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Prepared June 23, 2017 (for July 12, 2017 hearing)

To: Coastal Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Ryan Moroney, Supervising Coastal Planner

Subject: **UCSC Marine Science Campus Coastal Long Range Development Plan (CLRDP) Notice of Impending Development Number 9 (SCZ-NOID-0004-17) (Younger Lagoon Reserve Public Access Plan).** Coastal Commission consideration of UCSC's notice regarding its intent to continue implementation of the beach access management plan for the Younger Lagoon Reserve, pursuant to the certified CLRDP.

SUMMARY OF STAFF RECOMMENDATION

The University of California at Santa Cruz's (UCSC's) Marine Science Campus (Campus) Coastal Long Range Development Plan (CLRDP) was certified by the Commission on January 7, 2009. UCSC is now pursuing its ninth project pursuant to the CLRDP, and has submitted the above-referenced notice of impending development (NOID) to the Commission and is requesting that the Commission concur that the proposed project is consistent with the certified CLRDP.

Although historically a popular beach for general public access, Younger Lagoon Beach has been off-limits to such use since 1981 when the Commission authorized a CDP for a temporary beach closure to protect beach and lagoon resources and the University's research there. That beach closure was premised on a required periodic reevaluation, which occurred in 2001. Ultimately, in 2009, the periodic reevaluation tool was codified into the certified CLRDP. And thus, the amount and level of intensity of beach access is required to be reevaluated every five years through authorization of a Younger Lagoon Beach Public Access Plan, where that reauthorization process is designed to allow UCSC and the Commission to make changes in the degree of access provided to the beach area, whether to increase it or decrease it or leave it as is, for the next five years.

CLRDP Implementation Measure (IM) 3.6.3 requires that the public have supervised access to Younger Lagoon Reserve beach, but doesn't specify the level of supervision. Rather, it is subject to the periodic reevaluation identified above. IM 3.6.3 also requires that a monitoring program be created to document the condition of native flora and fauna within Younger Lagoon and its beach at five-year intervals, and that UCSC prepare a report at the end of each five-year period that presents the results of the monitoring and includes a discussion of the potential effects of

beach access on flora and fauna at Younger Lagoon, and whether access changes should be implemented – whether to increase or decrease access or leave it the same. At the end of each five-year period, UCSC must submit a NOID to the Commission to implement a beach access plan for the next five years.

In March 2010, the Commission approved UCSC's initial NOID to implement a beach access management plan to allow for supervised access to Younger Lagoon Beach and a five-year monitoring program, as required by IM 3.6.3 (UCSC NOID-2). The Campus began implementing the beach access plan and monitoring program in spring 2010, and submitted the report on the results of the monitoring to the Commission in February of 2016. The current NOID describes UCSC's plan for continuing the current beach access program. Specifically, UCSC is proposing to continue the docent-led beach tour program for an additional five years with no changes to the program. Tours are included with the cost of admission to the Seymour Marine Discovery Center (SMDC),¹ and will continue to be offered two times per month, including one tour on a weekday and one on a weekend. Tours will be led by SMDC docents, and will include a narrative history of the UC Natural Reserve System, a discussion of the lagoon and its habitats, a walk through a restored coastal scrub habitat with opportunities to view the rear dune, and will culminate with a walk on Younger Lagoon Beach.

The recently submitted Younger Lagoon Natural Reserve Beach Monitoring report complies with the parameters set forth in IM 3.6.3, including: 1) a regular schedule of guided, educational tours; 2) identification of all parameters for beach access; 3) a monitoring program that evaluates trends in beach area conditions, including the condition of flora and fauna; 4) an assessment of beach area resources and the effect of beach area use and activities on those resources, including the flora and fauna; and 5) a description of existing public access opportunities on the Campus and the way in which such opportunities relate to the amount and type of supervised access provided to the beach area. As set forth in the NOID, UCSC will also continue to monitor Younger Lagoon Beach as required by, and described in, IM 3.6.3, and will also continue to submit a NOID to the Commission every five years that both reports on the previous five years of beach access and includes a monitoring report that evaluates beach conditions, and that proposes beach access parameters for the next 5 years. The next NOID to implement the Younger Lagoon Beach Access Plan will be due in 2020.

In this case, and for similar reasons as the Commission has found in the past with respect to beach access, the proposed program can be found CLRDP consistent, and staff believes that the balance being struck here (i.e., resource and research protection versus beach public access) through the proposed docent led program is appropriate. At the same time, the beach access program is fairly limited, and it seems clear that some minor changes relating to awareness could definitely help to make it more successful. Thus, staff intends to continue to work with the University to increase the number of docent led tours provided if possible, and to increase the nature and amount of notice/advertising provided so that the general public is more aware of the program and can make better use of it.

¹ Currently, admission to the Discovery Center is \$8 for adults, \$6 for children between the ages of 3-16, and free for children younger than 3, so it will cost users of those different ages that amount to visit the beach.

Thus, as described above, continuation of the proposed beach access management plan for the next five years is consistent with the certified CLRDP. Staff therefore recommends that the Commission determine that the project is consistent with the certified CLRDP. The necessary motion and resolution to find the proposed development consistent with the certified CLRDP are found on page 4 below.

Staff Note - NOID Action Deadline: This NOID was filed as complete on June 14, 2017. The 30-working-day hearing deadline is July 27, 2017. (*See* Pub. Res. Code § 30606; CLRDP Section 8.2.2.) Thus, unless the University agrees to extend the hearing deadline (as allowed by CLRDP Section 8.4.2), the Commission must take action on the NOID by July 27, 2017 or it will be deemed consistent with the CLRDP.

TABLE OF CONTENTS

I. MOTION AND RESOLUTION4

II. FINDINGS AND DECLARATIONS5

 A. UCSC CLRDP5

 B. UCSC NOID 96

 C. CLRDP CONSISTENCY ANALYSIS9

 D. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)11

APPENDICES

Appendix A – Substantive File Documents

EXHIBITS

Exhibit 1: Location Map

Exhibit 2: Notice of Impending Development # 9

Exhibit 3: Figures 3.11 & 5.6 of Coastal Long Range Development Plan

I. MOTION AND RESOLUTION

Staff recommends a **YES** vote on the motion below. Passage of this motion will result in a determination that the development described in the UCSC NOID 9 is consistent with the certified UCSC CLRDP, and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Motion: *I move that the Commission determine that the development described in UCSC Notice of Impending Development Number 9 (SCZ-NOID-0004-17) is consistent with the certified University of California at Santa Cruz Coastal Long Range Development Plan, and I recommend a yes vote.*

Resolution: *The Commission hereby determines that the development described in UCSC Notice of Impending Development Number 9 (SCZ-NOID-0004-17) is consistent with the certified University of California at Santa Cruz Coastal Long Range Development Plan for the reasons discussed in the findings herein.*

II. FINDINGS AND DECLARATIONS

A. UCSC CLRDP

General CLRDP Background

As an alternative to project-by-project coastal permit review, Coastal Act Section 30605 allows for, among other things, universities to develop long-range development plans for Commission certification. Once certified, each university is the primary entity responsible for ensuring that future development on the site is consistent with the certified long range development plan, subject to ongoing Commission oversight. (See Pub. Res. Code § 30606.)

UCSC's Marine Science Campus

The Campus site is located directly adjacent to the Monterey Bay National Marine Sanctuary (Sanctuary) just within the western border of the City of Santa Cruz in Santa Cruz County (see **Exhibit 1** for a location map).² Agricultural land extends to the west along the coast beyond the Younger Lagoon Reserve and the western Campus boundary. To the north are the Union Pacific Railroad tracks, the Raytek industrial facility, and Highway One. To the south lies the Sanctuary and the Pacific Ocean, and to the east is Antonelli Pond (north of Delaware Avenue) and the densely packed De Anza Mobile Home Park (south of Delaware Avenue) beyond which is Natural Bridges State Park and past that West Cliff Drive in the City of Santa Cruz.

The Campus site is primarily made up of a relatively flat terrace area (roughly 73 acres) sloping gently from north to south (to the ocean) with the remainder occupied by a large arroyo feature (roughly 25 acres) on the west of the site, at the base of which lies Younger Lagoon, an estuarine lagoon that connects (at times) to the ocean. A sandy beach area fronts Younger Lagoon below the terrace. The lagoon, the beach, the arroyo and a portion of the terrace make up Younger Lagoon Reserve. The terrace portion of the site includes within it a 2.5 acre federally-owned parcel completely surrounded by UCSC property. Altogether, the Campus (including the federal in-holding and the Younger Lagoon Reserve) is about 100 acres.³

UCSC'S Marine Science Campus CLRDP

The CLRDP was certified by the Commission on January 7, 2009. The CLRDP provides a blueprint for future development of the site including a maximum increase of about 600,000 square feet of new Campus facilities (including outdoor research and support areas) mostly within four distinct development zones (occupying about one-third of the terrace area) for an expanded Marine Science Campus. The CLRDP provides for roughly 340,000 gross square feet of potential new facilities within the four development zones in new one- and two-story buildings up to 36 feet tall,⁴ with the remainder in outdoor research and support areas. The

² The main UCSC campus is located roughly two miles inland of the Marine Science Campus, in the rolling foothills northwest of downtown Santa Cruz. The main campus is located outside of the coastal zone.

³ As required by the CLRDP, the terrace areas located outside of the allowed development footprint on the Marine Science Campus were added to Younger Lagoon Reserve in 2009. Thus, when added to the original 25-acre Reserve area, Younger Lagoon Reserve now occupies 72 acres of the Marine Science Campus.

⁴ These buildings are currently under construction pursuant to NOID 6.

CLRDP also accounts for additional areas of roads, and some natural drainage ponds outside of the four development nodes. Overall, and at full buildout, the CLRDP allows for the Campus to grow by about three times its size at the time of CLDRP certification. In addition to the building program, the CLRDP also provides for an expanded public access trail system and natural habitat restoration in those wetland and open space areas on the terrace that are not part of the proposed development zones (roughly 47 acres) that, per the CLRDP, have been added to Younger Lagoon Reserve.

B. UCSC NOID 9

Notices of Impending Development

Under a certified CLRDP, university development of specific projects contained in the CLRDP can proceed without a coastal permit, provided the university sends a Notice of Impending Development (NOID) to the Commission and other interested parties prior to undertaking development, and either the Commission deems the identified development project consistent with the CLRDP (with or without conditions to make it so) within 30 working days after the NOID is filed with the Commission or else the development is deemed consistent if the Commission fails to act upon the NOID in a timely manner.⁵ Pursuant to Coastal Act Sections 30605 and 30606 and Section 13550(d) of Title 14 of the California Code of Regulations, the Commission may impose conditions on such development project proposals limited to ensuring consistency with the Coastal Act and the certified CLRDP.

Younger Lagoon Beach Access

Younger Lagoon Beach was historically a popular and well-used beach area for general beach activities for many years before the University acquired the property in the 1970s, and the beach area here is not unlike other pocket beaches that include lagoon and brackish features inland of them. However, the beach was closed to general beach access on a temporary basis back in 1981 in order to protect Younger Lagoon and related habitat resources and research, and to provide lab security more generally.⁶ Although some unauthorized access continued to occur, including primarily surfing and skimboarding use across the wet sandy forebeach, the University continued to prevent general public access to the beach area and the remainder of Younger Lagoon reserve other than for University researchers and authorized University personnel. At that time, such

⁵ Coastal Act Section 30606 requires that universities provide a NOID at least 30 working days prior to pursuing the development. 14 California Code of Regulations (CCR) Section 13549(b) provides that a NOID is only deemed filed following Executive Director review of the NOID and any supporting materials to ensure there is sufficient information for making the consistency determination. The filing review must be completed within ten working days after receiving the NOID submittal. (*Id.*) 14 CCR Section 13548 requires that the Commission take action on the notice within 30 working days of filing of the NOID or else the development is deemed consistent with the CLRDP. In sum, if the Commission does not take action within 30 working days of filing of the NOID, the identified development project is deemed consistent and can proceed. In the case of the UCSC CLRDP, the action deadline may be extended by UCSC for up to three months. (CLRDP Policy 8.4.2, Chapter 8).

⁶ This general public access closure was reviewed and allowed by the Commission on a temporary basis in 1981, and again on a temporary basis in 2001. The temporary nature of the closure was based on the premise that the Commission would continue to reevaluate the beach access issue on a regular basis to ensure that the access closure and associated trade-offs were justified in light of the requirements of Coastal Act to maximize public access to and along the shoreline.

closure was conditioned by the Commission for periodic reevaluation through CDP conditions, and that reevaluation mechanism was ultimately built into the CLRDP when it was certified in 2009. In short, the CLRDP Younger Lagoon Beach Access Plan is structured to be reevaluated every 5 years, and allows the University and the Commission to make changes in the degree of access provided to the beach area, whether to increase it or decrease it or leave it as is.

NOID 9 – Younger Lagoon Reserve (YLR) Public Access Management Plan

In March 2010, the Commission approved the UCSC's initial NOID as required by Implementation Measure 3.6.3 (UCSC NOID 2). That NOID provided for beach access to be limited to docent led tours, as had the initial CLRDP when it was certified in 2009 for the first 5 year period. The Campus began implementing the beach access plan and monitoring program in spring 2010, and submitted the report on the results of the monitoring program to the Commission in February of 2016 as part of the Younger Lagoon Annual Report. The current NOID describes UCSC's plan for continuing the beach access program that was initiated in 2010, and the associated monitoring program.

Background and Monitoring Report Results

Docent-led public beach tours to Younger Beach are provided through the Seymour Marine Discovery Center (SMDC) and are included with the cost of admission.⁷ These tours began in the spring of 2010 and are offered twice monthly, including one tour on a weekday and one on a weekend.⁸ The extent of the beach area that may be accessed during these tours varies depending on tidal conditions and the location of plants, because foot traffic is only permitted seaward of the dune vegetation. Thus, the exact access area may vary slightly from the areas depicted in Figure 1 of the NOID based on on-the-ground conditions (see, **Exhibit 2, p. 9**; see, also Figures 3-11 and 5-6 of the CLRDP (**Exhibit 3**). The walk on the trail down to the beach provides an interpretive experience for visitors that begins with the docent providing a narrative history of the UC Natural Reserve System (UCNRS), a discussion of the lagoon and its habitats, a walk through a restored coastal scrub habitat with opportunities to view the rear dune, and culminates with a walk on the beach. Tours are led by SMDC docents trained in the natural history and ecology of the YLR and who provide detailed information to visitors about flora, fauna, geology, and the UCNRS. The tour curriculum, which was first presented to SMDC docents during the regular winter docent-training program in 2010, focuses on the unique ecology of the YLR beach.

YLR Beach tours are advertised via the SMDC website,⁹ and filled via phone reservation. The SMDC allocates tour spaces and keeps track of all user data. Tours are limited to 12 persons and are best suited for adults in good physical condition and children over 10 years of age. Public members entering YLR are required to adhere to the UCNRS use guidelines. Because beach tours are limited to groups with trained docents who interpret the natural history of the YLR and ensure that visitors remain in areas authorized for access, no additional signage or fences have been required to be placed in the YLR. The trail consists of a simple dirt/mulch path with steps

⁷ Admission is currently \$8 for adults; \$6 for children between the ages of 3-16; and free for children younger than 3, so it will cost users of those different ages that amount to visit the beach.

⁸ In addition, all of the docent-led daily tours run by the SMDC include an informational stop regarding the YLR.

⁹ <http://seymourcenter.ucsc.edu/visit/behind-the-scenes-tours/>

that lead down the bluff to the beach and dune area. The trail is maintained by clipping overgrown vegetation and maintaining the earthen path and timber steps as needed.

In addition to monitoring Younger Lagoon Beach, the University also monitors nearby beaches that allow for varying intensities of use (i.e., Natural Bridges State Beach and Sand Plant Beach) during the five-year period starting in 2010 in order to examine differences in the flora, fauna and human use among the three sites. This effort required hundreds of hours of staff and student time, as well as coordination with State Parks staff. The annual survey results were included in annual reports submitted to the Commission over the past five years. The Younger Lagoon Natural Reserve Beach Monitoring Report (Monitoring Report) describes the monitoring program in detail and presents the results of the entire beach monitoring program. (**Exhibit 2**, pp. 34-93).

Data from the Monitoring Report indicate that Younger Lagoon Beach supports a wide variety of native flora and fauna, provides habitat for sensitive and threatened species, supports a very unique beach dune community, and is frequently used for teaching and research. In general, native plant species richness was greatest at YLR and Natural Bridges beaches compared to Sand Plant Beach; however, there was significant annual variation among the sites. A parameter that was quantified in 2012, and is evident from visual observation and photo documentation, is the presence of dune hummocks and downed woody material at YLR, both of which are almost entirely absent at local beaches due to human use. These features provide habitat for plant species such as the native succulent plant *Dudleya sp.*, which grows on downed woody material and dune hummocks, as well animal species, such as the burrowing owl that uses burrows in the dune hummocks and seeks shelter beneath downed woody material. The relatively natural state of YLR Beach and its associated dune vegetation is unique among most pocket beaches in Santa Cruz County and likely represents a glimpse into what many of the pocket beaches in the greater Monterey Bay area looked like prior to significant human disturbance. More broadly, the results of the monitoring program suggest that unregulated access to the beach (as is the case at Natural Bridge State Beach and Sand Plant Beach) could result in the loss of the unique ecological characteristics of the site, which would reduce its effectiveness as a research area for scientific study, and would likely have a negative impact on sensitive and protected species.

Proposed Project

UCSC is proposing to continue the docent-led beach tour program, without change, for an additional five years. UCSC will also continue to monitor YLR Beach, and to submit a NOID to the Commission at five-year intervals that reports on the previous five years of beach access management, including the required monitoring report that evaluates beach conditions as well as all necessary supporting information for a development project to implement a beach access management plan for the next five years as outlined in the CLRDP.

See **Exhibit 1** for a location map and a site plan; see **Exhibit 2** for the complete NOID and supporting materials.

C. CLRDP CONSISTENCY ANALYSIS

Applicable CLRDP Provisions

The CLRDP includes multiple provisions that regulate the YLR in general, as well as public beach access specifically. IM 3.6.3 governs public beach access within YLR and provides as follows:

Implementation Measure 3.6.3 - Public Beach Access within YLR (Original YLR). Supervised beach access to Younger Lagoon beach shall be provided to the general public consistent with and pursuant to a management plan for such access that is based on the best possible assessment of the capacity of the beach area to sustain use and the level of intensity of such use when considered in light of the fragility of the beach area and adjacent resources and ongoing research. Within six months of CLRDP certification, and at five-year intervals post-certification after that, the University shall submit a Notice of Impending Development to the Coastal Commission with all necessary supporting information for a development project to implement such a beach access management plan for the next five years. Each such management plan shall at a minimum include:

- A regular schedule of guided, educational tours to the beach area that is coordinated with and similar to other Marine Science Campus education and docent programs and designed to introduce visitors to the special aspects of beach ecology without causing deterioration of that ecology or loss of opportunity for feeding or breeding of beach dependent species. These tours may be weekly weather permitting, but shall be offered a minimum of two times per month.

- Identification of all parameters for beach access, including a clear depiction of the area within which such access is allowed, and a clear description of all related implementing measures (e.g., trail alignments, trail design, barriers/fencing, signage, timing restrictions, supervision requirements, etc.). Access shall be by way of controlled access trails shown on Figure 5.6. Trails shall be maintained, marked, and signed for safety and interpretation of YLR ecology.

- A monitoring program that evaluates trends in beach area conditions, where at a minimum such program shall include: user data (including identification of all user types and specific data on size and composition of beach tour groups); a selected set of repeatable photo points to be taken seasonally to show all major areas of the beach; presence/absence of tidewater goby and evidence of breeding activity; species composition and coverage of beach dune vegetation from the lowest (nearest to the mean high tide line) occurring terrestrial plant to 10 meters inland into the strand vegetation; evidence of seed production by beach strand species in this zone; species composition and abundance of animal tracks (vertebrate and invertebrate) on the beach and adjacent beach dune area; and regular counts of feeding shorebirds on the beach.

- An assessment of beach area resources and the effect of beach area use and activities (including authorized and unauthorized uses, research use, YLR activities, etc.) on such resources in the time since the last five-year review and overall in the time since at least CLRDP certification;

• *A description of existing public access opportunities on the Campus, and the way in which such opportunities relate to the amount and type of supervised access provided to the beach area.*

Policy 6.1 Public Access to the Marine Science Campus

Maximum public access to the coastal resources of the Marine Science Campus and the adjacent shoreline and coastal area shall be provided consistent with public safety, fragile coastal resources, implementation of the educational and research missions of the Campus, and security of sensitive facilities and research activities on the site.

Implementation Measure 6.1.1 – Free Public Access for Visitors

Free public visitor access to the Marine Science Campus shall be provided during at least daylight hours (i.e., one hour before sunrise until one-hour after sunset). Modest fees may be charged only for access to the Seymour Marine Discovery Center and similar University facilities with developed educational and/or visitor-oriented programs.

Consistency Analysis

UCSC is proposing to continue the docent-led beach tour program initiated in spring 2010 for an additional five years with no changes to the program. Tours will continue to be offered two times per month, including one tour on a weekday and one on a weekend, led by SMDC docents, and will include a narrative history of the UCNRS, a discussion of the lagoon and its habitats, a walk through a restored coastal scrub habitat with opportunities to view the rear dune, and ends up on the beach. Although IM 3.6.3 is silent with respect to whether a fee for the beach access program is allowed, the CLRDP makes clear that general public access to the Campus is meant to be free, other than for access to developed facilities. (IM 6.1.1.) As indicated above, the beach access program as currently operated requires that tour users pay for the cost of admission to the SMDC (ranging up to \$8 per adult) in order to access this beach via docent tour when they are offered.

As required by the CLRDP, UCSC is also proposing to continue preparation of the Younger Lagoon Public Access Plan and Beach Monitoring Report, which complies with parameters set forth in IM 3.6.3, including by providing: 1) a regular schedule of guided, educational tours; (**Exhibit 2**, pp. 40-42); 2) identification of all parameters for beach access (**Exhibit 2**, 40-42, see, also p. 9); 3) a monitoring program that evaluates trends in beach area conditions (**Exhibit 2**; pp. 46-49); 4) an assessment of beach area resources and the effect of beach area use and activities (**Exhibit 2** pp. 49-84; and 5) a description of existing public access opportunities on the Campus, and the way in which such opportunities relate to the amount and type of supervised access provided to the beach area (**Exhibit 2**, pp. 39-42).

As set forth in the NOID, UCSC will also continue to monitor YLR Beach as required by, and described in, IM 3.6.3; however, UCSC will no longer conduct monitoring at Natural Bridges State Beach or Sand Plant Beach (which is not required by IM 3.6.3) on the basis that the original five years of data collection have provided adequate information to assess differences in beach resources. The goal of the future monitoring program will be to document the presence and distribution of flora and fauna within YLR and to evaluate changes in distribution and density over time and to address those changes in relation to use of the area. Specific details regarding the proposed monitoring program are set forth in the NOID (see **Exhibit 2**, pp. 5-7). UCSC will also continue to submit a NOID to the Commission at five year intervals that (1)

reports on the previous five years of beach access management, (2) includes a monitoring report that evaluates beach conditions, and (3) includes all necessary supporting information for a development project to implement a beach access management plan for the next five years as outlined in the CLRDP. Importantly, as indicated above, these every five year reevaluations represent the time when the University and the Commission are required by the CLRDP to assess where more or less beach access is appropriate, building upon the Commission's pre-CLRDP CDP history as well as its certification of the CLRDP itself where the Commission concluded that a permanent beach access ban or permanent set of beach access criteria were not appropriate, but rather the level and intensity of beach access needed to be periodically reevaluated over time.

In this case, and for similar reasons as the Commission has found in the past with respect to beach access, the proposed program can be found CLRDP consistent, and the Commission believes that the balance being struck here (i.e., resource and research protection versus beach public access) through the proposed docent led program is appropriate. At the same time, the Commission encourages the University to work with Commission staff to increase the number of docent led tours provided if possible, and to increase the nature and amount of notice/advertising provided so that the general public is more aware of the program and can make better use of it.

Thus, as proposed by UCSC, continuation of the YLR Public Access Plan is consistent with the certified CLRDP.

D. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096(a) of Title 14 of the California Code of Regulations requires the Commission to make a specific finding that a permit application is consistent with any applicable requirements of CEQA. This requirement also applies to the Commission's review of NOIDs, based on Section 13550(d) of the Regulations (incorporating by reference Sections 13064 through 13096 of the Regulations). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

UCSC, as the lead agency under CEQA, certified a Final EIR (FEIR) for the CLRDP in September 2004. In November 2006, the University certified an addendum to the FEIR to respond to changes in the CLRDP in the time since the original FEIR certification, including changes stemming from Commission review of the CLRDP prior to certification.

The Commission finds that the proposed project will avoid significant adverse effects on the environment, within the meaning of CEQA. As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects that approval of the proposed project would have on the environment within the meaning of CEQA. The proposed project will not result in any significant environmental effects for which feasible mitigation measures have not been employed consistent with CEQA Section 21080.5(d)(2)(A).

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

1. CLRDP, including Appendix A – Resource Management Plan; Appendix B – Drainage Concept Plan
2. University of California at Santa Cruz Marine Coastal Long Range Development Plan Final Environmental Impact Report (September 2004), and Addendum (November 2006).