



# ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

September 16, 2020

Matt Dulcich, AICP  
Director of Environmental Planning  
Campus Planning and Environmental Stewardship  
University of California, One Shields Avenue  
Davis, CA 95616

Dear Mr. Dulcich,

**RE: DEIR for UCD's Sacramento Campus 2020 Long Range Development Plan Update**

This letter provides comments from the Environmental Council of Sacramento (ECOS) on the Draft Environmental Impact Report for the University of California Davis Sacramento Campus 2020 Long Range Development Plan (LDRP) Update.

ECOS is a 501(c)(3) public benefit nonprofit corporation dedicated to protecting the natural resources of the greater Sacramento region while building healthier, more equitable, economically thriving communities.

Our primary concern is that the planned expansion of the UC Davis Sacramento Campus facilities does not cause displacement of low-income residents in the surrounding neighborhoods. The Long-Range Development Plan (LDRP) projects a Sacramento campus-wide population of 21,000 by 2040, an increase of almost 8,000 over the current population. These thousands of additional employees and students will cause significantly increased demand for existing near-campus housing, increasing housing prices and rents and potentially displacing thousands of low-income residents who can no longer afford to live in their neighborhoods.

Employees who choose to commute to the UC Davis Sacramento campus from more distant neighborhoods will increase regional vehicle miles travelled (VMT) and green house gas (GHG) emissions, unless many can be persuaded to carpool or use public transportation.

***Displacement:***

Mitigation measures or alternatives that address the proportion of affordable housing in proximity to the campus and the risk of displacement are feasible and should be discussed. There are displacement impacts that have not been fully assessed by the LRDP DSEIR, and there are mitigation options available to minimize these impacts.

The DSEIR does not provide reasonable projections of the proportion of the new population are expected to live in the immediately surrounding community, or in other parts of the city, county, or region, or how many new residents could be anticipated to come to the region for these jobs. The DSEIR does not provide an analysis of the potential impact of increased housing demand on housing type per income level in the existing community in relation to the expected income levels of thousands of additional UC Davis students and employees.

The DSEIR acknowledges that the LRDP *could* have an indirect displacement effect on the surrounding community, and states UCD's commitment to "participating" in the support of creating new housing supply and affordable housing with the City. UCD can and must do better than this vague commitment.

There will ultimately be portions the new campus population living close to campus or commuting from elsewhere, with some housing impact to existing local residents and some VMT impacts. UCD's proposed mitigation does not address either of these impacts. The primary option to mitigate both displacement and VMT impacts within UC's control is to facilitate more affordable housing near to the project. These could include subsidized affordable apartment blocks along major streets as well as subsidized affordable multi-family dwelling units and accessory dwelling units added to existing residential areas.

UCD could either build these units or provide a commensurate financial contribution to a housing trust to build affordable housing in proximity to the project in coordination with the city.

### ***Vehicle miles traveled (VMT)***

The LRDP Update states campus related VMT is expected to nearly double and "the overall growth in VMT under the 2020 LRDP Update is projected to outpace campus population, leading to an increase in daily per capita VMT." Yet the DSEIR concludes that the project's VMT impact is presumed to be less than significant, because the project is in the "low-VMT area" for both employment and household. The project is thus exempt from doing further transportation impact analysis under the newly adopted CEQA guidelines regarding VMT. The reasoning for this is that "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. This presumption is *not* the case with the UC Davis Sacramento Campus, where the mix of uses, e.g. hospital, clinics, graduate schools, and research labs, is nothing like the mix of uses in the surrounding residential neighborhoods. VMT impact will need to be individually calculated and mitigated for this major development project.

A more specific mitigation within UC's control would be to provide improved on-site shuttle service between hospital transit hub and the 39<sup>th</sup> Street Light rail station, and new direct on-site shuttle bus service from Aggie Square to the 48<sup>th</sup> Street light rail station. Additional, frequent shuttle connections to the nearby light rail stations could increase employee use of public transit and affordable housing options farther from campus.

### ***Air Quality***

The LRDP conflicts with Sacramento Metropolitan Air Quality Management District's air quality attainment plans, and "this impact is conservatively determined to be significant and unavoidable." The DSEIR states that stationary source emissions will be mitigated by the purchase of offsets, and that mobile sources emissions will be less than significant. (?)

### ***Heat island effect:***

Chapter 6, in describing Alternative 6.4.1 Maximize Open Space, refers to a benefit of reducing "the heat island effect due to reduced impervious surface on campus." We suggest the proposed project should address the heat island effect that will occur as a result of the quantity of hardscape on the ground and

hard surfaces on building walls. Both Sacramento Metropolitan Air Quality Management District (SMAQMD) and SMUD are engaged in climate change mitigation and adaptation. SMUD's Kathleen Ave, senior climate program manager, describes urban heat islands as "an inadvertent geoengineering project, whereby humans have changed the temperature of their environment. . . I think a lot of people think that excess heat is just a given. . . but this is heat we've created ourselves; there's nothing natural about that. You can definitely take active steps to reverse that and make the region more livable."<sup>1</sup>

We suggest that the UC Davis Sacramento campus can mitigate its heat island and air quality impacts with a major shade tree planting program in the surrounding neighborhoods and thoroughfares. This program could be implemented over the course of five years or more, with attendant tree maintenance. These trees will give relief from the heat to some of the least wealthy communities within Sacramento, located along Stockton Boulevard and Broadway.

Many of the arguments supporting UC Davis' responsibility to address the anticipated displacement of low-income families living near the Sacramento campus are presented in more detail in a DEIR comment letter from the organization Sacramento Investment Without Displacement (SIWD). ECOS is a member of this organization and helped develop ideas described in the SIWD letter.

Yours very truly,

Sincerely,

A handwritten signature in cursive script that reads "Ralph Propper".

Ralph Propper  
President, ECOS