California Environmental Quality Act Findings Regarding the Final Subsequent Environmental Impact Report for the Solano Park Demolition Project State Clearinghouse No. 2017012008

I. CERTIFICATION

The University of California, Davis ("University"), through delegated decision-making authority from The Board of Regents of the University of California ("Regents"), certified the Final Subsequent Environmental Impact Report ("Final Subsequent EIR" or "Subsequent EIR") tiered from the 2018 Long Range Development Plan (LRDP) Program EIR (2018 LRDP EIR) (State Clearinghouse No. 2017012008) for the UC Davis Solano Park Demolition Project. The Final Subsequent EIR consists of the Draft Subsequent EIR, comment letters, responses to comments, and the Mitigation Monitoring and Reporting Plan ("MMRP"). These findings discuss the Solano Park Demolition Project ("Project") relative to the requirements of the California Environmental Quality Act, Public Resources Code Sections 21000, et seq. ("CEQA"), as specifically discussed and analyzed in the Final Subsequent EIR.

In accordance with CEQA Guidelines § 15090, the University, as Lead Agency for the Project, certified that:

1. The Final Subsequent EIR has been completed in compliance with CEQA;
2. The Final Subsequent EIR was presented to the UC Office of the President and UC Davis, and both have received, reviewed, and considered the information contained in the Final Subsequent EIR and in the administrative record prior to approving the Project;
3. The Final Subsequent EIR reflects the University's independent judgment and analysis.

UC Davis has exercised independent judgment in accordance with Public Resources Code ("Public Resources Code" or "PRC") § 21082.1(c) in retaining its own environmental consultant and directing the consultant in preparation of the Subsequent EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

In accordance with Public Resources Code § 21081 and CEQA Guidelines § 15091, the University has made one or more specific written findings regarding significant impacts associated with the Project. Those findings are presented below, along with the rationale behind each of the findings. Concurrent with the adoption of these findings, the University adopts the MMRP and the Statement of Overriding Considerations for the Solano Park Demolition Project.

The documents and other materials that constitute the record of proceedings on which the Project findings are based are located at UC Davis Office of Campus Planning and Environmental Stewardship, 436 Mark Hall, University of California, Davis, CA. 95616. The custodian for these documents is the UC Davis Office of Campus Planning and Environmental Stewardship, 436 Mark Hall, University of California, Davis, CA. 95616. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and CEQA Guidelines § 15091(e).

II. INCORPORATION BY REFERENCE

The UC Davis 2018 LRDP EIR (SCH #2017012008), MMRP, Findings, and Statement of Overriding Considerations are hereby incorporated by reference into these Findings. The 2018 LRDP, 2018 LRDP

EIR, MMRP, Findings, and Statement of Overriding Considerations are available for review at the following locations:

- UC Davis Campus Planning and Environmental Stewardship in 436 Mrak Hall on the UC Davis campus
- Reserves at Shields Library on the UC Davis main campus
- Online at: http://environmentalplanning.ucdavis.edu

III. PROJECT BACKGROUND

A. PROJECT DESCRIPTION SUMMARY

The Solano Park Demolition project site, located on the UC Davis central campus, is on approximately 16 acres located off Old Davis Road and Arboretum Drive, south of the Arboretum Waterway, and just north/northwest of the Union Pacific Railroad tracks. Solano Park is a student housing development, built in 1962, that consists of 26 two-and three-story multi-unit apartment buildings, a community center, and ancillary buildings for mail, laundry, storage, and maintenance. There are a total of 35 buildings on the site, totaling approximately 180,600 gross square feet.

The buildings at the UC Davis Solano Park student housing development have reached the end of their lifespan, are not compliant with current building codes, and would require substantial investments to provide for adequate seismic safety, building systems, and utility infrastructure. In addition, there are security concerns due to the unauthorized use of onsite utilities and vacated portions of the site. Police service calls for the Solano Park apartments have increased as buildings have been vacated (UC Davis 2022). The safety of the students and their families is a priority for the University and maintaining uninhabited buildings poses an ongoing management concern for the University. Therefore, the University has determined that vacating, demolishing, and removing the buildings, followed by site stabilization, is necessary.

As of November 2022, 60 percent of the units (in the southern Solano Park buildings) have been vacated, and 40 percent of the units remain occupied (in the northern Solano Park buildings). The units in the northern portion of the site will be vacated by September 2023. Consistent with the University of California Relocation Assistance Act Policy for Real Estate Acquisitions and Leases (University of California 2013) and the UC Davis 2018 LRDP, the students and their families within the Solano Park apartments that need housing beyond the closure dates at Solano Park have been or will be offered on-campus housing, primarily at Primero Grove and Orchard Park, in compliance with UC-CR-12-0187 Relocation Assistance Policy.

No new development is proposed at the project site and the demolition project does not include any new housing developments elsewhere on campus. Rather, other on-campus housing, primarily at Primero Grove and Orchard Park, will provide sufficient units to accommodate the students and families relocated from Solano Park.

The Project would involve demolition of the UC Davis Solano Park student housing development, including site preparation and hazardous materials remediation; demolition and removal of existing structures; relocation of water pipelines; electrical conduit to maintain streetlights and security lighting; and final site stabilization and management. The project site would be fenced during demolition to prevent public access. Pedestrian, bicycle, and vehicle access would be maintained along project's northern boundary, Arboretum Drive, during demolition.

All demolition would be completed in accordance with current codes and ordinances. A staging area, or multiple staging areas, would be established onsite to accommodate debris collection bins and equipment. Contractor employees would park within established locations in the demolition site boundaries. Measures would be taken to prevent tracking dirt from the construction site, and adjacent paved streets would be cleaned daily during demolition activities. Solid waste generated during demolition activities would be separated into recyclable and non-recyclable waste and removed/disposed of as appropriate. Appliances with refrigerants would be separated and coordinated with a University representative to ensure proper disposal requirements are followed.

In compliance with the 2018 LRDP EIR archaeological resource Mitigation Measures 3.4-1a through 3.4-1c, the University has identified and documented known archaeological resources at the project site and has designed the demolition project to avoid the known archaeological resources to the degree feasible. The demolition activities in the northern and southern portions of the project site would involve different levels of ground disturbance to prevent and minimize disturbance of native soils where there is high likelihood of encountering archaeological and tribal cultural resources.

B. PROJECT OBJECTIVES

The objectives of the Solano Park Demolition Project are to:

- demolish and remove the buildings and facilities, including surface and subsurface infrastructure, which have reached the end of their lifespan and would require substantial investments to provide for adequate seismic safety and building systems;
- resolve safety, security, and maintenance issues at the vacated portion of the buildings;
- demolish all existing buildings, surface improvements, and utilities on the project site; and provide for efficient demolition activities; and
- prevent future dilapidation and degradation of the buildings and facilities by removing them after they are vacated.

C. PROCEDURAL COMPLIANCE WITH CEQA

The CEQA environmental review process for the Solano Park Demolition Project started on June 10, 2022, with the UC Davis issuance of a Notice of Preparation ("NOP") of a Subsequent EIR tiered from the 2018 LRDP Program EIR (SCH #2017012008). The key milestones associated with preparation of the Subsequent EIR are set forth and described below.

- In accordance with PRC Section 21080.4 and CEQA Guidelines Section 15082, a NOP was prepared and circulated on June 10, 2022, for a minimum 30-day period of public and agency comment. Written scoping comments were accepted from June 10 through July 11, 2022.
- The NOP was submitted to the State Clearinghouse, the Yolo County clerk-recorder, and the Solano County clerk-recorder. The NOP was available during the scoping period at the following locations:
    - On-line: https://environmentalplanning.ucdavis.edu/solano-park-demolition
    - UC Davis: Office of Campus Planning and Environmental Stewardship, 436 Mrak Hall

    Public Libraries:

    - Davis: Mary L. Stephens Branch Library, 315 East 14th Street, Davis, CA 95616
    - UC Davis: Shields Library Reserves Section, Shields Avenue, University of California

- A public scoping meeting was held via webinar (Zoom) on June 27, 2022; no scoping comments were provided during the meeting.
- A total of five letters were received during the scoping period. A copy of the NOP and a summary of the scoping comments are included in Appendix A of the Subsequent EIR.
- The Public Draft Subsequent EIR was published on December 21, 2022 for review and comment by the public and other interested parties, agencies, and organizations. An extended public review period of 51 days was provided for the Draft Subsequent EIR to accommodate winter holidays: from December 21, 2022 through February 10, 2023.
- The Notice of Availability and the Public Draft Subsequent EIR were submitted to the State Clearinghouse, the Yolo County clerk-recorder, and the Solano County clerk-recorder.
- Copies of the Draft Subsequent EIR were available during the public review period at the following locations:
    - On-line: https://environmentalplanning.ucdavis.edu/solano-park-demolition
    - UC Davis: Office of Campus Planning and Environmental Stewardship, 436 Mrak Hall

  Public Libraries:

    - Davis: Mary L. Stephens Branch Library, 315 East 14th Street, Davis, CA 95616
    - UC Davis: Shields Library Reserves Section, Shields Avenue, University of California
- UC Davis hosted a virtual public hearing (via Zoom) on January 18, 2023 to receive oral public comment from public agencies, interested parties and the public regarding the Draft Subsequent EIR. There were no attendees and no comments were provided at the public hearing. A transcript of the public hearing is provided in Appendix C of the Final Subsequent EIR.
- UC Davis received three comment letters on the Draft EIR.
- Responses to agency comments on the Draft EIR were provided to the agencies on April 5, 2023.
- The Final Subsequent EIR was completed and published on May 3, 2023.
- Included in the Final Subsequent EIR are Volume 1, the Draft Subsequent EIR, and Volume 2, the Comments on the Draft EIR, Responses to Comments, and the MMRP.
- After consideration of the Final EIR, all public comments, the Findings, Statement of Overriding considerations, UC Davis certified the Final EIR and approved the Project.
- Subsequent to the Final EIR certification, University staff filed a CEQA Notice of Determination with the California Office of Planning and Research, State CEQA Clearinghouse.

D. ADEQUACY OF PRIOR ENVIRONMENTAL REVIEWS

In accordance with the provisions of CEQA, UC Davis prepared a Subsequent EIR tiered from the 2018 LRDP Program EIR. Subsequent environmental review is environmental analysis prepared for a later discretionary approval after an agency has certified a prior EIR to address potential changes in a project or changes in environmental conditions that may result in new or different significant impacts (Public Resources Code [PRC] Section 21166; CEQA Guidelines Sections 15162). As the lead agency under CEQA (PRC Section 21000 et seq.), UC Davis determined that a Subsequent EIR was necessary to further evaluate the project-specific information for the Solano Park Demolition Project in relation to potential impacts to archaeological and historical resources and tribal cultural resources, pursuant to State CEQA Guidelines Sections 15162 and 15168(d).

All other environmental resource topics are addressed in Chapter 3, "Environmental Checklist," of the Subsequent EIR, which documents how the Project is consistent with and addressed by the 2018 LRDP and 2018 LRDP EIR, respectively. That chapter documents that there are no changes in the 2018 LRDP or the circumstances under which the Project would be undertaken that could result in new or substantially more severe environmental impacts than considered in the 2018 LRDP EIR. The 2018 LRDP EIR mitigation measures that apply to the Solano Park Demolition Project, as summarized in Table 1, below, are identified in Chapter 3 of the Draft Subsequent EIR, listed in Appendix B to the EIR, and are incorporated into the project-specific MMRP.

The environmental effects of the Solano Park Demolition Project that were adequately addressed in the 2018 LRDP EIR (see Chapter 3 of the Subsequent EIR), are reflected in the Findings and Statement of Overriding Considerations for the 2018 LRDP EIR adopted by the University on July 19, 2018, in that those impacts: (1) have been mitigated or avoided, (2) have been examined at a sufficient level of detail to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the advanced work phase component of the project, or (3) cannot be mitigated to avoid or substantially lessen the significant impacts despite the University's willingness to accept all feasible mitigation measures, and the only purpose of including analysis of such effects in another environmental impact report would be to put the agency in a position to adopt a statement of overriding considerations with respect to the effects.

Table 1. 2018 LRDP EIR Mitigation Measures Imposed on the Solano Park Demolition Project

Air Quality
2018 LRDP Mitigation Measure 3.3-1: Reduce construction-generated emissions of ROG, NO_X, and PM_{10}.
2018 LRDP Mitigation Measure 3.3-4: Reduce short-term construction-generated TAC emissions.
Biological Resources
2018 LRDP Mitigation Measure 3.5-4a: Avoidance of Swainson's hawk and other nesting raptors.
2018 LRDP Mitigation Measure 3.5-6: Tricolored blackbird avoidance.
2018 LRDP Mitigation Measure 3.5-7: Valley elderberry longhorn beetle avoidance.
2018 LRDP Mitigation Measure 3.5-8b: Bat preconstruction surveys, exclusion, and mitigation.
2018 LRDP Mitigation Measure 3.5-11: Tree Surveys and tree removal mitigation.
Cultural Resources
2018 LRDP Mitigation Measure 3.4-1a: Identify and protect unknown archaeological resources.
2018 LRDP Mitigation Measure 3.4-1b: Protect known unique archaeological resources.
2018 LRDP Mitigation Measure 3.4-1c: Document unique archaeological resources.
Hazards and Hazardous Materials
2018 LRDP Mitigation Measure 3.9-2a: Site-specific investigation and work plan implementation.
2018 LRDP Mitigation Measure 3.9-2b: Hazardous materials contingency plan.
2018 LRDP Mitigation Measure 3.9-2c: Minimization of hazards during demolition.
2018 LRDP Mitigation Measure 3.9-6. Prepare and implement site-specific construction traffic management.
Noise
2018 LRDP Mitigation Measure 3.12-1: Reduce construction noise.

E. CONSISTENCY WITH UC DAVIS 2018 LRDP OBJECTIVES

The Solano Park Demolition Project is consistent with the UC Davis 2018 LRDP objectives as follows:

- The Project would support the academic enterprise by removing buildings that have reached the end of their lifespan, thereby making room for future facilities, as needed.
- The Project would enrich community life by removing outdated buildings that would require substantial investment to provide adequate safety and systems, removing hazardous building materials, and addressing security concerns.
- The Project would contribute to a sustainable future by relocating students from Solano Park to new on-campus housing units at Primero Grove and Orchard Park, which are all electric, and more energy/water efficient, and making room for future facilities that could be constructed using more sustainable methods and materials.

2018 LRDP Campus Population

For the 2021-2022 school year (three-quarter average), UC Davis had an annual average on-campus faculty and staff population of 11,740 people and an annual average on-campus student population of 36,944 people (UC Davis 2022). The Solano Park Demolition Project would not add students or staff at UC Davis and would not alter the on-campus population. Therefore, the Project is within the scope of the 2018 LRDP population projections.

2018 LRDP Land Use Designation

The 2018 LRDP designates the project site as *Student Housing*. The *Student Housing* land use designation applies to most of the land dedicated to campus housing, including residence halls for primarily first-year students and campus apartments for undergraduates, graduates, and students with families. The Project would demolish housing and support buildings within this land use designation. No redevelopment is proposed.

2018 LRDP Academic Building Space

The 2018 LRDP provides capacity for approximately 2 million square feet (sf) of additional academic building space for classrooms and study space, instructional and research labs, faculty and administrative offices, and other programs to support the academic mission in existing space. The Project would demolish unused and abandoned student housing buildings. No academic buildings would be demolished as part of the Project.

IV. ENVIRONMENTAL IMPACTS AND FINDINGS

Pursuant to Public Resources Code § 21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a Project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the Project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The University has made one or more of these specific written findings regarding each significant project-specific impact associated with the Solano Park Demolition Project. Those findings are presented below, along with a presentation of facts in support of the findings.

These findings summarize the determinations of the Final Subsequent EIR with respect to the Project's impacts before and after mitigation and do not attempt to describe the full analysis of each environmental impact considered in the Final Subsequent EIR. Instead, the findings provide a summary description of each impact, describe the applicable mitigation measures identified in the Final Subsequent EIR and adopted by the University for the Project, and state the University's findings regarding the significance of each impact with the adopted mitigation measures. The Final Subsequent EIR contains a full explanation of each impact, mitigation measure, and the analysis that led the University to its conclusions on those impacts. These findings hereby incorporate by reference the discussion and analysis in the Final Subsequent EIR, which supports the Final Subsequent EIR's determinations regarding the Project's environmental impacts and mitigation measures. In making these findings, the University ratifies, adopts, and incorporates by reference the Final EIR's analysis, determinations, and conclusions relating to environmental impacts and mitigation measures, except to the extent that any such determinations and conclusions are specifically and expressly modified by these findings.

In adopting the mitigation measures described below, the University intends to adopt each of the mitigation measures recommended in the Final Subsequent EIR related to the Project. Accordingly, in the event that a mitigation measure recommended in the Final Subsequent EIR has been inadvertently omitted from these findings, that mitigation measure is hereby adopted and incorporated by reference in the findings. Additionally, in the event that the description of mitigation measures set forth below fails accurately to capture the substance of a given mitigation measure due to a clerical error (as distinct from specific and express modification by the University through these Findings), the language of the mitigation measure as set forth in the Final Subsequent EIR shall govern.

The Final Subsequent EIR evaluation included a detailed analysis of impacts in two environmental disciplines, analyzing the Project and alternatives, including a No Project Alternative. The Subsequent EIR discloses the environmental impacts expected to result from the Project. Where possible, mitigation measures were identified to avoid or minimize significant environmental effects. In addition, the campus committed to implementing measures to reduce the direct and indirect impacts that would result from Project activities. The mitigation measures identified in the Subsequent EIR are measures proposed by the lead agency, responsible or trustee agencies or other persons that were not included in the Project, but could reasonably be expected to reduce adverse impacts if required as conditions of approving the Project, as required by CEQA Guidelines § 15126.4(a)(1)(A).

1. Findings on Project-Specific Significant Environmental Impacts That Can be Reduced to a Less Than Significant Level

The University finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final Subsequent EIR. These findings are based on the discussion of impacts in the detailed issue area analyses in Volume 1, Sections 4.1 and 4.2 of the Final Subsequent EIR and the cumulative impacts discussed in Volume 1, Chapter 5 of the Final Subsequent EIR. An explanation of the rationale for each finding is presented below.

Cultural Resources

Impact 4.1-2: Impacts to Unique Archaeological Resources

Archaeological site P-57-000198/CA-YOL-182 is a unique archaeological resource that is recommended eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). Project-related ground-disturbing activities could result in discovery or damage of archaeological resources as defined in State CEQA Guidelines Section 15064.5. (See Final Subsequent EIR Section 4.1)

FINDING: The University finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact 4.1-2. Archaeological resources have been identified within the Project area and there is potential that buried archaeological resources could be encountered during construction. However, implementation of 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c are feasible, are adopted, and would reduce impacts associated with precontact archaeological resources to a less-than-significant level. (Final Subsequent EIR Volume 1, Section 4.1, page 4.1-14).

The following mitigation measures from the 2018 LRDP EIR apply to the entirety of the Project.

2018 LRDP EIR Mitigation Measure 3.4-1a: Identify and Protect Unknown Archaeological Resources

During project-specific environmental review of development under the 2018 LRDP, the campus shall define each project's area of effect for archaeological resources. The campus shall determine the potential for the project to result in cultural resource impacts, based on the extent of ground disturbance and site modification anticipated for the proposed project. The campus shall determine the level of archaeological investigation that is appropriate for the Project site and activity, as follows:

- Minimum: excavation less than 18 inches deep and less than 1,000 sf of disturbance (e.g., a trench for lawn irrigation, tree planting, etc.). Implement Mitigation Measure 3.4-1a(1).
- Moderate: excavation below 18 inches deep and/or over a large area on any site that has not been characterized as sensitive and is not suspected to be a likely location for archaeological resources. Implement Mitigation Measure 3.4-1a(1) and (2).
- Intensive: excavation below 18 inches and/or over a large area on any site that is within the zone of archaeological sensitivity identified in Exhibit 3.4-1, or that is adjacent to a recorded archaeological site. Implement Mitigation Measure 3.4-1a(1), (2), and (3).

UC Davis shall implement the following steps to identify and protect archaeological resources that may be present in the project's area of effects:

1) For project sites at all levels of investigation, contractor crews shall be required to attend a training session prior to the start of earth moving, regarding how to recognize archaeological sites and artifacts and what steps shall be taken to avoid impacts to those sites and artifacts. In addition, campus employees whose work routinely involves disturbing the soil shall be informed how to recognize evidence of potential archaeological sites and artifacts. Prior to disturbing the soil, contractors shall be notified that they are required to watch for potential archaeological sites and artifacts and to notify the UC Davis Office of Campus Planning and Environmental Stewardship if any are found. In the event of a find, the campus shall implement item (5), below.

2) For project sites requiring a moderate or intensive level of investigation, a surface survey shall be conducted by a qualified archaeologist once the area of ground disturbance has been identified and prior to soil disturbing activities. For sites requiring moderate investigation, in the event of a surface find, intensive investigation will be implemented, as per item (3), below. Irrespective of findings, the qualified archaeologist shall, in consultation with the UC Davis Office of Campus Planning and Environmental Stewardship, develop an archaeological monitoring plan to be implemented during the construction phase of the project. If the project site is located within the zone of archaeological sensitivity or it is recommended by the archaeologists, the campus shall notify the appropriate Native American tribe and extend an invitation for monitoring. The frequency and duration of monitoring shall be adjusted in accordance with survey results, the nature of construction activities, and results during the monitoring period. A written report of the results of the monitoring will be prepared and filed with the appropriate Information Center of the California Historical Resources Information System. In the event of a discovery, the campus shall implement item (5), below.

3) For project sites requiring intensive investigation, irrespective of subsurface finds, the campus shall retain a qualified archaeologist to conduct a subsurface investigation of the project site, to ascertain whether buried archaeological materials are present and, if so, the extent of the deposit relative to the project's area of effects. If an archaeological deposit is discovered, the archaeologist will prepare a site record and a written report of the results of investigations and filed with the appropriate Information Center of the California Historical Resources Information System.

   If it is determined that the resource extends into the project's area of effects, the resource will be evaluated by a qualified archaeologist, who will determine whether it qualifies as a historical resource or a unique archaeological resource under the criteria of CEQA Guidelines § 15064.5. If the resource does not qualify, or if no resource is present within the project's area of effects, this will be noted in the environmental document and no further mitigation is required unless there is a discovery during construction. In the event of a discovery item (5), below shall be implemented.

4) If archaeological material within the project's area of effects is determined to qualify as an historical resource or a unique archaeological resource (as defined by CEQA), the UC Davis Office of Campus Planning and Environmental Stewardship shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, the establishment of a preservation easement, or other means that will permit avoidance or substantial preservation in place of the resource. If avoidance or substantial preservation in place is not possible, the campus shall implement Mitigation Measure 3.4-1b.

5) If archaeological material is discovered during construction (whether or not an archaeologist is present), all soil disturbing work within 100 feet of the find shall cease. The UC Davis Office of Campus Planning and Environmental Stewardship shall contact a qualified archaeologist to provide and implement a plan for survey, subsurface investigation as needed to define the deposit, and assessment of the remainder of the site within the project area to determine whether the resource is significant and would be affected by the project. Mitigation Measure 3.4-1a, steps (3) and (4) shall be implemented.

2018 LRDP EIR Mitigation Measure 3.4-1b: Protect Known Unique Archaeological Resources

For an archaeological site that has been determined by a qualified archaeologist to qualify as a unique archaeological resource through the process set forth under Mitigation Measure 3.4-1a, and where it has been determined under Mitigation Measure 3.4-1a that avoidance or preservation in place is not feasible, a qualified archaeologist, in consultation with the UC Davis Office of Campus Planning and Environmental Stewardship, and Native American tribes as applicable, shall:

1) Prepare a research design and archaeological data recovery plan for the recovery that will capture those categories of data for which the site is significant, and implement the data recovery plan prior to or during development of the site.

2) Perform appropriate technical analyses, prepare a full written report and file it with the appropriate information center, and provide for the permanent curation of recovered materials.

3) If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the CRHR, the UC Davis Office of Campus Planning and Environmental Stewardship shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the site to be preserved intact, such as project redesign, placement of fill, or project relocation or abandonment. If no such measures are feasible, the campus shall implement Mitigation Measure 3.4 1c.

2018 LRDP EIR Mitigation Measure 3.4-1c: Document Unique Archaeological Resources

If a significant unique archaeological resource cannot be preserved intact, before the property is damaged or destroyed, the UC Davis Office of Campus Planning and Environmental Stewardship shall ensure that the resource is appropriately documented. For an archaeological site, a program of research-directed data recovery shall be conducted and reported, consistent with Mitigation Measure 3.4-1a.

Rationale for Finding: Implementation of 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c would reduce impacts associated with precontact archaeological resources to a less-than-significant level by requiring the preparation of a data recovery plan (as detailed in Solano Park Demolition Project Mitigation Measure 4.2-1a), implementation of a worker cultural resources awareness program (as detailed in Solano Park Demolition Project Mitigation Measure 4.2-1b), require a qualified archaeological monitor during ground disturbing activities, the performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant precontact archaeological resources.

Cumulative Impact Related to Archaeological Resources

FINDING: The University finds that changes or alterations have been incorporated into the Project which mitigate cumulative effects related to archaeological resources. Ground disturbance associated with the Project could result in disturbances to buried archaeological resources. The disturbance or destruction of unidentified buried archaeological resources would be a significant impact that would contribute to an overall cumulative impact. However, implementation of 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c are feasible, are adopted, and would reduce impacts associated with precontact archaeological resources to a less-than-significant level.

2018 LRDP EIR Mitigation Measure 3.4-1a: Identify and Protect Unknown Archaeological Resources

2018 LRDP EIR Mitigation Measure 3.4-1b: Protect Known Unique Archaeological Resources

2018 LRDP EIR Mitigation Measure 3.4-1c: Document Unique Archaeological Resources

Rationale for Finding: 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c would apply to the entire Project; therefore, adverse effects on currently known archeological resources (P-57-000198/CA-YOL-182) and potentially newly discovered archeological resources would be avoided or mitigated. With implementation of these measures the Project would not contribute considerably to the cumulative loss of archaeological resources. (Final Subsequent EIR Volume 1, Chapter 5, page 5-4).

2. Findings on Project-Specific Significant Environmental Impacts That Cannot be Avoided or Reduced to a Less-Than-Significant Level

FINDING: Based on the issue area assessment in the Subsequent EIR, the University has determined that the Project will have significant impacts in the resource areas discussed below, and that these impacts cannot be avoided or reduced despite the incorporation of all feasible mitigation measures. These findings are based on the discussion of impacts in the detailed issue area analyses in Volume 1, Section 4.2 of the Subsequent EIR. For each significant and unavoidable impact identified below, the University has made a finding(s) pursuant to Public Resources Code § 21081. An explanation of the rationale for each finding is also presented below.

Tribal Cultural Resources

Impact 4.2-1: Substantial Adverse Change in the Significance of a Tribal Cultural Resource

The records search results identified one archaeological resource (P-57-000198/CA-YOL-182). In consultation with the Yocha Dehe Wintun Nation for the Project, UC Davis has discussed treatment of the site as a tribal cultural resource, as defined under PRC Section 21074, and it is assumed that the Tribe would like for it to be treated as such. Because project-related ground-disturbing activities could result in damage to tribal cultural resources, the Project could cause a potentially significant impact. (See Final Subsequent EIR Section 4.2)

FINDING: The University finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact 4.2-1. No archaeological resources have been identified within the Project area. However, there is potential that buried archaeological resources could be encountered during construction. 2018 LRDP EIR Mitigation Measures 3.4-1a and 3.4-1c are feasible, are adopted, and would reduce the Project's impact to tribal cultural resources but not to a less-than-significant level. Implementation of project-specific Mitigation Measures 4.2-1a through 4.2-1d are feasible and are adopted to reduce the Project's impact to tribal cultural resources; however, they cannot reduce this impact to a less-than-significant level. (Final Subsequent EIR Volume 1, Section 4.2, page 4.2-10).

2018 LRDP EIR Mitigation Measures 3.4-1a and 3.4-1c (see above)

Solano Park Demolition Project Mitigation Measure 4.2-1a: Prepare and Implement a Discovery and Treatment Plan

Prior to any demolition activities associated with the Project, including placement of heavy machinery within the boundaries of P-57-000198/CA-YOL-182, UC Davis shall finalize a discovery and treatment plan specific to the site. The plan shall be developed in collaboration with the Yocha Dehe Wintun Nation and submitted to the Tribe for final review 30 days prior to ground disturbance. If the Tribe does not reply within thirty days, work may commence. The discovery and treatment plan shall include, but is not limited to:

- specific descriptions of the known vertical and horizontal distribution of cultural deposits across the project site and a general sensitivity analysis for specific demolition activities based on this description;
- definitions of what constitutes a significant construction discovery and a research design in case such a find is made;
- specific measures that will be taken in the most likely discovery circumstances conceivable, to include:
    - recovery and immediate reburial conducted by the Yocha Dehe Wintun Nation at a predetermined location,
    - archaeological sampling and analysis (including radiocarbon dating or obsidian hydration), if approved by the Tribe, to be performed by the consulting archaeologist, and/or
    - specific provisions for the handling and processing of any items recovered during construction (e.g., use of paper rather than plastic bags, recovery of all soils associated with processed soil samples).
- archaeological and tribal monitoring (as required under 2018 LRDP Mitigation Measure 3.4-1a[2]) procedures, including:
    - logs shall be completed weekly by the archaeological monitor, and
    - based on presence/absence results of the monitoring, the boundaries of P-57-000198/CA-YOL-182 shall be validated or revised on appropriated Department of Parks and Recreation 523 forms.
- a burial treatment agreement;
- reporting requirements; and
- health and safety procedures.

Solano Park Demolition Project Mitigation Measure 4.2-1b: Prepare and Implement Worker Tribal Cultural Resources Awareness and Respect Training Program

A cultural resources awareness and respect training program will be provided to all construction personnel active on the project site prior to implementation of earth moving activities; this will be a component of the archaeological worker awareness training required under 2018 LRDP EIR

Mitigation Measure 3.4-1a(1). A representative or representatives from culturally affiliated California Native American Tribe(s) will be invited to participate in the development and delivery of the training program in coordination with a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists. The training program shall be submitted to the Tribe 14 days prior to ground disturbance for final review. If the Tribe does not reply within 14 days, the training may be given and work may commence. The program will include relevant information regarding sensitive tribal cultural resources, including protocols for resource avoidance, applicable laws regulations, and the consequences of violating them. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and protocols, consistent with Native American Tribal values, as determined through consultation with tribal representative(s).

Solano Park Demolition Project Mitigation Measure 4.2-1c: Construction Management

The following best management practices shall be incorporated into the demolition/construction requirements:

- Heavy equipment shall be required to have rubber tracks within the light demolition area.
- If heavy equipment must enter the boundaries of P-57-000198/CA-YOL-182, it shall be confined to the minimum area possible. In the light demolition portion of the project site, UC Davis and the consulting archaeologist shall create a map that identifies approved equipment routes and placement sites. The contractor(s) shall utilize the identified routes and equipment sites to avoid areas of known resources. These routes and sites shall be marked with flags or lathes.
- All demolition staging shall occur in paved areas outside the boundaries of P-57-000198/CA-YOL-182.
- Protective mats or other similar protective methods shall be used, when appropriate, to minimize damage to subsurface materials. Because rain-saturated soils would allow the mats to sink and potentially damage subsurface materials, protective mats shall not be used during or immediately following periods of rain. The archaeological and tribal monitors shall coordinate with the construction foreman regarding the appropriate timing for use of protective mats.
- Check-ins shall occur weekly as needed between the construction supervisor/foreman, the archaeological and tribal monitors, and UC Davis to coordinate and set expectations for the week's upcoming demolition work.

Solano Park Demolition Project Mitigation Measure 4.2-1d: Post-demolition Tribal Cultural Resources Protection

- Following completion of all demolition activities, UC Davis shall erect protective fencing around the light demolition portion of the project site, at the same time construction fencing is removed.
- High priority tribal cultural resources shall be capped. These high-priority areas shall be identified and coordinated with Yocha Dehe Wintun Nation and identified in the discovery and treatment plan. (Due to confidentiality concerns, the types and locations of the areas to be capped are not included herein.)

- UC Davis shall work collaboratively with Yocha Dehe Wintun Nation regarding wildfire management of P-57-000198/CA-YOL-182. Methods could include the use of riding mowers of less than 1,000 pounds or herbivory.

Rationale for Finding: Implementation of project-specific Mitigation Measures 4.2-1a through 4.2-1d would reduce the Project's impact to tribal cultural resources but not to a less-than-significant level. Implementation of project-specific Mitigation Measures 4.2-1a through 4.2-1d require the preparation and implementation of a worker tribal cultural resources awareness and respect training, the preparation and implementation of a discovery and treatment plan including preservation options and proper care of significant artifacts if they are recovered, and post-demolition measures to protect subsurface resources. As required by Public Resources Code Section 21082.3 (b) this Subsequent Environmental Impact Report has considered whether feasible alternatives (See Chapter 6) or mitigations measures exist to substantially lessen or avoid impacts to the tribal cultural resource, including those contemplated in Public Resources Code Section 21084.3. These mitigation measures would reduce the Project's impact to tribal cultural resources, but not to a less-than-significant level because the possibility remains that demolition activities might not be able to avoid impacting significant tribal cultural resources. Therefore, this impact would be significant and unavoidable.

Cumulative Impact Related to Tribal Cultural Resources

FINDING: The University finds that changes or alterations have been incorporated into the Project which mitigate cumulative effects related to archaeological resources. Ground disturbance associated with the Project could result in disturbances to buried archaeological resources. The disturbance or destruction of unidentified buried archaeological resources would be a significant impact that would contribute to an overall cumulative impact. However, implementation of 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c are feasible, are adopted, and would reduce impacts associated with precontact archaeological resources to a less-than-significant level.

2018 LRDP EIR Mitigation Measure 3.4-1a: Identify and Protect Unknown Archaeological Resources

2018 LRDP EIR Mitigation Measure 3.4-1b: Protect Known Unique Archaeological Resources

2018 LRDP EIR Mitigation Measure 3.4-1c: Document Unique Archaeological Resources

Rationale for Finding: 2018 LRDP EIR Mitigation Measures 3.4-1a through 3.4-1c and project-specific Mitigation Measures 4.2-1a through 4.2-1d would reduce the Project's impact to tribal cultural resources, but not to a less-than-significant level because the possibility remains that demolition activities might not be able to avoid impacting significant tribal cultural resources. Cumulative development would be required to implement similar mitigation to avoid/reduce impacts to tribal cultural resources, and compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097 would ensure that treatment and disposition of the remains occurs in a manner consistent with State guidelines and California Native American Heritage Commission guidance. However, despite implementation of all feasible mitigation measures, the Project would result in a considerable contribution to significant cumulative tribal cultural resource impacts. Therefore, this impact would be significant and unavoidable. (Final Subsequent EIR Volume 1, Chapter 5, page 5-4).

E. FINDINGS ON PROJECT ALTERNATIVES

1. Alternatives Screened Out from Detailed Consideration in the Subsequent EIR

Solano Park Redevelopment

The buildings at the UC Davis Solano Park student housing development have reached the end of their lifespan. Redevelopment of the Solano Park Apartments would require substantial investments to renovate the apartment buildings to provide adequate seismic safety, building systems, and utility infrastructure. In addition, there have been security concerns due to unauthorized use at the vacated portion of the site. The safety of the students and their families is a priority for the University and the time required to redesign and redevelop 35 buildings would not resolve the safety issues in a reasonable timeframe. Therefore, the University has determined that vacating, demolishing, and removing the buildings is necessary at the present time. Additional student housing is currently available and/or under construction on campus to accommodate current residents of the Solano Park apartments plus other students at UC Davis. As a result, redevelopment of the Solano Park Apartments to provide student housing is not necessary to meet LRDP housing commitments for the University at the present time. Redevelopment of the apartments would also involve the use of heavy equipment and ground disturbing activities that would exceed the soil depth identified for the demolition project.

Full Demolition with Resource Recovery and Repatriation Alternative

Due to the presence of known cultural resources within the project site, UC Davis considered but ruled out implementing full demolition, involving ground disturbance to remove surface structures such as pavement and foundations, throughout the entire Solano Park Demolition Project site. As discussed in Chapter 4, "Environmental Setting, Impacts, and Mitigation Measures," UC Davis consulted with Yocha Dehe Wintun Nation and identified one tribal cultural resource (P-57-000198/CA-YOL-182). P-57-000198/CA-YOL-182 within the project site because of its historic use as a residential and tool production base camp for tribal members. The resource was also recommended as eligible for the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). The University recognizes the likelihood of encountering cultural and tribal cultural resources during ground disturbing activities on or near this identified site.

Under this alternative, full demolition of the entire project site would be implemented, which would result in ground disturbing activities to remove all structures, surface structures, foundations, and utility infrastructure. Due to the known cultural site, it is anticipated that there would be discoveries, which would be handled through resource recovery and repatriation in consultation with qualified archaeologists and tribal representatives. The full demolition project approach would result in greater potential impacts to cultural and tribal cultural resources than the Project, which proposes avoidance of ground disturbance over approximately 8.2 acres of the identified cultural site. In addition, through AB 52 consultation between UC Davis and the Yocha Dehe Wintun Nation it has been made clear that avoidance of potential disturbance to known sensitive resources is the preferred approach, rather than discovery and repatriation.

The University finds that the alternatives eliminated from further consideration in the Draft EIR are infeasible and impractical, would not meet most Project objectives and/or would not reduce or avoid any of the significant effects of the proposed Project, for the reasons detailed in Volume 1, Chapter 6 of the Subsequent EIR.

2. Alternatives Analyzed in the Subsequent EIR

In compliance with CEQA and the CEQA Guidelines, the Subsequent EIR evaluated a reasonable range of alternatives to the Project. The Subsequent EIR's analysis examined the potential feasibility of each alternative, its environmental effects, and its ability to meet the basic Project objectives while reducing impacts to the environment. The alternatives analysis included analysis of a no-Project alternative and identified the environmentally superior alternative. The Draft Subsequent EIR evaluated two alternatives to the Project:

Alternative 1: No Project–No Demolition Alternative

Alternative 2: Light Demolition Across the Entire Project Site

Brief summaries of these alternatives and findings regarding these alternatives are provided below.

- ***Alternative 1: No Project–No Demolition Alternative:*** There would be no demolition of the Solano Park apartments and associated facilities, no realignment of utilities, nor abandonment of infrastructure. The project site would remain in its current condition. (See EIR Volume 1, Chapter 6, Section 6.4.1).

  FINDING: Pursuant to Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3), the University finds that the specific economic, legal, social, technological, or other considerations, including failure to meet basic Project objectives, render the No Project– No Demolition Alternative infeasible. Alternative 1 would not demolish or remove the buildings and facilities at Solano Park. The buildings, which have reached the end of their lifespan and pose safety and security concerns, would continue to deteriorate, potentially leading to dilapidated structures and further safety and management concerns for the University. The No Project Alternative would not meet the project objectives and the University therefore rejects this alternative.

- ***Alternative 2: Light Demolition Across the Entire Project Site:*** UC Davis would proceed with the project as proposed. However, instead of implementing full demolition on approximately 4.5 acres of the southern portion of the project site, light demolition would be implemented across the entire site to avoid subsurface ground disturbance. (Final EIR Volume 1, Chapter 6, Section 6.4.2).

  FINDING: Pursuant to Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3), the University finds that the specific economic, legal, social, technological, or other considerations, including failure to meet Project objectives, render the Light Demolition Across the Entire Site Alternative infeasible. Alternative 2 would demolish and remove the buildings and facilities at Solano Park utilizing light demolition to avoid ground disturbance to preserve and protect cultural and tribal cultural resources. This alternative would be more protective of cultural and tribal cultural resources by avoiding ground disturbing activities to resource P-57-000198/CA-YOL-182, while removing the potential for dilapidated structures and safety concerns by removing the vacated buildings and structures from the site. However, Alternative 2 would not completely avoid the significant and unavoidable impact because the possibility remains that demolition activities or ground-disturbance related to the new utility lines might not be able to avoid impacting significant tribal cultural resources. Additionally, Alternative 2 would not fulfill the project objectives to demolish all existing buildings, surface improvements, and utilities on the project site to the same degree as the Project. Nor would Alternative 2 achieve the objective to resolve safety, security, and maintenance issues. Any remaining surface structures can become a tripping hazard or potential impalement or blunt force hazard if a person falls on it. Soil settlement or migration can cause a flush surface structure to become a hazard in the future and unfilled voids can become an entrapment hazard for people or animals. Therefore, the light

demolition approach in Alternative 2 would not fully support achievement of the project objectives and the University rejects this alternative.

- ***Environmentally Superior Alternative***: Solano Park Demolition Project

  FINDING: Although Alternative 2: Light Demolition Across the Entire Project Site would greatly reduce the potential for impacts to tribal cultural resources, both the Project and Alternative 2 would result in a significant and unavoidable impact because the possibility remains that demolition activities could impact tribal cultural resources. Furthermore, Alternative 2 would not fulfill the project objective to resolve safety, security, and maintenance issues because it would leave all surface structures throughout the project site. Alternative 2 would not achieve the project objective to demolish all existing buildings, surface improvements, and utilities on the project site to the same degree as the Project. Because the Project would result in less-than-significant impacts with implementation of 2018 LRDP EIR mitigation measures, because the Project would implement all feasible mitigation measures to lessen the significant and unavoidable impact to tribal cultural resources, and because the Project would more fully achieve the project objectives, the Project is considered to be the environmentally superior alternative. The University adopts the Project, which is the environmentally superior alternative because it provides the best available and feasible balance between maximizing attainment of the Project's objectives and minimizing significant environmental impacts.

F. FINDINGS ON MITIGATION MEASURES PROPOSED IN COMMENTS

One comment (Comment S1-2) from California Department of Fish and Wildlife (CDFW) on the Draft Subsequent EIR suggested a mitigation measure related to Crotch bumble bee (*Bombus crotchii*), a candidate species for listing under the California Endangered Species Act (CESA). As explained in Response S1-2 in the Final Subsequent EIR, it is unlikely that Crotch bumble bee forage, nest, or overwinter in the community garden or anywhere else on the Solano Park Demolition Project site, and therefore the University concludes that the impact is not considered significant. However, consistent with the CDFW comment, and because of the one 1998 occurrence of crotch bumble bee noted in the CNDDB and a siting of this species within 1.2 miles of the project site, there is a potential, however slight, that the species could forage, nest, or overwinter on or near the site. Therefore, in an abundance of caution, and to respond to the CDFW comment letter, UC Davis adopts the following environmental protection measure and includes it in the Project's mitigation monitoring plan. This measure substantially incorporates the recommendations from CDFW and would further reduce the limited potential for the Project to affect this species.

Environmental Protection Measure: Implement Limited Operating Period or Conduct Focused Surveys for Crotch Bumble Bee

- Initial ground-disturbing work (e.g., grading, vegetation removal, trenching, staging) within the community garden portion of the project site shall take place between August 15 and March 15, if feasible.
- If completing all initial ground-disturbing work between August 15 and March 15 is not feasible, then a qualified biologist approved by CDFW, familiar with bumble bees of California, with experience using survey methods for bumble bees shall conduct a focused survey for Crotch bumble bee within the community garden prior to the start of any ground-disturbing activities. Because a survey protocol for this species has not been established, survey methods shall include but not be limited to the following elements (included in survey protocols for other bumble bee species in the United States [USFWS 2018]), and shall be approved by CDFW prior to implementation:

- Surveys shall be conducted during the active flight season (typically March through September).
- Surveys shall be conducted by walking transects through suitable habitat, or by surveying a minimum of one person-hour per three acres of suitable habitat without transects.
- Bumble bees within the project site shall be identified through passive, non-lethal methods (e.g., visual surveys using binoculars, photographic documentation) unless other means are approved by CDFW.
- UC Davis shall submit a survey report to CDFW within one month of survey completion, and shall notify CDFW within 24 hours if Crotch bumble bees are detected.
- If Crotch bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures may include, but not be limited to the following:
- Protective buffers shall be implemented around active nesting colonies or overwintering queens until these sites are no longer active. The size and shape of the buffer shall be determined by a qualified biologist in consultation with CDFW and shall consider various factors including but not limited to distance to the nearest project activity, adjacent land cover types, and existing natural buffers (e.g., vegetation, slope).
- If impacts on Crotch bumble bee cannot be avoided, and if the species becomes listed under the CESA, UC Davis shall obtain an Incidental Take Permit (ITP) from CDFW and shall implement all avoidance measures included in the ITP.

G. FINDING ON RESPONSES TO COMMENTS ON THE DRAFT SUBSEQUENT EIR, REVISIONS TO THE FINAL SUBSEQUENT EIR, AND OTHER FINDINGS

Volume 2, Chapter 2 of the Final Subsequent EIR includes the comments received on the Draft Subsequent EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines § 15088(a). The University finds that responses to comments made on the Draft Subsequent EIR and revisions to the Final Subsequent EIR merely clarify and amplify the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines §15088.5(b).

FINDING: The University finds that there are no changed conditions since certification of the Final Subsequent EIR. The University finds that no significant new information was added to the Draft EIR after the public review period. The University specifically finds that: no new significant environmental impact would result from the Project or from the implementation of a mitigation measure; no substantial increase in the severity of an environmental impact would result, or if such an increase would result, the University has adopted mitigation measures to reduce the impact to a level of insignificance; the University has not declined to adopt any feasible Project alternative or mitigation measures considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project; and the Draft Subsequent EIR is not so fundamentally and basically inadequate in nature that it precluded meaningful public review.

III. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed Project against its unavoidable environmental risks when determining whether to approve the Project. If the specific economic, legal, social, technological, or other benefits of a proposed Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable" (CEQA Guidelines § 15093). When the lead agency approves a Project which will result in the occurrence of significant effects which are identified in the Final Subsequent EIR but are not avoided or substantially lessened, the agency must state in writing the specific reason to support its actions based on the Final Subsequent EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record. (Id.)

Having (i) adopted all feasible mitigation measures, (ii) recognized all significant, unavoidable impacts, and (iii) balanced the benefits of the Project against its significant and unavoidable impacts, the University finds that the Project's benefits outweigh and override its significant unavoidable impacts for the reasons stated below. Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact.

- The Project will demolish and remove all the Solano Park buildings and facilities, including surface and subsurface infrastructure, which have reached the end of their lifespan and would require substantial investments to provide for adequate seismic safety and building systems.
- The Project will resolve safety, security, and maintenance issues at the vacated portion of the Solano Park buildings.
- The Project will provide for efficient demolition activities.
- The Project will prevent future dilapidation and degradation of the Solano Park buildings and facilities by removing them after they are vacated.
- The Project will not develop the project site.
- After demolition the entire site will be managed to ensure the area is safe, secure, and aesthetically equivalent to other undeveloped areas at UC Davis.
- The Project will fence the light demolition area after removal of buildings in the northern portion of the project site.

IV. APPROVALS

The University hereby takes the following actions:

1. The University adopts as conditions of approval of the Solano Park Demolition Project all mitigation measures within the responsibility and jurisdiction of the University.
2. The University adopts the Mitigation Monitoring and Reporting Program for the Solano Park Demolition Project.
3. The University adopts the Findings in their entirety, including the Statement of Overriding Considerations.
4. Having certified the Final Subsequent EIR, incorporated mitigation measures into the Project, and adopted the Mitigation Monitoring and Reporting Program and the foregoing Findings and Statement of Overriding Considerations, the University hereby approves the Solano Park Demolition Project, and directs staff to prepare and file a Notice of Determination for the Project.

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