

## 6.0 OTHER CEQA CONSIDERATIONS

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### 6.1 INTRODUCTION

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines states that an Environmental Impact Report (EIR) must include a discussion of the following three topics:

- Significant environmental effects which cannot be avoided if the proposed project is implemented;
- Significant irreversible environmental changes which would be involved in the proposed project should it be implemented; and
- Growth inducing effects of the proposed project.

In addition, Section 15128 of the State CEQA Guidelines requires a brief statement of the reasons that various possible effects of a project have been determined not to be significant and, therefore, are not evaluated in the EIR. The following sections address each of these types of impacts.

### 6.2 SIGNIFICANT AND UNAVOIDABLE EFFECTS

An EIR must identify significant impacts associated with implementation of the proposed project that could not be mitigated to a less than significant level. As part of the certification process, The Board of Regents of the University of California (The Regents) will make a final decision as to the significance of impacts and the feasibility of mitigation measures in this EIR. As detailed in **Chapter 4.0**, implementation of the proposed project would result in the following significant impacts that would not be mitigated to a less than significant level:

#### 6.2.1 Aesthetics

**SHW Impact AES-1: Implementation of the proposed project would have a substantial adverse effect on a scenic vista.**

**SHW Impact AES-2: Implementation of the proposed project would substantially damage scenic resources.**

**SWH Impact AES-3: Implementation of the proposed project would substantially degrade the visual character or quality of the Hagar site.**

## 6.2.2 Utilities and Service Systems

**SHW Impact UTIL-4:** The proposed project would increase the amount of water used on the project site, and would be adequately served by existing entitlements and water resources under normal water years but not under multiple dry year conditions.

**SHW Impact C-UTIL-1** The proposed project, in conjunction with other past, present and reasonably foreseeable future development, would result in a significant cumulative impact on utilities.

## 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Generally, a project would result in significant irreversible environmental changes if:

- the primary and secondary impacts would generally commit future generations to similar uses;
- the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy);
- the project would involve a large commitment of nonrenewable resources; or
- the project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Implementation of the proposed project would continue to commit the project sites to institutional uses, thereby ruling out other land uses on those sites during operation of the campus. The University's ownership of the campus represents a long-term commitment of the Santa Cruz campus lands to an institutional use. Restoration of the campus to pre-developed conditions is not feasible given the levels of disturbance and capital investment.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels. In addition, construction activities related to the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment.

As discussed in **Chapter 3.0, Project Description**, the proposed buildings would be constructed to meet the University of California Sustainable Practices Policy, which requires UC projects to aim towards

achievement of Triple Net Zero (Net Zero Energy, Net Zero Water and Net Zero Waste). The University also requires all UC projects to achieve a minimum of a Silver rating under United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) v4.0 Green Building Rating System (the "LEED Rating System"). The project is targeting to achieve a LEED Platinum certification but will achieve a minimum of Gold certification. Therefore, the consumption of these resources during construction and operation of proposed facilities would not represent unnecessary, inefficient, or wasteful use of resources.

As the project would achieve a LEED Gold rating and the project is targeting a LEED® Platinum certification, construction and operation of the proposed project would include strategies to minimize energy and water consumption and solid waste generation. Construction and operation of the proposed project would also comply with all applicable building codes, campus conservation features, and would ensure that all natural resources, including water, are conserved to the maximum extent feasible. Overall, due to the variety of energy and water conservation measures that would be implemented, the proposed project would not involve a large commitment of nonrenewable resources.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While the campus uses, transports, stores, and disposes of hazardous wastes, as described in **Section 4.15.3, Hazards and Hazardous Materials**, the Campus complies with all applicable state and federal laws and existing campus programs, practices, and procedures related to hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. In the history of the Campus, there have been no accidents resulting in irreversible environmental damage, indicating that current practices with respect to hazardous materials handling are adequate, and thus the potential for the proposed project to cause irreversible environmental damage from an accident or upset of hazardous materials, is considered low (Delemus 2018).

## 6.4 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR include a discussion of the potential for a proposed project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The State CEQA Guidelines do not provide specific criteria for evaluating growth inducement and state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth inducement is generally not quantified, but is instead evaluated as either occurring or not occurring with implementation of a project. The identification of growth-inducing impacts is generally informational, and mitigation of growth inducement is not required under CEQA. It must be emphasized that the State

CEQA Guidelines require an EIR to “discuss the ways” that a project could be growth inducing and to “discuss the characteristics of some projects that may encourage ... activities that could significantly affect the environment.” However, the State CEQA Guidelines do not require an EIR to predict or speculate specifically where such growth would occur, in what form it would occur, or when it would occur.

Growth inducing impacts are discussed in Chapter 6, Other CEQA Considerations, in the 2005 LRDP EIR. The 2005 LRDP EIR analyzed impacts from growth under the 2005 LRDP through the year 2020. The 2005 LRDP EIR found that the study area as a whole would have enough housing to handle the demand related to the 2005 LRDP. However, there would not be enough affordable housing, and if the LRDP-related demand were combined with the demand for housing from other regional growth, there would not be an adequate supply of housing to meet the cumulative demand. Therefore, the EIR noted that due to the projected cumulative demand, in addition to the new housing provided for in the general plans of the affected communities, more housing would need to be constructed.

The 2005 LRDP EIR also found that environmental impacts on agricultural lands, biological resources, and cultural resources from the development of new housing within the City of Santa Cruz would likely be less than significant because much of the new housing in the City would be developed on infill or redevelopment sites where these resources would likely not be encountered. However some significant and unavoidable impacts, especially related to habitat conversion and traffic, would occur. The 2005 LRDP EIR concluded that by virtue of being a contributor to the regional demand for new housing and urban amenities, the Campus would contribute to these environmental impacts as they are created by overall growth in regional housing and other urban amenities. In addition to impacts from the development of new housing, LRDP-related population that would reside off campus in regional communities would place a demand on utilities and services such as water, sewer, schools, and parks in these affected communities.

The 2005 LRDP EIR found that for every new direct job on the campus, additional indirect and induced jobs would be created or supported in the county. It also projected that the campus-related indirect and induced employment growth would result in more commercial infill development on lands that are vacant or underutilized, especially in those parts of the city that are near the campus. The EIR also concluded that the indirect and induced employment that would result from the implementation of the 2005 LRDP could in turn result in additional population growth as individuals could move into the study area to fill these jobs.

As discussed in **Chapter 3.0, Project Description**, the proposed project is within the planned development and growth projections of the 2005 LRDP. Therefore, as such the growth inducing impacts

of the proposed project are accounted for in the 2005 LRDP EIR analysis. Because the proposed SHW project would build more on-campus housing than previously planned under the 2005 LRDP, it will reduce the demand for off-campus housing and thereby reduce some of the housing-related growth impacts analyzed and reported in the 2005 LRDP EIR.

## 6.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR to briefly describe any potential environmental effects that were determined not to be significant during the Initial Study and EIR scoping process and were, therefore, not discussed in detail in the EIR. A discussion of the effects of the proposed project on agricultural and forest resources, hazards and hazardous materials, and mineral resources, that were found not to be significant, are presented in **Section 4.15, Other Resources**. Other impacts found to be less than significant in the EIR are discussed in detail in **Section 4.0, Environmental Setting, Impacts, and Mitigation Measures**, and summarized in **Section 2.0, Executive Summary**.

## 6.6 REFERENCES

Delemus, J. 2018. Environmental Programs Manager. UC Santa Cruz Environmental Health & Safety. Personal communication with A Klaus, Senior Environmental Planner, UC Santa Cruz. February.