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Prepared July 19, 2019 (for August 9, 2019 hearing)

To: Coastal Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Sarah Carvill, Coastal Planner

Subject: **UCSC Marine Science Campus Coastal Long Range Development Plan (CLRDP) Notice of Impending Development Number 10 (SCZ-NOID-0002-19) (Emergency Generator Replacement).** Coastal Commission consideration of UCSC's notice regarding its intent to replace an existing diesel emergency generator with a new natural gas emergency generator and a 500-gallon backup propane storage tank adjacent to the Seymour Marine Discovery Center at UCSC's Marine Science Campus, pursuant to the certified CLRDP.

SUMMARY OF STAFF RECOMMENDATION

The University of California at Santa Cruz's (UCSC's) Marine Science Campus Coastal Long Range Development Plan (CLRDP) was certified by the Coastal Commission on January 7, 2009. UCSC is now pursuing its tenth 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.

The proposed project would replace an existing diesel generator that provides backup power to the Seymour Marine Discovery Center (Seymour Center), a marine education and research facility, with a natural gas-powered generator. The new generator would be located in the same footprint as the generator it would replace, within an existing storage yard adjacent to the Seymour Center building. UCSC also proposes to install a 500-gallon propane storage tank to serve as backup fuel for the new generator. The tank cannot be located in the existing storage yard due to fire code requirements, so UCSC proposes to construct a new, 100-square-foot enclosure for the tank approximately ten feet from the Seymour Center building, in what is now a landscaped island between a parking area and two pedestrian walkways. The enclosure would be made of non-combustible vertical siding that resembles the wood siding of the surrounding structures.

This is a small-scale project that is located as close as possible to existing development and complies with all CLRDP implementation measures related to the siting and intensity of new

development on the Marine Science Campus and the protection of environmentally sensitive habitat areas and visual and aesthetic resources. Staff recommends that the Commission determine that the project is consistent with the certified CLRDP. The necessary motion and resolution are found below.

Staff Note - NOID Action Deadline: This NOID was filed as complete on July 12, 2019 (see Pub. Res. Code Section 30606; CLRDP Section 8.2.2). The 30-working-day hearing deadline is August 23, 2019. Thus, unless UCSC extends the action deadline (as allowed by CLRDP Section 8.4.2), the Commission must take action on the NOID by the August 23, 2019 hearing or it will be deemed consistent with the CLRDP.

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EXHIBITS

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 10 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 10 (SCZ-NOID-0002-19) 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 10 (SCZ-NOID-0002-19) 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 universities to develop long range development plans for Coastal 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 for any given proposed project. UCSC's Marine Science Campus CLRDP was certified by the Coastal Commission on January 7, 2009.

UCSC's Marine Science Campus

UCSC's Marine Science Campus (Campus) 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 and seaward of Highway One. Thus the Campus site, which has been known locally for many years as Terrace Point, is situated at the edge of the City in an area of transition from urban uses (to the east) to the rural north coast of the unincorporated County (to the west) (see **Exhibit 1** for a location map).[1] The Santa Cruz County north coast area is well known to the Commission for its sweeping vistas of both coastal agricultural fields and natural landscapes framed by the undulating coastal range, and the Campus site is part of the beginning of this stretch of coast as one heads upcoast out of the City of Santa Cruz and, by extension, out of the urbanized portion of northern Monterey Bay.[2]

[1] The main UCSC campus is located roughly two miles inland of the Campus in the rolling foothills northwest of downtown Santa Cruz.

[2] The City of Santa Cruz is located at the upcoast end of the larger urban portion of northern Monterey Bay that extends downcoast through unincorporated Live Oak, the City of Capitola, and the more urban portion of south

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). The developable footprint of the Campus is on the middle and southern portions of this terrace feature. At this time, developed facilities on the terrace include UCSC's Coastal Biology Building, a California Department of Fish and Wildlife laboratory, and a 2.5-acre federal in-holding housing the NOAA Fisheries Southwest Fisheries Science Center, all located in the mid-terrace area and, at the southernmost end of the terrace, UCSC's Joseph M. Long Marine Laboratory, which includes UCSC's 20,000-square-foot marine science education center, the Seymour Marine Discovery Center (Seymour Center).

The remainder of the Campus site is occupied by a large arroyo feature (roughly 25 acres) on the west side of the terrace, 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[3] make up Younger Lagoon Reserve. Altogether, the Campus (including the federal in-holding and the Younger Lagoon Reserve) is about 100 acres.

In the general Campus vicinity, 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, a private office/laboratory 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.

UCSC'S Marine Science Campus CLRDP

The CLRDP provides a blueprint for development of the Campus, including a maximum increase of about 600,000 square feet of new facilities relative to what had already been built at the site at the time of CLRDP certification. This construction is mostly restricted to four distinct development zones occupying about one-third of the terrace area. 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, with the remainder of developable facility area within outdoor research and support areas. The 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 certification. Much of that allowed development, including but not limited to the 40,000-square-foot Coastal Biology Building, 7,500 square feet of greenhouse space, two parking areas, and road, storage, and utility infrastructure, was approved under NOID 6 and has already been constructed.

Santa Cruz County (i.e., the Aptos-Rio del Mar-Seascape areas). Though defined by city limit boundaries, these more urban areas all blend somewhat together as a larger urban "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.

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 (roughly 47 acres) that were added to Younger Lagoon Reserve per the CLRDP.

B. UCSC NOID 10

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 (or a "NOID") to the Commission prior to undertaking development, and the Commission determines that the identified development project is consistent with the CLRDP (as submitted or with conditions to make it so) within 30 days of NOID submission. If the Commission does not act within 30 days of NOID submission, the development is deemed consistent with the CLRDP.[4] Pursuant to Coastal Act Sections 30605 and 30607, the Commission may impose conditions on such development project proposals only to ensure that the proposed development is consistent with the certified CLRDP.

NOID 10 – Emergency Generator Replacement

The Seymour Center building's electrical system is currently backed up by a diesel emergency generator, which is located within an outdoor storage yard that shares its eastern wall with the Seymour Center. The storage yard is bordered on the west by a row of service parking stalls that extends south of the Seymour Center's building footprint. UCSC is proposing to replace this existing generator with a natural gas emergency generator that can also use propane as a backup fuel. The new 125kw generator would be equivalent in size and form to the existing diesel generator, and would be installed in the location of the existing generator's footprint and connected to an existing natural gas service line located within the storage yard. However, there is not enough space within the existing storage yard to accommodate the new propane tank and also meet fire code requirements relating to the placement of liquefied petroleum gas containers.[5] Thus, UCSC also proposes to construct a new, approximately 100-square-foot fenced enclosure for the propane tank located approximately 20 feet south of the storage yard, in what is currently a landscaped island between the aforementioned parking strip and two existing pedestrian walkways (see **Exhibit 2** for project plans and **Exhibit 3** for site photos).

[4] Coastal Act Section 30606 requires that the University provide notice of an impending development at least 30 working days prior to pursuing it. 14 CCR Section 13549 provides that a NOID is only 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 [see 14 CCR § 13549(b)] days after receiving the NOID submittal. 14 CCR Section 13548 requires that the Commission take action on the notice within 30 working days of filing of the NOID. 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 per CLRDP Policy 8.4.2.

[5] Specifically, the 2016 edition of the California Fire Code Section 6104.3 (which the City of Santa Cruz adopted in Municipal Code Section 19.05.010 in 2016) requires that a 500-gallon above-ground container be placed a minimum of ten feet from a building or structure. A similar requirement precludes placement of such containers within ten feet of a transformer, which is also relevant in this case because there is a PG&E transformer in the existing storage yard.

The project would also include construction of new, corrosion-resistant propane and electric lines between the propane tank and the emergency generator. These would be placed below grade in the location of an existing sidewalk. The propane tank itself would be installed on a concrete slab and screened by a retaining wall and fence (including an access gate at grade). The enclosure would be six feet high, per fire code requirements. Bollards will be installed facing the existing UCSC service parking spaces. The fenced portion of the enclosure will be constructed with materials that conform to the aesthetic of the existing outdoor storage yard and Seymour Center building (i.e., non-combustible vertical siding). Non-combustible materials are also required by the fire code for the propane tank enclosure.

The emergency generator replacement itself is exempt from the NOID development review procedures under CLRDP Section 8.3(A), which incorporates by reference the Commission's 1978 exclusions of certain utility hookup and maintenance activities from permit requirements. Replacement of gas storage facilities is included in the list of excluded activities. However, installation of the new propane storage tank within a new fenced enclosure meets the definition of a proposed development project in the CLRDP and is therefore the focus of these findings.

C. CLRDP CONSISTENCY ANALYSIS

Applicable CLRDP Provisions

With very limited exceptions (discussed further below), the CLRDP does not explicitly anticipate or provide specific guidelines for the construction of small new structures that are ancillary to existing buildings, such as the new propane tank and fenced enclosure that is the subject of this NOID. Rather, the CLRDP includes multiple provisions that apply to virtually all development on the Campus and collectively set the parameters for small projects such as this, including, but not limited to, policies that restrict development to specific, pre-defined areas (both in absolute terms and based on development type); impose protective setbacks from environmentally sensitive habitat areas (ESHA), coastal bluffs, and agricultural lands; and ensure that new development does not block public views and harmonizes with the aesthetic of the campus.

Quantity and Location of Campus Development

Relevant Policies, Implementation Measures, and Figures

CLRDP Figures 5.1, 5.2, 5.3, and 5.4 (see **Exhibit 4**) show the kinds, locations, and maximum size and intensity of development allowed under the CLRDP (provided that such development is otherwise consistent with applicable CLRDP policies and implementation measures). Figure 5.1 shows the maximum area of new construction allowed under the CLRDP for each type of development anticipated for the site. Figure 5.2 is a map of the Campus that shows which areas are reserved for research and education uses as opposed to other, non-development uses (e.g., open space, resource protection, buffers). Figure 5.3 describes the types of development that are allowed in each of four development zones, including the Lower, Middle, and Upper Terrace and Campus Entrance areas. Figure 5.4 provides maximum building heights and building coverages for each of 16 development subareas.

Additionally, the following CLRDP Policies and Implementation Measures (IMs) constrain the siting, quantity, and type of development on Campus:

> **IM 2.3.1 Cluster Development**
> Except for allowed drainage facilities, development shall be clustered within, and open space shall be preserved outside of, areas designated for Research and Education Mixed Use including through such means as building clustering, building articulation and scale reduction at the boundary of development zones, rural/agricultural building design, limited lighting, and vegetative and other screening of development, as well as by use of agricultural setbacks, habitat buffers, natural habitats, view corridors, and open space areas. Among other things, this siting and design approach is intended to reinforce the sense of urban edge created by the canyon topography of the original Younger Lagoon Reserve, existing development, and the Santa Cruz city limit.
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> **IM 2.3.2 Impervious Coverage** (in relevant part)
> At least 30 percent of land area within the Lower and Middle Terrace development zones shall be maintained in a pervious state and free of impervious surfaces...
>
> **Policy 2.5 Ensuring Appropriate Land Uses on the Marine Science Campus**
> All development and uses on the Marine Science Campus shall be limited to marine/coastal research and education, resource protection, and public access development and uses, including primarily coastal-dependent and coastal-related development and uses. All other development and uses on the Marine Science Campus shall be prohibited.

Consistency Analysis
The project is located within the Lower Terrace Development Zone's Subarea #15. The project is allowable in its proposed location because it would be sited within the Research and Education Mixed Use land use designation, and utilities that support existing coastal-dependent uses (such as the Seymour Center) are allowed within that designation (Figure 5.2). Additionally, new Equipment Storage and Maintenance Facilities are allowed within the Lower Terrace Development Zone if they are ancillary to other allowed uses (Figure 5.3). The proposed project is also within the original "limits of construction" for the Seymour Center (i.e., an area defined in the CLRDP within which the building itself and its ancillary facilities could be developed), and is significantly shorter, at six feet in height, than the maximum building height for Development Subarea #15 (24 feet). Also, the proposed project is classified in the CLRDP as an "Outdoor Open Laydown Yards," which are described in the CLRDP as outdoor facilities, either fenced or enclosed, that are required to serve the campus (including for utility purposes as well as service and storage of vehicles and equipment). Approximately 56,500 square feet of this type of development have been built on Campus and the addition of the 100 square foot project area would not exceed the maximum quantity of 70,000 square feet for Open Laydown Yards allowed in the CLRDP (Figure 5.1). Further, outdoor laydown and storage areas do not apply towards the maximum building coverage calculations. Therefore, the proposed project is consistent with all development parameters outlined in Figures 5.1-5.4.

With respect to clustering, the proposed propane tank enclosure would be located as close to the existing Seymour Center building (which extends south beyond the southern limit of the existing

storage yard) as the fire code would allow (i.e., ten feet). The project is thus consistent with IM 2.3.1. With respect to IM 2.3.2, UCSC estimates that the pervious area in the Lower and Middle Terrace areas is currently about 76%, which far exceeds the 30% requirement. The addition of 100 square feet of impervious area for the propane storage tank pad and enclosure would therefore not exceed the impervious limits set forth in IM 2.3.2.

The Seymour Center building supports coastal-dependent marine research and education, and the proposed project supports these uses by ensuring that backup power is available. The project can therefore be found consistent with CLRDP Policy 2.5 requiring limitation of development on the Campus to the designated specific uses.

Sensitive Habitat and Biological Resources

Relevant Policies and Implementation Measures

The Campus encompasses several environmentally sensitive habitat areas (EHSAs), including on terrace lands. Several CLRDP policies and implementation measures ensure that development of the Campus will be protective of these areas:

> **Policy 3.4 Protection of Environmentally Sensitive Areas (ESHAs)**
> Environmentally sensitive habitat areas (ESHAs) shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. Development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of those habitat areas. ESHAs have been designated as "Resource Protection" in this CLRDP, and the uses and development allowed in this designation are identified in Section 5.2.2. ESHAs shall be buffered from urban uses as shown in Figure 5.2 and described in Section 5.2.2 (Resource Protection Buffer subsection).
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> **IM 3.4.2 Noise Intrusion into Terrace ESHA**
> Development shall be sited and designed so that noise sources are no closer than 100 feet from designated Resource Protection areas located in the terrace portion of the Marine Science Campus (other than development, such as paths, that may include minimal noise sources and that is planned and/or located within 100 feet of these areas and where measures are taken so that noise potentially audible from within these areas is limited to the maximum extent feasible). Use of Campus facilities shall occur in a manner that does not result in undue noise into designated terrace area Resource Protection areas. Noise shall be monitored periodically or upon complaint and appropriate noise attenuation measures shall be immediately implemented to lower any unacceptable noise generation.
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> **IM 3.4.3 Noise Intrusion into YLR (original YLR)**
> YLR (original YLR) shall not be exposed to noise generated by human activity on the terrace portion of the Marine Science Campus in excess of 60 dBA CNEL, as measured at the boundary of the YLR (original YLR). For the purposes of this measure,"dBA CNEL" means a 24-hour energy equivalent level derived from a variety of single noise events, with weighting factors of 5 and 10 dBA applied to the evening (7pm to 10pm) and nighttime

(10pm to 7am) periods, respectively, to allow for the greater sensitivity to noise during these hours.

Consistency Analysis
The proposed project would be located within the Research and Education Mixed Use land use designation, and outside the Resource Protection Buffer and Resource Protection land use limits, as close to existing developed area as allowed by fire code, in what is now a landscaped strip between existing parking areas and pathways. Thus the project, in addition to being minor in scope, would be isolated from ESHA by virtue of its location and is consistent with the restrictions identified in Policy 3.4.

The replacement natural gas generator would have minimal noise impacts since it would only operate during emergency and periodic testing events. Additionally, it would generate less noise than the existing diesel generator, and would be equipped with a second stage muffler and second level sound attenuating enclosure to further limit operational noise.

Scenic and Visual Resources
Relevant Figure and Implementation Measures
CLRDP Figure 3.16 (**Exhibit 4**) shows the key constraints to Campus development, including view corridors that must be maintained. The CLRDP also includes policies and IMs that require that development be sited to protect public views, and be designed for visual compatibility with existing campus structures:

IM 4.1.1 Location of Development
The University shall cluster development on the Marine Science Campus as shown in Figures 5.2 and 5.4 so as to leave ample open space that protects identified public views, including identified public view corridors.

Policy 4.2 Protection of Scenic Quality
New development at the Marine Science Campus shall be sited and designed to be compatible with existing Campus development and surrounding areas.

IM 4.2.1 Design Standards and Illustrative Campus Buildout Site Plan
Decisions on siting, materials, height, clustering, and other aspects of project design shall be consistent with Chapter 5 and Chapter 6…

IM 4.2.7 Construction Materials.
Stained vertical wood siding, roughcast concrete, high-quality shingle roofing, and other materials with compatible appearances (e.g., stone, wood, cor-ten steel, etc.) shall be used for the exterior of all buildings and other structures to ensure design compatibility among all buildings on the Marine Science Campus.

Additionally, Chapter 6 of the CLRDP provides Design Guidelines for new development on the campus, including for fencing and barriers that are used to protect buildings and ancillary structures from unauthorized access:

6.8 Fence/Barrier Design: Fencing/Barriers for Buildings, Research Areas, and Seawater System Intake, Filtration, and Storage
The University may install fencing and/or barriers as part of a building or its directly associated research areas when necessary to protect these areas from significant damage due to unauthorized access.

- Any such fencing/barriers shall be fabricated of natural or natural looking materials, and shall blend seamlessly into the design of the building to which the fencing is associated. Materials such as stone, wood, and cor-ten steel that are compatible with the building design and site character and that have limited areas of contrasting materials and color may be appropriate.

- Fencing/barriers shall be integrated with architecture and other site features.

- Fencing/barrier siting and design shall be appropriate to its intended function, but in no case shall be taller than eight (8) feet in height above grade.

Consistency Analysis
Collectively, the above-cited policies, IMs, and guidelines require development to be sited in a manner that is sensitive to specifically-identified public view corridors and designed to maintain visual consistency with the existing aesthetic of the Campus. As discussed above, the proposed project would be located as close to the main Seymour Center building (for which it provides support) as is allowed under the fire code, and would be outside of the public view corridors depicted in Figure 3.16 of the CLRDP, and within a zone in which development is allowed, consistent with IM 4.1.1.

The proposed propane tank would be screened with non-combustible vertical siding that resembles wood and would appear similar to the fencing on the existing outdoor storage yard (see **Exhibit 2**), consistent with Policy 4.2 and IM 4.2.7. The propane enclosure fencing would be six feet in height, as required by fire code, which is less than the eight-foot limit in the above-cited Design Guidelines, and would not present any contrasting colors or have any other features that would visually distract from the enclosure or present a departure from the design of surrounding development consistent with the Design Guidelines.

Overall, the proposed project would be both small in scale, which will minimize its visual impact on the Campus viewscape, and consistent with all applicable requirements in the CLRDP, and can thus be found consistent with the requirements of the CLRDP.

D. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
Section 13096 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 Commission Regulation Section 13550(d). 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.

The University, 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 Coastal Commission review of the CLRDP prior to certification. Again acting as lead agency, UCSC determined on June 6, 2019 that the proposed project qualifies for a categorical exemption due to the fact that all components of the project either replace existing utilities (CEQA Guidelines Section 15302(c)) or involve the installation of small new equipment and facilities in small structures (CEQA Guidelines Section 15303).

The Coastal Commission's review and analysis of land use proposals has been certified by the Secretary of Natural Resources as being the functional equivalent of environmental review under CEQA. The Commission has reviewed the relevant coastal resource issues raised by the proposed project, and has determined that the proposed project will not have adverse impacts on coastal resources. All public comments received to date have been addressed in the findings above. All above findings are incorporated herein in their entirety by reference.

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[6]

- UCSC CLRDP
- NOID File SCZ-NOID-0002-19

APPENDIX B – STAFF CONTACT WITH AGENCIES AND GROUPS

- UCSC Planning Staff

[6] These documents are available for review in the Commission's Central Coast District office.