

**RESPONSE TO COMMENTS ON THE
CIRCULATED INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

The comment letters received by the University for the Cal Poly I Field Improvements Project Initial Study and Proposed Mitigated Negative Declaration (MND) are provided below, with the responses following the individual letters. Comment letters are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments.

With the exception of the letter from the State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit, all comment letters are listed chronologically in the order of receipt.

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OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

I Field Improvements Project

SCH Number: 2017011021

Document Type: MND - Mitigated Negative Declaration

Project Lead Agency: California State Polytechnic University, San Luis Obispo

Project Description

Cal Poly Athletics and ASI propose to construct an artificial turf field with field lighting at Cal Poly I Field to serve as a practice location for Cal Poly football, men's and women's soccer, intramural sports, and other student activities and tournaments. The practice field would be available for use all year long, but the most intensive uses would occur during Cal Poly's regular academic school year (i.e., the fall, winter, and spring terms lasting from mid-September through mid-June). The project includes grading to achieve a level site; construction of retaining walls along the northern, western, and southern portions of the field; and installation of an artificial turf field, goal posts, scoreboard, filming towers, field lighting, perimeter fencing, storage buildings, and landscaping.

Contact Information

Primary Contact:

Julie Hawkins
California State Polytechnic University, San Luis Obispo
(805) 756-6563
Facility Services, Building 70, Cal Poly
San Luis Obispo, CA 93407

Project Location

County: San Luis Obispo
City: San Luis Obispo
Region:
Cross Streets: Grand Ave and Slack St
Latitude/Longitude: 35° 17' 48.7" / 120° 39' 26.8" [Map](#)
Parcel No: 073-341-020
Township: 30S
Range: 12E
Section: 23
Base: MDBM
Other Location Info:

Proximity To

Highways: 073-341-020
Airports:
Railways: UPRR
Waterways: Stenner Creek, Brizzolara Creek, San Luis Obispo Creek
Schools: Cal Poly; ES
Land Use: Passive recreational uses, limited football & soccer practices/Recreation, athletics, and physical education land use category

Development Type

Recreational (sports and recreational practice field)

Local Action

Site Plan

Project Issues

Aesthetic/Visual, Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Drainage/Absorption, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Septic System, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Water Supply, Wetland/Riparian, Growth Inducing, Landuse, Cumulative Effects

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; **Native American Heritage Commission**; Public Utilities Commission

Date Received: 1/12/2017 **Start of Review:** 1/12/2017 **End of Review:** 2/10/2017

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1.1

**1. Response to: State of California Governor's Office of Planning and Research
State Clearinghouse and Planning Unit (MND Received January 12, 2017)**

- 1.1 The University notes the State Clearinghouse and Planning Unit's receipt of the Initial Study/Mitigated Negative Declaration.

209 Longview Lane
San Luis Obispo
93405

Emily Creel
SWCA Environ. Consul.
1422 Monterey St. # C 200
SLO 93401

29 January 2017

Dear Ms. Creel:

re: artificial turf field w/ field lighting

I see the NOI about the project at the corner of Slack + Longview Lane. I understand the need for the project, and I do not object to use during daylight hours.

However, I worry about two things:

a) field lighting

b) hours, during the night, of use.

→ (Would it be possible to close the field at 10 pm rather than midnight?)

→ (And, could you make sure the lights are directed AWAY from the neighborhood?)

Thank you for your attention.

Sincerely, Sherry Lewis

sherry.lewis66@att.net (805) 503-9022
cell

2.1

2.2

Sherry Lewis
209 Longview
SLO 93405

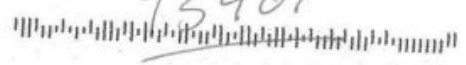
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Emily Creel
SWCA Environmental
Consultants
1422 Monterey St Ste C 200
San Luis Obispo

93401



2. Response to: Sherry Lewis (Letter dated January 29, 2017)

- 2.1 The IS/MND identified a potentially significant impact associated with use of the field until midnight. Therefore, mitigation measure NOI-3 was included and requires all onsite recreational and intramural sporting events to be limited to the hours of 7:00 a.m. to 10:00 p.m. and all onsite Intercollegiate Athletics activities to be limited to the hours of 6:00 a.m. to 10:00 p.m. No use of the field after 10:00 p.m. would be allowed.
- 2.2 The project would include six 70-foot tall field lights with full cut-off light shielding. The shielding will help prevent any light trespass or spillover off campus. The photometric diagrams provided by the lighting manufacturer for the field lights indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. Therefore, the lights will not be pointed at the residential areas adjacent to the field and measures are in place to ensure no light spills over into the residential areas.

Emily Creel

From: Sharon Whitney <whitney.sharon@gmail.com>
Sent: Sunday, January 29, 2017 1:37 PM
To: Emily Creel
Subject: MND for Cal Poly's "I Field Improvements Project"

Dear Emily,

Thank you for the opportunity to comment on the MND for the above project and its potential impacts on surrounding residences.

As a personal matter, I am a resident of upper Albert Drive in San Luis Obispo, just around the corner from the intersection of Slack Street and Longview Lane. From my second floor family room space I have a good northerly view of the PAC, the parking structure, the track, mature trees in the vicinity, Grand Ave on campus, dorms, and the Poly P. From the residence, including my bedroom, I can hear activities that take place on Cal Poly's campus, especially from its southeastern corner and from the PA system when football games are in play on the other side of campus. My family has been at this location continuously since 1963. I and other members have, since the mid-1950s, been associated with Cal Poly, either as students, faculty, or staff. We enjoy campus-life.

Generally speaking, Cal Poly's officially-sponsored activities and events are not a significant disruption to the quiet enjoyment of our residence. For example, I rather enjoy band practice on the track-field in the vicinity. Nonetheless, I was among the residents who sued to fight the Housing South Project, for reasons I will not re-litigate here. And, when our student resident population parties in a way that disrupts the quiet enjoyment of our residence and neighborhood, I am not averse to making a complaint to Cal Poly's administration and/or to the City.

I am currently concerned with the proposed development of I Field. I have read over the MND, and I want to call to your attention statements in it with which I am in disagreement. I also want to endorse those which discuss possible mitigation in the hope they will actually mitigate potential significant negative impacts on the residences surrounding the site.

Project Description: I disagree that the site is within the campus "instructional" core. In fact, the site is at the very edge of campus, on its southern border and adjacent to two City roads, Slack Street and Longview Lane, which provide the surrounding residents in the R-1 zone with local access in and out of the neighborhood. In my opinion, it is disingenuous to describe the project as within the campus "instructional" core. To be sure, instruction (e.g., physical education and music) do occur in the area. However, with respect to these instructional elements, the current passive and limited use of I Field does not disrupt the surrounding neighborhood in any significant way, but the planned project will. The offsite and cumulative

3.1

3.2

impacts that are most likely to be disruptive in a significant way are aesthetics, including light pollution, and ambient noise.

Aesthetics (including light pollution): The project will have a significant negative impact on the existing visual character and quality of the site and in its surroundings because it transforms what is now essentially low-recreational and open space into intensive recreational space. It does this, in part, by establishing an 8 foot wall along Slack Street and a 6 foot wall along Longview Lane. Roadway views along Slack and Longview would be significantly and negatively impacted.

It also creates a new source of light pollution and glare, which would significantly and negatively impact night time views in the area. Lighting poles would substantially alter the scenic quality and visibility from Slack and Longview.

Fencing, lights, goal posts, filming towers, nets and new perimeter landscaping are inconsistent with the current visual character of the site and its surroundings. It transforms it from limited recreational and open space into significant and intensive recreational development.

The 70 foot pole lights have, by your own statement, an impact on a 250 foot section of the westward lane of Slack Street. Removal of the two mature eucalyptus trees would contribute to that significant negative impact. Replacement trees would not significantly reduce that negative impact in either the short term or the long term.

3.3

By your own statement, a substantial impact is possible if there is any deviation from the light-pole manufacturer's standards, imposing long-term glare and disturbance of night time views.

Mitigation may help reduce the negative impacts, but may not eliminate them to less than significant. Changing the size of shields, lowering the wattage, changing the size of the poles, and/or modifying operations of the field may all reduce the impact, but will it reduce it to no impact or to less than significant impact?

AES 1: You offer a lighting evaluation engineer's report as the way to understand the mitigation necessary. I wonder how this evaluation will reach its conclusions. I wonder if the engineer will be sufficiently sensitive to the trespass issues of light pollution on the surrounding residences. I hope so.

AES 2: I appreciate the desire to save the two eucalyptus trees by having a certified arborist evaluate their potential destruction by site construction.

Noise: I find it interesting that the MND says: "Existing ambient noise levels in the project area are predominantly associated with increased student activity within the area and increased vehicle traffic along Slack Street and Longview Lane. Ambient noise levels in adjacent

3.4

residential areas within the City of San Luis Obispo currently exceed applicable City thresholds."

We, the non-student City residents of the surrounding neighborhood--which is called Alta Vista Neighborhood--have been making this very claim since about 1990. This ambient noise, especially when compounded by "instantaneous" noise, does disturb the peaceful and quiet enjoyment of residences in the Alta Vista Neighborhood, especially when it occurs during the hours of ordinary sleep patterns of working and retired residents, e.g., 10 p.m. to 7 a.m., Monday through Sunday.

The worrisome element of the proposed project, at least to me, is not the temporary negative impacts caused by construction of the proposed project. Rather, it is the probable significant negative long-term impacts caused by the operations of the site itself.

3.4
(cont'd)

I agree that the increased ambient noise is not likely to be caused by increased traffic on Slack Street and Longview Lane. I agree that it is likely to be caused by the proposed increased intensive use of the site as a recreation area, especially with the possible use of an amplified or PA system.

Mitigation of the long-term ambient noise increase is recommended by limiting the official uses of the site, including Intercollegiate activities, to the hours of 6 a.m. to 10 p.m. weekdays (Monday to Friday) and 8 a.m. to 10 p.m. weekends (Saturday and Sunday). This restriction may be sufficient mitigation. However, I would prefer the restricted time zone for operation to include the 6 a.m. hour.

If I understand NOI 4 correctly, the use of any amplified or P.A. system at any time is prohibited; well, that is a welcome relief!

3.5

In conclusion, from my personal perspective, it appears that the most potentially disruptive significant negative impact off-site to the surrounding residences are: 1) the increased intensity of the recreational activities and walling off of what is now passive recreation and essentially open-space; 2) light pollution; and 3) increased ambient noise. It appears the university is especially sensitive to the issues of light pollution and noise and wants to mitigate these where possible. I look forward to knowing the results of the lighting evaluation by an engineer. I am grateful there will be no amplified sound or PA system allowed.

3.6

Sincerely,
Sharon G. Whitney

--
We are all teachers and students for each other.

3. Response to: Sharon Whitney (Letter dated January 29, 2017)

3.1 This information introduces the commenter and her experience living adjacent to the University since 1963. It introduces the comments on the IS/MND; no further response is necessary.

3.2 The IS/MND describes the project site as “within the southern portion of the campus instructional core” and states that a concrete pathway adjacent to the I Field leads into the “central instructional core”. The campus instructional core is defined in the 2001 Cal Poly Master Plan, which states: “The 155-acre Instructional Core is the area bounded on the south by the property line on the edge of the City of San Luis Obispo, on the west by the Union Pacific Railroad tracks, on the north by Highland Drive and the extension of Highland Drive easterly to a point due north of the present Building 70, and on the east by a portion of Perimeter Road and Grand Avenue.”

The delineated boundary of the campus instructional core is shown in Figure 2, Project Location – Overview, of the IS/MND. The IS/MND accurately describes the project site as being within the southern portion of this area. The IS/MND also recognizes that the project is not located in the central instructional core.

The IS/MND recognizes that offsite and cumulative impacts that could potentially affect surrounding neighborhoods as a result of the project include those associated with aesthetics, light trespass and spillover, and ambient noise. These issues are analyzed in the IS/MND and potential impacts were found to be less than significant with implementation of identified mitigation measures.

3.3 The IS/MND and Visual Impact Assessment prepared for the project analyzed the potential change in existing visual quality and character as a result of the intensified recreational use of the site, including the 6-8 foot retaining walls and fencing that would surround the site. The Visual Impact Assessment determined that the visual context of the project site is mostly influenced by the uses and buildings of University development. Although bordered to the south, southeast and southwest by predominantly residential neighborhoods, the project location is clearly within the campus boundary. Accordingly, viewer expectations related to the project site would consider campus-style development appropriate, including scale, usage, and patterns consistent with the rest of the University. The project would maintain the current recreational use of the site. This recreational use would be intensified, and the degree of associated development would increase, however these changes would be in keeping with the density of recreational uses seen in the surrounding athletic facilities in this portion of the campus. The proposed elements of the project including fencing, lights, goal posts, filming towers, nets, and perimeter landscaping would all be considered consistent with the visual character of the site and its surroundings. The project proposes a recreational use on an existing recreational site, adjacent to an area of campus that currently has multiple highly visible recreational facilities. Although the project would intensify the use, it would remain consistent with the visual character of the site and surroundings. From the surrounding community the project would also be seen as a logical use for site, and an expected campus function and visual condition. Therefore, impacts related to visual quality and character, including roadway views from Slack Street and Longview Lane, were found to be less than significant.

The photometric diagrams provided by the lighting manufacturer for the field lights indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties, though glare and light spillover would extend across an approximately 250-foot portion of Slack Street. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. With implementation of this measure, significant impacts related to offsite glare and light trespass will be avoided. If light spillover is limited to on-campus areas, potential impacts on adjacent residential areas would be less than significant.

Mitigation measure AES 1 requires the University to confirm that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary. This measure ensures impacts beyond the campus boundary associated with light trespass and spillover would be avoided and reduced to less than significant.

- 3.4 Under CEQA, the University is required to consider the project's potential impacts when compared to existing conditions (the environmental baseline). The areas surrounding the I Field are currently fairly noisy for most of the day, due to bustling campus activity and traffic. The potential increase in ambient noise levels as a result of long-term operation of the site were evaluated in the IS/MND and a Noise Impact Assessment, which found that the project would increase existing noise levels during the relatively quieter evening hours and during any time amplified sound would be used. Therefore, use of the field during the quieter evening hours and use of an amplified PA system were prohibited by Mitigation Measures NOI-3 and NOI-4.

Use of the field at 6:00 a.m. is important for Intercollegiate Athletics activities. The Noise Impact Assessment determined that no significant or noticeable increase in noise would occur after implementation of Mitigation Measure NOI-4 since there are already high ambient noise levels in the area.

- 3.5 Mitigation Measure NOI-4 prohibits any use of amplified PA sound systems at the field at any time.
- 3.6 This comment summarizes what the commenter believes would be the most disruptive significant negative effects to residences surrounding the I Field, as discussed in Responses to Comments 3.2 through 3.5, above. The commenter recognizes the detailed evaluation of potential issues related to light pollution and noise and the University's efforts in minimizing those impacts where possible. No further response is necessary.

From: Jeff Eidelman <jeff@sbcglobel.net>
Sent: Wednesday, February 01, 2017 11:38 AM
To: Courtney Leigh Kienow
Cc: Karen Adler
Subject: Re: Cal Poly I-Field Project Update

Hi Courtney

It's been my experience going thru Cal Poly's Banana Republic is a waste of time and won't ever go in the neighborhoods favor. What Cal Poly wants, Cal Poly gets.

The 6 a.m. Football practice, 6p.m. to midnight intramural football are outrageous and unacceptable. Noise noise noise in Alta Vista neighborhoods. Also lights shining into our houses!

Don't turn Alta Vista into Isla Vista!

That has been my cry onto Cal Poly's deaf ears.

Sorry to be rude, it's not directed at you personally, but to your employer, who really doesn't care about it's neighbors.

Sincerely,

Jeff

Sent from my iPad (Supercalifragilisticexpialidocious)!

On Feb 1, 2017, at 9:08 AM, Courtney Leigh Kienow <ckienow@calpoly.edu> wrote:

Dear Cal Poly neighbors and community members,

We are now in the middle of the 30-day public review period for the Draft Initial Study/Mitigated Negative Declaration for the proposed I Field Improvements Project, located on Slack Street adjacent to the tennis courts and track on Cal Poly's campus. The 30-day review period ends on February 13, 2017.

You can read the Notice of Intent here:

https://afd.calpoly.edu/facilities/campusprojects/ifieldimprovements/cal-poly_i-field_noi.pdf

You can read Cal Poly Athletics Press Release here: <http://gopoly.com/genrel/doerr>

You can read the Initial Study/Mitigated Negative Declaration here:

https://afd.calpoly.edu/facilities/campusprojects/ifieldimprovements/cal-poly_i-field_is-mnd_01-10-17.pdf

Here is a map of the location (highlighted in yellow):

<image001.jpg>

And a rendering of the plans:

<image002.png>

I wanted to highlight some of the mitigations that are in place as an outcome of the environmental study:

4.1

4.2

4.3

1. **Noise:** It was originally proposed that an audio system be included. The amplified PA/sound system is no longer included in the project.
2. **Hours of operation:** It was originally proposed that the field remain open until midnight on the weekends. That is no longer the case. No activity will be allowed past 10 p.m. on weekday or weekend nights.
- a. Onsite sports and recreational events shall be limited to the following hours:

All onsite recreational and intramural sporting events, not including Intercollegiate Athletics activities, shall be limited to between the hours of 7:00 a.m. and 10 p.m., Monday through Friday, and between the hours of 8:00 a.m. and 10:00 p.m. on weekends. All onsite Intercollegiate Athletics activities (i.e., football practices, soccer practices) shall be limited to between the hours of 6:00 a.m. and 10 p.m., Monday through Friday, and between the hours of 8:00 a.m. and 10:00 p.m. on weekends. (Page F-11)

3. **Traffic:** The study concluded that the additional peak hour vehicle trips to this facility (maximum of 40 under typical conditions) does not trigger the need for additional study based on both the CSU and City of San Luis Obispo standards (Page 3, Trip General Estimates).
4. **Lighting:** Prior to project construction, an evaluation of the lighting manufacturer's lighting data (Appendix B, Visual Impact Assessment, Figure 5) shall be conducted for the purpose of confirming that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary. The Report shall be prepared by a qualified engineer who is not a prospective vendor or manufacturer of the lighting system to be used on the project (Page F-3). The lighting evaluation shall include the following at a minimum:
 - a. If off-campus light trespass or point-source visibility is identified in the Lighting Evaluation Report, specific recommendations shall be identified to eliminate such trespass and/or visibility. Recommendations may include but not be limited to: repositioning lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. (Page F-3)
 - b. Prior to construction of the retaining wall, the project plans shall be revised to save the existing eucalyptus trees located between the I Field and Slack Street upon confirmation by a certified arborist that retaining the trees would not pose a safety hazard. A certified arborist shall evaluate the trees to determine whether or not they can be feasibly and safely be retained onsite. If retaining any of the trees is determined to be possible, the certified arborist shall provide written recommendations to confirm that no impacts would occur to the trees to be retained or their root zones as a result of project construction and operation. All recommendations of the certified arborist shall be incorporated into the project plans and implemented by the University prior to construction of the retaining wall. (AES-2)

4.3
(cont'd)

You can read through the rest of the mitigations, if you would like, in the F section of the Initial Study document.

Additionally, comments submitted within the 30-day review period will be further reviewed as a normal part of the development and environmental review process. Written comments should be sent to Emily Creel, SWCA Environmental Consultants, 1422 Monterey Street, Suite C200, San Luis Obispo, CA 93401, or to ecreel@swca.com, as indicated in the Notice of Intent for this project.

You are welcome to email me, along with Julie Hawkins (jkhawkin@calpoly.edu), Cal Poly Campus Planner, with any questions.

Most sincerely,

Courtney

[Courtney Kienow](#)

Director of Community Relations

Office of the President

(805) 756-6027

<image003.png>

4.3
(cont'd)

4. Response to: Jeff Eidelman (Letter dated February 1, 2017)

- 4.1 The comment identifies potential impacts related to noise, the proposed hours of operation, and lights shining into adjacent residences. The IS/MND evaluated existing noise in the area surrounding the I Field and prohibited use of the field during those times when noise from operational use of the field would result in an increase in ambient noise levels over existing conditions. Therefore, use of the field after 10:00 p.m. was prohibited and use of any amplified PA sound systems at any time was prohibited.

The project would not result in lights shining into adjacent residences. The project proposes the use of full cut-off light shielding, which would prevent the lights from shining off campus. The photometric diagrams provided by the lighting manufacturer show that no light spillover, trespass, or glare would extend into adjacent residential areas. The light spillover would extend off campus over an approximately 250-foot segment of Slack Street. The amount of spillover anticipated would be visually similar to an automobile low beam headlight. Mitigation Measure AES-1 would require the University to independently verify the results of the photometric diagrams and ensure that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary by implementing specific recommendations to the extent necessary to eliminate any off-site trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. The lighting manufacturer's data shows no light from the field lights would reach adjacent residences; implementation of additional measures identified in the IS/MND will ensure these results will be achieved and no significant lighting impacts on adjacent residences will occur.

- 4.2 This comment does not include comments specific to the IS/MND; no further response is necessary.
- 4.3 This comment represents public outreach and communication conducted by the University during the 30-day public review period for the IS/MND. The information does not include comments related to the IS/MND; therefore, no further response is necessary.

CAL POLY

From: Marti Lindholm <mlindholm528@gmail.com>
Sent: Thursday, February 02, 2017 5:06 PM
To: Courtney Leigh Kienow
Subject: Re: Cal Poly I-Field Project Update

Hi Courtney,

These drawings must be REALLY old, because the HUGE new dorms that our neighborhoods protested are being built as we speak and they are not in your architectural plans. The drawings should be up-to-date and show ALL of the changes Cal Poly is making overshadowing the border of our neighborhood. I am disappointed in the architectural work done by Cal Poly. Don't they have an architectural department there?

Marti

On Feb 1, 2017, at 9:08 AM, Courtney Leigh Kienow wrote:

Dear Cal Poly neighbors and community members,

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<image001.jpg>

And a rendering of the plans:

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I wanted to highlight some of the mitigations that are in place as an outcome of the environmental study:

5.1

5.2

1. **Noise:** It was originally proposed that an audio system be included. The amplified PA/sound system is no longer included in the project.
2. **Hours of operation:** It was originally proposed that the field remain open until midnight on the weekends. That is no longer the case. No activity will be allowed past 10 p.m. on weekday or weekend nights.
- a. Onsite sports and recreational events shall be limited to the following hours:

All onsite recreational and intramural sporting events, not including Intercollegiate Athletics activities, shall be limited to between the hours of 7:00 a.m. and 10 p.m., Monday through Friday, and between the hours of 8:00 a.m. and 10:00 p.m. on weekends. All onsite Intercollegiate Athletics activities (i.e., football practices, soccer practices) shall be limited to between the hours of 6:00 a.m. and 10 p.m., Monday through Friday, and between the hours of 8:00 a.m. and 10:00 p.m. on weekends. (Page F-11)

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5.2
(cont'd)

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You are welcome to email me, along with Julie Hawkins (jkhawkin@calpoly.edu), Cal Poly Campus Planner, with any questions.

Most sincerely,

Courtney

[Courtney Kienow](#)
Director of Community Relations
Office of the President
(805) 756-6027
<image003.png>

5.2
(cont'd)

5. Response to: Marti Lindholm (Letter dated February 2, 2017)

- 5.1 The drawing referred to in this comment is an schematic architectural drawing and is not intended to be an accurate photo simulation of the proposed project. Accurate photo simulations of the project have been prepared and are included in the Visual Impact Assessment prepared for the project. Existing views of the new Student Housing South housing project, currently under construction, are shown in these simulations.
- 5.2 This comment represents public outreach and communication conducted by the University during the 30-day public review period for the IS/MND. The information does not include comments related to the IS/MND; therefore, no further response is necessary.

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
 West Sacramento, CA 95691
 Phone (916) 373-3710
 Fax (916) 373-5471
 Email: nahc@nahc.ca.gov
 Website: <http://www.nahc.ca.gov>
 Twitter: @CA_NAHC



February 2, 2017

Julie Hawkins
 California Polytechnic State University, San Luis Obispo
 Facilities & Capital Projects, Building 70, Cal Poly
 San Luis Obispo, CA 93407

sent via e-mail:
jhawkins@calpoly.edu

Re: SCH# 2017011021, I Field Improvements Project, City of San Luis Obispo; San Luis Obispo County, California

Dear Ms. Hawkins:

The Native American Heritage Commission (NAHC) has reviewed the Mitigated Negative Declaration prepared for the project referenced above. The review included the Project Description/Introduction, the Environmental Checklist, section V Cultural Resources, and the Mitigation, Monitoring and Reporting Program prepared by SWCA for California Polytechnic State University, San Luis Obispo. We have the following concerns:

- There is no Tribal Cultural Resources section or subsection in the Executive Summary as per California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>
- There are no mitigation measures specifically addressing Tribal Cultural Resources separately. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring.
- Mitigation Measure CR-1 specifies "data recovery" for archaeological finds. Mitigation language for archaeological resources (such as data recovery and curation) is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources.

6.1

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

6.2

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,



Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

6.3

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project,⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program,** if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report **may not be certified,** nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸
This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

6.4
(cont'd)

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

6.4
(cont'd)

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

6. Response to: Native American Heritage Commission (Letter dated February 2, 2017)

- 6.1 Only one Native American tribe has provided notice to the University requesting consultation under AB 52. The University complied with AB 52 for the I Field project by sending a Notice of Opportunity to Consult to the Torres Martinez Desert Cahuilla Indians on February 7, 2017. The University did not receive any response from the Torres Martinez Desert Cahuilla Indians or any other request for consultation per AB 52.

The project site is not considered highly sensitive for cultural resources, based on records searches performed for the Cal Poly Master Plan and EIR (Cal Poly 2001) and the extent of existing disturbance. Mitigation measures were included to minimize impacts associated with inadvertent discoveries. No potential impacts on tribal cultural resources were identified and no mitigation is necessary. The results of the University's consultation efforts under AB 52 have been summarized in the Final IS/MND. The University is also in the process of updating its CEQA checklist to add a separate section specific to tribal cultural resources.

- 6.2 The project is not subject to SB 18, as it does not proposed adoption or amendment of a general plan or specific plan or the designation of open space. The project does not include any federal nexus and is not subject to NEPA.

- 6.3 The University complied with AB 52 as described above. The University understands NAHC is recommending that the University consult with all tribes that are traditionally and culturally affiliated with its jurisdiction under AB 52. The University has taken this approach on projects with a heightened potential to affect historic resources or tribal cultural resources. The University is currently coordinating with all tribes geographically affiliated with its jurisdiction during preparation of its new Master Plan and in correlation to several other projects with the potential to disturb cultural resources. The University appreciates the cooperation and information that can come out of tribal consultation efforts and will continue to engage local tribes as required by law and as best determined necessary based on the circumstances of a particular project.

- 6.4 This comment includes information provided by the NAHC related to AB 52 and SB 18 and does not include any comments specific to the IS/MND. The University appreciates the information; no further response is necessary.



Air Pollution Control District
San Luis Obispo County

February 8, 2017

Joel Neel, Facilities Planning & Capitol Projects
Cal Poly University, Building 70
San Luis Obispo CA 93407

SUBJECT: APCD Comments Regarding the Cal Poly I Field Improvements Project

Dear Neel:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed improvements to the natural grass field north of Slack Street (known as the Cal Poly I Field).

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

7.1

CONSTRUCTION PHASE IMPACTS - Below Threshold

The mitigated negative declaration evaluated the construction impacts of this project using the most recent CalEEMod computer model for estimating construction emissions related to the development of land uses. The modeling results indicate that the construction phase impacts will likely be less than the APCD's significance threshold values identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: slocleanair.org). **Therefore, with the exception of the requirements below, the APCD is not requiring other construction phase mitigation measures for this project.**

7.2

Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) has been identified by the California Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the county where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the CARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying,

7.3

and Surface Mining Operations (93105), **prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD.** If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at slocleanair.org/business/asbestos.php.

7.3
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Developmental Burning

Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the APCD Engineering & Compliance Division at (805) 781-5912.

7.4

Dust Control Measures

The project, as described in the referral, will not likely exceed the APCD's CEQA significance threshold for construction phase emissions. However, construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. **APCD staff recommends the following measures be incorporated into the project to control dust:**

Projects with grading areas that are less than 4-acres and that are not within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to significantly reduce fugitive dust emissions, to manage fugitive dust emissions such that they do not exceed the APCD 20% opacity limit (APCD Rule 401) and minimize nuisance impacts:

- a. Reduce the amount of the disturbed area where possible;
- b. Use water trucks, APCD approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the District's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible. **Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.** For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook;
- c. All dirt stock-pile areas should be sprayed daily and covered with tarps or other dust barriers as needed;
- d. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible, and building pads should be laid as soon as possible after grading unless seeding, soil binders or other dust controls are used;
- e. All of these fugitive dust mitigation measures shall be shown on grading and building plans;
- f. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints and reduce visible emissions below 20% opacity. Their duties shall include holidays and weekend periods when work may not be in progress.

7.5

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present

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during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders **if used for tree removal activities**;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering & Compliance Division at (805) 781-5912 for specific information regarding permitting requirements.

Construction Phase Idling Limitations

This project is in close proximity to nearby sensitive receptors (residential dwelling units and schools). Projects that will have diesel powered construction activity in close proximity to any sensitive receptor shall implement the following mitigation measures to ensure that public health benefits are realized by reducing toxic risk from diesel emissions:

To help reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
 - a. **On-road diesel vehicles** shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5-minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.
 - b. **Off-road diesel equipment** shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.
 - c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.

7.6
(cont'd)

7.7

- d. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/factsheet.pdf and www.arb.ca.gov/regact/2007/ordies107/froal.pdf.
2. Diesel Idling Restrictions Near Sensitive Receptors (schools, residential dwellings)
In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
 - c. Use of alternative fueled equipment is recommended; and
 - d. Signs that specify the no idling areas must be posted and enforced at the site.

7.7
(cont'd)

Truck Routing

Proposed truck routes should be evaluated and selected to ensure routing patterns have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals. If the project has significant truck trips where hauling/truck trips are routine activity and operate in close proximity to sensitive receptors, toxic risk needs to be evaluated.

7.8

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-5998.

Sincerely,



Rubi Rajbanshi
Planning and Outreach Manager

RR/ihs

cc:

Tim Fuhs, Enforcement Division, APCD
Dora Drexler, Enforcement Division, APCD
Gary Willey, Engineering Division, APCD

- 7. Response to: San Luis Obispo County Air Pollution Control District (Letter dated February 8, 2017)**
- 7.1 This general comment introduces the scope of APCD’s review of the IS/MND and does not include any comments specific to the IS/MND; no further response is necessary.
- 7.2 This comment states that the APCD is not requiring additional construction phase mitigation measures based on the IS/MND’s determination that construction-related emissions would be within acceptable thresholds. No further response is necessary.
- 7.3 The project site is within an area with the potential to contain Naturally Occurring Asbestos. Therefore, the IS/MND included mitigation measures to ensure compliance with the CARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (see Mitigation Measures AQ-4 and AQ-5). These measures require that prior to any construction activities at the site, a geologic evaluation will be conducted to determine if the area disturbed is exempt from the ATCM. If exempt, the measures require the University to file an exemption request with the APCD. If not exempt, the measures require compliance with the requirements outlined in the ATCM.
- 7.4 No developmental burning is proposed; the APCD’s prohibition of developmental burning of vegetative materials within San Luis Obispo County is noted in Mitigation Measure AQ-1.
- 7.5 This comment identifies APCD’s standard dust mitigation measures to reduce construction dust and minimize nuisance impacts on proximate sensitive receptors. The IS/MND included these measures in Mitigation Measure AQ-1. Non-substantive edits to this measure have been added to the Final IS/MND to match the language provided by the APCD.
- 7.6 This comment states that portable construction equipment used for project construction may require California statewide portable equipment registration or an APCD permit. Mitigation Measure AQ-6 requires that prior to ground disturbance and construction, the Construction Contractor shall obtain all required permits for the use of portable equipment, 50 horsepower or greater, from the San Luis Obispo APCD.
- 7.7 This comment identifies APCD’s standard diesel idling control measures to reduce construction emissions and reduce potential public health impacts on proximate sensitive receptors. The IS/MND included these measures in Mitigation Measure AQ-2. Non-substantive edits to this measure have been added to the Final IS/MND to match the language provided by the APCD.
- 7.8 The project does not propose hauling/truck trips as a routine activity. Although no significant impact is expected to occur as a result of hauling/truck trips, the evaluation of proposed truck routes during construction has been added to Mitigation Measure AQ-2 to further reduce the potential effects of the project.

Emily Creel

From: Julie Kristine Hawkins <jkhawkin@calpoly.edu>
Sent: Wednesday, February 08, 2017 9:03 AM
To: Emily Creel
Cc: Colin Princi
Subject: Fw: Comments on Environmental Document for I Field Improvements Project - Cal Poly SCH# 201701102

See Water Board comments below.

Julie Hawkins, AICP
Campus Planner
Facilities Planning and Capital Projects
California Polytechnic State University
San Luis Obispo, California

Direct: 805.756.6563
Cell: 805.903.3117
jmoloney@calpoly.edu
afd.calpoly.edu/facilities
calpoly.edu

From: Sharkey, Lucas@Waterboards <Lucas.Sharkey@waterboards.ca.gov>
Sent: Wednesday, February 08, 2017 8:45 AM
To: Julie Kristine Hawkins
Cc: Kim Busby Porter; Roques, Dominic@Waterboards
Subject: Comments on Environmental Document for I Field Improvements Project - Cal Poly SCH# 201701102

Julie,

This email constitutes the Central Coast Water Quality Control Board (Central Coast Water Board) stormwater related comments on the Environmental Document for the "I Field Improvements Project" – State Clearing House Number 2017011021.

Central Coast Water Board staff reviewed the document in relation to stormwater requirements and find inaccurate statements related to Section IX. Hydrology and Water Quality. The document states on page 31, "The existing drainage patterns at the site would be generally maintained, as stormwater would percolate into the field and sheet flow to surrounding streets and storm drains... No substantial change or increase in impervious surfaces or drainage patterns would occur." These statements are not supported as the entire field will be underlain by an impermeable fabric liner, there-by converting the field to an impervious surface leading to an increase in stormwater runoff. Unless proper stormwater control measures are constructed to mitigate the increased stormwater runoff, this statement is appears unfounded.

8.1

In addition to the Stormwater Pollution Prevention Plan as stated on page six under "Applicable Regulations," the project is subject to the State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ, National Pollutant Discharge Elimination System General Permit No. Cas000004, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (2013 General Permit) as implemented by Cal Poly. CalPoly applies the Central Coast Post Construction Requirements (PCRs). The project as designed does not appear to comply with Section B.3.b of the PCRs. The site is in WMZ3 and thus is not required to meet Performance Requirement 3. However, the site is still required to meet Performance Requirement 2, Water Quality Treatment. The proposed "Detention Basin" does not appear to meet the intent of the post-construction requirements to employ Low Impact Development and to retain runoff from the 85th


8.2

percentile storm to meet Performance Requirement 2 or reduce runoff from the 85th Percentile storm. The detention basin outlet structure appears to allow the majority of detained water to be released un-treated to the stormwater conveyance, and may not result in reduced runoff volumes to mitigate the proposed impervious surfaces.

8.2
(cont'd)

The project must be designed and constructed such that it meets the post-construction requirements of the 2013 General Permit as implemented by Cal Poly.

Sincerely,
Lucas Sharkey

=====
Lucas J. Sharkey, P.E. | Water Resource Control Engineer
Central Coast Water Board | 895 Aerovista Place, Suite 101 | San Luis Obispo, CA 93401
P: (805) 594-6144
 Think before you print

8. Response to: Central Coast Regional Water Quality Control Board (Letter dated February 8, 2017)

- 8.1 Revisions have been made to the Final IS/MND to clarify that the turf field will be permeable on the surface, but impermeable at a certain depth.
- 8.2 The University has implemented design changes to achieve compliance with the State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ, National Pollutant Discharge Elimination System General Permit No. Cas000004, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (2013 General Permit) as implemented by Cal Poly. The University will meet the flow based criteria of the 2013 General Permit by reconfiguring the proposed stormwater pipe and control orifice sizes and elevations. No significant impacts related to increased stormwater flows would occur.



This is being hand delivered since it was rejected by the recipients e-mail provider. How many other responses have been rejected???

Linda White <lindaleewhite15@gmail.com>

Notice of intent practice field

1 message

Linda White <lindaleewhite15@gmail.com>
To: ecreel@swca.com

Thu, Feb 9, 2017 at 9:04 PM

February 9, 2017

Re: Proposed practice field adjacent to Slack and Longview

I reviewed the Notice of Intent regarding the practice field. I am concerned with a few items:

1. Field Lighting- Will the lights be situated in such a way to keep from shining into the adjacent San Luis Obispo neighborhood? The lights from the existing parking lot are so bright that on Thanksgiving, when our family of 27 eat, we must close the blinds to keep from being blinded by the lights. This parking lot lighting was supposedly mitigated but it is not effective. Hopefully a better job will be done this time around.

2. Hours of operation: 6 AM is rather early for the very enthusiastic coaching yells and fervent responses of the hopeful players. We already tolerate the early morning swim practice with the bullhorn, whistle and pacing drum.

12:AM is rather late for Thursday through Sunday intramural events considering that these activities are occurring adjacent to a residential neighborhood. This is the same period of time that we endure the roaming hordes, screaming, honking, and yelling to one another in search of parties.

3. What buffer will be used to mitigate the noise? I believe that the Poly Master Plan calls for buffers between the University and adjacent neighborhood.

4. Will any signage be placed on the fields? The tennis scoreboard where Hathway dead ends becoming Longview, is very ugly when viewed from the city. The scoreboard aluminum back reflects into drivers and pedestrians when approaching on Hathway. It would be a shame to have more signage just a few yards away.

Sincerely,

Linda White

125 Longview Lane

9.1

9.2

9.3

9.4

9.5

Gmail

More

COMPOSE

Undeliverable: Notice of intent practice field

Inbox x

Inbox (12)

Starred

Important

Sent Mail

Drafts

All Mail

Business (84)

Airbnb (7)

Correspondence

Education

Family (10)

Anna's Trip

Anthony's Trip

Friends (7)

WISO (1)

Genealogy (5)

Joe House

Keep

Medical (2)



postmaster@swca.com

to me

CO1NAM03FT057.mail.protection.outlook.com rejected your m

ECreel@swcacorp.mail.onmicrosoft.com

Your message wasn't delivered because the recipient's email provic

CO1NAM03FT057.mail.protection.outlook.com gave this error:
Access denied, banned sending IP [67.106.251.130]. To request removal follow the directions. For more information please go to <http://go.micro>

Diagnostic information for administrators:

Generating server: hybexch13.swcacorp.com

ECreel@swcacorp.mail.onmicrosoft.com

CO1NAM03FT057.mail.protection.outlook.com

Remote Server returned '550 5.7.606 Access denied, banned sending IP [67.106.251.130] https://sender.office.com/ and follow the directions. For more information please g

Original message headers:

Received: from hybexch13.swcacorp.com (10.100.103.201) by hybexch13.swcacorp.com (10.100.103.201) with Microsoft SMTP Server (TLS

9.6

9. Response to: Linda White (Letter dated February 9, 2017)

- 9.1 Due to routine maintenance, the email address for receiving comments was temporarily unavailable for approximately 2 hours one evening during the comment period. This comment letter was forwarded to the email address after maintenance activities were completed. No other comment letters were submitted during this time.
- 9.2 The project proposes the use of full cut-off light shielding, which would prevent the lights from shining off campus. The photometric diagrams provided by the lighting manufacturer show that no light spillover, trespass, or glare would extend into adjacent residential areas. The light spillover would extend off campus over an approximately 250-foot segment of Slack Street. The amount of spillover anticipated would be visually similar to an automobile low beam headlight. Mitigation Measure AES-1 would require the University to independently verify the results of the photometric diagrams and ensure that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary by implementing specific recommendations to the extent necessary to eliminate any off-site trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. The lighting manufacturer's data shows no light from the field lights would reach adjacent residences; implementation of additional measures identified in the IS/MND will ensure these results will be achieved and no significant lighting impacts on adjacent residences will occur.
- 9.3 The IS/MND evaluated existing noise in the area surrounding the I Field and prohibited use of the field during those times when noise from operational use of the field would result in an increase in ambient noise levels over existing conditions. Therefore, use of the field after 10:00 p.m. was prohibited and use of any amplified PA sound systems at any time was prohibited. Since existing noise levels at 6:00 a.m. are louder than those that would occur as a result of the project, no noticeable increase in overall ambient noise would occur.
- 9.4 The Noise Impact Assessment determined that no significant or noticeable increase in noise would occur after implementation of Mitigation Measure NOI-4, since there are already the high ambient noise levels in the area. Since use of the field would not increase existing noise levels during the proposed hours of operation (as mitigated), no additional mitigation (including buffers) is necessary.
- 9.5 The project includes a scoreboard and perimeter fencing, with green windscreen and Cal Poly logo branding. These features were determined to be consistent with the existing visual context of the area, which is clearly within the campus boundary and surrounded by intense recreational and athletic uses within campus. With implementation of identified mitigation measures, visual impacts related to the project would be less than significant.
- 9.6 This comment reflects the delivery status of the comment letter, as described in Response to Comment 9.1, above. No further response is necessary.

Emily Creel

From: Karen Adler <fudge805@charter.net>
Sent: Sunday, February 12, 2017 9:05 PM
To: Emily Creel
Subject: Cal Poly I - Field Improvements Project

Ms. Creel:

As Chairperson of the Alta Vista Neighborhood Association (AVNA), we would like to convey our appreciation for the modification of the start times for intramural sports from 6am to 7am during the week & that evening activity will cease by 10pm on weeknights! But Sundays should be a day of non-use. It would be nice to have one day of the week to not be assaulted by "noise"! We would also like to see Cal Poly's football & soccer practices adhere to the same schedule. Their noise carries the same as other activities on the Field . Our neighborhood is subjected to everything Cal Poly does due to our close proximity. Residents on Longview Lane & Slack Street need to be assured that field lights will not be shining into their homes. Yes, permanent residents still live in that area. We would greatly appreciate Cal Poly's consideration of them (us) in their Field Improvement Plans.

10.1
10.2
10.3
10.4

Thank you, Karen Adler
1676 Fredericks St
SLO - 93405

10. Response to: Alta Vista Neighborhood Association (Letter dated February 12, 2017)

- 10.1 Field use on Sundays is critical to intramural activities and events. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur on these days during the proposed hours of operation (as mitigated).
- 10.2 Field use at 6:00 a.m. is critical to Intercollegiate Athletics football practices. As mitigated (see Mitigation Measures NOI-3 and NOI-4), no significant increase in ambient noise levels over existing noise levels would occur at this time and noise from field use would be largely unnoticeable due to existing noise levels.
- 10.3 The project proposes the use of full cut-off light shielding, which would prevent the lights from shining off campus. The photometric diagrams provided by the lighting manufacturer show that no light spillover, trespass, or glare would extend into adjacent residential areas. The light spillover would extend off campus over an approximately 250-foot segment of Slack Street. The amount of spillover anticipated would be visually similar to an automobile low beam headlight. Mitigation Measure AES-1 would require the University to independently verify the results of the photometric diagrams and ensure that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary by implementing specific recommendations to the extent necessary to eliminate any off-site trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. The lighting manufacturer's data shows no light from the field lights would reach adjacent residences; implementation of additional measures identified in the IS/MND will ensure these results will be achieved and no significant lighting impacts on adjacent residences will occur.
- 10.4 The University understands that permanent residents live in the Alta Vista Neighborhood and has evaluated the impacts of the project with an emphasis on potential effects to surrounding neighborhoods. All comments received regarding the project will be responded to and provided to the Cal Poly Facilities Planning and Capital Projects Department and the California State University Chancellor's Office for its consideration.

Emily Creel

From: Camille Small <notetocamille@yahoo.com>
Sent: Sunday, February 12, 2017 3:26 AM
To: Emily Creel
Subject: Cal Poly I-Field Initial Study

To Emily Creel, SWCA Environmental Consultants
ecreel@swca.com

Initial Study and Proposed Negative Declaration for the
Cal Poly I-Field Improvements Project

NOISE

City Noise standards should be incorporated into the final mitigations.

11.1

People in SLO neighborhoods will be most impacted and deserve close attention be paid to the volume of noise and the time of day noise emanates from the field.

During Construction

A. Air Quality

11.2

1. **WHAT CAN residents do** if dust becomes a problem?
Please state what method you will use **to inform residents** how, and to whom, they report problems.
2. Equipment layover and/or staging on residential streets would seriously disrupt neighborhoods. Please propose specific language be incorporated to assure this will not be allowed.

11.3

B. Noise

The city's construction noise policy, which prohibits construction noise before 7:00 a.m., after 7:00 p.m. and all day Sunday, was adopted as mitigation.

11.4

After Construction.

1. Aesthetics.

Adopt wording requesting an on-site evaluation confirming that all mitigations are successfully preventing light trespass beyond the campus boundary. Assure no point-source light is visible beyond the campus boundary.

11.5

2. Noise.

a. How can the noise be reduced to tolerable levels? State whether someone will monitor noise when the field is in use. Noise can have major impacts on adjacent neighbors and their right to quiet

11.6

enjoyment of a private residence.

b. The Study acknowledges that this project will increase noise (although it is determined to be less than significant with mitigation) in an area where ambient noise usually exceeds the maximum standards. City Policy - "It shall be the policy of the city to maintain quiet in those areas which currently exhibit low noise levels and to implement programs aimed at reducing noise in those areas within the city where noise levels are above acceptable levels" (emphasis added).

c. The Study ignored that part of the City's noise ordinance regarding the requirement to reduce noise when it was above acceptable levels. In R-1, single-family residential, the maximum exterior sound level from 7:00 a.m. to 10:00 p.m. is 55 dBA; from 10:00 p.m. to 7:00 a.m. it is 50 dBA.

d. The project **creates a new source of noise**, and would expand the hours of noise disturbance in this single-family residential neighborhood. **Noise disturbance should not be allowed outside the city's established twelve-hour period and/or any time on Sunday.**

11.6
(cont'd)

It is unnecessary to disregard residents by establishing hours that begin at an hour earlier than 7 a.m.
and for evening hours to extend beyond 10 p.m.

Study states that impacts associated with a temporary or permanent increase in ambient noise levels would be less than significant with mitigation incorporated (Study, pg. 39), What does "less than significant" mean in dBA and/or quality of life to an individual?

Summary

Establish wording that the **PA system has been removed permanently** from consideration and will not be

installed at a later date!

Establish weekday start time **no earlier** than 7 a.m.

Establish that Saturday start time never earlier than 8 a.m.

Establish the final hour for use at 10 p.m.

Disallow exceptions to the requested set hours.

Disallow use of the field on Sundays.

Residents will be asked to tolerate 9 months of long days of nearly constant use. It would be considered an egregious act by the University to ask nearby residents in Cal Poly's host city of San Luis Obispo to tolerate seven days straight with disruption of sleep from hours set too early in the a.m. and too late in the p.m.

Further burden to residents should not be imposed beyond the extra impact of the new field so near their residences.

Please kindly consider the impacts to our residents' lives.

11.7

To The Decision Makers:

It would be such a relief to know our residents, whose lives are impacted from activities beyond their control year after year, would be granted consideration that would create a small relief from what they will experience with yet another impact.

11.8

*Thank You,
Camille Small*

11. Response to: Camille Small (Letter dated February 12, 2017)

- 11.1 The City of San Luis Obispo does not have jurisdiction over the University and the City's Noise Ordinance and other regulations are not enforceable on University projects. Nevertheless, the IS/MND and Noise Impact Assessment prepared for the project identified that the residential neighborhoods adjacent to I Field were within the City of San Luis Obispo and subject to City noise standards. Ambient noise levels in the project area currently exceed City thresholds; therefore, the noise analysis conservatively assumed any audible increase in noise over existing levels would be a potentially significant impact. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur during the allowed hours of operation and noise from field use would be largely masked by existing noise levels. Therefore, City noise standards were considered in the analysis and the project was mitigated to ensure no increase in existing ambient noise levels would occur.
- 11.2 As described in Mitigation Measure AQ-1: "The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints and reduce visible emissions below the SLOAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such person(s) shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition." Implementation of this measure and other standard dust control measures will ensure potential impacts related to construction dust will be minimized. In addition, the Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. A copy of these comments and responses will be provided to any individual who commented on the IS/MND to inform them of the University's responses.
- 11.3 As described in Mitigation Measure NOI-2, the IS/MND requires that: "Lay-down and vehicle staging areas shall be located at the furthest practical distance from nearby residential land uses." No construction staging on residential streets would occur.
- 11.4 The comment accurately points out that construction noise would be prohibited prior to 7:00 a.m., after 7:00 p.m., and at any time on Sunday. No further response is necessary.
- 11.5 The project proposes the use of full cut-off light shielding, which would prevent the lights from shining off campus. The photometric diagrams provided by the lighting manufacturer show that no light spillover, trespass, or glare would extend into adjacent residential areas. The light spillover would extend off campus over an approximately 250-foot segment of Slack Street. The amount of spillover anticipated would be visually similar to an automobile low beam headlight. Mitigation Measure AES-1 would require the University to independently verify the results of the photometric diagrams and ensure that no light trespass would occur beyond the campus boundary and that no point-source light would be visible from beyond the campus boundary by implementing specific recommendations to the extent necessary to eliminate any off-site trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. The lighting manufacturer's data shows no light from the field lights would reach adjacent residences; implementation of additional measures identified in the IS/MND will ensure these results will be achieved and no significant lighting impacts on adjacent residences will occur. The Mitigation Monitoring and Reporting Program (MMRP) identifies inspection requirements of the University to ensure mitigation is complied with.
- 11.6 With implementation of identified mitigation measures (see NOI-3 and NOI-4), the noise analysis determined that the proposed use of the field would not increase existing ambient noise levels in the project area. The City of San Luis Obispo does not have jurisdiction over the University and the City's Noise Ordinance and other regulations are not enforceable on University projects. No field use would be

allowed after 10:00 p.m.; however, field use at 6:00 a.m. Monday through Friday is critical to Intercollegiate Athletics football practices. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur at this time and noise from field use would be largely masked by existing noise levels. For purposes of the IS/MND analysis, a potentially significant impact was defined as any audible increase in existing noise levels when existing levels currently exceed applicable thresholds (as they do in the adjacent residential areas). Therefore, the “less than significant” determination was made where the project would not increase existing noise levels to an extent audible to the human ear.

- 11.7 The City of San Luis Obispo does not have jurisdiction over the University and the City’s Noise Ordinance and other regulations are not enforceable on University projects. Nevertheless, the IS/MND and Noise Impact Assessment prepared for the project identified that the residential neighborhoods adjacent to I Field were within the City of San Luis Obispo and subject to City noise standards. Ambient noise levels in the project area currently exceed City thresholds; therefore, the noise analysis conservatively assumed any audible increase in noise over existing levels would be a potentially significant impact. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur during the allowed hours of operation and noise from field use would be largely masked by existing noise levels.

To ensure no increase in existing noise levels would occur over existing conditions, the IS/MND identified mitigation measures that limited the proposed hours of operation and prohibited the use of amplified PA sound systems at the field. Per Mitigation Measure NOI-3, weekday use would be limited to the hours of 6:00 a.m. to 10:00 p.m. and weekend use would be limited to the hours of 8:00 a.m. to 10:00 p.m. Per Mitigation Measure NOI-4, the use of amplified PA sound systems at the field is prohibited. Noise modeling completed for the project indicated that the proposed field use would increase existing noise levels after 10:00 p.m. and any time amplified sound was used; therefore, these activities have been prohibited through project mitigation. Field use at 6:00 a.m. Monday through Friday is critical to Intercollegiate Athletics football practices. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur at this time and noise from field use would be largely masked by existing noise levels. Field use on Sundays is critical to intramural activities and events. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur on these days during the proposed hours of operation (as mitigated).

- 11.8 The University understands that permanent residents live in the City residential areas surrounding campus and has evaluated the impacts of the project with an emphasis on potential effects to surrounding neighborhoods. All comments received regarding the project will be responded to and provided to the Cal Poly Facilities Planning and Capital Projects Department and the California State University Chancellor’s Office for its consideration.



February 13, 2017

Emily Creel, J.D.
SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401

SUBJECT: City of San Luis Obispo comments on the Initial Study/Mitigated Negative Declaration for the proposed I Field Improvements Project

This letter serves as the City of San Luis Obispo's comment letter on the above referenced Initial Study/Mitigated Negative Declaration (IS/MND). Staff has provided comments below recommending additional language and clarification to ensure impacts to the surrounding neighborhood are reduced to less than significant levels.

Noise

Mitigation Measure NOI-3 should clarify that only the recreational and intramural sporting events and intercollegiate activities evaluated in the IS/MND are allowed in the hours of operation discussed in the mitigation measure, and that other sound producing activities which were not evaluated in the noise assessment and mitigated negative declaration are prohibited (i.e. band practice, club events, ceremonies, concerts, etc.).

Mitigation Measure NOI-3 should include provisions to prohibit practice/event setup and closing activities during hours indicated where noise impacts are predicted to occur in Table 10 of the noise assessment (Appendix D). Without prohibition of these activities during these hours, the noise assessment indicates that impacts would be potentially significant.

Mitigation measures and the Mitigation Monitoring and Reporting Plan (MMRP) should require that upon completion and use of the field, actual operational noise levels above ambient levels are verified as less than significant per methodology of the sound assessment. Noise assessments should include a full analysis of all hours studied in the IS/MND and be conducted during timeframes where the field is in use with the range and intensity as anticipated in the project description. Recommendations should be included by a qualified noise expert which could be implemented in the event that noise levels exceed noise assessment predicted levels. The recommendations should include a series of steps to be taken until measured sound levels are achieved below levels of significance.

12.1

Mitigation measures and the MMRP should include provisions for neighborhood outreach and include requirements to provide information to nearby property owners and tenants of the I Field approved uses, hours of operation, and should provide contact information for facilities management or other appropriate Cal Poly staff or administration to ensure ongoing compliance with hours of operation and approved uses.

12.1
(cont'd)

Aesthetics

Existing mitigation measure AES-1 should be modified to include field verification that recommendations of the Lighting Evaluation Report have been properly implemented and are effective in shielding the light sources and eliminating light trespass beyond the campus boundary. Operationally, restrictions should be included to ensure the lighting is shut off as soon as possible when the field is not in use.

12.2

Mitigation Monitoring and Report Plan (MMRP)

The MMRP table only indicates "Cal Poly" as the responsible party for the verification and implementation of all of the mitigation measures. The MMRP should include more specific information on the department/positions responsible for each mitigation measure.

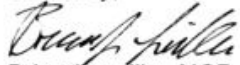
12.3

The City requests to continue to be notified/consulted on further project review such as any significant project modifications, environmental review, and upcoming hearings.

12.4

Please feel free to contact me if you have any questions or would like to arrange a meeting. I can be contacted by phone at 805-781-7166, or by e-mail: bleveille@slocity.org

Sincerely,



Brian Leveille, AICP

Senior Planner

Long Range Planning

City of San Luis Obispo, Community Development Department

CC: San Luis Obispo City Council
Michael Codron, Community Development Director
Xzandrea Fowler, Deputy Director of Community Development
Tim Bochum, Deputy Director of Public Works
Jake Hudson, Traffic Operations Manager
Hal Hannula, Supervising Civil Engineer
Roger Maggio, Fire Marshal

12. Response to: City of San Luis Obispo (Letter dated February 13, 2017)

- 12.1 Mitigation Measure NOI-3 has been revised to clarify that practice/event setup and closing activities would be prohibited outside of the allowable hours of field use and that any other additional use of the field beyond those uses already existing and included in the environmental baseline would be prohibited. There are limited existing uses of the field (i.e., limited band practices) that currently occur at I Field. These uses are part of the environmental baseline and NOI-3 has been revised to prohibit any increase in these other uses. Therefore, no increased use or noise associated with these uses would occur.

Cal Poly Facilities Planning and Capital Projects has consulted with the Cal Poly Associate Director of Bands regarding the Mustang Band's potential future use of the I Field. The band typically practices at the adjacent track field. The Associate Director of Bands confirmed that preparation on the adjacent track field is critical to the performance and success of fall Mustang Band. The track field most closely resembles where the students perform for football and the new I Field will not be ideal for Mustang Band purposes since it will be flat (no crown) and turf requires the students use a different marching technique than what they use in Spanos Stadium. Therefore, no increased use of the I Field by the Mustang Band would occur, and use will potentially decrease due to the addition of artificial turf.

Use of the field as mitigated (see Mitigation Measures NOI-3 and NOI-4) is not expected to increase ambient noise levels in surrounding areas. To ensure no increase in existing noise levels would occur over existing conditions, the IS/MND identified mitigation measures that limited the proposed hours of operation and prohibited the use of amplified PA sound systems at the field. The Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact for the project. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. A copy of these comments and responses will be provided to any individual who commented on the IS/MND. Complaints regarding noise (if any) during operation of the field can be made to these individuals. The University will then determine whether additional action is necessary to further minimize noise. Because there is currently no information that indicates noise levels at the site would increase, no additional mitigation is required at this time.

- 12.2 Mitigation Measure AES-1 has been revised to clarify that field verification will be required to ensure the recommendations of the independent lighting evaluation have adequately eliminated light trespass beyond the campus boundary. The field lighting will be shut off immediately at the conclusion of field events and when the field is not in use. The facility will be staffed with a supervisor in the evenings who will be in charge of the facility for intramural sports and other recreational activities. The field supervisor will be responsible for turning off the lights and locking the field at the end of the night.
- 12.3 Cal Poly's Facilities Planning and Capital Projects Department will be the responsible party for ensuring the proper implementation of mitigation measures. The Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact for the project. Colin can be reached at (805) 756-6590.
- 12.4 The University will notify the City of any further project reviews, modifications, or hearings.

Emily Creel

From: Paso Almond <pasosalmond@gmail.com>
Sent: Monday, February 13, 2017 3:15 PM
To: Emily Creel
Subject: Cal-Poly Field Improvement Project

February 13, 2017

Ms. Emily Creel

SWCA Environmental Consultants

1422 Monterey St.

San Luis Obispo, CA 93401

Dear Ms. Creel,

I would like to raise the following concerns about the analyses included in the “Initial Study and Proposed Negative Declaration for the Cal-Poly Field Improvement Project”

Lighting

13.1

Figure 9 (page 25) of the Visual Impact Assessment contains a map entitled “Manufacturer’s Lighting Data--Environmental Glare Impact. The map shows a decreasing impact from glare the farther a viewer is from the boundary of the playing field. Does this map consider the contour of the surrounding area? Specifically the field elevation is approximately 355’ with the top of the proposed light standard being 70’ higher, or roughly 425’. A viewer from a ground floor window at a residence on either Slack St or Longview Ln could easily be above 400’, and a viewer from a second story window could be at or above the height of the lamps themselves. What evidence is there that the proposed shielding would work when the viewer is at such an elevated position?

Noise

13.2

The Study presents extensive projections of the anticipated sound levels at various residential locations on Slack St. and Longview Ln, with the highest sound levels occurring during a Competitive (i.e. Intramural) Event either with or without a PA system (Figs. 13-18). Did these predicted sound levels consider that the prevailing wind is from the North towards the residences? The indicated Noise Contours suggest that they did not, so how is it possible to accurately assess the noise impact on the surrounding residences, particularly on warm evenings when one could expect windows to be open to catch those very breezes?

The Study also presumes that the most troublesome noise source will be the playing field itself. No analysis was made of noise originating from the parking lot to the west of field, and yet it is entirely predictable that participants and spectators will return to their cars sometime *after* 10:00 pm. This noise could be especially problematic because the eastern boundary of the lot will no longer be an open and absorptive grass covered field but a hard reflective concrete retaining wall. Why was noise from this source not evaluated, and the appropriate mitigation measures proposed?

13.3

Sincerely,

Russell Hall

179 Longview Ln.

San Luis Obispo, CA 93405

13. Response to: Russell Hall (Letter dated February 13, 2017)

13.1 Yes, the photometric diagrams provided by the lighting manufacturer for the field lights consider site contours (as reflected in the images) and indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. Therefore, measures are in place to ensure no light spills over into the residential areas.

13.2 The University has conducted an extensive noise study to evaluate the project's potential noise-related impacts on adjacent residences. The noise measurement surveys were used for purposes of determining ambient noise conditions (pre-project), which were used for determining the noise standard to be applied and evaluation of increases in ambient noise levels. To be conservative, the analysis relied upon the lowest measured noise levels. Predicted noise levels for the project were modeled based on the worst case meteorological conditions, which were then compared to the ambient noise levels. Use of the field as mitigated (see Mitigation Measures NOI-3 and NOI-4) is not expected to increase ambient noise levels in surrounding areas. To ensure no increase in existing noise levels would occur over existing conditions, the IS/MND identified mitigation measures that limited the proposed hours of operation and prohibited the use of amplified PA sound systems at the field. This would be the case when windows are open or when they are closed.

The Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact for the project. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. A copy of these comments and responses will be provided to any individual who commented on the IS/MND. Complaints regarding noise (if any) during operation of the field can be made to these individuals. The University will then determine whether additional action is necessary to further minimize noise. Because there is currently no information that indicates noise levels at the site would result in significant impacts, no additional mitigation is required at this time.

13.3 Increases of 3 decibels in ambient noise levels is typically considered the minimum level audible to the human ear. A doubling of traffic trips is generally required to achieve a 3 dBA increase in average-daily traffic noise levels. The project would not result in a doubling of traffic trips; therefore, no audible change in traffic related noise would occur. In fact, the project would reduce trips over existing conditions, resulting in a reduction in traffic-generated noise. Most players/participants at the field are expected to park in the Grand Avenue parking structure next to Mott Gym and/or walk from other areas of campus. Although some use of the parking lot would occur after field events, this use is not expected to be a substantial noise source. The perimeter of the field would be landscaped, providing sound absorptive materials adjacent to the parking lot. In addition, existing use of the field currently results in use of this parking lot and is not limited in hours of duration like the proposed project would be. This impact is considered less than significant, particularly when considered in the context of existing ambient noise levels.

Emily Creel

From: RQN of SLO <rqn.board@yahoo.com>
Sent: Monday, February 13, 2017 4:11 PM
To: Emily Creel
Subject: Cal Poly I-Field Improvements Project
Attachments: Sports Field RQNLtr.doc

Hi Emily,

Attached please find the comments on this project from Residents for Quality Neighborhoods. Thanks for the opportunity to provide our input.

Sincerely,

Sandra Rowley
Chairperson, RQN

14.1



SUBJECT: Initial Study and Proposed Negative Declaration for the Cal Poly I-Field Improvements Project

Dear Ms. Creel,

Thank you for the opportunity to submit our comments regarding the study and proposed negative declaration. The study was lengthy and quite detailed, so our apologies in advance for any comments that address items that are covered in the report, but we missed.

Regarding mitigation measures, particularly those for lights and noise, we did not notice the inclusion of mitigations relating to any follow-up actions after project completion to ensure that, for light, the mitigation measures were successful and, for noise, the addition of needed mitigation measures (e.g., adjustment in the hours of usage, on-site noise monitor, other).

14.2

The Initial Study and Proposed Negative Declaration regarding the I-Field states that the CSU CEQA Handbook recommends that good sources for impact threshold determination include federal, state and local guidelines. Regarding the project's effect on the existing visual character and quality of the site and its surroundings, it did not appear that community values were considered. Regarding noise generated after project completion, it did not appear that the City's noise ordinance was taken into consideration when determining intensity of use, and yet it will be city residents because of their close proximity to the project who will be the most affected.

Before/During Construction:

1. AES-1. The I-Field is currently a wide open field at the perimeter of campus that gets only periodic use and that provides a tranquil view for the surrounding community while acting as a buffer between Cal Poly and the homes that border Cal Poly. It is being transformed into a practice and events field with an 8-foot fence, 36-foot filming towers, 70-foot light poles, and a raised scoreboard. The development also include a substantial increase in intensity of use by, among other things, moving football practice and intramural sports from the sports complex on the north side of campus (Appendix E), where resident views are not a factor, to the southern perimeter of campus immediately across the street from single-family homes, and by significantly extending the hours in which the field is to be used. The build-up on this site and the increase in intensity of use **will** have an adverse visual impact by degrading the current visual quality of the site.

14.3

The uses on either side of the field are not intense. The discussion of intensifying the use of the field does not consider the total visual character of the frontage area from Longview Lane to the edge of the Housing South project as seen from across Slack Street and, to a lesser degree, from

across Longview Lane. The 2.5 acre field is sandwiched between a ground-level parking lot to the west (with a small green belt to the west of the parking lot) and, because of a mature stand of trees and minimal lighting, a partially visible track to the east. Views across the track are not obstructed because of the type of fencing used. The tennis courts are located downslope, to the north of and below the field, with the nets barely visible. Behind the tennis courts is an unseen pool with several buildings and the parking structure in the background.

The discussion does not delve into documented community values regarding open spaces. The community advocates for and funds much of the acquisition of the Open Space that surrounds the city, even saying in a 2012 survey that it was the only item for which city residents would be willing to provide additional funds. This love of open spaces is not limited to that surrounding our city. It covers community gardens and the 18 or so parks in the city. Additionally, all large development projects are required to include one or more parks in their design. Even though San Luis Obispo is a city, as a community we have retained a love for the land and for being able to see patches of green - real or faux.

The commonality between the field as it currently exists and the field after it has been developed is that they are both fields used for some type of recreation. However, they are very different visually, very different in intensity of use, and their purpose is dissimilar. The existing field also acts as a buffer between the active recreational uses behind it and the residents across the street. The updated field will bring active recreation uses to the proverbial doorstep of those residents. When viewed from the campus the project may very well be seen as a logical use for the site and an expected campus function and visual condition. However, when seen from the community it will more likely be viewed as spoiling the looks and character of the field, and as replacing a welcome buffer area with a lot of activity.

The conclusion (App. B, pgh 8.3) that the project would result in no adverse alteration of visual character for the site and its surroundings does not appear to see the distinction between an open field with primarily passive uses and a built-up field with active uses, the visual character of the site in conjunction with the uses to the east and west of it, or the current view from the neighborhood.

Requested Mitigation. Presuming the project will go forward as planned, request mitigation in the form of a reduction in the intensity of the use. Specifically, request the weekday hours be shortened by one hour (moving the start time from 6:00 a.m. to 7:00 a.m.), and eliminating Sundays from all scheduling at this field.

2. AQ-1. If dust becomes a significant problem, it is unclear who city residents are to contact, the university or the county APCD. It is, also, unclear if or how nearby residents will be furnished with this information.

14.3
(cont'd)

14.4

3. AQ-2. Although conditions imply that equipment layover and staging areas are not allowed on residential city streets, that is not clearly stated in the Study. Equipment layover and/or staging on residential streets would seriously disrupt the flow of traffic to and from work and school. 14.5

4. NOI-1 E, G, H and NOI-2 c, d. Having compared the Cal Poly noise policies cited in the Study with those of the City of San Luis Obispo, we are very pleased to see that the city's construction noise policy, which prohibits construction noise before 7:00 a.m., after 7:00 p.m. and all day Sunday, was adopted as a mitigation. 14.6

After Construction:

1. AES-1.
a. Once the project has been completed and is ready for use, will there be someone knowledgeable about the various sources of light to verify that there is no trespass of light beyond the campus boundary, that no point-source light is visible beyond the campus border, and to correct whatever problem(s) may exist? Occasionally, plans go awry and we would hope that verification of zero light trespass, etc., would not be left to resident complaints. 14.7

b. Request the intensity of use be reduced by decreasing the allowed hours of use, i.e., weekday set-up/start time no earlier than 7:00 a.m., personnel and equipment off the field by or before 10:00 p.m., and all use prohibited on Sunday. 14.8

2. NOI-3.
a. Per the Report, the Cal Poly Land Use Guidelines define basic land use principals including compatibility between adjacent uses, proximity among related uses and community buildings, and to be considerate of impacts on neighborhoods near campus.
b. City Policy - "It shall be the policy of the city to maintain quiet in those areas which currently exhibit low noise levels and to implement programs aimed at reducing noise in those areas within the city where noise levels are above acceptable levels" (emphasis added). The Study acknowledges that this project will increase noise (although it is determined to be less than significant with mitigation, i.e. less than a 3 dBA increase) in an area where ambient noise usually exceeds the maximum standards. 14.9

c. In Appendix D, page 35, it states football practice currently starts at 6:00 a.m. and would continue to do so under the proposed project. This schedule is currently used; however, team practices are occurring at the sports complex on the north side of campus away from residential uses. Although Cal Poly has no restrictions on time or scheduling, the conclusion that the proposed project would not expose people to noise levels that conflict with applicable standards, ordinances, or policies does not take the City's standards into account. Since the Cal Poly Land Use Guidelines include being considerate of impacts on neighborhoods near campus (see above) and

practices are to be moved to an area immediately across the street from city residents, we request the 6:00 a.m. start time be reviewed again to see if opening I-Field at 7:00 a.m. would be more in keeping with the new location.

d. Sundays and holidays are days of relative quiet when noise is normally kept to a minimum; see San Luis Obispo noise ordinance. Although average hourly event noise levels may be in the "less than significant" range, it is not uncommon for such events to have periods of quiet followed by periods of loud outbursts. An average hourly level would not identify such outbursts, but that doesn't mean none occur nor does it mean repeated outbursts are not disturbing to those who live nearby. Request consideration be given to eliminating Sundays from the I-Field schedule.

e. Ambient noise in this neighborhood was measured at higher levels than the city's standards. Results of the noise study indicated this was due to traffic along Slack and Longview and increased student activity within the area. (App. D, pg 38) Cal Poly and the City have been working to reduce the noise impacts, especially in this area. Once the second-year residence halls are constructed, fewer students will live in the city. This, plus the efforts of Cal Poly and the City should result in a decrease in student activity and traffic through the neighborhood which should, if there are no other changes, result in a decrease in student activity and traffic and, thus, in the ambient noise level.

f. The project creates a new source of noise, and would expand the hours of noise disturbance in the neighborhood if allowed to occur outside of the city's established twelve-hour period of 7:00 a.m. - 7:00 p.m. and any time on Sunday. Although the Study states that impacts associated with a temporary or permanent increase in ambient noise levels would be less than significant with mitigation incorporated (App. D, pg 39), it is unclear what "less than significant" actually means in terms of quality of life to an individual subject to said impacts.

Summary.

a. Request there be no use of the field on Sundays. If possible, Intercollegiate football and soccer practice should begin no earlier than 7:00 a.m. Monday - Friday in lieu of 6:00 a.m.

b. Area residents are pleased that the PA system has been removed from consideration, the field is to close at 10:00 p.m., the weekend start time is 8:00 a.m. instead of 7:00 a.m., and procedures to ensure light will not travel past the university's boundary will be implemented. However, since the field may be heavily used from mid-September to mid-June for 14 to 16 hours a day with a concomitant increase in traffic and noise, asking area residents to tolerate seven days straight, week after week is pushing at the patience of even the most ardent Cal Poly supporter. Request they be granted a reprieve from the use of the field on Sundays.

c. Although not addressed, and potentially not within the purview of the Study, what recourse is available to a city resident who is awakened by noise from the I-Field, or whose sleep is repeatedly

14.9
(cont'd)

14.10

14.11

interrupted or who finds the noise at whatever time of day so intrusive and/or disruptive that he is unable to enjoy his own home? Who does he call? The city police force has no jurisdiction. And because the noise would be emanating from state land, but not annoying Cal Poly personnel, would anything be done to reduce the noise to tolerable levels? Will anyone be tasked to monitor noise when the field is in use?

14.11
(cont'd)

Sincerely,

Sandra Rowley
Chairperson, RQN

14. Response to: Residents for Quality Neighborhoods (Letter dated February 13, 2017)

14.1 This comment introduces the comments from Residents for Quality Neighborhoods. No further response is necessary.

14.2 The IS/MND has identified mitigation to ensure noise and lighting impacts are reduced to less than significant. The University has conducted an extensive noise study to evaluate the project's potential noise-related impacts on adjacent residences. Use of the field as mitigated (see Mitigation Measures NOI-3 and NOI-4) is not expected to increase ambient noise levels in surrounding areas. To ensure no increase in existing noise levels would occur over existing conditions, the IS/MND identified mitigation measures that limited the proposed hours of operation and prohibited the use of amplified PA sound systems at the field. The Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact for the project. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. A copy of these comments and responses will be provided to any individual who commented on the IS/MND. Complaints regarding noise (if any) during operation of the field can be made to these individuals. The University will then determine whether additional action is necessary to further minimize noise. Because there is currently no information that indicates noise levels at the site would result in significant impacts, no additional mitigation is required at this time.

The photometric diagrams provided by the lighting manufacturer for the field lights indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties, though glare and light spillover would extend across an approximately 250-foot portion of Slack Street. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. With implementation of this measure, significant impacts related to offsite glare and light trespass will be avoided. If light spillover is limited to on-campus areas, potential impacts on adjacent residential areas would be less than significant. Mitigation Measure AES-1 has been revised to clarify that field verification will be required to ensure the recommendations of the independent lighting evaluation have adequately eliminated light trespass beyond the campus boundary.

14.3 CEQA does not protect or consider private views and the existing field within the Cal Poly campus instructional core does not qualify as open space. The IS/MND and Visual Impact Assessment prepared for the project analyzed the potential change in existing visual quality and character as a result of the intensified recreational use of the site. The Visual Impact Assessment determined that the visual context of the project site is mostly influenced by the uses and buildings of University development. Although bordered to the south, southeast and southwest by predominantly residential neighborhoods, the project location is clearly within the campus boundary. Accordingly, viewer expectations related to the project site would consider campus-style development appropriate, including scale, usage, and patterns consistent with the rest of the University. The project would maintain the current recreational use of the site. This recreational use would be intensified, and the degree of associated development would increase, however these changes would be in keeping with the density of recreational uses seen in the surrounding athletic facilities in this portion of the campus. The proposed elements of the project including fencing, lights, goal posts, filming towers, nets, and perimeter landscaping would all be considered consistent with the visual character of the site and its surroundings. The project proposes a recreational use on an existing recreational site, adjacent to an area of campus that currently has multiple highly visible recreational facilities. Although the project would intensify the use, it would remain consistent with the visual character of the site and surroundings. From the surrounding community the project would also be seen as a logical use for site, and an expected campus function and visual condition. Therefore, impacts related to visual quality and character, including roadway views from Slack Street and Longview Lane, were found to be less than significant.

Field use on Sundays is critical to intramural activities and events and field use at 6:00 a.m. is critical to Intercollegiate Athletics football practices. As mitigated, the IS/MND found that no significant impacts would occur on these days during the proposed hours of operation (as mitigated).

- 14.4 As described in Mitigation Measure AQ-1: “The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints and reduce visible emissions below the SLOAPCD’s limit of 20 percent opacity for greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such person(s) shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.” Implementation of this measure and other standard dust control measures will ensure potential impacts related to construction dust will be minimized. In addition, the Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University’s primary point of contact. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. A copy of these comments and responses will be provided to any individual who commented on the IS/MND to inform them of the University’s responses.
- 14.5 As described in Mitigation Measure NOI-2, the IS/MND requires that: “Lay-down and vehicle staging areas shall be located at the furthest practical distance from nearby residential land uses.” No construction staging on residential streets would occur.
- 14.6 The comment recognizes and provides appreciation for implementation of the City’s construction noise standards. No further response is necessary.
- 14.7 The photometric diagrams provided by the lighting manufacturer for the field lights indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties, though glare and light spillover would extend across an approximately 250-foot portion of Slack Street. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. With implementation of this measure, significant impacts related to offsite glare and light trespass will be avoided. If light spillover is limited to on-campus areas, potential impacts on adjacent residential areas would be less than significant. Mitigation Measure AES-1 has been revised to clarify that field verification will be required to ensure the recommendations of the independent lighting evaluation have adequately eliminated light trespass beyond the campus boundary.
- 14.8 Field use on Sundays is critical to intramural activities and events and field use at 6:00 a.m. is critical to Intercollegiate Athletics football practices. As mitigated, the IS/MND found that no significant impacts would occur on these days during the proposed hours of operation (as mitigated). Additionally, Mitigation Measure NOI-3 has been revised to clarify that practice/event setup and closing activities would be prohibited outside of the allowable hours of field use and that and any other use of the field not described in the IS/MND (e.g., band practice, concerts, ceremonies) would be prohibited.
- 14.9 The City of San Luis Obispo does not have jurisdiction over the University and the City’s Noise Ordinance and other regulations are not enforceable on University projects. Nevertheless, the IS/MND and Noise Impact Assessment prepared for the project identified that the residential neighborhoods adjacent to I Field were within the City of San Luis Obispo and subject to City noise standards. Ambient noise levels in the project area currently exceed City thresholds; therefore, the noise analysis conservatively assumed any audible increase in noise over existing levels would be a potentially significant impact. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur during the allowed hours of operation and noise from field use would be largely masked by existing noise levels. Therefore, City noise standards were

considered in the analysis and the project was mitigated to ensure no audible increase in existing ambient noise levels would occur. For purposes of the IS/MND analysis, a potentially significant impact was defined as any audible increase in existing noise levels when existing levels currently exceed applicable thresholds (as they do in the adjacent residential areas). Therefore, the “less than significant” determination was made where the project would not increase existing noise levels to an extent audible to the human ear.

- 14.10 Field use on Sundays is critical to intramural activities and events and field use at 6:00 a.m. is critical to Intercollegiate Athletics football practices. As mitigated, the IS/MND found that no significant impacts would occur on these days during the proposed hours of operation (as mitigated). Additionally, Mitigation Measure NOI-3 has been revised to clarify that practice/event setup and closing activities would be prohibited outside of the allowable hours of field use and that any other use of the field not described in the IS/MND (e.g., band practice, concerts, ceremonies) would be prohibited.
- 14.11 The Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University’s primary point of contact. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281. Complaints regarding noise (if any) during operation of the field can be made to these individuals. The University will then determine whether additional action is necessary to further minimize noise. Because there is currently no information that indicates noise levels at the site would result in significant impacts, no additional mitigation is required at this time.

Emily Creel

From: Darrell Voss <dvossjazz@gmail.com>
Sent: Monday, February 13, 2017 12:56 PM
To: Emily Creel
Cc: Karen Adler
Subject: Concerned Neighbor about CP Sports Field
Attachments: CP Sports Field Letter.docx

Dear Emily,

I have been a resident of Alta Vista Neighborhood since 1992.
I have seen many changes of the past 25 years.
I am deeply concerned with the proposed sports field located at the
edge of Cal Poly Campus, in the middle of a single family residential neighborhood.

I have attached a letter for your purpose.

Thank you for your time and consideration.

Sincerely,

Darrell Voss
Resident/home owner, Alta Vista Neighborhood

15.1

To Whom It May Concern:

2-13-17

I am writing this letter in response to the proposed sports field to be built at Slack and Longview Streets for the benefit of Cal Poly. I have been a resident of Alta Vista neighborhood Since 1992. I have seen and lived through many changes, both in my immediate neighborhood, and on the Cal Poly campus. I live on Hathway Avenue, where the residents are now mostly students. This has changed upon first moving in, where at that time, there was about 50% students and 50% homeowners/family occupied. My wife and 2 children continue to live in the house we purchased 25 years ago. Our most recent challenge has been noise from increased vehicle traffic and off campus student activities (Greek events, parties, dorm residents walking through our neighborhood at late hours with unruly conduct, directly related to alcohol consumption). I have concluded that a large contributor to this problematic increase is that Cal Poly has no longer has a perimeter road through campus. This usually results in traffic being re-routed from Foothill at California, to Carpenter, to Hathway, to Longview, to Slack, then Grand Ave, and finally, the CP entrance. This traffic is directly related to Cal Poly Dorm Occupants, Staff, sports events, intermural activities and Performing Arts Center events, also important to mention, all of the emergency response vehicles for Cal Poly campus (SLO Fire, SL Ambulance, SLO PD, when needed) that travel through Alta Vista Neighborhood to get to the Grand Avenue entrance of Cal Poly. Other factors also contribute to noise such as increased number of students at Cal Poly (now 20K) with a proposed 25k in the master plan.

15.2

Other areas of concern are Air quality, Aesthetics, and increased traffic and noise from the new dorms on Slack and Grand to be mixed in with all of sports fields use and parking,etc....

15.3

With all of this said, one may question the proposal of another noise induced catalyst such as a sports field upon a single family residential neighborhood, when Cal Poly already has multiple sports fields near Poly Canyon Village (which also created controversial lighting and noise). To include increased lighting, hours of use, with increased crowds and traffic, this will complicate what already seems to be a maximum tolerance on permanent residents here in the Alta Vista Neighborhood. If this proposal is implicated, I question who will be overseeing the conduct and uses of such a sports field. With all the proposed hours of use that would be available to make noise, it makes no sense in the eyes of a homeowner who would like to have a normal living situation, due to multiple negative side effects. I believe the factors involved makes a very unfavorable outcome for any non-student resident here in Alta Vista Neighborhood. I urge you to weigh these negative affects heavily as the city and college work out the details of options.

15.4

Sincerely,

Darrell Voss
Home Owner, Alta Vista Neighborhood.

15. Response to: Darrell Voss (Letter dated February 13, 2017)

- 15.1 This comment introduces the commenter's comments. No further response is necessary.
- 15.2 This comment describes the existing noise environment in the Alta Vista neighborhood area. The IS/MND provided consistent information regarding the high ambient noise levels that currently exist in the area. No further response is necessary.
- 15.3 This comment generally identifies air quality, aesthetics, and increased traffic and noise as concerns related to the project, in addition to cumulative impacts associated with the proximate Student Housing South project. The IS/MND considered each of these potential impacts and determined that potentially significant impacts related to air quality, aesthetics, and noise could be reduced to less than significant with implementation of identified mitigation measures, which limit the allowable hours of operation of the field, prohibit the use of amplified PA sound systems, require verification of the light spillover analysis that shows no spillover into adjacent residential areas, and standard dust and emission control measures. Each of these impacts would be reduced to less than significant with the adoption of identified mitigation requirements.
- 15.4 The IS/MND evaluated potential noise-related impacts of the project. Ambient noise levels in the project area currently exceed City thresholds; therefore, the noise analysis conservatively assumed any audible increase in noise over existing levels would be a potentially significant impact. As mitigated (see Mitigation Measures NOI-3 and NOI-4) no significant increase in ambient noise levels over existing noise levels would occur during the allowed hours of operation and noise from field use would be largely masked by existing noise levels. To ensure no increase in existing noise levels would occur over existing conditions, the IS/MND identified mitigation measures that limited the proposed hours of operation and prohibited the use of amplified PA sound systems at the field. Per Mitigation Measure NOI-3, weekday use would be limited to the hours of 6:00 a.m. to 10:00 p.m. and weekend use would be limited to the hours of 8:00 a.m. to 10:00 p.m. Per Mitigation Measure NOI-4, the use of amplified PA sound systems at the field is prohibited. Noise modeling completed for the project indicated that the proposed field use would increase existing noise levels after 10:00 p.m. and any time amplified sound was used; therefore, these activities have been prohibited through project mitigation. In addition, Mitigation Measure NOI-3 has been revised to clarify that practice/event setup and closing activities would be prohibited outside of the allowable hours of field use and that any other use of the field not described in the IS/MND (e.g., band practice, concerts, ceremonies) would be prohibited.

The project would include six 70-foot tall field lights with full cut-off light shielding. The shielding will help prevent any light trespass or spillover off campus. The photometric diagrams provided by the lighting manufacturer for the field lights indicate that the proposed field lighting would result in no spillover or glare into the surrounding residential properties. The IS/MND also includes a measure that requires the University to independently verify the results of the photometric diagrams. If off-campus light trespass or point-source visibility is identified, the University would be required to implement certain actions to eliminate the trespass or visibility, including repositioning the lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures. In addition, Mitigation Measure AES-1 has been revised to clarify that field verification will be required to ensure the recommendations of the independent lighting evaluation have adequately eliminated light trespass beyond the campus boundary.

No bleachers are proposed at the field, and no large spectator events are anticipated. The project would reduce traffic trips over existing conditions due to the more proximate location of the I Field to other associated sports and recreational facilities on campus. The Cal Poly Facilities Planning and Capital Projects Project Manager, Colin Princi, will be the University's primary point of contact. Colin can be reached at (805) 756-6590. Complaints regarding campus operations can also be made to the University Police Department at (805) 756-2281.

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