or existing services are not sustainable, a boundary change proposal may be approved if there will be a net decrease in impacts on water resources.”

Since the Draft EIR is deficient in many respects and fails to include import information to substantiate conclusions regarding impacts and mitigation measures, the University must correct these deficiencies and release a Revised DEIR for public comment.

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<sup>1</sup> HUD, *Displacement of Lower-Income Families in Urban Areas Report* (2018)

<sup>2</sup> National Low Income Housing Coalition, *Out of Reach Report* (2019)