CHAPTER 10
RESPONSE TO COMMENTS ON THE 2014 RECIRCULATED DRAFT EIR

The Response to Comments chapter of the EIR includes comment letters for the California Polytechnic State University, San Luis Obispo (the University or Cal Poly) Student Housing South 2014 Recirculated Draft EIR. These comment letters were received from entities including federal and state agencies, non-agency organizations, and the general public. In accordance with CEQA Guidelines §15132(d), this Final EIR presents the University's response to comments submitted during the 2014 Recirculated Draft EIR review and consultation process.

The letters of comment are in chronological order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments.

10.1 AGENCY COMMENT LETTERS AND RESPONSES

The following agencies have submitted comments on the 2014 Recirculated Draft EIR.

Respondent	Code	Contact Information	Page
State of California **Office of Planning and Research** **State Clearinghouse and Planning Unit** Posted: February 14, 2014	SCH	1400 10th Street Sacramento, CA 95812 www.ceqanet.ca.gov	10.1-2
City of San Luis Obispo **City Council** **Town Hall Meeting Comments** Letter dated: March 27, 2014	THM	919 Palm Street San Luis Obispo, CA 93401 *Contact: Carlyn Christianson, Vice Mayor*	10.1-4
City of San Luis Obispo Letter dated: March 31, 2014	SLO	919 Palm Street San Luis Obispo, CA 93401 *Contact: Derek Johnson, Community Development Director*	10.1-274
San Luis Obispo County **Air Pollution Control District** Letter dated: March 31, 2014	APCD	3433 Roberto Court San Luis Obispo, CA 93401 *Contact: Melissa Guise, Air Quality Specialist*	10.1-449

SCH-1

California Home Tuesday, April 1, 2014

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

Student Housing South

SCH Number: 2013091085

Document Type: EIR - Draft EIR

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

Project Description

Provide up to 1,475 housing units and a 300 to 500-space parking structure with access and appurtenant facilities on 12 acres currently in use as the R-1, R-2 and G-4 parking lot.

Contact Information

Primary Contact:
Joel Neel
California State Polytechnic University, San Luis Obispo
(805) 756-2193
1 Grand Avenue
San Luis Obispo, CA 93407

Project Location

County: San Luis Obispo
City: San Luis Obispo
Region:
Cross Streets: Grand Avenue and Slack Street
Latitude/Longitude: 35° 17' 49.2" / 120° 39' 17" Map
Parcel No:
Township: 23
Range: 12E
Section: 30S
Base:
Other Location Info:

Proximity To

Highways: Hwy 101, 1
Airports: No
Railways: UPRR
Waterways: Stenner Creek, Brizzolara Creek
Schools: Former Pacheco ES
Land Use: Parking and Outdoor Recreation/Athletics

Development Type

Residential, Transportation: Other (Parking Structure, 300-500 spaces)

Local Action

Other Action (Campus Project)

Project Issues

Air Quality, Archaeologic-Historic, Biological Resources, Drainage/Absorption, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, 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, Aesthetic/Visual

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

Resources Agency; Department of Fish and Wildlife, Region 4; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 5; Air Resources Board; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received: 2/14/2014 **Start of Review:** 2/14/2014 **End of Review:** 4/1/2014

CEQAnet HOME | NEW SEARCH

10.1.1 Response to State Clearinghouse Notice of Distribution

Comment No.	Response
SCH-1	Standard notice of agency distribution from State Clearinghouse. No changes to the EIR are necessary.

city of san luis obispo

OFFICE OF THE CITY COUNCIL
990 Palm Street ■ San Luis Obispo, CA 93401-3249 ■ 805/781-7119

March 27, 2014

VIA PERSONAL DELIVERY

Jeffrey Armstrong, President
Cal Poly State University
1 Grand Avenue
San Luis Obispo, CA 93407

VIA PERSONAL DELIVERY

CSU Board of Trustees
Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

SUBJECT: Draft Environmental Impact Report for Cal Poly Student Housing South Project ("Project")

Dear Dr. Armstrong and Ms. Carter:

As a jurisdiction that has been identified as being impacted by the above-referenced Project, the community of the City of San Luis Obispo has a strong interest in ensuring that you have as much information as possible when you consider the environmental analysis for the Project. At the request of several community members, on March 25, 2014, the City Council for the City of San Luis Obispo held a special town hall meeting to provide a forum in which its community could express its concerns and comments about the proposed Project and the Draft Environmental Impact Report that is currently circulating. For your consideration, I am submitting a copy of written correspondence submitted to the City Council, and the draft minutes for the meeting, prepared by the City Clerk. The minutes are considered draft because the City Council has not formally approved them at one of its regularly scheduled meetings. In addition, I am submitting a DVD of the recording of the town hall meeting. The DVD contains more details than the minutes of the meeting.

THM-1

The City Council and our community expect that the CSU Board of Trustees will comply with its obligations under the California Environmental Quality Act, and therefore, will ensure that the Environmental Impact Report adequately and accurately analyzes the impact of the Project. Accordingly, I urge you to review all of the materials submitted so that you have a full understanding of the sentiments of our community members to address the shortcomings of the environmental analysis. In addition, Community Development Director Derek Johnson will be submitting the City's official comments based on our technical analysis of the Draft EIR for the Project in a separate letter. If you have any further questions about this submission, please contact Mr. Johnson at (805) 781-7187 or djohnson@slocity.org.

Very truly yours,

Carlyn Christianson

Carlyn Christianson
Vice Mayor for the City of San Luis Obispo

cc (*without attachments*):
City Council
Katie Lichtig, City Manager
Christine Dietrick, City Attorney
Derek Johnson, Community Development Director

minutes
city of san luis obispo

TOWN HALL MEETING OF THE CITY COUNCIL

Tuesday, March 25, 2014
Special Meeting – 6:00 p.m.
Ludwick Community Center, 864 Santa Rosa Street
San Luis Obispo, California

CALL TO ORDER

A Special Meeting of the San Luis Obispo City Council was called to order on Tuesday, March 25, 2014 at 6:00 p.m. in the Ludwick Community Center, located at 864 Santa Rosa Street, San Luis Obispo, California, by Vice Mayor Christianson.

ROLL CALL

Council Members
Present: Council Members John Ashbaugh, Dan Carpenter, Kathy Smith, and Vice Mayor Carlyn Christianson

Council Member
Absent: Mayor Marx

City Staff
Present: Katie Lichtig, City Manager, Andrea Visveshwara, Assistant City Attorney, Derek Johnson, Community Development Director, and Anthony Mejia, City Clerk, were present at Roll Call.

VICE MAYOR INTRODUCTION

Vice Mayor Christianson announced that Mayor Marx recused herself from deliberations on the Cal Poly student housing project because she owns property within 500' of the subject property; advised that the City is in the process of preparing its second letter in response to the recirculated Draft Environmental Impact Report (DEIR) on the project; explained the town hall meeting format.

THM-2

PUBLIC COMMENT ON CAL POLY STUDENT HOUSING PROJECT AT GRAND AVENUE ENTRANCE

Sharon Whitney, San Luis Obispo, asserted that the subject DEIR contains analytical omissions; urged that the City's comments on the DEIR request analysis on nighttime light pollution and whether the project will cause growth inducement; recommended that the Cal Poly Master Plan be updated to incorporate the City's Land Use and Circulation Elements (LUCE) update.

THM-3

Patrick Vaughan, San Luis Obispo, expressed concern regarding bicyclist safety on Grand Avenue. **THM-4**

Susan Hay, San Luis Obispo, pointed out residential driveways on Grand Avenue pose a danger to pedestrian and bicyclist safety; stated that the project would have negative impacts on noise and air quality, noting that Old Pacheco School will be a magnet school thereby impacting those students. **THM-5**

Stephanie Conner, San Luis Obispo, asserted that Cal Poly has not seriously considered alternative project sites and intends to construct the dorms at the proposed site despite community objections; stated the project will have negative impacts on the surrounding neighborhoods and City infrastructure and resources; urged Council to oppose the project. **THM-6**

Stephanie Conner, read a written statement for Terry Conner, San Luis Obispo, stating that the project will worsen residential traffic congestion and deterioration of neighborhood quality of life; urged Council to make every effort to oppose the project. **THM-7**

Paul Allen, San Luis Obispo, stated that the project will intrude on the quiet enjoyment of neighboring residences; spoke on the importance of creating a buffer zone between residences and dorm projects; questioned Cal Poly's rationale for not pursuing alternative sites; asserted that Cal Poly is intimidating residents thereby causing them to sell their homes to students; stated that Cal Poly has already issued request for bids for the project. Mr. Allen submitted a letter, dated March 25, 2014, which is on file with the City Clerk. **THM-8**

Joe Arsenio, II, San Luis Obispo, suggested that Council direct the City's Planning Commission to evaluate the project and report back to Council. **THM-9**

Gordon Phares, San Luis Obispo, opined that if a private developer was attempting to construct a similar project within the jurisdiction of the City, that the project would be denied; asserted that student gentrification is negatively impacting the surrounding neighborhoods; suggested that identified alternate sites would be closer in proximity to student resources such as the library and cafeteria. **THM-10**

Dia Hurd, San Luis Obispo, voiced concerns that Cal Poly students are active during evening hours thereby impacting the quality to sleep for neighborhood residents; asserted that students are destroying the community; opined that the project will impact the local water supply. **THM-11**

Rebecca Keisler, San Luis Obispo, stated that the project will have long range and lasting impacts on the City; opined that the project will cause the demise of two residential neighborhoods; pointed out that the DEIR states that alternate sites would have less impacts to viewshed, traffic, parking, and City resources; urged Council to oppose the project. Ms. Keisler submitted a petition, containing 247 signatures opposing the project, which is on file with the City Clerk. **THM-12**

Jan Durocher, San Luis Obispo, questioned Cal Poly's rationale for not selecting an alternate site and suggested that the DEIR should evaluate Cal Poly's internal politics as to this question. **THM-13**

Duba Gott, San Luis Obispo, voiced opposition to the project; noted that there is a lack of available employment for students and increasing enrollment would worsen conditions. **THM-14**

Michelle Tasseff, San Luis Obispo, opined that there is misinformation being spread about the project; pointed out that Cal Poly is a State organization and the project is not subject to approval by the City. **THM-15**

Karen Blake, San Luis Obispo, stated that Cal Poly is required to mitigate and/or compensate the City for impacts caused by the project; cited Cal Poly President Armstrong as stating that enrollment is expected to increase by 5,000 students in the future; voiced concern that constructing a freshmen dorm will only increase availability of residential housing for upper classmen. **THM-16**

Claudia Andersen, San Luis Obispo, expressed concerns that Cal Poly does not effectively discourage the use of alcohol by students, pointing out the number of police calls for service in the adjacent neighborhoods; spoke on the misconduct of students such as fighting and vandalism; urged Council to protect the quality of life for the surrounding neighborhoods. **THM-17**

Isabel Marques, San Luis Obispo, opined that the topography of the site is not appropriate for dorms; voiced concern that the proposed 300-500 parking space lot is not adequate to address the needs for the site; voiced concerns regarding an increase in pedestrian and vehicular traffic caused by the dorms and reuse of Old Pacheco School. **THM-18**

Karen Adler, San Luis Obispo, conveyed support for on-campus student housing but opposes the proposed site; recommended that Parking Lots H12 and H16 be selected as an alternate site. **THM-19**

Laura White, San Luis Obispo, displayed aerial photos of San Luis Obispo and the morros; expressed concern that the dorms will impact the viewshed and noise; spoke on the impacts of studentification on neighborhoods. Ms. White submitted a letter and two reports from Cardiff University and Universities UK related to studentification, which are on file with the City Clerk. **THM-20**

Linda White, San Luis Obispo, voiced concerns that the DEIR does not adequately analyze traffic impacts to the intersection of Grand Avenue and Slack Street and Highway 101/Grand Avenue; pointed out that Old Pacheco School will have a more intense use and the DEIR does not analyze potential impacts. **THM-21**

John Keisler, San Luis Obispo, voiced opposition to the selected project site, stating that Parking Lots H12 and H16 would be superior sites as identified in the DEIR; urged Council to recommend that Cal Poly select the alternate site. **THM-22**

Terry Elfrink, San Luis Obispo, voiced concern that the DEIR does not address parking needs during the construction period nor does it analyze long term traffic impacts on Grand Avenue; stated that the California Environmental Quality Act (CEQA) requires public agencies to consider economic and social impacts on neighborhoods, asserting that the DEIR does not consider these factors; stated that the project will result in a loss of privacy and property values for residences. **THM-23**

Gordon Mullin, San Luis Obispo, voiced opposition to the selected site; read and urged Council to adopt a resolution voicing opposition to the project and requesting that Cal Poly consult with the City hereafter on the placement of dorms and the timing of increased student population growth. **THM-24**

Sandra Rowley, representing Residents for Quality Neighborhoods (RQN), spoke in support of on-campus student housing; addressed the need for locating an alternate site for the project that is further away from residents. **THM-25**

Eric Meyer, San Luis Obispo, voiced concerns that Cal Poly has not addressed the east/west circulation connection, which will cause cut-through traffic in residential streets; urged Council to support residents and to oppose the project. **THM-26**

Charlene Rosales, representing the San Luis Obispo Chamber of Commerce, noted that the Chamber has not taken a policy position on the proposed project but supports on-campus student housing and planned student population growth; stated that on-campus housing will improve conditions in residential areas. **THM-27**

Rachel Kovesdi, San Luis Obispo, reported that the California Supreme Court has determined a public agency's noncompliance with CEQA and regulatory law constitutes a prejudicial abuse of discretion; asserted that Cal Poly has rejected superior alternate sites without rationale and needs to make findings of overriding considerations, but only after it has been determined mitigation cannot be met; voiced concern that Cal Poly has already issued request for bids. **THM-28**

Jamie Lopes, San Luis Obispo, conveyed support for the resolution proposed by Gordon Mullin and the selection of Parking Lots H12 and H16 as an alternate site; suggested that Council direct staff to determine whether the proposed project would comply with the City's General Plan, Zoning Code, and Design Guidelines; voiced concern related to impacts on aesthetic resources, pedestrian safety, and traffic; stated that the proposed mitigation measures for aesthetic resources are unacceptable. **THM-29**

Carolyn Smith, San Luis Obispo, distributed a map of noise complaints reported in September 2013, noting 237 calls for service primarily from neighborhoods near Cal Poly; raised concern regarding the issue of noise and student misconduct; stated that the proposed dorms would significantly increase noise, vandalism, and assaults; urged Council to protect residents from Cal Poly's encroachment on peace and safety. **THM-30**

Michele Hall, San Luis Obispo, expressed concern related to the proximity of the proposed dorms to Old Pacheco School; pointed out that Old Pacheco students will be impacted by noise, noxious fumes, and dust during the three year construction period; stated the project will negatively impact pedestrian safety at the intersection of Slack Street and Grand Avenue; expressed support for selecting the identified alternate site. **THM-31**

Russell Hall, San Luis Obispo, expressed concerns regarding noise and dust impacts during construction and noise, trash, and illegal substance use near Old Pacheco School following construction. **THM-32**

Mila Vujovich-LaBarre, San Luis Obispo, related concerns on the height, shape, and massing of the proposed project and impacts to noise, traffic, public safety resources, and air circulation; stated the project is not consistent with neighborhood character and that alternate sites should be further evaluated and selected. **THM-33**

Laurel Smith, San Luis Obispo, voiced concern that the project will negatively impact bicyclist safety, residents' quality of life, and property values; spoke on the misconduct by students including vandalism to her property on Longview and Slack. **THM-34**

Tim Townley, San Luis Obispo, pointed out that the existing parking lot is heavily utilized and questioned where parking will be relocated to accommodate current and future increases in student population; urged that the City make a statement in opposition to the selected site. **THM-35**

Hayley Townley, San Luis Obispo, submitted a letter calling for Council to pledge to protect the quality of life for all residents. A hard copy of Ms. Townley's letter, dated March 25, 2014, is on file with the City Clerk. **THM-36**

Eliane Wilson, San Luis Obispo, questioned whether Cal Poly has inquired as to whether students desire to live in dorms; recommended that Cal Poly update its Master Plan prior to expanding student housing. **THM-37**

Sherry Lewis, San Luis Obispo, stated that the project will have long term impacts on ambient noise and will increase traffic intensity particularly on Slack Street, Longview Lane, and Foothill Boulevard. **THM-38**

Jim Duenow, San Luis Obispo, recommended that the City negotiate with Cal Poly as to selecting a project site; suggested that Grand Avenue may need to be considered for closure as leverage. **THM-39**

Annie Aguiniga, San Luis Obispo, voiced disappointment that the Town Hall meeting was conducted during Spring Break; stated that it is important for students to living close to or on-campus in order to be near student population and resources; suggested that attention should be focused on improving relationships. **THM-40**

Ken Schwartz, San Luis Obispo, noted that he is a former facility member of Cal Poly's College of Architecture and Environmental Design and former Mayor of San Luis Obispo; suggested evaluation of population and housing and the back-fill of housing units by students in relation to the proposed project; asserted that the City is subsidizing student residents, citing their inability to match the average sales tax revenue generated by the average citizen. **THM-41**

Debbie Farwell, San Luis Obispo, pointed out that the DEIR does not address the Grand Avenue/Slack Street intersection; expressed concern regarding bicyclist safety at the intersection; spoke on the death of a bicyclist at the subject intersection. **THM-42**

COUNCIL DISCUSSION

Community Development Director Johnson advised that staff is evaluating the recirculated DEIR and will be submitting comments to Cal Poly prior to the March 31, 2014 deadline; explained that residents can submit comments directly to Cal Poly. **THM-43**

Council discussion ensued as to whether it should support a resolution expressing opposition to the proposed project site and requesting that Cal Poly consult with the City hereafter on the placement of dorms and timing of increased student population growth.

By Council consent, it was agreed that: 1) a letter will be sent to Cal Poly, under the signature of the Vice Mayor, as formal input on the DEIR and will include the minutes and recording of the meeting; and 2) to direct staff to ensure that Cal Poly follows CEQA law.

ADJOURNMENT

The City Council adjourned at 8:24 p.m.

Anthony J. Mejia
City Clerk

APPROVED BY COUNCIL: XX/XX/14

AOL Mail - Message View http://mail.aol.com/38466-111/aol-6/en-us/Lite/MsgRead.aspx?..

RECEIVED
MAR 26 2014
SLO CITY CLERK

AOL | Mail Toolbar | Make AOL My Home Page

AGENDA
CORRESPONDENCE
Date 3.25.14 Item# H

sthay21 Sign Out

Check Mail | Compose | Search the Web | Search enhanced by
Shortcuts | Settings | Help

Search
Mail

Today on AOL
Inbox (0)
Drafts
Sent
Spam
Trash
Saved Chats

Contacts
Calendar
My Folders Manage Folders

Reply | Reply All | Forward | Actions
Go | Delete

Cal Poly New Housing Project

From: Susan Hay <sthay21@aol.com>
To: ncarter <ncarter@swca.com>
Bcc: patshere <patshere@charter.net>
Date: Wed, Mar 26, 2014 11:33 am

Dear Nicole,
Your contact information was given to us last night at the SLO Town Meeting on the proposed site for new freshmen housing at Cal Poly. I have been a full time and part time resident at the corner of Grand Ave. and Fredericks over the last 8 years. We were told final comments are due by Monday, March 31.
I have the following additional comments:

1. Since the neighborhood south of Cal Poly has turned into college rental houses...including increased population with landlords turning garages into additional bedrooms to line their own pockets...The UC Regents and Cal Poly should publish a disclaimer to the parents if the new dorm and parking are built next to the college rental neighborhood:
"Your freshmen student will be living in a dormitory directly across the street from a compacted neighborhood of college rental houses with overage adults who hold drinking binge parties weekly. This neighborhood across from your freshmen student dorm has a police call record you can access through sanluisobispo.com ... police reports that reflects thefts, sexual assaults, drunks, DUI's are on record. If you as a parent prefer your freshmen student not live directly across from this lifestyle, then do not "buy into" this new dorm facility. This dorm is the equivalent to your student living across the street from an array of drinking bars, and the houses advertise by a light turned on, or a flag in their front window, and if one house gets busted, your student can go on social networks to find the next house to drink again."

These comments above are true, as I go out on the streets to observe what goes on...so the above "disclaimer" to parents would be the "honest" approach by the Univeristy.
As a parent, we like to think our young adult student would be safe in the university setting within the paradise of San Luis Obispo County. We also "think" our freshmen student will be safe in a "dorm."
I read an article in a Neurological publication that stated the front lobe of the brain does not fully develop until age 25. It is that part of the brain that houses "judgement." No wonder teens and those under 25 make bad choices. Our job as parents and educators is to help our young people...not throw them to the wolves!

THM-44

1 of 3 3/26/14 11:45 AM

THM-44 (continued)

2. **Traffic**...We do not NEED a car to get an education! UC Regents and Cal Poly should strongly consider the more environmentally conscious route and discourage automobiles for students. The approximate cost to own and operate a vehicle is probably close to $7,000. a year. Help today's families by reducing expense to educate their child by showing the savings of not having a car at school, and consider a "Student Environmental Incentive Program." Perhaps a nice graduation bonus can be paid out for those graduating in 4-5 years, by not bringing an automobile to San Luis Obispo!
Follow the campus and town at UC Davis...for their bike friendly campus and town...and don't increase our neighborhood and downtown problems with more vehicles!

3. **UC Regents Long Term Plans**...It has been brought to my attention that UC Regents did a study of all the UC and Polytech campuses to decide on classroom expansions for the growing population in the State of California. I was told Cal Poly in SLO is the campus chosen to allow expansion for a total of 12,000 additional students within some period of time.
We want to see the UC Regents master plan for the long-term. I am not convinced that this dormitory for 1,400 students, plus the press only being told a growth of 5,000 students, is the complete information.
If UC Regents intends to double the student population at Cal Poly, the townspeople and taxpayers have a right to know about this so we can amicably find solutions.

4. **Future Threat**...I am afraid the type of growth in #3 above would eventually bring upon homeowners on Grand Avenue and other streets a future threat of Eminent Domain. If the growth of the college campus is not planned properly for the long term, it could cause the State of California to level the houses on Grand Ave. to add 2 more lanes to handle the influx of all the traffic to the campus. Would any of you want to have your home taken by Eminent Domain?

5. **Neighborhood Demographic Change** ... Through the years, owner occupied homes have dwindled in the neighborhood south of Cal Poly and turned into a high percentage of college rentals as we know. This has also impacted the churches in this neighborhood, which organize community help. These churches have programs to feed and house the homeless people in the town of San Luis Obispo. By losing owner occupied neighbors, we are losing church members. and the community help programs are in jeopardy with fewer people and financial resources to maintain the churches.
Did you know these churches provide overnight housing for homeless women, children and disadvantaged during the coldest months of the year? Did you know these churches are also on the list of organizations who prepare and bring food to the homeless shelter so those people get a meal every day?

It seems to me a lot of people planning a project from their office or from afar who do not want to hear about the grass roots history. As we know, people do not care if the problem "is not in their back yard."

6. **EIR** - Why are we continuing to spend time, energy and money on the current EIR to study the worst location to build this new dorm facility for the campus? I, as a business woman, am conscious of time, money and goals. You are going down the wrong path here in the opinion of many locals.

One last comment on campus growth...since I recommend new housing for students be built in a bike friendly, village environment. With resources in

agriculture and beverages in the area, you might consider making housing more "home" friendly. Have shade trees, picnic tables, open cooking grills and food prep area. This location can also be used for a new elective class in Home Food Preparation, Food Safety, and Food Budgeting. This can help young students with their futures by learning skills to improve their lives and become practical members of society.

Let's get rid of the old mentality, "Let's just add dorms." How about, "Let's plan and build a homey, village environment" to teach young adults how to live and care for their own community in a more healthy and cost effective manner, so the entire town of San Luis Obispo can be proud!

Regards,

Susan Hay
Full and part time resident at the corner of Grand Ave. & Fredericks

THM-44 (continued)

Kremke, Kate

From: Mejia, Anthony
Sent: Thursday, March 27, 2014 11:55 AM
To: Kremke, Kate
Subject: FW: Comments on Cal Poly Housing South Recirculated EIR
Attachments: Letter_SoHouseProj_DraftEIR_Lopes.pdf

Agenda Correspondence for 03/25/14.

RECEIVED
MAR 27 2014
SLO CITY CLERK

Anthony J. Mejia | City Clerk
City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401
tel | 805.781.7102

AGENDA
CORRESPONDENCE
Date 3-25-14 Item# TH

THM-45

-----Original Message-----
From: James Lopes [mailto:jameslopes@charter.net]
Sent: Wednesday, March 26, 2014 4:13 PM
To: Nicole Carter; Codron, Michael; Dietrick, Christine; Lichtig, Katie
Cc: Carpenter, Dan; Christianson, Carlyn; Marx, Jan; Smith, Kathy; Ashbaugh, John; Mejia, Anthony; Johnson, Derek; Murry, Kim; 'Karen Adler'
Subject: Comments on Cal Poly Housing South Recirculated EIR

March 26, 2014

Nicole Carter, Senior Planner
SWCA Environmental Consultants

Hi Nicole,

Attached and in the mail to you are my comments on the Housing South Recirculated EIR. Please contact me if you have any questions or concerns.

Regards,

Jamie Lopes

--

James Lopes
1336 Sweet Bay Lane
San Luis Obispo, CA 93401
Ph. 805-781-8960

1

THM-45 (continued)

1336 Sweetbay Lane
San Luis Obispo, California 93401

March 26, 2014

CSU Board of Trustees
C/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

Subject: Student Housing South – Recirculated Draft Environmental Impact Report

Dear Ms. Carter:

Comments on the Cal Poly San Luis Obispo Student Housing South project are listed below for your review and responses. I appreciate the extension of time and the recirculation of the Draft Environmental Impact Report. Thank you for your consideration of my comments. Please contact me at jameslopes@charter.net or 805-602-1365 if you have any questions.

Sincerely,

James Lopes

THM-45 (continued)

4-1 Aesthetic Resources

Impact Analysis: AES Impact 2 accurately identifies a potential impact from the visibility of structures as seen from the Slack Street neighborhood.

Mitigation Measure Discussion: The Draft EIR states, "Allow complete removal of all vegetation, and plant replacement planting to screen at least 50 percent of the project." These measures would enable grading of a mature landscaped slope, with 60-80-foot tall pine trees and others at the top. Any replacement trees will take a generation - 15 to 25 years to replace the current ones. This is an unacceptable method and time frame for a mitigation measure, and appears to be part of the project description.

The project site plan, Figure 2-3, shows the five-story South Building near the top edge of the Slack Street embankment. This location will cause complete disruption of this bank in order for construction to occur on the south side of the building. The close location of the building to Slack Street will intrude on necessary slope for the final embankment, which will preclude any development of a sidewalk at the bottom of the bank, unless extensive retaining walls are built or the sidewalk replaces street parking. These walls would cause potential aesthetic impacts themselves to campus visitors, residents and students. The impact discussion should address the interaction of the close placement of the southern and western buildings with the embankments.

Proposed Measures/Alternatives: I request that you consider a different set of mitigation measures:

1. Locate grading and development within the existing parking lot area, with at least a 120-foot setback from Slack Street.
2. Retain the existing vegetation, especially healthy tall trees, and provide a wider landscaped setback than exists, with supplemental planting to screen 80 percent of development.
3. The south and southwest buildings shall be limited to three stories within a 35-foot height limit, to reduce their scale to a more compatible and less visible height. This mitigation should be offset by replacement housing elsewhere on the project site or campus.
4. Revise the project site plan so that the parking structure building, wrapped by the proposed uses, is moved adjacent to or near the drive to the existing parking structure.
    a. This building should be designed to be compatible with the Performing Arts Center, with a plaza in front of it. Design the residential buildings so that the configuration is more urban in character (compact, linear, grid-like, oriented to focal points and open space), similar to Poly Canyon Village.
    b. Design the residential configuration so that the south end of the project site is in open fields for casual recreation.

Impact Analysis: The EIR did not identify a potentially significant impact from the architecture of the Project. A visual assessment should address the congruity of the Project with existing conditions of the landscape. In this setting, the landscaping is introduced and mature, and it presents a highly vegetated edge to the site, with the Santa Lucia Hills as a natural backdrop above it. The view of these landscapes presents a very unified and harmonious setting, as shown in Photo 4.1-21:

2

THM-45 (continued)

The rectilinear architecture of the Project buildings will disrupt and degrade the visual character of the landscaped areas next to the existing parking lots and the open views of hillsides, by its height, starkness and long rooflines and wall planes. If developed in the City, the Project architecture would be inconsistent with the Community Design Guidelines.

Proposed Measure/Alternative: Revise the proposed architecture from a modernist theme to a more residential one, with sloped roofs, eave overhangs; wall patterns such as pediments, pilasters and cornices; obvious changes in planes; all engaged in softening and "breaking up" the unrelieved wall planes and roof lines.

My proposed mitigation measures will potentially block views of the Morros. To avoid or mitigate for the loss of these views, strategic view openings should be part of the project. Revise the site plan to orient buildings to provide two or three angled views west through the site to the Morros, in particular from an angle such as seen in Photo 4.1-17:

4.4 Noise

4.4.5.4 Nuisance Noise

Impact Analysis Discussion: Impacts from pedestrians and their bad behaviors should be addressed as an increase above existing levels, rather than being dismissed by the assessment that, the "project will not alter existing enforcement methods, and will not alter campus enrollment." The essential point about the project is that it will locate an additional 1,400 approximate students at the edge of a single-family residential area. These students will join an existing student sub-culture of walking through the neighborhood looking for parties and friends to join. The neighborhood has become a recreational zone for existing students who pass on this sub-culture to new ones. Although noise and bad behaviors from some students might be occasional, they are individually often significant. The impact assessment should consider the number of nuisance/ noise complaints that have been filed with the City, and also consider the "impact" nature of these noises.

Impacts from mechanical equipment are not adequately addressed in terms of standard practice, partly since Cal Poly construction is not subject to City standards.

Mitigation Measure Discussion: Nuisance impacts should be reduced by structural means, by locating walkways within the campus as much as feasible to channel circulation to California and Foothill Streets through campus from the site. Where a walkway must be placed near or at the edge of campus, a sound wall should be constructed to define the edge of the walkway and campus, and to block sound from the walkway. A wall at the edge of campus and outside a walkway is an ordinary way to define the boundary of student activity. See the following section on Pedestrian and Cyclists Off-Campus Impacts for related discussion.

Nuisance noise should be addressed and mitigated by programmatic means as part of the project. An ongoing, permanent "good neighbor" program should be developed by Cal Poly and the City, to

THM-45 (continued)

educate and warn students about the situation and how to reduce neighborhood impacts and respect the existing community.

To ensure that the project will adequately control mechanical equipment noise, standards similar to the City code should be included as mitigation measures, to require solid screening which will effectively reduce the noise of mechanical equipment from rooftops or other locations.

4-6 Traffic and Circulation

4.6.4.2 Pedestrian and Bicycle Facilities

Mitigation Measure Discussion: Table TC Impact 2: Mitigation Measure TC/mm-1.a suggests a partial mitigation measure for the lack of sidewalks. It speaks to "including Pacheco Way and along the north side of Slack Street." Taken a limited way, it would require the development of sidewalks only on the frontage of the project site. However, there is no existing sidewalk west of Pacheco Way until Longview Street. This measure could leave pedestrians on the street surface at Pacheco Way and Slack Street, unless the following changes are made:

1. Clarify that pedestrian circulation shall be developed between the project site and the existing sidewalk at Longview Street. However, this mitigation is difficult to meet at the street edge:
    a. There is no space at the south edge of the project site or west of Pacheco Way for a sidewalk, since the existing embankment goes directly up from the curb of Slack Street at the project site, and directly down along the curb of Slack Street west of Pacheco Way. It would have to be graded back the necessary distance from the existing curb and fill brought in at these locations.
    b. Or, the existing 8-foot parking aisle would have to be used for a sidewalk, which would not be an adequate width. Using the parking aisle would be ineffective and counter-productive, because it would require a mid-block crosswalk at Pacheco Way and direct students to the neighborhood sidewalk on the south side of Slack Street, causing the identified potential impact.

   It is not acceptable to provide just a sidewalk along the length of Slack Street to Longview Street. This is a route selection that will invite if not direct pedestrians into the neighborhood, albeit more safely. This mitigation measure should be replaced with the following concepts:

Proposed Measure/Alternative: To reduce traffic into the neighborhood, an on-campus route through the recreation area around the track should be developed. The mitigation measure should be revised to state that a management plan shall:

1. Locate and design walkways that avoid increased pedestrian traffic and noise into the Alta Vista neighborhood.
2. Give priority to locating walkways entirely on-campus instead of at the edge of Slack Street, to connect to the sidewalk at Longview Street. Highest priority is to utilize the existing driveway onto Pacheco Way, and westerly around the track to Longview Street sidewalk, or a different extended walkway to connect to Foothill Boulevard.

If this measure is not accepted, then another measure should be written to address Slack Street:

Develop a new sidewalk on the north side of Slack Street, with at least an 8-foot width, inside a 5-foot landscaped parkway, to extend past the project site to the existing sidewalk at Longview Street. This measure will require extensive cut on Slack Street at the project site, and a retaining wall may be necessary, and it will require fill placement west of Pacheco Way. To

THM-45 (continued)

accomplish this, Cal Poly should not grade the embankment on the south project site edge, but instead replace the existing street parking with this walkway.

P. 4.6-24: Pedestrian and Bicyclist Off-Campus Impacts:

Impact Analysis: This section does not examine the existing and potential increase in pedestrian trips through the local streets in the Alta Vista neighborhood; yet the bad behavior of some people who are walking in the neighborhood can be attributed to Cal Poly students, as evidenced by City records of nuisance/noise complaints. The first paragraph states, "Off-campus pedestrian and bicycle trips associated with the project would be concentrated along Grand Avenue and, via internal campus roads, California Boulevard, and Foothill Boulevard, as those streets are equipped with pedestrian and bicycle facilities and provide more convenient connections."

This assessment says nothing about the neighborhood. Actually, trips through the neighborhood go to student houses throughout it, and funnel to Longview, Orange and Hathway Streets to connect to fraternities, sororities and student housing near or on these streets. This section should be revised and upgraded to account for actual travel routes and behavior and an anticipated increase in trips and nuisance complaints. The combination of noise and other bad behavior will accompany the project's addition of over 1,400 students in the vicinity. This fact is not accounted for or examined. It is an existing significant impact that will be worsened with the project.

The section does point out that trips to downtown, parks and surrounding roadways will increase. However, the measures in TC/mm-1 are inadequate as described above.

Proposed Measure/Alternative: Please refer to the proposed mitigation measures above for internal, on-campus pathways, and walls where necessary to control and limit neighborhood access.

4.6.6 Cumulative Impacts – Intersection Impacts.

Impact Analysis: This section discusses the California/Taft Streets intersection and states that the project would add to significant impacts here, but curiously it concludes quickly that no mitigation measures are feasible.

Proposed Mitigation Measure: Standard measures should be written that require "fair share" contribution to intersection improvements, including signalization. To say that there is not enough evidence that such an approach will reduce potential impacts is questionable and debatable, and TC Impact 4 should be revised to include standard mitigation measures.

Cumulative Pedestrian, Bicycle and Transit Impacts.

Impact Analysis: This section does not recognize that Teach School will add these kinds of trips, in terms of teacher and student walking and bike trips. These additional trips should be addressed in the cumulative analysis.

THM-45 (continued)

5 Alternatives Analysis

New Alternative Proposal: Move Parking Garage North – Create an Urban Village

This alternative is discussed above as a mitigation measure to aesthetics, noise and traffic impacts, but it could be extensive enough to be evaluated as a project alternative. It would shift the project site away from Slack Street to avoid or reduce aesthetic, noise and traffic impacts.

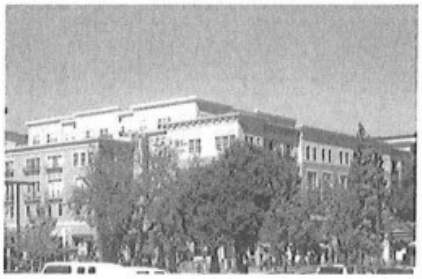
1. The parking garage could be moved closer to the entrance drive to the Performing Arts Center (PAC), with a façade of the desired offices and visitors center facing the PAC. The building could be designed to complement the PAC but not replicate its sweeping lines. It could have a small plaza in front, but not a huge area. The garage would include the spaces lost from the proposed project's parking lots.
2. The residential buildings would also be moved north, and they would be sited in an urban village similar in compactness to the configuration of Poly Canyon Village.
3. The height of the buildings would be lower at the west and south ends of the project.
4. Student shops and services would be located on the ground floor similar to a pedestrian mall.
5. A large play field / park would be located at the south end (not as big as shown in the Master Plan).

This design would relocate the entire project closer to the Performing Arts Center and make the building distribution more compact. However, pedestrian circulation and on-site noise could still create noise and traffic impacts due to the project's close location to the neighborhood.

5.5.3 Location Alternative – H-12 and H-16 Parking Lots

I support the alternative of locating the project to the H-12 and H-16 Parking Lots and their vicinity. A parking structure and a dining commons should also be located with this alternative. The design and features of the buildings should include these features:

1. The residential buildings in an urban village similar in compactness to the configuration of Poly Canyon Village.
2. The height of the buildings should be lower at the edges of the project.
3. Student shops and services should be located on the ground floor similar to a pedestrian mall.
4. A large play field / park should be located adjacent to the project.
5. The buildings should be residential in character, rather than modernist, to create a comfortable and familiar living environment, distinct from the utilitarian learning environment on campus.



6

RECEIVED
MAR 26 2014
SLO CITY CLERK

AGENDA
CORRESPONDENCE
Date 3-25-14 Item# TH

Kremke, Kate

From: Mejia, Anthony
Sent: Wednesday, March 26, 2014 8:23 AM
To: Kremke, Kate; Goodwin, Heather
Subject: FW: Cal Poly Dorms Town Hall
Attachments: CP Town Hall Comments.doc

THM-46

Please redistribute and replace online.

Anthony J. Mejia | City Clerk
City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401
tel: 805 781-7102

From: Rachel Kovesdi [mailto:rachel@kovesdiconsulting.com]
Sent: Tuesday, March 25, 2014 5:18 PM
To: Mejia, Anthony
Cc: Johnson, Derek; Grigsby, Daryl
Subject: Re: Cal Poly Dorms Town Hall

Fresh copy – without spelling errors! (No need to correct record before 6.) Thanks!
RKK
Rachel Kovesdi
Kovesdi Consulting
3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

From: "Mejia, Anthony" <amejia@slocity.org>
Date: Tuesday, March 25, 2014 1:59 PM
To: Rachel Kovesdi <rachel@kovesdiconsulting.com>
Cc: "Johnson, Derek" <djohnson@slocity.org>, "Grigsby, Daryl" <dgrigsby@slocity.org>
Subject: RE: Cal Poly Dorms Town Hall

Thank you,

Anthony J. Mejia | City Clerk
City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401
tel: 805 781-7102

From: Rachel Kovesdi [mailto:rachel@kovesdiconsulting.com]
Sent: Tuesday, March 25, 2014 12:24 PM
To: Mejia, Anthony

1

Kovesdi Consulting
Land Use & Environment
A CALIFORNIA CORPORATION
"Building Legacies"

THM-46 (continued)

Vice-Mayor, Council Members:

Thank you so much for allowing the community to speak on this critically important project. The residents of your City have identified serious concerns and need you to act as their advocates.

The California Supreme Court has determined that "A public agency's noncompliance with procedures required by law, including the California Environmental Quality Act's substantive requirements and information disclosure provisions, constitutes a prejudicial abuse of discretion."

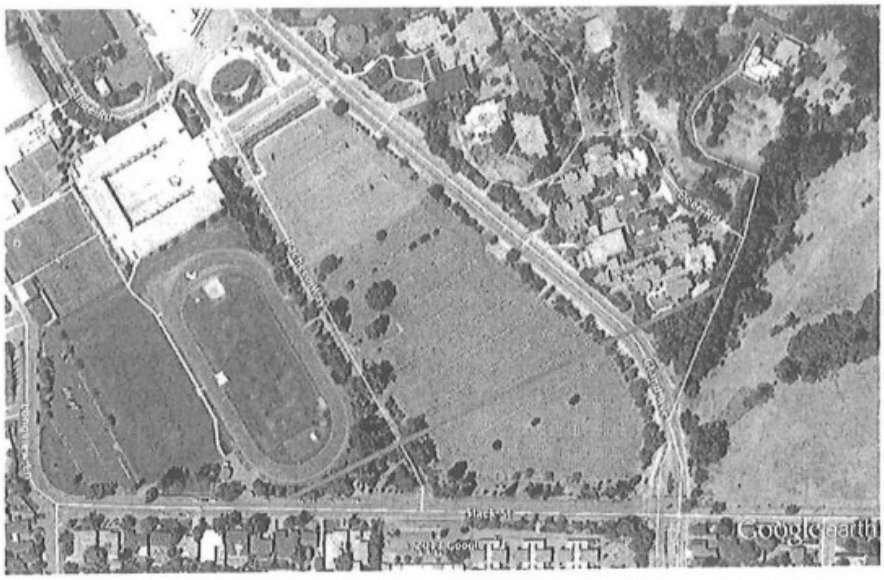
CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian.

In both the original and recirculated draft EIRs for the Cal Poly Dorm project, significant, unavoidable impacts were identified. Additionally, several environmentally superior alternatives were identified and rejected without offering any explanation of how the environmentally superior alternative sites are infeasible in any way:

> ***"5.5.3 Location Alternative – H-12 and H-16 Parking Lots***
>
> *This alternative, suggested by a community member, would consist of relocation of the proposed development to the current site of the H-12 and H-16 parking lots, north of Highland Drive and Brizzolara Creek (refer to Figure 5-2). The existing surface parking lots in this location would be removed, and 1,475 beds, a dining facility, and a 300- to 500-space parking structure would be constructed. These parking lots were designated for Parking in the 2001 Master Plan. This alternative would meet most of the project objectives."*

And there are other alternatives that have not been analyzed. For example, redesigning the project on the proposed site to maintain an open space buffer between the exiting dorms on Grand Avenue and the residences on Slack Street:

3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com



THM-46 (continued)

3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

2

THM-46 (continued)

CEQA requires that feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by decision makers and the public prior to certification of the EIR and approval of a project. It permits government agencies to approve projects with significant impacts, but only after they justify those choices through findings of overriding considerations. Furthermore, an agency can adopt a statement of overriding considerations only after it has first found that mitigation measures are truly infeasible.

Among other deficiencies, both iterations of the Draft EIR FAIL ENTIRELY to analyze the two closest intersections to the proposed development: Slack Street and Grand Avenue, and the Grand Avenue/101 Interchange. This alone presents a "fatal flaw" in the environmental document. Without ANY information regarding how the proposed project will affect these intersections, the University Board cannot legally certify this EIR.

Again, multiple California Supreme Court cases have determined that failure to comply with the law subverts the purposes of CEQA if it omits material necessary to informed decision-making and informed public participation.

By not substantively investigating and addressing the proposed project's impacts on the City's traffic infrastructure and whether those impacts may be significant under CEQA, CSU has not proceeded as required by law.

CEQA IS CRYSTAL CLEAR. THE LEGAL PRECEDENTS ARE CRYSTAL CLEAR. WHAT IS NOT CLEAR IS WHETHER CAL POLY WILL COMPLY WITH CALIFORNIA LAW. THAT'S WHY WE'RE GATHERED HERE TONIGHT.

We hope that your Council will direct staff to once again respond meaningfully to the University, so that City residents and taxpayers will not shoulder the burden of unmitigated impacts from this proposed project.

Thank you again for your time and consideration.

RKK

Rachel Kovesdi
Kovesdi Consulting

3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

March 25, 2014

To: Mayor Marx, City Council Members and Fellow Residents

From: Roger and Linda Bishop
100 Henderson Ave, San Luis Obispo (at the corner of Slack and Henderson)

Dear Friends:

We are unable to attend the Town Hall meeting this evening due to a previously planned vacation during Cal Poly's Spring Break.

We wish to take this opportunity, however, to thank the Mayor, the City Council and the city staff, for providing this opportunity for San Luis Obispo residents to voice their concerns regarding Cal Poly's proposed Freshman Dorm complex at the corner of Slack and Grand Ave. Others here tonight will undoubtedly point out the many problems presented by the project and the deficiencies in the current DEIR that has been submitted by the University, among them: **THM-47(a)**

1. Disregard of the impact of the project on the intersection of Grand Ave. and Slack Street.
2. Disregard for the impact of the project on the Grand Ave./Highway 101 interchange.
3. What focus there is on traffic in the DEIR being directed primarily at motor vehicle traffic with little regard for the impact of 1,425 pedestrians, bicycle riders and skateboarders on Slack St., Grand Ave. and surrounding neighborhoods.
4. Noise, construction traffic and air quality effects during three years of construction. **THM-47(b)**
5. Impact upon the new Teach School to be located at the old Pacheco School site.
6. Elimination of the view-shed of our lovely hills, both East and West from Grand Ave.

And finally,

7. Elimination of any open "buffer" zone between the Cal Poly core and its supporting structures and the residential neighborhoods adjacent to it. **THM-47(c)**

We wish to instead address our concerns regarding the financial impact of the project on the City of San Luis Obispo as a whole. Some Council members have recused themselves or "thrown up their hands" stating that they, as a Council, have no authority over what Cal Poly does within its boundaries and that any effort is a "waste of time". This smacks of fear or laziness, and is far from reality. **THM-47(d)**

California's Environmental Quality Act and supporting court cases state plainly that public entities, including Universities, have an obligation to mitigate their impact on the surrounding communities. At a minimum, the city should demand concessions and compensation for the added costs of: **THM-47(e)**

1. Increased city (not campus) police to patrol neighborhoods.
2. Upgrades in fire protection services, including any new equipment required.
3. Expansion of hospital and emergency-room facilities and ambulance response.
4. Traffic control, signals and lighting on affected streets and intersections.
5. Protective barriers to channel pedestrians and prevent jaywalking and erosion of the hillside adjacent to Slack St. as students seek shortcuts to downtown across Slack St. and through neighborhoods and the Teach School campus.

6. Reasonable hours of construction and the attendant back-up bells that we will be listening to for three years.

THM-47(e) (continued)

The University contends that this project will not increase enrollment, but instead relieves neighborhoods by moving students on to campus. This is misleading at best. By design, this will be a freshman dorm, occupied by students not yet here. Any migration of students from adjacent neighborhoods onto campus will be offset by other students moving from outlying cities and neighborhoods into vacancies closer to the University. The result will be a net 1,425 increase in the concentration of residents in this area.

THM-47(f)

This project represents the tip of the iceberg that will become evident as Cal Poly seeks to increase its enrollment by 5,000 students in the near future. The University has an obligation to mitigate the impact of this growth on the City of San Luis Obispo. The time is now for our elected City Council to begin demanding the social and financial concessions necessary to prevent the costs of this expansion from falling on the residents and taxpayers of San Luis Obispo.

THM-47(g)

The community is speaking out. Please listen and direct a strong response to the DEIR now before us.

Thank you,

Roger and Linda Bishop

Kremke, Kate

From:	Mejia, Anthony
Sent:	Monday, March 24, 2014 11:12 AM
To:	Kremke, Kate
Subject:	FW: new proof
Attachments:	814298.pdf

MAR 24 2014

AGENDA CORRESPONDENCE
Date 3-25-14 Item# T1

THM-48

Anthony J. Mejia | City Clerk
city of san luis obispo
990 Palm Street
San Luis Obispo, CA 93401
tel | 805 781.7102

From: Marx, Jan
Sent: Saturday, March 22, 2014 6:33 PM
To: Mejia, Anthony
Subject: FW: new proof

agenda correspondence

Jan Marx
Mayor

CITY OF SAN LUIS OBISPO

Office of the City Council
990 Palm Street, San Luis Obispo, CA 93401-3249
E jmarx@slocity.org
T 805.781.7120
slocity.org

From: Marx, Jan
Sent: Saturday, March 22, 2014 4:14 PM
To: janmarx@stanfordalumni.org
Subject: FW: new proof

Jan Marx
Mayor

CITY OF SAN LUIS OBISPO

Office of the City Council

1

990 Palm Street, San Luis Obispo, CA 93401-3249
E jmarx@slocity.org
T 805.781.7120
slocity.org

From: Terry Conner [tc9rugby@charter.net]
Sent: Saturday, March 22, 2014 1:46 PM
To: tc9rugby@charter.net
Subject: FW: new proof

See attachment for information on Cal Poly dorms project and related City Town Hall Meeting

Terry W. Conner
805.543.1969
www.slorugby.org

Dream Big, Pursue Your Dreams

THM-48 (contined)

THM-48 (continued)

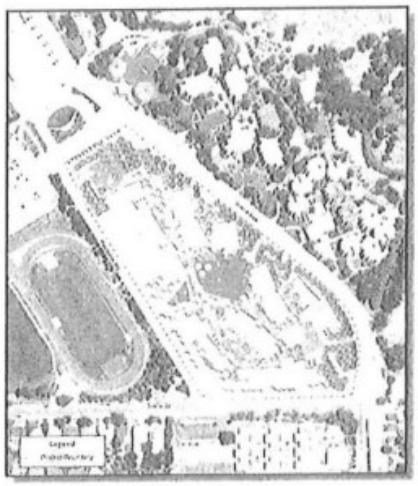
PAID ADVERTISEMENT

GRAND AVE. DORMS

Let Your Voice Be Heard!

Cal Poly is proposing SEVEN new 60' high dormitory towers, equivalent to the size of SIX Walmarts on a quiet, residential street.

The impact of this project is Infrastructure and Emergency Services and will cost City-wide residents millions of tax dollars.



Visit http://afd.calpoly.edu/facilities/facp_index.asp for more information on the project.

Paid for by concerned citizens of San Luis Obispo

This Affects You! We NEED your Voice!

Please Join Us,

City of SLO

TOWN HALL MEETING

Tuesday, MARCH 25th

6:00 P.M.

Ludwick Community Center Gym
864 Santa Rosa St.
Corner of Mill & Santa Rosa

Goodwin, Heather

MAR 2 1 2014

From: Johnson, Derek
Sent: Wednesday, March 19, 2014 4:05 PM
To: Goodwin, Heather; Mejia, Anthony
Subject: FW: Cal Poly Dorms

THM-49

For the 25th.

From: Terry Conner [mailto:tc9rugby@charter.net]
Sent: Wednesday, March 19, 2014 9:23 AM
To: Ashbaugh, John; Carlyn Christianson; Dan Carpenter; Smith, Kathy; Marx, Jan
Cc: Johnson, Derek; Murry, Kim; Lichtig, Katie
Subject: FW: Cal Poly Dorms

Forwarded message

AGENDA
CORRESPONDENCE
Date 3/25/14 Item# 14

Terry W. Conner
805.543.1969
www.slorugby.org

Dream Big, Pursue Your Dreams

From: Terry Conner [mailto:tc9rugby@charter.net]
Sent: Wednesday, March 19, 2014 9:21 AM
To: letters@thetribunenews.com
Cc: Sharon Whitney; 'Karen Adler'; Linda & Roger Bishop (oneslonurse@gmail.com); Linda White (lindaleewhite15@gmail.com); 'Claudia & Fred Andersen'; Jeff Eidelman (jefffe@sbcglobal.net); Rebecca Keisler (rebjohn50@hotmail.com); Gordon Phares (Gphares@pacbell.net); Linda & Roger Bishop (oneslonurse@gmail.com); Terry Elfrink (slofrink@gmail.com); Frank Kassak; Wife (s215.conner@gmail.com)
Subject: Cal Poly Dorms

Dear Editor,
This is an invitation to the citizens of San Luis Obispo to attend the City Council Town Hall Meeting, Tuesday, March 25 at the Ludwick Center. The meeting is at 6 PM. The Ludwick Center is at the corner of Santa Rosa and Mill Streets. The Town Hall Meeting has been called to give citizens the opportunity to weigh in on the proposed new freshman dorms at the corner of Slack St. and Grand Ave at the southwest edge of the campus. The proposed dorms project is a slap to the face of the citizens of SLO!
Please attend the meeting.
Thanks.

Terry W. Conner, San Luis Obispo
805.543.1969
www.slorugby.org

1

THM-49 (continued)

Dream Big, Pursue Your Dreams

2

Goodwin, Heather

MAR 19 2014

From: Marx, Jan
Sent: Wednesday, March 19, 2014 7:44 AM
To: Jeff Eidelman
Cc: Mejia, Anthony; Goodwin, Heather
Subject: RE: A copy of my 3 minutes from March 18, 2014

Thank you, Jeff. I am including our city clerk in this response, so your email is posted on our website as agenda correspondence for March 25.
All the Best,
Jan

AGENDA
CORRESPONDENCE
Date 3/25/14 Item# TH

Jan Marx
Mayor

CITY OF
SAN LUIS OBISPO

Office of the City Council
990 Palm Street, San Luis Obispo, CA 93401-3249
E jmarx@slocity.org
T 805.781.7120
slocity.org

From: Jeff Eidelman [Jefffe@sbcglobal.net]
Sent: Wednesday, March 19, 2014 6:25 AM
To: Marx, Jan; Carpenter, Dan; Smith, Kathy; Christianson, Carlyn; Ashbaugh, John
Subject: A copy of my 3 minutes from March 18, 2014

Good Evening Madame Mayor and city council members
My name is Jeff Eidelman, 34 year resident of San Luis, residing in the Alta Vista neighborhood, Hell's Kitchen, which may being going from the **frying pan into the fire!**

THM-50

Contrary to some opinions i have heard, this council can effect the situation with the proposed Cal Poly dorms and **you can make a difference**. I am asking you to use your leverage to affect decisions that Cal Poly may or not make! We have a symbiotic relationship with Cal Poly. We need them, they help the city economically in many ways. **But let us not forget, they need us too**. We provide workers that fuel their machine. They cannot just get up and walk away.

There are contracts between the city and Cal Poly involving water, sewage, Police and fire protection. These contracts can be renegotiated in the near future.

I see this as a matter of leadership and integrity. This could be an incredible moment in time for your personal legacies, for the mayor and each council member.

On the other side, this could be a moment of clarity for President Armstrong, as he realizes that maybe there is a better solution for Cal Poly and the surrounding neighborhoods.

Ken Schwartz, former mayor of San Luis did many great things. But his greatest legacy that he will be remembered most for, is closing off Monterey Street and forming Mission Plaza. This is now our pride and joy and

1

THM-50 (continued)

crowning Jewel. He did this while most city leaders and business people opposed. But he had a vision and thank goodness, for look what that vision has done for our town.

Cal Poly has thrown a chess game for you!
I am a pawn, but you, are the Queen and her council. You must play! The stakes are high and they are the future destiny of San Luis. Remember, in chess the most important piece on the board is the Queen. She has more power than even the King and most games are won when the queen and her forces cause the opposing King to come into check/mate. The King is never the piece that wins the game. He must only survive! But the queen can win the game.

The Berlin wall came down when all said it was impossible. This is no different. I appeal to all people listening to my voice and watching on television, to email your mayor and city council person. Express your feelings to them so that they know that their constituency wants this action. They are our humble stewards and they represent us. Let them know how you feel.

Just say **NO** to Cal Poly's plan to put the dorms on Grand and Slack. Say yes to build them in some other part of their vast 6000 acre holdings.

Finally, your many years of learning and experience have brought you here to our city council is greatly appreciated. You are each, the sum total of this. Please take a stand and demand that Cal Poly listens to you. It is your destiny! Citizens of San Luis Obispo are depending on you!
Save Alta Vista from becoming Isla Vista! Thank you!

2

MAR 2 2 2014

Heather Goodwin
Deputy City Clerk

AGENDA
CORRESPONDENCE
Date 3·25·14 Item# 11-1

Begin forwarded message:

From: "Marx, Jan" <jmarx@slocity.org>
Date: March 20, 2014 at 6:05:41 PM PDT
To: George French <gofrench@charter.net>
Cc: "Mejia, Anthony" <amejia@slocity.org>, "Goodwin, Heather" <hgoodwin@slocity.org>
Subject: RE: Cal Poly Dorms

Thank you for your message. I am including our city clerk staff in this response, so that your email is posted on our city website as agenda correspondence.
Your neighbor,
Jan

Jan Marx
Mayor

From: gofrench1@gmail.com [gofrench1@gmail.com] on behalf of George French [gofrench@charter.net]
Sent: Thursday, March 20, 2014 3:34 PM
To: Marx, Jan
Subject: Cal Poly Dorms

George O. French, M.D.

125 Longview Lane

San Luis Obispo, CA 93405

805-543-8801

March 19, 2014

Dear Madam Mayor and Council Members,

I am almost 93-years old and unable to attend the Town Hall Meeting on March 25, 2014. However, I do want you to understand my position. **THM-51**

I have lived at 125 Longview Lane, across from the tennis courts, for 60 years. I raised my five children in this home. I was the team physician for both the Cal Poly and Cuesta football teams for many years. I

THM-51 (continued)

was the orthopedic consultant at the Cal Poly Health Center until my retirement in 1986. My older brother, Edison French started the French Hospital and Clinic in the 1940's and supervised the new construction of the present facilities on Johnson Ave. in 1972 and 74.

I accept the minor irritations of living so close to Cal Poly. However, in recent months the poor behavior of the students seems to have escalated. I know that the majority of students are as delightful as those I interacted with many years ago. The small percentage of ill-behaved students ruin it for the rest of the students and our neighborhood.

I just don't understand why Cal Poly insists on placing so many students on the fringe of their campus and in our front yards. I was driven up to the new dorms in Poly Canyon and it seems to me that this would be a much better site for student housing. They could be mentored by the older students and would perhaps not get into the mischief that occurs in my neighborhood. If the mischief continued on campus it would just be "kids".

My children are worried about my safety and now make sure that someone spends the night with me. Until now, I didn't realize that I worried also.

I think that Cal Poly does need to increase the on-campus housing. However, the corner of Slack and Grand is not an appropriate site. We need a buffer separating the neighborhood from the campus.

Thank you.

George French, M.D. retired

MAR 24 2014

Kremke, Kate

From: Mejia, Anthony
Sent: Monday, March 24, 2014 11:13 AM
To: Kremke, Kate
Subject: FW: California Polytechnic State University Student Housing South Project E.I.R.

Anthony J. Mejia | City Clerk
city of san luis obispo
990 Palm Street
San Luis Obispo, CA 93401
tel | 805 781 7102

AGENDA
CORRESPONDENCE
Date 3.25.14 Item# TH

From: Juventino Ortiz [mailto:javajuv@me.com]
Sent: Saturday, March 22, 2014 8:06 PM
To: Ashbaugh, John; Carpenter, Dan; Christianson, Carlyn; mcodron@slocity; orgcdietrick@slocity.org; klichtig@slocityorg; Marx, Jan; Smith, Kathy; Mejia, Anthony
Cc: Sandra Rowley
Subject: California Polytechnic State University Student Housing South Project E.I.R.

Dear City Councilmembers:

The Cal Poly Student Housing South Project deserves your attention and commitment for one of the goals of your City Council: Improvement of the Neighborhood Wellness and Community Civility conditions in the City of San Luis Obispo. The Draft E.I.R. for this Student Housing South Project has been riddled with incomplete analysis and minimal consideration of impacts to the neighborhoods surrounding this project as well as an elementary school site. **THM-52(a)**

I want you to collectively support your City Staff initial and subsequent analysis and comments directed to this project E.I. R. Please use all possible means to negotiate with Cal Poly President Jeff Armstrong and CSU Board of Trustees to seek answers and mitigation for the impacts identified by City Staff and local residents.

These impacts will add to operating costs of City services already negotiated with Cal Poly such as water, utilities, and emergency services. This project will increase the disruption in local residential neighborhoods threatening progress for the improvement of neighborhood wellness and community civility. **THM-52(b)**

Cal Poly has failed to consistently follow its Land Use and Design Guidelines in regards to its current Master Plan (project site is not in Master Plan), minimizing impacts to residential communities, and failing to provide circulation mitigation for the Grand Avenue corridor from Highway 101 and all intersections crossing Grand Avenue up to the campus entrance. **THM-52(c)**

Please do not discount your role in this E.I.R. process simply because you feel the City of San Luis Obispo has no jurisdiction in this project analysis. As a responding agency you have an obligation to point out all possible issues and impacts with this project regarding the City of San Luis Obispo and importantly the residential neighborhoods adjacent to the project site. **THM-52(d)**

1

As leaders held accountable for the City of San Luis Obispo you have a responsibility and duty to lead by all means necessary trusting your City Staff as subject matter experts to guide your options. Please do not wring your collective hands and figure you have no influence or options for action to prevent this quickly and incompletely scoped project from turning into a harsh reality impacting the City of San Luis Obispo with increased costs and deterioration of neighborhood wellness for current and future residents.

THM-52(d) (continued)

Thank you for your consideration and service.

Juventino Ortiz

Kremke, Kate

From:	Mejia, Anthony
Sent:	Monday, March 24, 2014 11:13 AM
To:	Kremke, Kate
Subject:	FW: Cal Poly Student Housing South project SCH#2013091085
Attachments:	March 22EIRletter.docx

Anthony J. Mejia | City Clerk
City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401
tel: 805.781.7102

THM-53

From: Juventino Ortiz [mailto:javajuv@me.com]
Sent: Saturday, March 22, 2014 9:26 PM
To: ncarter@swca.com
Cc: Mejia, Anthony
Subject: Cal Poly Student Housing South project SCH#2013091085

Please accept this attached correspondence for public comment for this project.

Thanks you very much

Juventino Ortiz

1

THM-53 (continued)

Juventino Ortiz
2267 Santa Ynez Avenue• San Luis Obispo, CA 93405
• E-Mail: javajuv@charter.net

March 22, 2014

CSU Board of Trustees
c/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

Subject: California Polytechnic State University Student Housing South Project SCH#2013091085

The Cal Poly Student Housing South Project E.I.R. deserves more attention and analysis of several checklist items including:

Aesthetics: The only two Class 1 (significant and unavoidable) impacts identified with air quality and traffic. Given the height and massing of the proposed structures (shown in all simulations as four stories, but described in the narrative as five stories), the night lighting to protect hundreds of co-eds, as well as the sensitivity of the surrounding hill and peak vistas, this project will also include Class 1 aesthetic/visual resource impacts.

Emergency Services: City Fire and Emergency Medical Services currently serve Cal Poly, under a contract executed in the summer of 2013 prior to the disclosure of this project E.I.R. notice. This massive project adjacent to the City of San Luis Obispo neighborhoods and educational facilities will require additional police, fire and emergency medical staffing to service the additional residents within this proposed housing facility. The costs for these additional services or delayed response times if funding is not available, will default to City of San Luis Obispo residents. This should be regarded as a Class 1 Public Services impact as well as anticipated increases in disturbances in adjacent residential neighborhoods because of the close proximity of residential college-aged students.

Land Use: This project will cause Class 1 land use compatibility impacts with the surrounding established, single-story residential neighborhoods and elementary school across the street. The elementary school has a current enrollment of approximately 450 students, and the San Luis Coastal Unified School District is currently evaluating an additional 150 students for next fall for a total of 600 students adjacent to the proposed project. Will this E.I.R. evaluate noise, increased traffic and safety impacts to these students actively engaged in academic and outside activities during the continuous 31-month construction period?

Traffic: The E.I.R. analysis of Class 1 impacts is incomplete. There is no analysis for the impacts associated with this project for the Slack Street/ Grand Avenue intersection or the Grand Avenue/ Highway 101 interchange. All of the intersections crossing Grand Avenue such as Loomis Street and other residential streets must be analyzed for circulation and traffic safety. The one traffic light at the west side of the Highway 101/Grand Avenue overpass is inadequate for traffic attempting to cross Grand Avenue from Loomis to the southbound Highway 101 on-ramp. This coupled with left turn

THM-53 (continued)

pockets along Grand Avenue will simply be made worse with more vehicle trips associated with additional residents and a Welcome Center at the proposed project site. This will be especially true during peak times of traffic along Grand Avenue during special events and campus activities (Open House, Student Move-in Day and student move out dates). CALTRANS should also be considered a Responsible Agency for comment if they have not already submitted comments regarding this project.

The preferred alternative identified in the Draft E.I.R. is in keeping with the Cal Poly Master Plan where as this project is not. It is disheartening that public comments from Cal Poly leadership have already committed to the proposed project site prior to the completion of this CEQA required process.

I appreciate the opportunity to comment on this proposed project and ask that the CEQA process for this project be more comprehensive and detailed regarding the impacts associated with it.

Sincerely,

Juventino Ortiz

Cc: City Clerk of City of San Luis Obispo, City Council for City of San Luis Obispo

Goodwin, Heather

MAR 21 2014

From: Carpenter, Dan
Sent: Thursday, March 20, 2014 10:07 AM
To: Goodwin, Heather
Subject: FW: CP Dorm EIR Comments
Attachments: Part 1 Recirculated Draft EIR SCH #2013091085.pdf; Part 2 Recirculated Draft EIR SCH # 2013091085.pdf; Part 3 Recirculated Draft EIR SCH #2013091085.pdf; Part 4 Recirculated Draft EIR SCH #2013091085.pdf

THM-54

From: Linda White [mailto:lindaleewhite15@gmail.com]
Sent: Thursday, March 20, 2014 12:26 AM
To: Smith, Kathy; Christianson, Carlyn; Carpenter, Dan; Marx, Jan; John Ashbaugh
Subject: CP Dorm EIR Comments

Thank you for agreeing to hold a Town Hall to hear our concerns regarding the proposed dorm towers on Slack and Grand.

I am attaching my comments on the re-circulated draft EIR. However, I am a technological misfit. I bought a ($99) program to convert my Word documents which are quite large to PDF files. I broke the files down into 4 parts so far. I am sending these for you to have before the Town Hall.

I hope that they come through. As I complete further sections, I will send these to you also. If these are not readable, please e-mail me and I will make five copies for you and deliver them.

Again, thank you for holding this Town Hall. We really appreciate your openness to listening to us.
Linda White
2077 Slack St.

AGENDA
CORRESPONDENCE
Date 3/25/14 Item# 11

1

THM-54 (continued)

Recirculated Draft EIR SCH #2013091085

Line by Line

Notice is Hereby Given
"...and invites comments on the adequacy and completeness of the environmental analyses and mitigation measures described in the Recirculated Draft EIR."

Comment: How can this be considered an adequate and complete analysis when President Armstrong is quoted in the January 15, 2014, Mustang Daily (fully one month before the release of the draft) as saying: "Although the two other sites looked at weren't found to be suitable for freshman housing in the future, Cal Poly will likely look at their potential for upperclassman housing... There will be another 45-day comment period after a review of the two rejected sites has been added to the draft Environmental Report."

How can this EIR be considered objective when the alternate sites were "rejected" before being placed into and studied by the Recirculated Draft?

How can these alternative sites be rejected today but then be added to the new master plan as housing for upper classmen in a few months? It seems that the sites are either inferior now and in the future or superior now and in the future.

It appears that this entire Draft EIR is based on an incorrect foundation leading to inaccurate analysis leading to inaccurate conclusions and an abuse of discretion.

Executive Summary
A. Purpose of the EIR
"...is to identify the potential significant impacts of the proposed project on the environment, indicate the manner in which such significant impacts will be mitigated or **avoided**, and **identify alternatives** to the proposed project that avoid or reduce these impacts."

Comment: All impacts would be avoided by building on a site further within the campus away from the only R-1 San Luis Obispo city neighborhood composed of single-story homes (circa 1950's).

If the purpose of the EIR is to "identify alternatives" how can this be a valid EIR when the alternatives were "rejected" by President Armstrong 9 days <u>before</u> the original EIR comment period closed.

B. Project Location pg ES-2
"The University campus occupies over 6,000 acres."
Comment: Of this 6000 acres, the 12 acre proposed site is the <u>only</u> border adjacent to a City R-1 neighborhood.

1

THM-54 (continued)

Figure ES-2 Project Location Map on page ES-4
Comment: Please note that the proposed site is the ONLY campus border with an R-1 residential neighborhood.

B. Project Location Pg. ES-6
"The San Luis Coastal Unified School District (SLCUSD) expects to provide space for approximately six classrooms, or 150 students, on site. San Luis Obispo Classical Academy will remain in operation. In 2018, the school district may either renew existing leases or opt to expand the Teach program on site."

Comment: This paragraph fails to mention that the Classical Academy presently serves 300 students, pre-K through 12th grade (according to Amy Calloway of the Classical Academy on 2/19/2014). This brings the school population to 450 students this year. According to Ryan Pinkerton SLCUSD personal communication (on 2/18/2014), the San Luis Coastal Unified School District is studying the enrollment of the Teach program and will be able in future years, if needed, to expand their enrollment to the 10 classrooms presently available. They are also studying the demographics of the city and when the Classical Academy lease is up in 2018 will either take over the remaining classrooms and re-open the original Pacheco facility or continue to share the facility with the Classical Academy.

C. Project Background
"The 2001 Cal Poly Master Plan is the primary document governing land use and capital improvements on campus through 2020."

Comment: There is no mention that this Master Plan will need to be amended to use this site as housing. There is no mention that the Master Plan is now considered outdated, and that it is now in the process or will soon be upgraded, revised, etc.

"The Residential Communities element identifies constraints associated with housing on campus and communitywide, outlines principles to guide the housing program on campus and identifies several locations for housing communities (H) on University lands (refer to Figure ES-4)."
Where is a copy of this Residential Communities element???

Pg ES-7
"With the completion of the complexes outlined in Table ES-1, Cal Poly offers 6,239 beds in student housing, a significant increase from the 2,838 beds available at the time of Master Plan adoption."

Comment: Table ES-1 claims to have 6,239 beds for students. However, it includes the 69 beds of Bella Montana which is supposedly faculty and staff housing. Is it faculty and staff or do students live there? Wasn't that a condition of city approval that it would be staff, not students?

2

THM-54 (continued)

"Constraints at the remaining housing sites identified in the Master Plan have led to the consideration of the proposed site for residential development."

Comment: We have repeatedly asked University Administration to look outside the old, outdated MP. The existing MP is already or will be revised very shortly to accommodate the additional 5,000 students that CP expects to add over the next few years. We ask that they not limit their choices to an outdated MP. We don't ask them to wait to build additional on campus housing until the new MP has been written. We realize that they must "use it or lose it" with the State Funds. We merely ask that they consider using 12 of their 6,000 acres further within the campus.

"The current site is further considered because of proximity to other existing freshman housing and existing communal dining facilities."

Comment: Have the sociological, cultural, and psychological studies on group psychology, mob psychology, and hazing been refuted? How can you consider adding 1475 17-& 18-year-olds to an existing 3500 freshman population across Grand Ave? How can you provide for their health, welfare, and safety? Look at what happens when you place 4000 students together at the new recreation center. See Tribune article "14 arrested 6 hospitalized after campus concert". Obviously, you were unable to control that group despite the fact that you supposedly beefed up security.

How do you keep these underage students from migrating into the adjacent neighborhood for underage drinking parties. See Cal Coast SLO Social Seen, house party 2-10-14. Justin Wellner in an August 2013, postcard to some neighbors stated:

"We believe this project will benefit not only our students but also be helpful in improving overall neighborhood wellness. For example, research strongly suggests a direct correlation between students' academic success and living on campus, particularly in their first and second years. As well, expansion of on-campus living will free up more city residences for workforce housing. Additionally, as we experienced with the completion of Poly Canyon Village, on campus housing reduces vehicle traffic to and from campus and encourages greater student involvement in on-campus activities."

We agree that placing students on-campus will improve their academic success. That is why we ask that you place them further into campus, not adjacent to the temptations that you are trying to protect them from.

We disagree that expansion of on-campus housing will free up more city residences for workforce housing. The increased 5,000 students proposed over the next few years will take up the housing freed up by students living on campus. Furthermore, the prices of the mini-dorm houses housing 6 or more students are out of reach for workforce wages.

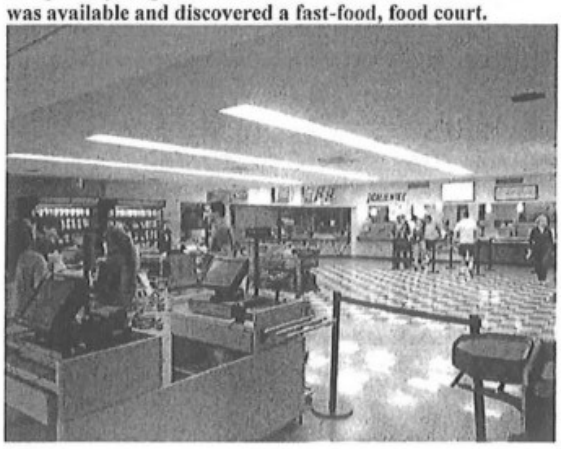
3

THM-54 (continued)

We disagree that this project will improve overall neighborhood wellness. City police nor CP administration can control the problems that we now have.

Regarding the communal dining facilities, I walked to the campus core and found only one facility that I initially considered a dining facility and this was limited to 216 students.

Imagine my surprise when I went around the corner from this sign to see what food was available and discovered a fast-food, food court.

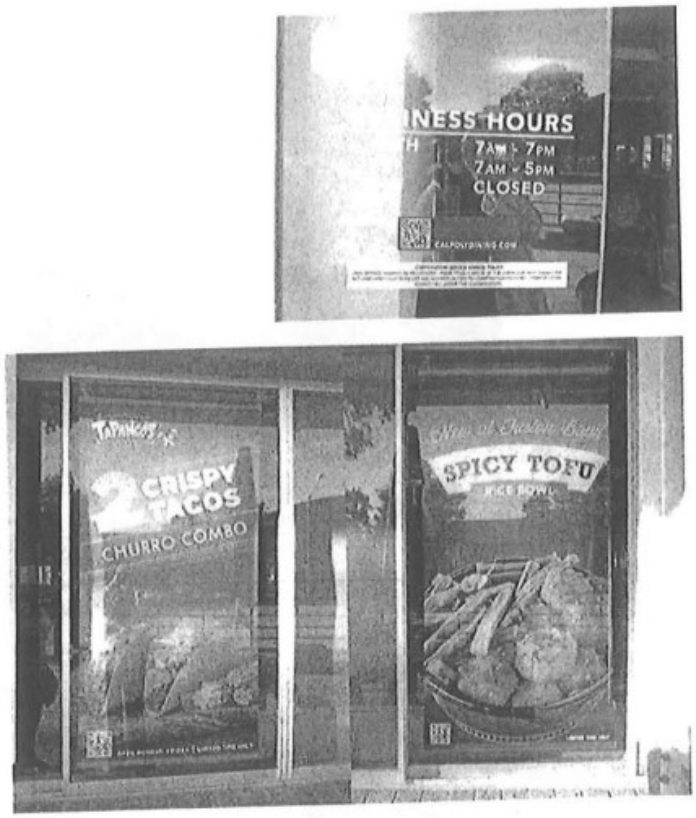


4

THM-54 (continued)

Is this what is considered communal dining facilities? The remainder of the core was filled with individual fast-food "dining facilities" mostly with weekday only hours. Is their no facility where students can eat a real meal? These fast food franchises can be built out and rented anywhere on campus to provide student "dining facilities".

5



THM-54 (continued)

6

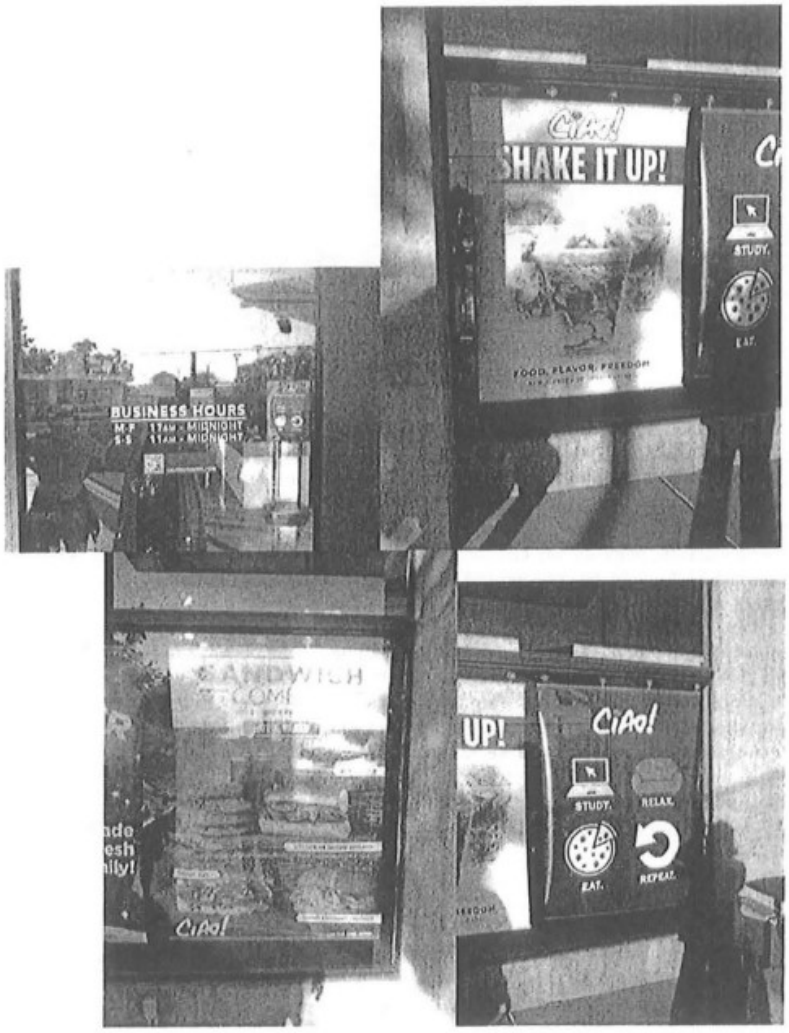
THM-54 (continued)

7

THM-54 (continued)

8

THM-54 (continued)



9

THM-54 (continued)

Is this what passes for existing communal dining that we have to have these freshmen within 10 minutes walk? No wonder we are an obese society. You should place this "dining" out on the far 6000 acres and make the students jog and climb an obstacle course to get this cholesterol laden junk food.

"Under the current proposal, the bed count identified in the Master Plan for housing sites H-4 through H-7 would be consolidated at the current site and the complexes at sites H4-H7 would not be pursued under the current Master Plan."

Comment: You are consolidating four sites of 120 beds, 512 beds, 136 beds, and 612 beds (1380 beds) into one huge tower complex housing 1475 17-&18-year olds. And you are placing these vulnerable, impressionable students adjacent to the very temptations that you are trying to protect them from. What psychological, social, or educational studies tell you that this is a wise move?

Since you are amending the MP to accommodate this site, again we ask why you can't look outside the outdated MP and look toward the area of future expansion north of H-1.

Pg ES-9

"The difference in land use specified for the proposed site in the Guidelines as opposed to the Master Plan indicates an evolution in both the housing program and in the understanding of constraints to development on campus.

Comment: Evolution is a good thing. We ask that you not get stuck with a faulty, ill conceived premise and build it out in stubbornness and a desire to show strength and power. We ask that you continue to evolve your vision of the future of the University. Everyone agrees that much more on-campus housing is needed and

10

THM-54 (continued)

needed rapidly to house not only present students but the additional 5000 that will be coming to CP in the near future. Please don't be short-sited with your stubborn insistence on this site.

Save this site for a state-of-the-art low-profile Welcome Center that transitions from the SLO residential bungalows and ranch style homes of the 50's to the ever advancing University. Build the open space, study areas, and retail that your Land Use Guidelines call for. These are all appropriate for this site---not 5 story towers of industrial, warehousing dormitories.

Please take time to read the following letter to President Armstrong from Kenneth Schwartz a prominent and knowledgeable Monterey Heights/Alta Vista resident who knows a thing or two about architecture, the university, and city of San Luis Obispo:

January 16, 2014
Dr. Jeffrey D. Armstrong
President, California Polytechnic State University,
San Luis Obispo, CA 93407

Dear Dr. Armstrong:
My name is Kenneth Schwartz. I have worn a number of titles in my life including: Professor of Architecture, Associate Dean and Interim Dean of Cal Poly's College of Architecture and Environmental Design an Institution I served from 1952 – 1988. I am an architect by profession and a Fellow of the American Institute of Architects. I have also been a Planning Commissioner for the City of San Luis Obispo and for the County of San Luis Obispo for eight years each. For ten years, I served as Mayor of San Luis Obispo and later on, another six years as a Council member. While at Cal Poly I served as architect consultant on two Agency for International Development (A.I.D.) projects, the last being EARTH UNIVERSITY in Costa Rica where I had a hand in the physical planning of that campus.

I provide this long-winded introduction in order to suggest to you that I know a wee bit about community and campus planning and a considerable bit about Cal Poly's physical and academic relationships as well as its relationships with the citizens of the City of San Luis Obispo.

My response to your email letter of January 15, 2014 and to today's front page story in the Tribune can be summed up in one word: Hogwash!

I attended the second session held on campus to acquaint city residents with Cal Poly's plans for Freshman Dormitories. (You were absent.) This session was designed as if it were a presentation to the CSU Board of Trustees instead of local citizens whose major concerns were not the learning benefits to freshman students but rather to the surrounding neighborhoods in which they lived. While this was a fundamental error of judgment on the part of Cal Poly administrators, the comment that captured my attention

11

THM-54 (continued)

was the comment by one of your vice-presidents who said, in essence, "We even considered the demolition of the 'concrete dorms' in order to intensify the use of those sites for these Freshman dorms." I thought to myself, if they are serious about this, that means they have opened their minds to a whole spectrum of site possibilities; the slate must be clean. They truly mean to select the best possible site and want to be intellectually honest about this project.
And then came this morning's Tribune. How wrong I was!

Dr. Armstrong, the Grand Avenue site you and your advisors have selected for dormitory construction is not the best site for freshman students or any students for that matter. Any simple flow and relationship diagrams (graphic tools used by architects and planners) to determine the best relationships between buildings (or spaces) based on the circulation expected to take place between those buildings on a University campus would show conclusively that this proposed site is not the best site for freshmen. The very best site is the site of Cal Poly's administration building in which your office is located. A good planner would have put that site into the mix even though the idea of moving/converting an administration building to a Freshman Dormitory might seem daunting. The best place for a new low-level architecturally subdued administration building is on Grand Avenue where the dorms are proposed.

Consider the location of the present administration building: it is immediately adjacent to the Student Union; It is just a few steps from the main student cafeteria and dining rooms; the student health center is close by as well as is the new student recreation facilities; the Kennedy Library is within easy reach as are the principal academic classrooms and laboratories Including the new Baker Science Building; Mott Gym is a half block away. An Administration Building has little need to be adjacent to any of these facilities, but these are the facilities student housing needs to be close to. This site is the very best location for new Freshmen Dorms and architects should be set to work sketching how this building could be converted to a new purpose; should this site and adjacent parking be too small, one or more or the nearby brick dorms should be enlarged accordingly.

The closer student housing is to the center of the campus, the greater the opportunity for peace and quiet in adjacent City residential neighborhoods.

You have publically announced plans for Cal Poly to grow by another 4 – 5,000 students. The citizens of San Luis Obispo want to know where these additional students are to be housed; I dare say citizens would love to see that entire number located on campus. Is Cal Poly prepared to not only provide new classrooms, laboratories and ancillary facilities, but on-campus student housing as well? Any institution, private or public, that envisions a 25% increase in size has a responsibility, no, an obligation, to amend its master plan of land use and circulation to show how this growth is to be accommodated – well before specific plans are prepared to carry out the objectives of that amended Master Plan.

12

THM-54 (continued)

I detect no movement on the part of Cal Poly's administration to share its thinking about its proposed growth. While I do not represent the City of San Luis Obispo in any official capacity, I am a concerned citizen knowledgeable in these matters. I urge you to become a better neighbor. Notwithstanding Cal Poly's enviable record as an educational institution and its unique learn by doing philosophy, Cal Poly's record and standing as a neighbor leave much to be desired.

Sincerely,

Kenneth E. Schwartz, FAIA
Cal Poly Faculty Emeritus, Architecture
201 Buena Vista
San Luis Obispo, CA 93405

Let me tell you a little about the City of San Luis Obispo and particularly about its citizens which do not fit the mold associated with most Californians. San Luis Obispo is a Charter City; does your staff know the difference between a General Law City and a Charter City? Almost immediately, San Luis Obispians desired a distinctive style to their local government. San Luis Obispo does not have any significant natural resources necessary to generate "primary industries." The most significant natural resources are a benign climate and a beautiful natural setting. San Luis Obispo has a very limited water supply; it sits on a constricted water aquifer which limits safe annual water withdrawal to 2,000 acre feet; consequently the City has entered into agreements to obtain water off-site from the Whale Rock Reservoir, the Salinas Reservoir, and the Naciemento Reservoir.

San Luis Obispo was one of the first cities to recognize the importance of air quality and do something about it by banning backyard burning of trash and to require mandatory trash collection including green waste. San Luis Obispo generated its first General Plan in 1961 and initiated a street tree program and required the undergrounding of overhead utilities long before most California cities of similar size. In the late 1960's the City did away with patronage and called on citizens to volunteer for service on the City's numerous citizens' advisory commissions and committees (now 14) a condition in which volunteerism was encouraged to the point that National Geographic researcher Dan Buettner in his book, "Trive," called San Luis Obispo, the "Friendliest City in all of North America."

San Luis Obispo was friendly enough in 1971 to elect a Cal Poly City and Regional Planning student, T. Keith Gurnee to its City council; Keith served approximately six years.

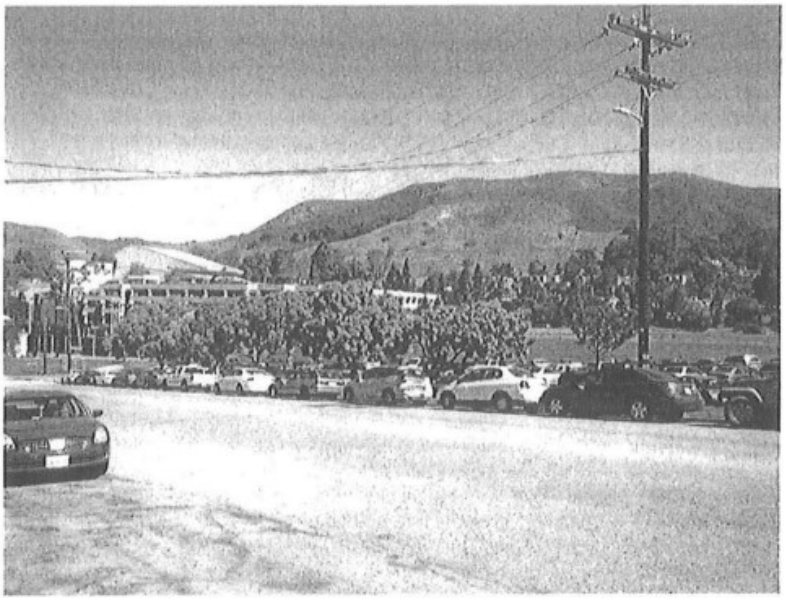
But here, Dr. Armstrong, is the kicker. In 1978 when the infamous Prop 13 was on the ballot which most Californians swallowed hook line and sinker, not one single voting precinct in the City of San Luis Obispo voted in favor. If you have done any personal research in the basic causes for the financial difficulties in financing public higher education in California, you will find the passage of Prop 13 to be one of the root causes for our problems. San Luis Obispians think differently and progressively.

13

THM-54 (continued)

Pg ES-8
"Additional, approved parking structures have not been built in part because of declining use of existing parking facilities..." Etc. etc, etc. to pg ES-11 where it concludes "...parking facilities on campus generally provide excess capacity."

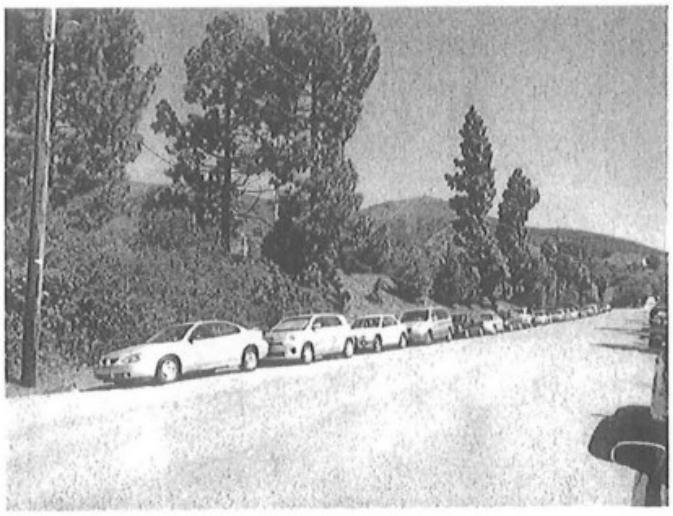
Comment: If there is so much excess available parking on campus, have you thought to ask why the adjacent City neighborhoods and retail parking lots are so heavily and negatively impacted with Cal Poly students who park and then unload their bikes, or skateboards to get onto campus.



Slack St. and Longview Lane looking toward the new Recreation Center and Parking structure.

14

THM-54 (continued)



Slack Street from Pacheco Way to Grand Ave. Looking East.

Slack St. from Grand Ave. looking West to the rise at Longview Lane. Picturing the North side of Slack St.

15

THM-54 (continued)

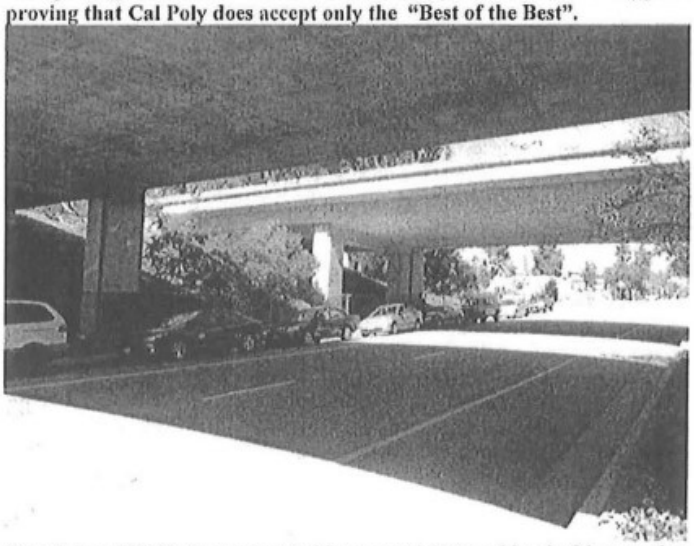
Slack St. from Grand Ave. looking west to the rise at Longview Lane. Picturing the South side of Slack St.

Loomis Street from Grand Ave. looking east. South side is non-restricted parking.

16

THM-54 (continued)

One of the Loomis Street Regular patrons to our neighborhood parking lot is so enterprising that he locks his commute-to-campus bike to the Eucalyptus tree proving that Cal Poly does accept only the "Best of the Best".



Grand Ave. 101 Underpass west side unrestricted parking looking north toward the Campus Main Entrance .

17

THM-54 (continued)

Grand Ave. 101 Underpass east side unrestricted parking looking toward the Campus Main Entrance.

These City streets, maintained by the City have turned into parking lots for Poly students. On the day the pictures were taken 93 spaces were used out of approximately 103 possible for a 90% occupancy of the city maintained street parking.

The City has also implemented City Parking Districts so that residents can park near their own homes. The City sells Parking Placards for $10.00 each and each homeowner is allowed to purchase only two. The staff necessary to implement and manage this program are paid by the City. The parking enforcement officers are provided by the City. Call to find if this is shared by CP or 100% by City.

You are making incorrect assumptions on the reasons for your excess parking on campus and as a result are coming to an erroneous conclusion.

Pg ES-11
D. Project Objectives
Comments: All seven of these project objectives are great and no one disagrees with any of them. However, these objectives can also be realized at a site within the campus that doesn't adversely affect the City of San Luis Obispo and its residents.

18

THM-54 (continued)

This is Slack St. looking northeast toward the proposed dorm site. Please note the beautiful view of the Santa Lucia foothills available to all who walk, bike, skateboard, park, or drive along Slack St. Note the white light standard left of center in the existing parking lot. How high is the light standard? How much higher will the dorm towers be?

The photos on the next page are copied from the draft EIR page 4.1-21 and consist of Figures 4.1-4 and 4.1-5. Please compare the above photo with the EIR photos and note the cropping on the EIR photos that crops the view of the Santa Lucia foothills.

Most of the pictures in the EIR are taken at an angle or cropped to reduce the visual impact of the dorm project on the adjacent neighborhood.

Also note the difference in the parking situation between the photos taken by the EIR and those taken by an amateur on a normal parking day.

19

THM-54 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street

THM-54 (continued)

The seventh objective is to utilize campus lands for "highest and best use". The highest and best use for this site is not for dorms. It would be for a true Welcome Center, retail store selling CP goods, coffee shop, student study areas both indoors and out, classrooms and offices.

The Welcome Center is stressed in this project. However, the plans show a Welcome Center the size of the Coffee Shop. A true welcome center would inform the visiting public of the importance of this university. It would include the history of CP and its "Learn by Doing Philosophy", starting with the lobbying efforts of Myron Angel in 1894, the 1903 visit of President Theodore Roosevelt, and culminating with classes opening in 1903. It would show the growth and advancement of the various schools, the embracing of new technologies with new times, the transformation of a vocational high school into a world-class university.

Aesthetically and architecturally, it is inappropriate to slam the Visitor entering the Main Entrance with 5-story industrial warehouse towers housing their children and blocking the view of the surrounding hills for which San Luis is noted.

This is a copy of the announcement of local photographer and Cal Poly professor Brian Lawler's recent show. This is what we are attempting to preserve. This is our only natural resource. This is part of why Cal Poly is one of the most popular of State Universities. This is part of what makes us, "The Happiest City in America".

21

THM-54 (continued)

E. Proposed Project
1. Grading and Site preparation
Comment: This the same bank in ES-1 B Project Location paragraph 3 sentence 2 that is supposedly providing "topographical separation". Again, has the proximity of the 450 student Pacheco/Teach Elementary been taken into account in removing all of this 2.6 million cubic feet of "topographical separation" in regard to the dust, noise, and diesel fuel?

"The project will result in disturbance of the entire 12-acre site."
Comment: Please keep this in mind when evaluating the alternative sites and the grading that makes the alternatives less desirable. Here disturbing 12 acres or 2.6 million cubic feet is determined to be a less than significant impact. However, on alternatives, grade is considered to be a significant and unavoidable adverse impact.

2. Structures
"The project will provide approximately 1,475 beds in seven four-to five-story towers totaling 450,000 gross square feet.
Comment: This sentence suggests that the housing towers could be just 4-stories when in fact a few sentences further it states:
"The preliminary site design includes seven residential structures... Residential structures will be five stories."
Comment: In fact, all seven of the residential towers will in fact be 5-story towers. It is only the garage that will be a maximum of 4 stories. This massive project is like putting 6 Wal-Marts next to an R-1 residential neighborhood.

"...Preliminary axonometric projections and renderings are provided in Figures ES-6 and ES-7.
Comment: These two lovely axonometric projections and renderings do not include the adjacent single-story neighborhood that this massive 6-Wal-Mart equivalent project overwhelms. This is one of the main reasons that this site is so out of place.

ES-15 Figure ES-8 Preliminary Floor Plan, Parking Garage and Ancillary Services

Comment: The Coffee House is larger than the Welcome Center. See upper left corner and enlarge the miniscule print. The Coffee House is the pink corner and the Welcome Center is the blue block next door. The Community Lounge (peach block) is larger than the Welcome Center.

The Welcome Center is stressed in this project. However, the plans show a Welcome Center the size of the Coffee Shop. A true welcome center would inform the visiting public of the importance of this university. It would include the history of CP and its "Learn by Doing Philosophy", starting with the lobbying efforts of Myron Angel in 1894, the 1903 visit of President Theodore Roosevelt, and culminating with classes opening in 1903. It would show the growth and advancement of the various schools, the embracing of new technologies with new times, the transformation of a vocational high school into a world-class university.

22

THM-54 (continued)

Pg ES-17 For the Purposes of this analysis, it is assumed that the project will require entirely new on-site water infrastructure, wastewater infrastructure, and gas and electrical power infrastructure, as well as substantive new on-site stormwater facilities.
Comment: Would this be needed at alternative sites?

"...improvements to existing water mains at Grand Avenue are not required."
Comment: Not required by whom, CP or City? Why not?

"The project may also include roof-top solar energy systems to supplement climate control and power demand."
Comment: Why is this optional? Why is this being left so late in the planning process to decide.

Pg ES-17 4 Access and Parking
"Vehicle parking will be provided in a four-story parking structure comprising 300 to 500 spaces."
What happens to the 1324 displaced parking capacity with an average occupancy of 857? You are 557 to 357 short.

Pg ES-18 F. Scoping and Notice of Preparation Process
"During the environmental determination process, an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project."

Comment: How do we get a list of these interested parties? How were they notified? I pay taxes on five properties in the immediate neighborhood and received no notice. Can we challenge from a lack of notice standpoint?

Pg. ES-19
"For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local proposed project area or the area adjacent to the proposed project."

Comment: Aren't we the "area adjacent to the proposed project"?

Pg. ES-20 H. Areas of Controversy Known to Lead Agency
Parking. The analysis focuses on whether sufficient capacity exists within the campus parking system to accommodate redistributed commuters and residents and the environmental impacts associated with trip reduction.

Comment: Same as earlier with photos of parking on city streets. Shouldn't Cal Poly have to mitigate this expense of the City? What about the neighbors who have to pay $20 dollars to secure 2 placards to park in front of their own homes?

23

THM-54 (continued)

Recirculated Draft EIR Part 2

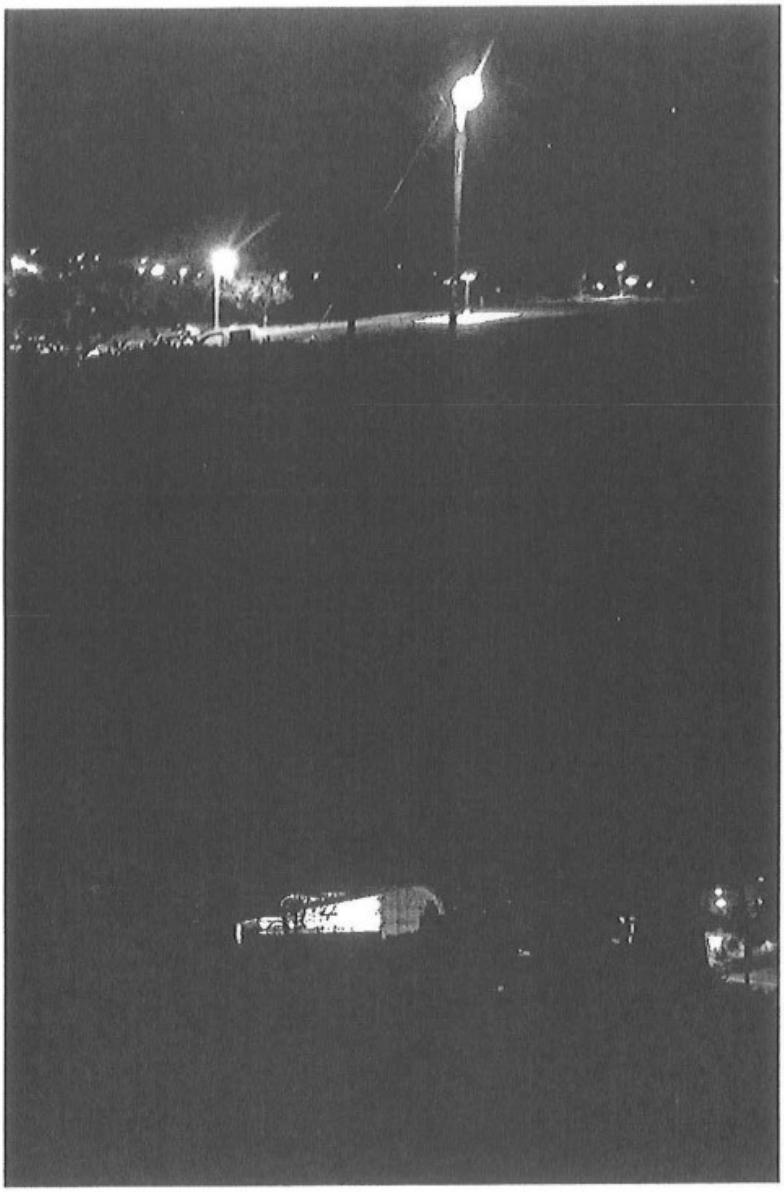
Begin at page ES-20 Nuisances Associated

ES-21
3. Location Alternative-H-12 and H-16 Parking lot
"...suggested by a community member."
"This alternative may require additional components such as a new common dining facility."
Comment: Unless there is a hidden cafeteria that I missed please refer to prior statements and pictures of present "common dining facilities".

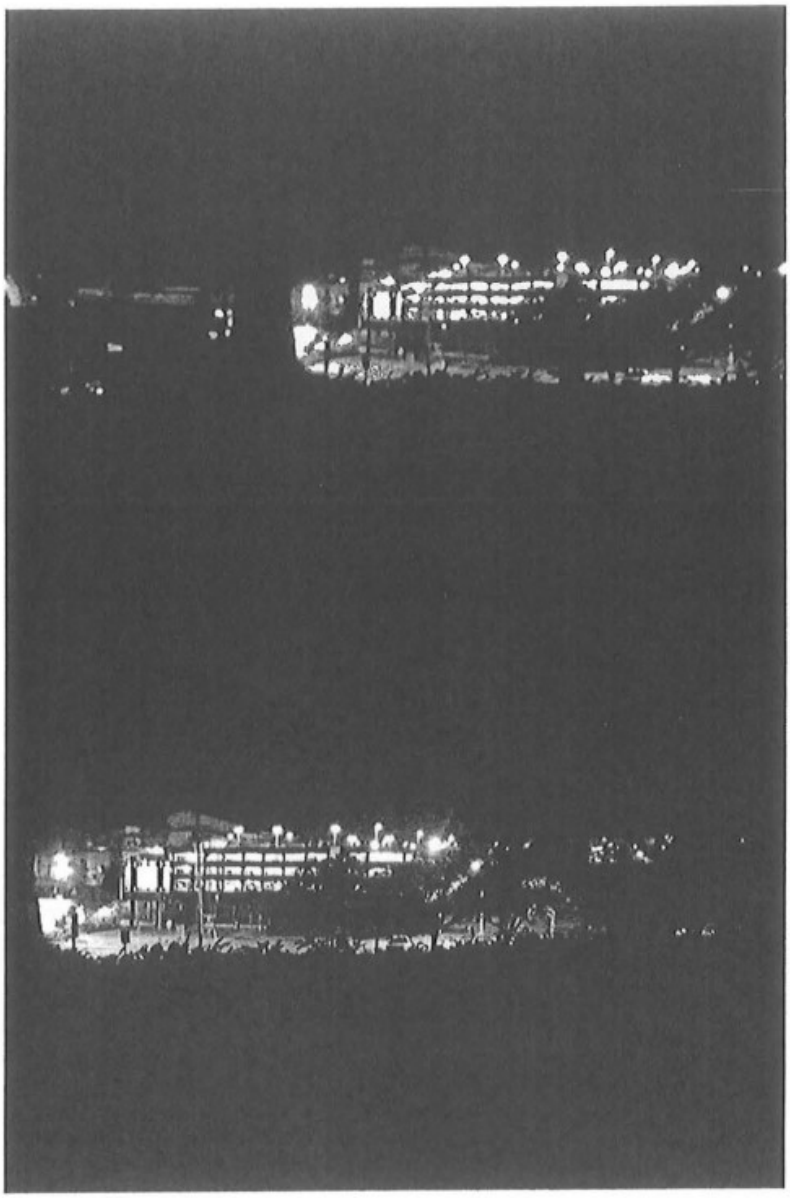
J. "Based on the analysis in Chapter 5, the H-12 and H-16 Parking Lot Alternative, No Parking Garage Alternative, and Reduced Scale Alternative ar3e considered environmentally superior.
Comment: If the Alternative suggested by a community member, is environmentally superior what other superior sites might be available if the Poly Planning and Facilities departments got together and opened their visions and outdated Master Plan consideration. The EIR evaluates only the outdated Master Plan suggestions.

ES-24 AES Impact 4
"The project's prominent location and building heights could increase noticeability of light sources.
Comment: It was my understanding that the EIR cannot defer potential project Mitigation Measures to a later date. Yet, AES/mm-3 does exactly that. Below are photos of the previously mitigated Recreation Center project. As you see from the photos below, the mitigations measures are NOT working. We expect better mitigation than to defer to a comprehensive lighting plan for review and of the State Architect. Wasn't the Rec Center reviewed by and approved by the State Architect? IT's NOT WORKING!

The pictures below were taken on Thanksgiving weekend from 125 Longview Lane. In order to enjoy the holiday meals, the blinds were drawn at night due to the glare into the dining and living room.



THM-54 (continued)



THM-54 (continued)

THM-54 (continued)

ES-25 Impacts
"However, as seen from public viewpoints and neighborhoods immediately adjacent to it, the project would appear out-of-scale and would reduce views to identified scenic resources. Although the project is technically considered in-fill, the interface between the large buildings along the perimeter would not have a harmonious visual transition to the surrounding community."
Comment: This paragraph says it all. It is just too massive to be adjacent to the only R-1 City neighborhood with the entire campus. We agree that this parking lot must be developed but not with seven five-story towers. A low profile buffer between the neighborhood and campus is all that we ask.

ES-34 Public Safety. Pursuant to CEQA, impacts are considered significant if the project would result in environmental impacts associated with the provision of additional structures or facilities to support police and other public services. Incremental changes associated with the location of nuisance activity in the community will not result in the need for such facilities; alteration in police may include redistribution of patrols and additional personnel.
Comment: The present status of the neighborhood public safety for both off-campus students and City residents is not acceptable. There are too few police patrols, too much underage drinking, too many assaults, drug deals gone bad, irresponsible and ultimately dangerous behavior, eg. Office chair races down Frederick's St. hill to Grand Ave. If this had occurred on a campus street rather than on a neighborhood

THM-54 (continued)

street toward a busy city street it would have been a cute college prank. Please see list and dates of news reports.

ES-35 Pedestrian and Bicycle Circulation
Mitigation Measure
TC/mm-1
What about the south side of the street @ Longview to Hathway? What about feeder streets?

ES-36 Pedestrian and Cycling Facilities.
"Off-campus pedestrian and bicycle trips associated with the project would be concentrated along Grand Avenue and via internal campus roads."

"The project would result in a reduction in peak hour vehicle trips through the Grand Avenue campus gateway. The reduction in commuter trips would ultimately provide a more comfortable travel environment in the local area as the number of potential conflicts during the periods of heaviest vehicle travel would be reduced."

"The Student Housing South project has a net effect of reducing vehicle traffic in the vicinity of Grand Avenue and Slack St."

"Substantial bicycle facilities exist in the project vicinity as described in Section 4.6.1.2, above and would provide adequate connection to areas where trips are likely to occur..."

How do you know all of this when this intersection was never studied? What about Slack St.? It has no bicycle facilities.

ES-37

TC Impact 4
The project will have significant impacts when considered along with cumulative development.
Residual Impacts: Significant and unavoidable
So what is proposed? Is this just ignored?

Cumulative Pedestrian, Bicycle, and Transit
"The project is not expected to result in a substantial contribution to cumulative impacts to pedestrian, bicycle or transit facilities in the project area."
Comment: The EIR cannot be speculative. This is very speculative considering that this intersection was never studied. Why? What is the University afraid of in studying this intersection?

Chapter 1
1.1 "...identify alternatives to the proposed project that avoid or reduce these impacts."

THM-54 (continued)

Comment: So why is the only reasonable alternative the one suggested by a community member and none from the University. Why were alternative sites rejected by the University?

1.5.1 Background
"Cal Poly has also prepared additional visual simulations for the project."

Comment: Either the simulations are incorrect or the verbiage in the EIR. They do not match. See details in 2.3.2

Chapter 2
2.1.1 Project Location
Comment: The underlined addition finally updates the fact that the San Luis Coastal Unified School District will reopen the original Pacheco School with the Teach elementary program of 150 students in Fall 2014. However, the EIR fails to mention that the Existing San Luis Obispo Classical Academy that will remain in operation has an enrollment of 350 bringing the Fall 2014 student population to 500 students.

The EIR quotes Ryan Pinkerton, SLCUSD, as either renewing the Classical Academy lease in 2018, or opt to expand the Teach program. Again the EIR stops the quote at the point where Ryan Pinkerton states that demographic studies are presently being conducted by the district. Current elementary schools are becoming overcrowded and the District will possibly take over the entire campus in 2018 when the Classical Academy lease expires.

2.3.2 Structures Pgs. 2-10-11
"The project will provide approximately 1,475 beds in seven four-to five story towers totaling approximately 450,000 gross square feet."
"The preliminary site design includes seven residential structures,..."

Comment: Figure 2-6 Rendering of Building shows a four-story tower and yet all of the written statements clearly state that the residential towers will be five stories. See page ES-12 2. Structures "The project will provide approximately 1,475 beds in SEVEN FOUR-FIVE-STORY TOWERS totaling approximately 450,000 gross square feet. The preliminary site design includes SEVEN RESIDENTIAL STRUCTURES.

This project is the equivalent of 6 Walmarts being built across from a City R-1 neighborhood.

NONE of the renderings or axonometric drawings show the buildings to be 5 stories---only 4.

2.3.4 Access and Parking

"Vehicle parking will be provided in a four-story parking structure, comprising approximately 300 to 500 spaces."

Comment: Who parks here? What of the 800 to 1000 lost parking spaces? Where do the 857 average occupants of this present lot park? If parking spaces are so underutilized on campus, why build a parking structure at all? See Table ES-3 on pg ES-9.

Figure 2-8 Axonometric Projection of Proposed Project
Comment: This projection does not portray the words of the EIR. All buildings are represented as four stories high not the five stories as stated on page ES-12 Section 2. Structures "The project will provide approximately 1,475 beds in SEVEN FOUR-FIVE-STORY TOWERS totaling approximately 450,000 gross square feet. The preliminary site design includes SEVEN RESIDENTIAL STRUCTURES.

Figure 2-9
Comment: Same as above.

Figure 2-10
Comment: As stated earlier, the Welcome Center is the same size as the coffee shop. Since being close to communal dining is so important, do away with this plan and use this entire ground floor for fast food franchises. This whole project could then be moved and built anywhere on campus.

THM-54 (continued)

Part 3 Recirculated Draft EIR

3.1.1 Physical Setting
Comment: Again the number of students (500) attending the original Pacheco campus is being minimized. This draft EIR has not made a good faith effort at full disclosure on this issue, parking, and intersection studies.

Pg 3-6 Table 3-2 Consistency with Plans and Policies
Cal Poly Master Plan
Compatibility-Establish and maintain buffers between the campus and neighborhoods.
Comment: This is all we ask. There is no buffer. The wall of dorms is right on Slack St. adjacent to our city neighborhood blocking not only our view of the Santa Lucias but also anyone riding, biking, walking, driving down our street.

THM-54 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street

THM-54 (continued)

Pg 3-6 Table 3-2 Consistency with Plans and Policies
Cal Poly Master Plan
Proposed Action
"The project provides housing proximate to other, existing freshman housing and existing support services such as dining halls."
Comment: See photos in ES section of the existing dining halls. These fast food franchises could be replicated anywhere on campus.

Residential Communities.
"External Community Impact-Housing on campus should mitigate immediate impacts on the local housing market."
Comment: This is a speculative statement with no basis in fact or studies to support it.

Proposed Action
"The project includes student learning components and addresses needs of freshmen with modern amenities. The project includes support services including small-scale retail and recreational facilities, and is ADA compatible."
Comment: This can be replicated anywhere on campus.

Table 3-2 Consistency with Plans and Policies
Parking
Comment: Why is parking decreased on campus? You make assumptions that are false. You don't take into account the negative impact on the neighborhood parking. See photos of City streets used for Cal Poly parking in the ES section. Why can't the city require the University to provide enough parking on campus for each student? If the excess parking on campus was free---part of tuition, the city street parking would disappear immediately. The city needs to red curb all of the north side of Slack St., both sides of Grand under the freeway, and south side of Loomis.

4.1 The Campus
"From the more elevated portions of campus, including the project site, distant views include Cerro San Luis and Bishop Peak (part of the Morros chain of mountains) to the west and the Santa Lucia Mountain foothills to the east."
Comment: From the standpoint of the campus, the views have been preserved. What about the residents of the City who are being deprived of their views of the same peaks and foothills?

Section 15021 (d) of the CEQA Guidelines states that, "In determining whether a project should be approved, a public agency must balance a variety of project objectives including economic, environmental, and social factors and in particular, the goal of providing a decent home and satisfying living environment for every Californian."

This statement holds true for many of the sections in this draft EIR and the EIR does not take this into consideration.

"Two- and three-story student housing complexes are located immediately across Grand Avenue from the project site. Larger-scale on-campus housing is found northeast of the campus core in and near Poly Canyon."
Comment: These towers even dwarfs the existing on-campus housing complex buildings immediately across the street. A buffer is provided between these existing housing complexes and the neighborhood. This new project does not provide a buffer.

Photo 4.1-5 View of the site from the intersection of Grand Avenue and Slack Street.
Comment: It amazes me that in all pictures taken for the EIR, the angle and cropping of the photos minimizes the existing views, and diminishes the impact of the project. Below is an un-cropped amateur photo taken of the same intersection of Grand and Slack Street.

Pg.4.1-5
Surrounding Neighborhoods
"...single-family detached homes are predominant to the south and southeast..."
"The section of Grand Avenue approaching campus is designated as a Scenic Roadway in the City's Circulation Element."
Comment: This is true but doesn't seem to have been taken into account when placing seven five-story towers the equivalent of six Walmarts directly across the street from our homes and on a Scenic Roadway.

Pg 4.1-8 to 4.1-9 2001 Cal Poly Master Plan
Land Use
3) Compatibility: be considerate of impacts on neighborhoods near campus.

Comment: This is all we ask. We have said from the beginning that this project is not compatible with the neighborhood. This would be a terrific project if it were further into the campus and not immediately adjacent to an R-1 neighborhood. We who live in this neighborhood are here because of CP. We are among the most ardent supporters of CP because we have been affiliated with the University for generations.

Natural Environment
8) Stewardship: develop and use management practices that protect and enhance natural resources; permanently protect especially sensitive areas; be an example to the greater community."
Comment: Protection of the natural resources is what we want. Our views of the morros and foothills are the only natural resources we have in SLO. We want to protect this sensitive area. We would like Cal Poly to be an example of good stewardship and partnership with the community.

THM-54 (continued)

14) Aesthetics: protect scenic resources and take advantage of them in new designs.
Comment: We want our scenic resources protected. This is why we don't want a five story wall blocking the views of the foothills to anyone traveling on Slack Street.

70) Beautification: gateways and corridors should be attractive.
Comment: We agree that this gateway to the University should be attractive. Five story warehouse towers is not our idea of beautification of the University gateway.

Parking
81) Neighborhoods: be sensitive to impacts on adjacent neighborhoods.
Comment: This is all we ask, that the University be sensitive not only to our parking but views, peace and quiet enjoyment of our homes.

Pg. 4.1-9
4.1.2.2 City of San Luis O)bispo Planning Documents
San Luis Obispo General Plan Circulation Element
15.0.3 Development along Scenic Routes.
B. Development projects should not wall off scenic roadways and block views.
Comment:
Please look one more time at page 4.1-21 of the Recirculated draft EIR. This project violates all of the principals stated above. Even with the foliage grown to maturity(through Photoshop) to camouflage the building, it still violates the principles.

THM-54 (continued)

THM-54 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street

THM-54 (continued)

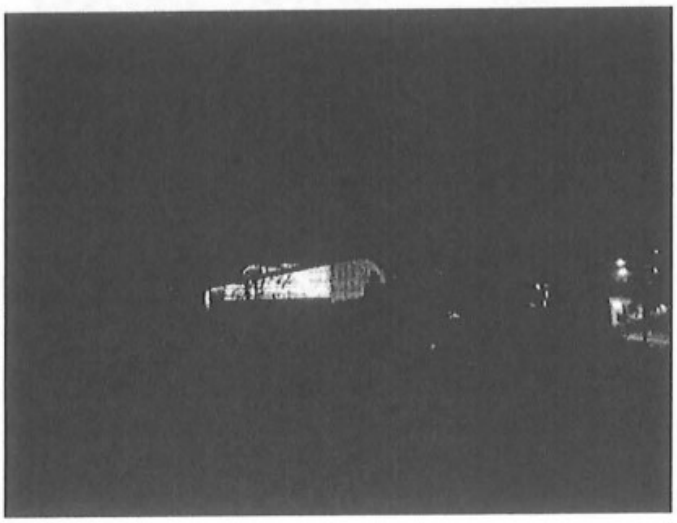
Pg4.1-10
4.1.3 Thresholds of Significance
"If a change in visual criteria was identified, this change was analyzed for its potential effect on the existing scenic character. This analysis was combined with the potential number of viewers, their sensitivities, and viewing duration in order to determine the overall level of impacts."

4.1.3.1 CEQA Guidelines
1. Have a substantial adverse effect on a scenic vista.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.
Comment: This project would do both of the above.

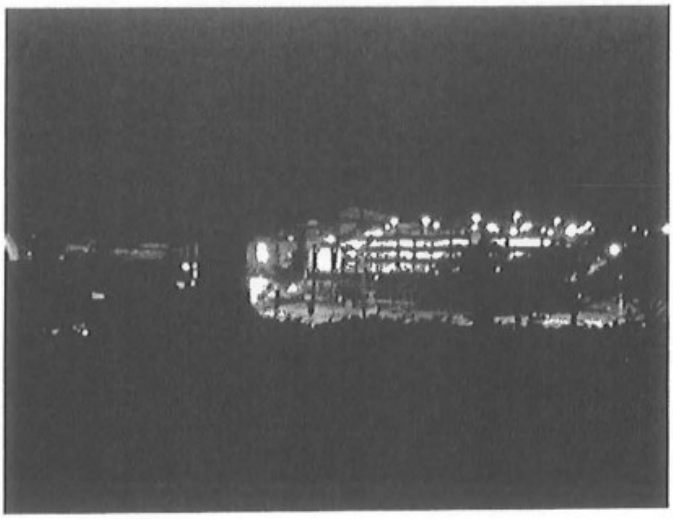
Have a substantial adverse effect on a scenic vista.
If the proposed project could significantly degrade the scenic landscape as viewed from public roads, or in particular designated Scenic Roadways, or from other public areas, this would be considered a potentially significant impact on the scenic vista.
Comment: This project would do all of the above.

Create a new source of substantial light glare which would adversely affect day or nighttime views in the area. .
"The project would result in a significant impact if it subjected public viewing locations or adjacent residents to a substantial amount of point-source lighting visibility at night, or if the collective lumination of the project resulted in a noticeable spillover effect into the nighttime sky, increasing the ambient light over the region."
Comment: There is no way that this project would not result in spillover into the surrounding neighborhood and more importantly into the nighttime sky, increasing the ambient light over the region.

Below are photos taken of the recently built recreation center at the end of Slack and Hathway. This project was supposedly mitigated to avoid spillover to adjacent neighborhoods and into the nighttime sky. As you can see, it's not working. These amateur photos were taken over the Thanksgiving weekend from 125 Longview Lane.



THM-54 (continued)



THM-54 (continued)

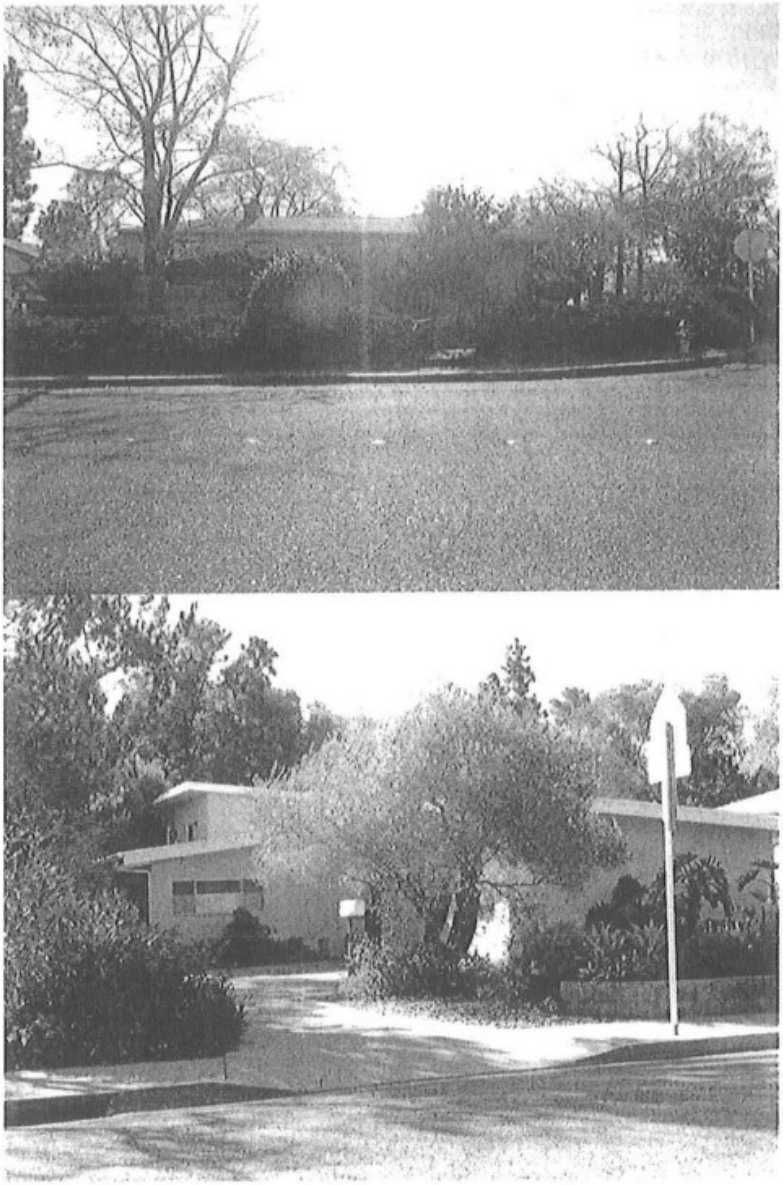
THM-54 (continued)

Pg 4.1-11
4.1.4.1
Analysis Methodology
The analysis considers the existing development as part of the visual baseline. This includes the neighborhoods immediately surrounding the project as well as the developed campus, ... The visual quality of the community has as much to do with the built environment as the natural setting. Patterns of development, architecture, scale, massing and vegetation define how the campus and community are perceived by residents and visitors.

Pg 4.1-11 to 4.1-13
4.1.4.1
Analysis Methodology
"The analysis considers the existing development as part of the visual baseline. This includes the neighborhoods immediately surrounding the project as well as the developed campus, ... The visual quality of the community has as much to do with the built environment as the natural setting. Patterns of development, architecture, scale, massing and vegetation define how the campus and community are perceived by residents and visitors.

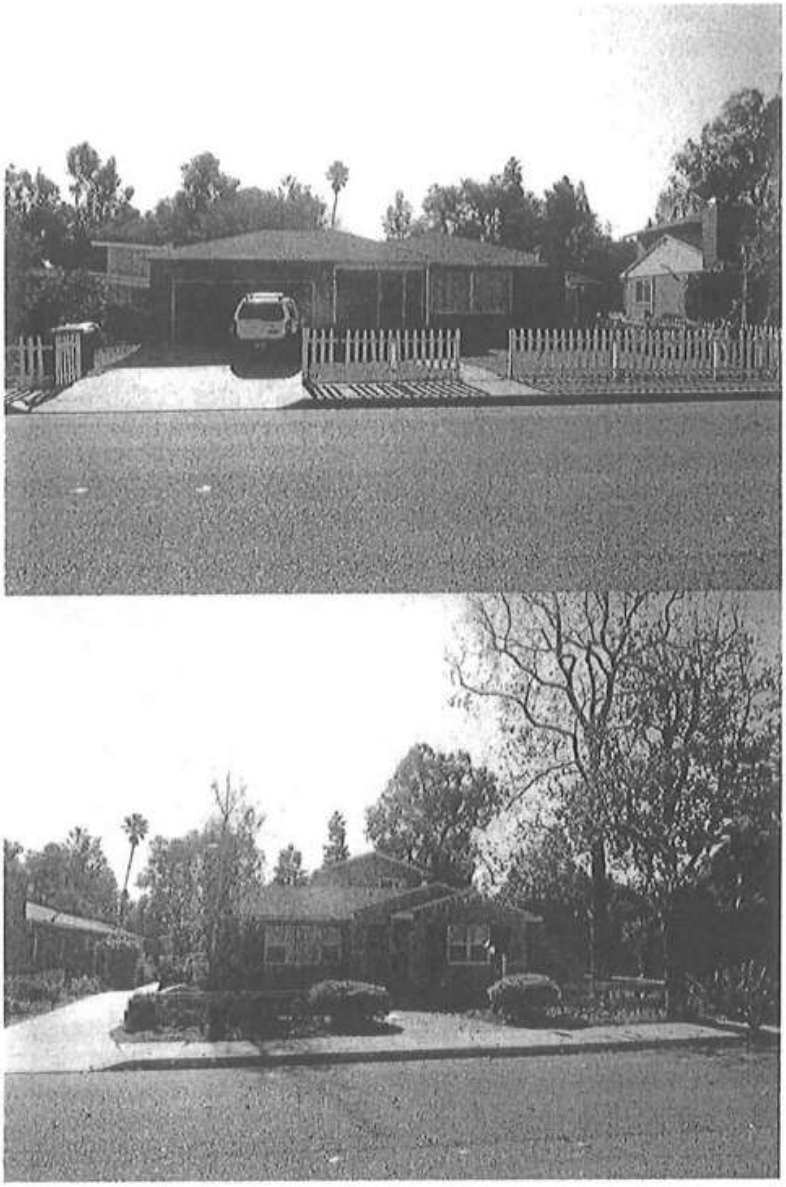
"...Existing visual resources and site conditions were photographed and recorded.
Comment: The photos produced are cropped to minimize the effects of the project or taken at such an angle as to distort the view. Many of the photo exhibits are of the asphalt roadways rather than the adjacent houses. Below are photos of the neighborhood that give a better representation of the true nature of the neighborhood.

THM-54 (continued)

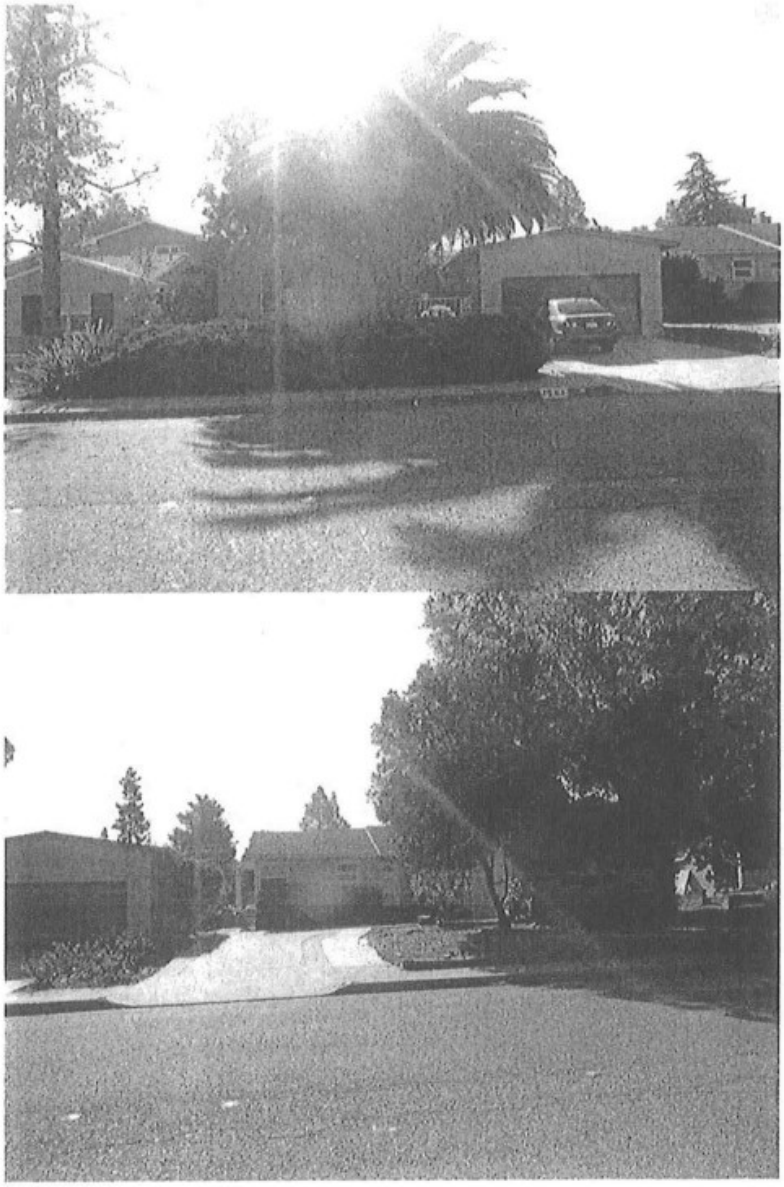


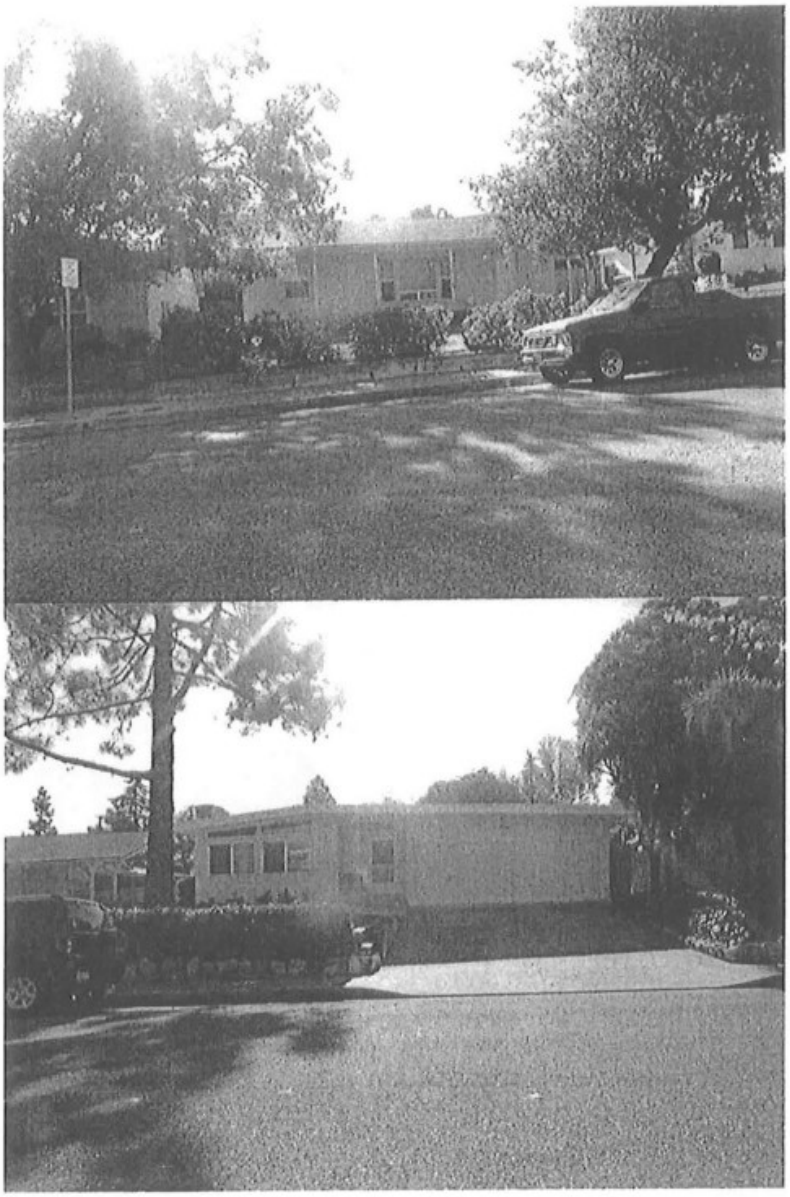
THM-54 (continued)

THM-54 (continued)



THM-54 (continued)





THM-54 (continued)

THM-54 (continued)

Please note that in most of these photos, the homeowner or tenant has kept foliage away from the windows that give view to the surrounding hills. Later in the EIR it is stated that the residents wouldn't be affected by the construction because of the mature screening foliage obstructing their view.

"...Representative photo simulations were prepared which would best illustrate the visual changes proposed by the project (refer to 4.1.5..."

Comment: The referenced photo is copied here. It says it all, despite cropping and addition of photo shopped mature foliage. This photo does not, however photo shop the loss of sunlight that will be experienced with this project. This photo is reminiscent of the Berlin Wall.

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Stack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Stack Street

THM-54 (continued)

THM-54 (continued)

"... the analysis defines the visual environment of the project area, quantifies the visual resources, and considers expected viewer response to those resources. The analysis identifies the resource change that would be introduced by the project and the corresponding viewer response to that change."

Comment: How can this report quantify our response to the change in our viewshed? It is apparent from the public outcry that this report has diminished the public response.

"To understand and predict viewer response to the appearance of a project, the viewers who may see the project are identified, along with the aspects of the visual environment to which they are likely to respond. ...The receptivity of different viewer groups to the visual environment is not equal.
" Viewer response assumptions include consideration of viewing proximity, duration of views, activity while viewing, and overall viewing context. Local values based on visual preferences historical associations, and community aspirations and goals are important indices of predicting viewer sensitivity and response to change."

Comment: An EIR cannot be speculative. An EIR must be objective. However, this statement calls for speculation and subjectivity.

Pg. 4.1-14
Surrounding Community
"The project would be seen to varying degrees from the surrounding residential neighborhoods.
"Topography, residential development, and mature vegetation limit much of the views to the project site from the surrounding neighborhoods."
Comment: This is simply not true as demonstrated in the pictures shown before of the neighborhood. Vegetation was planted carefully to preserve the views and this vegetation has matured but not obstructed the view.

"Currently, the project site includes mature trees around much of its perimeter along Grand Ave and Slack Street. The existing trees along Slack St. combined with the parking lot's elevated position screen much of the view of the project site.
Comment: Later in the report when grading is discussed, these mature screening trees are removed. Five feet of this screening elevation is to be removed to build the project.

Pg 4.1-15
The local topography causes portions of the adjacent residential neighborhoods to be somewhat elevated above the campus and the project site. As a result, some of these areas can have broader views of the surrounding landscape. The surrounding hills are also often part of the overall viewshed from these locations. Because of the mature trees and landscaping throughout these established neighborhoods, views of the campus and the project are often filtered or blocked.

THM-54 (continued)

Comment: Please refer once again to the pictures of the established neighborhood and the care that was taken to not obstruct or filter the view of the viewshed.

Photos 4.1-20 through 4.1-26

Comment: As mentioned before, the photos used in the EIR are cropped or taken at an angle or focused down toward the street minimizing the effects of the project. An EIR must provide a good faith effort at full disclosure. These photos appear to diminish full disclosure.

Pg. 4.1-17
4.1.5.1 Have a substantial adverse effect on a scenic vista.
"... The section of Grand Avenue that approaches campus from the south and extends north along the project site for approximately 150 feet is a designated Scenic Roadway (City of San Luis Obispo 2006). ...From the designated Scenic Roadway section of Grand Avenue (refer to Photo 4.1-27), views of the Morros are substantially blocked by intervening vegetation and development.
Comment: Photo 4.1-27 is not a photo of the City's portion of the Scenic Highway but taken on campus and of the existing parking lot. As for the intervening mature vegetation that blocks the view, this will be removed during the five feet of soil removal and grading for the proposed dorms.

Pg. 4.1-19 to 4.1-24
Figure 4.1-2 Photo simulation of the student housing project, as seen from the Corner of Grand Avenue and Slack.
Comment: This simulation, as with all other simulations (4.1-5, 4.1-7, 4.1-9) has only 4 stories rather than the proposed 5 stories for all residential towers. Furthermore, this photo does not provide a wide angle view that includes the one-story original Pacheco School and the neighborhood of 1-story homes.

Pg. 4.1-21 Figures 4.1-4 and 4.1-5 so vividly displays the scale, dominance, incompatibility of this project with the residential neighborhood that I will include it once again. Remember the simulation shows the tower only 4-stories high, not the 5-stories. Imagine how one more story will adversely affect this neighborhood.

THM-54 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street

Pg.4.1-25
AES Impact 1
The height and location of the proposed housing structures would block existing quality views of Bishop Peak, Cerro San Luis and the Santa Lucia foothills. ...resulting in a direct long-term impact to the scenic vistas.

Residual Impacts
The project would have an adverse effect on scenic vistas as seen from portions of Grand Avenue and Slack Street. ...impacts are considered significant and unavoidable.

Comment: Moving the location of this project to the environmentally superior H-12 H-16 parking site would mitigate this significant and unavoidable impact.

Pg 4.1-25 to 4.1.-27
4.1.5.2 Substantially degrades the existing visual character or quality of the site and its surroundings.
"...The proposed structures would be visually compatible with the somewhat modern, institutional architecture of campus development constructed over the last several years. Proposed buildings would generally include articulated exterior walls and would be angled away ffrom the axes of adjacent roadways, which would add visual interest and reduce the project's spatial dominance on the surrounding area."
Comment: How can the spatial dominance of 6 Walmarts be reduced to fit in a single-story 1950's style residential neighborhood? Furthermore, the dorm building along Slack Street is not angled away from the axes of the adjacent roadway. It appears as a solid concrete wall with windows towering over and peeping into our houses. Again refer to Figures 4.1-4 and 4.1-5 and keep in mind that the photo simulation simulates only 4-stories not 5 as described on pg ES-12 2. Structures "...seven residential structures...Residential structures will be five stories."

"As seen from the neighborhood immediately to the south along the Slack Street frontage, the project would appear out-of-scale with the residential character and low-profile institutional buildings of the existing neighborhood. The perception of height of the proposed buildings along the southern perimeter of the project would be exaggerated by the elevated building site above the adjacent roadway and neighborhood (refer to Figure 4.1-5)."
Comment: In this paragraph, the EIR states in one paragraph and one photo what we, the neighbors have been stressing from the first forum when the public was first invited to participate in this process, November 6, 2013.

THM-54 (continued)

Kremke, Kate

From: Mejia, Anthony
Sent: Monday, March 24, 2014 10:28 AM
To: Kremke, Kate
Subject: RE: Town Hall Meeting March 25, 2013_Correspondence

MAR 24

Agenda Correspondence

Anthony J. Mejia | City Clerk
city of san luis obispo
990 Palm Street
San Luis Obispo, CA 93401
tel | 805.781.7102

AGENDA
CORRESPONDENCE
Date 3-25-14 Item # TH

From: Sharon Whitney [mailto:whitney.sharon@gmail.com]
Sent: Saturday, March 22, 2014 11:31 AM
To: Ashbaugh, John; Carpenter, Dan; Christianson, Carlyn; Codron, Michael; Dietrick, Christine; Lichtig, Katie; Marx, Jan; Smith, Kathy; Mejia, Anthony
Subject: Town Hall Meeting March 25, 2013_Correspondence

THM-55(a)

Regarding My Anticipated Comments at Town Hall Meeting

March 25, 2014

Ludwick Center, 6-9 pm

Dear Council Members, Honorable Mayor, and Staff,

My name is Sharon Whitney. I live 1 block from Cal Poly's planned project site called "Student Housing South."

I support Cal Poly's 2001 Master Plan to build more on-campus student housing. However, because of serious analytical omissions I oppose its proposed amendment as laid out in its DEIR for which comments are due March 31. In line with this opposition, I support the City's January 24 letter to the Board of Trustees commenting on the DEIR.

Thank you for hosting this town hall meeting and to staff for facilitating it. Thank you Derek Johnson and Kim Murry for your work related to the January 24 letter to the Board of Trustees.

1

I do believe that the January 24 letter resulted in an improved DEIR as re-circulated. However, serious problems remain.

THM-55(a) (continued)

For example, the re-circulated DEIR omitted addressing two key statements made on page 2 of City's January 24 letter, subtitled "General Comments" and "Cumulative Impacts." Those are what I want to address here. At the same time, I am urging the City Council to direct staff to submit another letter to the Trustees in response to the re-circulated DEIR, strengthened if possible and framed by relevant California Supreme Court rulings about CEQA compliance, including the *City of Marina* and the *City of San Diego*.

THM-55(b)

- *General Comments:* This section of the City's January 24 letter points out that the proposed Master Plan amendment omits discussing the disposition of the identified existing housing sites. It suggests that unless the EIR includes that discussion there is a potentially significant adverse cumulative impact on the City requiring mitigating measures. As I read it, the University's omission of that discussion hides a factor about potential growth inducement in the student population with the addition of the Housing South Project. The City indicates its willingness to engage in discussions to identify and mitigate these off-site impacts.I support the City on that point.

- *Cumulative Impacts*: This section of the City's letter refers to Chapter 6 of the DEIR and related CEQA concerns for growth-inducing impacts. As the January 24 letter noted Cal Poly's President Jeffrey Armstrong announced on Sept 16, 2013 his intention to seek an enrollment increase of 4-5 K students, bringing the total population to about 24-25 K. Accordingly, the City asked Cal Poly to address the projected student population growth, as well as the projected growth in the surrounding community, in its cumulative impacts evaluation, referring Cal Poly to review the City's LUCE update and giving them its URL address.

THM-55(c)

These two points suggest that no matter where Cal Poly chose to add its freshman dorm complex there is a growth-inducement factor in student population that it has failed to address, that it should have addressed, and could have addressed. Places where the analysis should appear, for example, include the Executive Summary, Table 4, with respect to "Master Plan Consistency" and "Cumulative Impacts," at Section 3.1.3, dealing with "Campus Enrollment," and again in Chapter 6, at page 268 referencing CEQA guidelines with respect to growth-inducement of a proposed project.

THM-55(d)

Moreover, the re-circulated DEIR made no substantive reference to the City's LUCE update. It should have done this done in Chapter 7, titled "Mitigation Monitoring and Reporting."

THM-55(e)

I urge that the City Council to direct staff to resubmit a strengthened letter to the Board of Trustees in line with the above-identified points.

2

Kremke, Kate

From:	Mejia, Anthony
Sent:	Monday, March 24, 2014 10:27 AM
To:	Kremke, Kate
Subject:	FW: Town Hall Meeting March 25_my 3 minute speech draft
Attachments:	untitled-[1.2].html; My Town Hall Meeting Talk.doc

THM-55 (continued)

Agenda Correspondence

Anthony J. Mejia | City Clerk
City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401
tel | 805 781 7102

From: janmarx@alumni.stanford.edu [mailto:janmarx@alumni.stanford.edu] **On Behalf Of** Jan Marx
Sent: Friday, March 21, 2014 5:40 PM
To: Mejia, Anthony
Subject: Fwd: Town Hall Meeting March 25_my 3 minute speech draft

---------- Forwarded message ----------
From: <sharon@sharonwhitney.com>
Date: Fri, Mar 21, 2014 at 5:37 PM
Subject: Town Hall Meeting March 25_my 3 minute speech draft
To: Jan Marx <janmarx@stanfordalumni.org>, jan marx <jmarx@slocity.org>, Jan Marx <janhmarx@gmail.com>, cchristi <cchristi@slocity.org>, cchristiansen <cchristiansen@slocity.org>, Kathy Smith <mavourneen@charter.net>, kathy smith <ksmith@slocity.org>, Dan Carpenter <dancarp54@charter.net>, Dan Carpenter <dancarpslo@yahoo.com>, dan carpenter <dcarpent@slocity.org>, John Ashbaugh <john@johnashbaugh.com>, john ashbaugh <jashbaug@slocity.org>
Cc: sharon <sharon@sharonwhitney.com>, Derek Johnson <djohnson@slocity.org>, Kim Murry <kmurry@slocity.org>

Dear Council Members, Staff, and other undisclosed recipients;
Attached, please find my anticipated Town Hall Meeting speech for March 25. It is a bit technical, but necessary, in my opinion. If this needs to be directed to other members of the SLO City staff, please let me know. Thank you,
Sharon G. Whitney, PhD

1

THM-55 (continued)

Dear Council Members, Staff, and other undisclosed recipients;

Attached, please find my anticipated Town Hall Meeting speech for March 25. It is a bit technical, but necessary, in my opinion.

If this needs to be directed to other members of the SLO City staff, please let me know.

Thank you,

Sharon G. Whitney, PhD

THM-55 (continued)

Town Hall Meeting
March 25, 2014
Ludwick Center, 6-9 pm

1. Self-Intro:
   a. My name is Sharon Whitney.
   b. I live 1 block from Cal Poly's planned project site called "Student Housing South."
   c. I support Cal Poly's 2001 Master Plan to build more on-campus student housing.
   d. Because of serious analytical omissions I oppose its proposed amendment as laid out in its DEIR for which comments are due March 31.
   e. I support the City's January 24 letter to the Board of Trustees commenting on the DEIR.

2. Thank you:
   a. City Council for hosting this town hall meeting and to staff for facilitating it
   b. Derek Johnson and Kim Murry for your work related to the January 24 letter to the Board of Trustees.
   c. The Jan 24 letter resulted in an improved DEIR, as re-circulated.
   d. Nonetheless, serious problems remain.

3. My Purpose:
   a. I urge the City Council to direct staff to submit another letter to the Trustees in response to the re-circulated DEIR, strengthened if necessary and framed by relevant Supreme Court precedents, including the *City of Marina* and the *City of San Diego*.
   b. The re-circulated DEIR omitted addressing two key statements made on page 2 of City's Jan 24 letter, subtitled "General Comments" and "Cumulative Impacts."

- *General Comments:* This section points out that the proposed Master Plan amendment omits discussing the disposition of the identified existing housing sites, and unless it includes that discussion there is a potentially significant adverse cumulative impact on the City requiring mitigating measures. The implication appears to be that there is a hidden factor of growth-inducement in the student population with the addition of the Housing South project. The City indicates its willingness to engage in discussions to identify and mitigate these off-site impacts.
- *Cumulative Impacts*: This section refers to Chapter 6 of the DEIR and related CEQA concerns for growth-inducing impacts. As the Jan 24 letter noted Cal Poly's President Jeffrey Armstrong announced on Sept 16, 2013 his intention to seek an enrollment increase of 4-5 K students, bringing the total population to about 24-25 K. Accordingly, the City asked Cal Poly to address the projected student population growth, as well as the projected growth in the surrounding

community, in its cumulative impacts evaluation, referring Cal Poly to review the City's LUCE update and giving them its URL address.

4. Conclusion:

a. The re-circulated DEIR should have addressed the City's expressed concerns in its General Comments and Cumulative Impacts statements. It could have done so, for example, in the Executive Summary, Table 4, with respect to "Master Plan Consistency" and "Cumulative Impacts," at Section 3.1.3 dealing with "Campus Enrollment," and again in Chapter 6, at page 268 referencing CEQA guidelines with respect to growth-inducement of a proposed project.

b. Moreover, the re-circulated DEIR made no substantive reference to the City's LUCE update, which it could have done in Chapter 7, titled "Mitigation Monitoring and Reporting."

c. Therefore, I urge that the City Council to direct staff to resubmit a strengthened letter to the Board of Trustees in line with the above-identified points.

THM-55 (continued)

MAR 18 2014

Goodwin, Heather

From: Marx, Jan
Sent: Tuesday, March 18, 2014 2:00 PM
To: 'Carol'; Smith, Kathy; Christianson, Carlyn; Carpenter, Dan; Ashbaugh, John
Cc: Mejia, Anthony; Goodwin, Heather
Subject: RE: Cal Poly Student Housing Project South

Thank you for your comments, Mr. Winger. I am including our city clerk staff in this response, so your comments will be posted on our website as agenda correspondence.
All the Best,
Jan

AGENDA CORRESPONDENCE
Date 3/25/14 Item# TH

From: Carol [mailto:dcwinger@charter.net]
Sent: Tuesday, March 18, 2014 1:37 PM
To: Marx, Jan; Smith, Kathy; Christianson, Carlyn; Carpenter, Dan; Ashbaugh, John
Subject: Cal Poly Student Housing Project South

Dear Mayor Marx, Council members Ashbaugh, Carpenter, Christianson, and Smith

I am a 51 year resident of San Luis Obispo and have lived at 2041 Hays Street for 49 years of that period. I am unable to attend the City town hall meeting on Tuesday March 25, 2014 because of a previously scheduled out of state trip, otherwise I would be presenting my comments in person. You are well aware of the problems for the permanent residents of the Cal Poly neighborhoods relating to student activities (parties, noise, etc.) that have developed over the years. These residents were shocked last summer to learn of Cal Poly's intention to build a large dormitory complex near the Slack/Grand intersection as this was never presented as a building site in the Cal Poly Master Plan. Extensive work was done relating to this project with minimal or no consultation with area residents or city officials. We do not see building up to five story structures housing over 1400 freshman across the street from a SLO R-1 neighborhood as anything but fraught with problems for us and the city. **THM-56(a)**

There are many issues that should concern the city relating to the draft EIR for this project, however, I will only highlight one in this note. I have traveled the Grand/Slack intersection as a motorist, bicyclist and pedestrian nearly every day for 50 years and feel qualified to comment on the traffic issues there. Let me simply list a few issues: **THM-56(b)**

- This is a 4 way stop, however, motor traffic frequently treat this as a hesitation stop on Grand Avenue. It is particularly dangerous for motorists coming on Slack from the east as this traffic seems to be ignored by the Grand Avenue traffic.
- Bicycle traffic coming out of Cal Poly routinely does not stop on this downhill section and frequently the bicycle traffic is on the wrong side of Grand.
- Reopening of Original Pacheco grade school at Grand/Slack will add more congestion and was not addressed in the draft EIR.
- The draft EIR considered the effect of the project on some intersections that have little to do with the location of this project. An example being Olive and Santa Rosa and the 101 Northbound/California Street exit. What about the Grand Av/Slack Street intersection and the 101 exits for Grand Avenue and Monterey Street?
- The Cal Poly dorm plan suggest that the freshman housed in the proposed project will have very few cars, this is simply an assumption and may not hold true for the future. As far as I know there is no restriction on freshmen bringing cars to campus. Even if a student doesn't have a car, they cannot be confined to campus and will either use bikes or get picked up by friends with cars for off campus excursions. To assume that there will be no significant traffic issues for the city seems unrealistic.

All in all it appears that Cal Poly is determined to force this project through on a site that was never designated as a build site as it may be the expedient thing to do in terms of time and money. This is to the detriment of the city residents nearby as well as the city in general. I would ask that the city council take some appropriate action to help its residents. I have been made aware of some other California cities who have done so in somewhat similar situations. Thank you for your attention and hopefully your support on this matter. **THM-56(c)**

Donley Winger
2041 Hays Street
San Luis Obispo, CA 93405

Submitted by Paul Allen

March 25, 2014

Comments to the City of San Luis Obispo
Regarding Cal Poly's Proposed Housing South Project

AGENDA CORRESPONDENCE
Date _____ Item# _____

Introduction and General Comments

Almost everyone in San Luis Obispo supports efforts by Cal Poly to house more of their students on campus. The problem with Cal Poly's latest dorm proposal, Housing South, is its location, and the massive intrusion it creates for existing nearby, quiet single-family residential neighborhoods. Housing a large number of new freshmen, who will be experimenting with new personal behaviors and who are just learning to be responsible adults, right next to these neighborhoods is a recipe for community disaster. There absolutely needs to be a better, more suitable buffer zone between the new proposed four-story dorms and nearby single-family homes, or between the new dorms and Teach School, a growing magnet elementary school for high-achieving youngsters. **THM-57(a)**

By placing the dorms right across from the neighborhoods, Cal Poly is intimidating families and homeowners and encouraging them to move away, and sell their homes to new owners who will then rent to students. With very little expenditure or effort, Cal Poly thereby gets the advantage of added student housing within close walking distance of the campus. It also sets the stage for building more dorms in future years across from Monterey Heights, with the same disastrous effect on that neighborhood. **THM-57(b)**

Residents along Slack Street and in Monterey Heights are speaking out in unanimous opposition to the proposed location of Cal Poly's new dorm. It is totally out of character with their professional and blue collar neighborhoods, and a genuine threat to their homes and families. Serious, viable alternatives have been proposed at several public meetings about the Housing South project, but these have never been given serious consideration by Cal Poly. Cal Poly administration values expedience and reduced dormitory construction cost far more than neighborhood vitality and wellness in the City.

In addition to speaking out for themselves, San Luis Obispo residents and working families need the City to speak out and step in on their behalf, to defend their homes and the hard-earned quality of life we all treasure here.

Specific Comments on the Recirculated Draft EIR

1. Section H, pg ES-20 Nuisances Associated with the Student Population
   The DEIR states "Community members were concerned with the project contributing to this ongoing problem" (trespassing, congregating, walking through neighborhoods). COMMENT: The DEIR fails to acknowledge community concerns about the project contributing substantially to neighborhood deterioration, brought on by owner-occupied residences being sold, owners moving out, and residences being used as student rentals. **THM-57(c)**

2. Section 3.1.3, pg 3-2 Campus Enrollment
   COMMENT: The DEIR fails to mention or incorporate recent proposals to increase Cal Poly's enrollment from the current 19,000 (approx.) to 24,000 (approx.) in the near future. The effects on enrollment growth this Housing South project, its impacts and mitigations should be addressed now, not years down the road. **THM-57(d)**

3. Pg. 4.1-21 COMMENT: The view of 4-story dorms immediately adjacent to Slack Street is atrocious. The Housing South project will dramatically change the quiet, residential character of this neighborhood and Teach School, right across the street. **THM-57(e)**

4. Section 4.6, pg 4.6.2 COMMENT: No traffic impact analysis is performed on the 4-way boulevard stop intersection of Grand Ave. and Slack Street, a major entrance to Cal Poly and the proposed Housing South dorms. This is an unacceptable deficiency, as high, added traffic at many times will affect public safety and parents delivering their children to classes at Teach Elementary School. **THM-57(f)**

5. Section 4.8.3, pg 4.8-11 and beyond- Cultural Resources
COMMENT: No mention is made of the project's high negative impact on residential neighborhoods immediately adjacent to the project. Long-time residents, professional and blue-collar families, will move to get away from the dense student population. Their homes will be rented to students and a further cancerous deterioration of the neighborhoods will occur. There should be a significant buffer zone between high-density student dorms and existing neighborhoods. **THM-57(g)**

6. Section 4.8.7, pg 4.8-21 Population and Housing
COMMENT: Under Displace Housing or People, no mention is made of the project's strong contribution to movement of existing families away from adjacent neighborhoods, to be replaced by student renters. **THM-57(h)**

7. Section 5, pg 5-1 Alternatives Analysis
COMMENTS: Alternative site H-12 & H-16 was not genuinely considered, as it this alternative was judged to be "inconvenient" for existing users. How does that stack up against the huge inconvenience of the existing proposal on adjacent homeowners and residential neighborhoods? **THM-57(i)**

   The 8.7 acre site was rejected due to "lack of proximity to dining facilities". Cal Poly will build more dorms in the near future, and should focus on this area of campus for housing expansion rather than cause neighborhood deterioration on the south border of campus, and within the City of San Luis Obispo. They should plan properly and build for the future now. Adding some dining component now, and building the new freshmen dorms on the 8.7 acre site would do this. Such planning for the future would "continue to enrich and develop the residential community on campus" (pg 5.3).

   This "planning for future dorms" objective would also be met by Section 5.5.3 Location Alternative- H-12 &H-16 Parking Lots. The DEIR and Cal Poly planners fail to genuinely weigh the value of these alternatives, by continually discounting the fact that the project, as proposed, will have dramatic negative impacts on the peace and quality of existing adjacent neighborhoods within the City of San Luis Obispo. The DEIR does this consistently throughout the document.

8. Section 5.5.4, pg 5-9 COMMENT: The DEIR further concludes (erroneously) that building the proposed parking structure on Slack Street would not mitigate project impacts on adjacent neighborhoods, even though a significant and highly desirable buffer would be created. **THM-57(j)**

Paul Allen, Foothill Area resident for 40 years - 544-2306

RECEIVED
MAR 27 2014
SLO CITY CLERK

03/25/2014
Submitted by Rebecca Keisler
AGENDA CORRESPONDENCE
Date 3/25/14 Item# TH

THM-58

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Rebecca A. Keisler Rebecca A. Keisler	144 Henderson Ave. San Luis Obispo, CA 93405 2-9-14
Carey aphoberts Carey aphoberts	1164 Henderson Ave San Luis Obispo, CA 93405 2-9-14
[signature] JAMES APHOBERTS	1164 HENDERSON AVE SAN LUIS OBISPO, CA 93405 2-9-14
John Keisler John Keisler	144 Henderson Ave. San Luis Obispo 2-9-14
Tawn Ride Tawn Ride	88 Brenda L. Slo 2-11-14
[signature] Purita Huffman	331 Santa Rosa Ave SLO 93405 2-11-14
Juventino Ortiz Juventino Ortiz	2267 SANTA YNEZ AVENUE SAN LUIS OBISPO, CA 93405 2-11-14
[signature] CHARLES W. NOFFSINGER	2134 SANTA YNEZ 2/11/14
Ruth McIlwain Ruth McIlwain	1911 Hays ST 2/11/14
Kevin Clark KEVIN CLARK	1954 HAYS ST 2/11/14

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Signature TERRY ELFRINK Printed Name	1983 SLACK ST. SAN LUIS OBISPO Address 2.11.14 Date
Signature Vicki McPartland Printed Name	1983 Slack St San Luis Obispo Address 2-11-14 Date
Signature DON STIMSON Printed Name	2100 SLACK ST - SLO 93405 Address 02/11/14 Date
Signature Helen L. Wiens Printed Name	241 HENDERSON SLO 93405 Address 2-11-14 Date
Signature RICHARD A. WIENS Printed Name	241 HENDERSON AVE 93405 Address 2/11/14 Date
Signature Gail Anderson Printed Name	1362 Tanglewood Dr. Address 2-11-14 Date
Signature Eve Neuhaus Printed Name	2031 McCollum St. Address 2-11-14 Date
Signature RoAnn McConnell-Blackwell Printed Name	275 Buena Vista Address 2-10-14 Date
Signature Michael J. Conway Printed Name	275 Buena Vista Address 2-11-14 Date
Signature KENNETH E. SCHWARTZ Printed Name	201 BUENA VISTA, SAN LUIS OBISPO Address 2.11.14 Date

2

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Linda H. Bishop / LINDA H. BISHOP	100 Henderson Ave. SLO / 2/10/14
Donley Winger / Donley Winger	2041 Hays St. SLO / 2/10/14
Carol Winger / Carol Winger	2041 Hays St SLO / 2/10/14
Martha J. Lindholm / Martha J. Lindholm	246 Henderson Avenue SLO. / 2/10/14
Patricia Dodette / PATRICIA DODETTE	1845 HAYS SLO / 2/10/14
Kathryn M. Chapman-Scurria / Kathryn M. Chapman-Scurria	1844 Hays St. SLO / 2/10/14
Phyllis Braiotta / Phyllis Braiotta	#844 Hays St / Feb. 10, 2014
K Crozier / KRISTINE CROZIER	141 Gravelaine / 2/10/14
Tracy Eby / TRACY EBY	230 Henderson Ave / 2/10/14
Karen Blake / KAREN BLAKE	292 GRAND AVE / 2-10-2014

3

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
C. Sullivan Carmen Sullivan	190 Henderson Ave. SLO Ca 93405 2/11/14
Gordon Phares	281 Kentucky Street 2/12/14
Carolyn Phares CAROLYN PHARES	281 Kentucky Street 2-12-14
Edward R Oliveira EDWARD R. OLIVEIRA	1889 McCollum St SLO 2-12-14
Sandra Furtney Sandra Furtney	2044 Hope Street SLO 2/13/14
Jane Batterson Jane Batterson	2045 Hope SLO 2/13/14
Ron Batterson Ron Batterson	2045 Hope SLO 2/13/14
Aaron P Kaplan Aaron P. Kaplan	2049 McCollum 2-14-14
Bernita L Myers DERNITA L. MYERS	1965 HOPE ST. S.L.O. 2-14-2014
Darrell N. Voss Darrell N. Voss	188 Hathway Ave., SLO, CA 93405 2-15-14

4

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name: Lisa K. Moreno	Date: 2/15/14
Signature: Lisa Moreno	Address: 188 Hathway Ave. SLO, CA. 93405
Signature	Address: 2061 Hope St.
Printed Name: Lisa Batterson	Date: 2/15/14
Signature	Address: 2085 HAYS ST
Printed Name: JANET D BURT	Date: 2/15/14
Signature	Address: 2085 HAYS ST
Printed Name: Wallace H. Burt WALLACE BURT	Date: 2/15/14
Signature	Address: 2084 Hays St
Printed Name: Karen Lauritsen	Date: 2/15/14
Signature	Address: 2084 HAYS ST
Printed Name: DOUGLAS N. IRION	Date: 2-15-14
Signature	Address: 2076 HAYS ST. SLO. 93405
Printed Name: LAUREL DAVAR	Date: 2-15-14
Signature	Address: 2076 HAY ST. SLO 93405
Printed Name: LAUREL DAVAR	Date: 2-15-14
Signature	Address: 2061 Slack St SLO 93405
Printed Name: Ludmila Bryan	Date: 2/15/14
Signature	Address: 1814 Hays St
Printed Name: Michael Serrin	Date: 2/15/14

5

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Signature JED B. BLAKE Printed Name	292 GRAND AVE. Address 02-15-2014 Date
Signature IONE DONATI Printed Name	Address 1990 HOPE ST Date 02-15-2014
Signature Dan Donati Printed Name	412 Mitchell Dr Address 2/15/14 Date
Signature Patricia Miller Printed Name	1962 Hope ST. SLO, CA 93405 Address 2-15-14 Date
Signature Kylee Jacobson Printed Name	2254 Santa Inez Address 2-16-14 Date
Signature JUNE M. RODRIGUEZ Printed Name	3255 Santa Ynez Ave SLO. 93405 Address 2/16/14 Date
Signature ROBERT SALEM Printed Name	2106 SANTA YNEZ Address 2-17-14 Date
Signature MARIE CALDERA Printed Name	455 Buena Vista Ave Address 2/17/2014 Date
Signature Sharon L. Lougy Printed Name	495 Buena Vista Ave Address 2/17/2014 Date
Signature Jeffrey Prostovich Printed Name	495 Buena Vista Ave Address ~~SC~~ 2-17-14 Date

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Signature Printed Name: FARI ANSARI	Address: FLORA ST Date: 2/26/14
Signature Printed Name: Robert W. Gloman	Address: 860 CHURCH ST SLO CA 93401 Date: 2/26/14
Signature: Katherine W Garner Printed Name: Katherine W. Garner	Address: 256 Chalon DR SLO Date: 2/26/14
Signature: Judith Bartels Printed Name: JUDITH BARTELS	Address: 1121 Iris St SLO, CA 93401 Date: 2-26-2014
Signature: Tracy Burton Printed Name: Tracy Burton	Address: 128 Hermosa Dr. Pismo Beach 93449 Date: 2-26-14
Signature: Mary Thompson Printed Name: MARY THOMPSON	Address: 1197 Lexington SLO CA 93401 Date: 26 Feb 14
Signature: Nancy Bruno Printed Name: NANCY BRUNO	Address: 528 Mason Way Date: 2/26/14
Signature: Leola Dublin Macmillan Printed Name: Leola Dublin Macmillan	Address: 1021 Southwood Drive SLO, CA 93401 Date: 2/26/14
Signature: Constance A McNoble Printed Name: Constance A McNoble	Address: 430 Dana St SLO 93401 Date: 2/26/14
Signature: Dorothy Edminster Printed Name: DOROTHY EDMINSTER	Address: 354 Woodbridge SLO 93401 Date: 2-26-14

4

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
George O French / George O French, M.D	125 Longview Lane SLO / 2/26/2014
Alice Thomas	250 Oak Park Blvd. AG. 93420 / 2-26-14
Jonathan Howard	978 Valencia Ct SLO / 2/26/14
Ginny Pekar	Alta Mira Lane SLO / 2/26/14
Diane N. Duenow	1443 Osos St, SLO 93401 / 2/26/14
Susan Pyburn	1061 Grove St. SLO 93401 / 2/26/14
Elaine Townsend	531 Lawrence Dr. 93401 / Feb. 26 // 2014
Holly Lindenthaler	1012 Vista Collados SLO 93401 / 2/26/14
Kay L. Emmons	2237 Bushnell St 93401 / 2-26-14
Traviyanne Dye	1326 San Marcos Ct / 2-26-14

9

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature Linda White	Address 2077 Slack St.
Printed Name LINDA White	Date 2/22/2014
Signature Audrey Keylon	Address 555 Fresno AV Morro Bay
Printed Name Audrey KeyLon	Date 2-22-2014
Signature Thomas J. Keylon	Address 555 FRESNO AV, MORRO BAY 93442
Printed Name THOMAS J. KEYLON	Date 2-22-14
Signature Joan M. Judson	Address 1616 Highland Dr. SLO, CA 93405
Printed Name Joan M. Judson	Date 2-22-14
Signature Andie Judson	Address 1444 Santa Rosa St. #A, SLO, CA, 93401
Printed Name Andie Judson	Date 2-22-14
Signature Sheila Spector	Address 1209 Nipomo St SLO, 93401
Printed Name Sheila Spector	Date 2-26-14
Signature Wanda Patton	Address 3038 Bahia Ct. SLO 93401
Printed Name Wanda Patton	Date 2-26-14
Signature [illegible]	Address Buen Tiempo SLO
Printed Name	Date
Signature [illegible]	Address 206 Albert Dr SLO 93401
Printed Name LOUIS M. TEDONE	Date 2/26/2014
Signature Mary Lee Waggoner	Address 3915 Hollyhock Way, SLO 93401
Printed Name Mary Lee Waggoner	Date 3/3/14

10

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Jocelyn Roeder Signature	6082 Pebble Beach Way, SLO Address
Jocelyn ROEDER Printed Name	2/25/14 Date
Carol Grosse Signature	1369 San Marcos Ct, SLO CA. Address
CAROL GROSSE Printed Name	2-25-14 Date
Joan M. Kunkler Signature	3500 Bullock #79 SLO Address
JOAN M. Kunkler Printed Name	Feb. 25, 2014 Date
[signature] Signature	1369 San Marcos Ct, SLO Address
ROBERT GROSSE Printed Name	FEB 25, 2014 Date
[signature] Signature	Address
Silvio Cadamasso Printed Name	3164 Flora SLO 93401 Date 2/25/14
Margie Walters Signature	1784 Royal Way Address
Margie Walters Printed Name	2/25/14 Date
Barbara Mintz Signature	490 Henderson, San Luis Obispo CA Address
Barbara Mintz Printed Name	2/25/14 Date
Gerald Mintz (Vandalism victim) Signature	490 HENDERSON AVE 93405-2032 Address
GERALD MINTZ Printed Name	Feb 25-2014 Date
[signature] Signature	6 PERLA LANE SLO Address
JB BATES Printed Name	2-25-2014 Date
Gay Hull Signature	950 Huasna Rd Address
Gay Hull Printed Name	2-25-14 Date

11

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Verena Dvon Engel Verena D von Engel	1638 Hillcrest Pl. SLO 93401 Feb 27 - 2014
Suzanne H. Smith Suzanne H. Smith	1174 Lexington Ct. SLO 93 Feb. 28, 2014
Holly L. Longstaff Holly L. Longstaff	1410 Island Ct. Oceano 93445 Feb. 28 2014
Marian E French-Gray Marian E. French-Gray	530 Karl Ct., Nipomo, 9344 2-27-14
June F Finchor June F Finchor	Feb 28, 2014 1070 Vista del Caballos SLO 934[illegible]
Leonard W. Wall Leonard W. Wall	
Deborah Kastner DEBORAH KASTNER	1274 Sumac Court SLO 2/28/01
[signature] LINDA SNYDER	2077 SLACK ST, SLO 2/28/2014
Patricia A. Bennett PATRICIA BENNETT	9315 SANTA CLARA, ATASCADERO 3/10/14
Susan E McKee Susan E McKee	3415 Sequoia ST. SLO 3/10/14

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
MARY Kleeman / Mary Kleeman	3427 Sequoia Dr. SLO / 3/10/14
Anna P. Mesmar / Anna P. Mesmar	2391 Lawton Ave SLO / 3-10-14
Jennifer Bauer / Jennifer Bauer	4575 Spanish Oaks Dr. SLO / 3-10-14
Doree O'Connell / Doree O'Connell	1446 Ironbark St. SLO / 3/10/2014
Dottie Thompson / Dottie Thompson	1222 Vista Del Lago - SLO 93405 / 3-10-14
Kate Sarey / Kate Sarey	1509 Southwood Dr SLO 93405 / 3/10/14
Glynis Inohara / Glynis Inohara	/
Michelle Stevens / Michelle Stevens	2000 PIXLINI SLO / 3/10/14
Dorothy McLean / Dorothy McLean	3-11-14 / 1650 Corava CT SLO
Michiko Maisenbacher / Michiko Maisenbacher	1315 Aralia Ct. / 3-12-14

13

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Carolyn J. Smith CAROlyn J. Smith	1568 Cucaracha Ct. - SLO 02/19/2014
LaVerne Storni LA Verne Storni	1490 Smith St SLO. Ca 93401 2-19-14
Debra Farwell Debra Farwell	1551 Palm St, SLO. Ca 93401 2-19-14
Sharon Whitney	216 Albert Dr, SLO 2-19-14
Odile Aybal ODILE AYBAL	300 Ferrini, SLO 93405 2-19-14
Karen L. Adler Karen L. Adler	1676 Fredericks St, SLO 93405 2-19-14
Sandra Rowley SANDRA ROWLEY	3107 Flora St 2-19-2014
Frank Kovak FRANK KASSAK	295 Cerro Romauldo SLO 2-19-14
Maureen A Dresp MAUREEN A. DRESP	23 Vista Lane SLO 93401 03.13.14
Janet Salem JANET SALEM	2106 Santa Inez Ave San 3-13-14

14

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Signature: [signature] Printed Name: CHARLIE FURTNEY	Address: 2044 Hope St, SLO, 93405 Date: 3/10/2014
Signature: Lucille C Mudgett Printed Name: Lucille C Mudgett	Address: 318 Buena Vista Ave Date: 3-13-14
Signature: Kristoffer Hans Pfister Printed Name: Kristoffer Hans Pfister	Address: 3960 S. Higuera St. Sp. 67 SLO, CA 93401 Date: 3-15-14
Signature: James C. Polk Printed Name: JAMES C. POLK	Address: 780 SERRANO DR. SLO Date: 3-15-14
Signature: [signature] Printed Name: ROBERT CHRISTENSON	Address: 2469 JOHNSON, SLO 93401 Date: 3/15/14
Signature: [signature] Printed Name: JOHN L. CRAIG	Address: 1680 DIABLO DRIVE 93405 Date: 3/15/2014
Signature: James P. Vaughan Printed Name: JAMES P. VAUGHAN	Address: 395 GRAND AVE. SLO 93405 Date: 3/15/14
Signature: [signature] Printed Name: ROBERT G. GROSSE	Address: 1369 SAN MARCOS COURT SLO 93401 Date: March 15, 2014
Signature: Michael Drez Printed Name: Michael Drez	Address: 1750 Prefumo Cyn Rd. #91 SLO, CA Date: 3/15/14
Signature: [signature] Printed Name: THOMAS W. NEUHAUS	Address: 2021 McCOLLUM ST SLO CA Date: 3/15/14

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature: [signature]	Address: 415 Dana · SLO 93401
Printed Name: Vicki Tucker	Date: 3-3-2014
Signature: [signature]	Address: 3960 S. Higuera Sp 162 SLO 93401
Printed Name: MAUREEN JONES	Date: 3-6-14
Signature: Tom LUGINBILL	Address: 415 DANA St #2 SLO 93401
Printed Name: Tom Luginbill	Date: 3-6-14
Signature: [signature]	Address: 1226 Manzanita Way SLO, 93401
Printed Name: Heather Warnke	Date: 3/7/14
Signature: [signature]	Address: 6078 [illegible] SLO, CA 93401
Printed Name: Judi L Riener	Date:
Signature: [signature]	Address: 330 Castillo Rd SLO 93405
Printed Name: Gladys C. Porter	Date: 3-11-14
Signature: [signature]	Address: 1577 Brookwood SLO
Printed Name: Janet Kourakis	Date: 3-11-14
Signature: ~~[illegible]~~	Address: Duplicate ~~[illegible]~~
Printed Name: ~~[illegible]~~	Date: ~~[illegible]~~
Signature: [signature]	Address: 1300 Santa Cruz Rd.
Printed Name: Kevin French	Date: 3/12/14
Signature: [signature]	Address: [illegible]
Printed Name: [illegible] A. [illegible]	Date: 3-17-14

16

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name: RYAN PALO	Date: MARCH 04, 14
	1555 SLACK ST. SLO, CA 93405
Tori Norville	1555 Slack St. SLO, CA 93405
Printed Name: Tori Norville	Date: March 5, 2014
Dylan George Sauer	1555 Slack St., SLO, CA 93405
Printed Name: Dylan George Sauer	Date: 3/5/14
Michelle Fantozzi	1555 Slack St, SLO, CA 93405
Printed Name: Michelle Fantozzi	Date: 3/5/14
	1555 SLACK ST SLO 93405
Printed Name: LAWRENCE YUN	Date: 3/5/14
	1555 Slack St. San Luis Obispo
Printed Name: Kenneth J Staal	Date: 3/5/14
	465 Pismo St, E San Luis Obispo
Printed Name: Dominica Dawson	Date: 3/9/14
	151 Foothill Blvd, SLO
Printed Name: Jenny Greene	Date: 3/17/14
	Diablo 27, 1 Grand Ave, SLO
Printed Name: Kyle McCarry	Date: 3/13/14
	Palomar 5, 1 Grand Avenue, SLO
Printed Name: Mike Nothern	Date: 3/13/14

17

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature: Rachel Staal	Address:
Printed Name: Rachel Staal	Date:
Signature:	Address: 1860 [redacted] Canyon Circle
Printed Name: JACK VILLUIS	Date: 3/14/14
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:
Signature:	Address:
Printed Name:	Date:

18

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name: ROGER H. BISHOP	Date: 2/22/2014

Signature	Address: 635 Buckley Road, SLO.
Printed Name: Linda Jankay	Date: Feb. 11, 2014

Signature	Address: 635 Buckley
Printed Name: Peter Jankay	Date: March 19, 2014

Signature	Address: 11844 Los Osos Valley Road SLO
Printed Name: Conrad Mendoza	Date: 3/20/14

Signature	Address: 5245 Palma Atascadero
Printed Name: DAVID. KUBUA	Date: 3/20/14

Signature	Address: 13914 Royal Way
Printed Name: Lois Scriven	Date: 20 March 14

Signature	Address: 469 CHORRO ST.
Printed Name: Derek Sisting	Date: 3/20/14

Signature	Address: P.O Box 642 Oceano CA 93475
Printed Name: CATHLEEN LEWIS	Date: 3-20-14

Signature	Address: 5275 Allendale Ave, Atas CA 93422
Printed Name: Alma Rodriguez & Family	Date: 3.20.2014

Signature	Address: 4445 Corral de Piedra, SLO 93449
Printed Name: Kathleen Tufel	Date: 3/20/2014

19

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Roger H. Bishop	100 Henderson Ave, SLO 2/22/2014
Linda Jankay	605 Buckley Road, SLO. Feb. 11, 2014
Peter Jankay	635 Buckley March 19, 2014
Donna L Jones	43 El Mirador Ct SLO 93401 3/20/14
Marcia L. Lindvall	2320 Camino Colina SLO 93401 3/20/14
Terry Comer	5160 Olmeda Ave, Atascadero, Ca 93422 3/20/14
Karla Quiroga	83 S Tassajara Dr. SLO 3.20.14

Previous Page

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Printed Name	Address	Date
Evelyn Justesen	Evelyn Justesen	2065 McCollum St SLO 93405	3/15/14
North Keene	NORTH KEENE	231 Buena Vista Ave.	03-15-14
Julia E. Hickey	JULIA E. HICKEY	345 Buena Vista.	3-15-14
Barbara Jauregui	Barbara Jauregui	2280 Santa Inez Ave	3-14-14
Karla Carichner	Karla Carichner	343 Santa Maria Ave	3-15-14
D.C. Harlan	David Craig Harlan	155 Buena Vista Ave	March 15, 2014
Sallie Harlan	Sallie Harlan	155 Buena Vista	March 15, 2014
James R Duncan	James R Duncan	1443 OSOS SLO CA	3/17/14
Kathy apRoberts	Kathy apRoberts	251 Twin Ridge, SLO	3-18-14
James apRoberts	James apRoberts	251 Twin Ridge SLO	3-18-14

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name: Russell H Hall	179 Longview Ln SLO Date: 19 mar 14
Signature Printed Name: CHARLES R. KENDRICK	2330 SANTA YNEZ SLO Date: 3/20/14
Signature Printed Name: DIANNE POORE	1874 McCollum ST, SLO Date: 3-22-14
Signature Printed Name: Jeanette Gonzalez	1739 Frederick's Street San Luis Obispo, CA 93405 Date: 3-24-14
Signature Printed Name: Ingrid Frokjer	4587 Waverree St SLO CA 93401 Date: 3/24/14
Signature Printed Name: Kent D. Smith	Address: 2090 McCollum San Luis Obispo, CA Date: 3/25/2014
Signature Printed Name: Dorothy A. Smith Dorothy Smith	Address: 2090 McCollum SLO, Ca Date: 3/25/2014
Signature Printed Name: Joe Arsenio II	Address: 2053 Hays ST. Date: 3/25/14
Signature Printed Name	Address Date
Signature Printed Name	Address Date

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name: Stephanie S. Conner	Date: Feb 19, 2014
Signature: Terry W. Conner	Address
Printed Name: TERRY W. CONNER	Date
Signature: Terry W Conner	Address: 215 ALBERT. DR
Printed Name: Terry W. CONNER	Date: FEB. 19, 2014
Signature	Address: 163 Longview Ln SLO
Printed Name: John Whilton	Date: Feb 20, 2014
Signature: Sherrill A. Lewis	Address: 209 Longview Lane 93405
Printed Name: Sherrill A. Lewis	Date: 2-20-2014
Signature: Robert Cummings	Address: 209 Longview Lane 93405
Printed Name: ROBERT CUMMINGS	Date: 2-20-2014
Signature	Address: 209 Longview, SLO, 93405
Printed Name: LINDA DUGGAN	Date: February 20, 2014
Signature: Harold L. Ehlers	Address: 249 Longview Lane
Printed Name: Harold L. Ehlers	Date: 2/20/14
X Signature: Dorothy E Rasmussen	Address: 249 Longview Lane
Printed Name: Dorothy E. Rasmussen / Dorothy E. Rasmussen	Date: 2/20/14
Signature: Melody Bragg	Address: 1429 SLACK ST SLO
Printed Name: MELODY BRAGG	Date: 2/20/14

25

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Printed Name	Address	Date
Michele G. Hall	Michele G. Hall	179 Long View	2/20/2014
J. Lawler	J. Lawler	122 Countryside Lane SLO	2/27/14
Carol A. Spaan	Carol A Spaanman		2-28-14
Eva Young	EVA YOUNG	139 Longview Lane, SLO, 93405	3/13/14
Jessi Foster	Jessie Foster	252 Albert Dr	3/13/14
Marilyn Leverich	Marilyn Leverich	258 Albert	3/13/14
Carolyn Clanin	CAROLYN CLANIN	3-13-14 / 296 ALBERT D	
Sharon G Whitney	~~Sharon G Whitney~~	216 Albert Drive, SLO / March 13, 2013 duplicate	
Dorothy E. Conner	DOROTHY E. CONNER	216 Albert Dr, SLO, 93405	March 13, 2014
Laurel G Smith	Laurel G Smith	163 Longview Ln, 93405	March 12, 2014

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature / Printed Name	Address / Date
Signature GONZALO CHAVEZ Printed Name	350 TOLOSA WAY, SLO CA 93405 Address 2-12-14 Date
Signature VIRGINIA JENSEN Printed Name	1278 12TH ST. Los Osos CA 93402 Address FEB 12 2014 Date
Signature TERRI BAKER Printed Name	P.O. BOX 1249, GROVER BEACH 93483 Address 2/12/14 Date
Signature WANDA McDONALD Printed Name	1605 Hells Bond. Santa Maria 93455 Address Date
Signature Beth Ralston Printed Name	542 Matilija Ln AG 93420 Address 2/12/14 Date
Signature RICHARD MANSFIELD Printed Name	12905 SANTA LUCIA Rd 9342 Address 2-13-14 Date
Signature JoAnn Sasso Printed Name	P O BX 1098 Nipomo CA 93444 Address 2-13-14 Date
Signature Frederick M. Andersen Printed Name	1405 Slack St, SLO, CA 93405 Address 02/12/2014 Date
Signature PAULA ANDERSEN Printed Name	PO BOX 1022 Pismo Beach, CA 93448 Address 2-13-14 Date
Signature JUDY WEST Printed Name	1278 12th street Los Osos Address 2-16-2014 Date

25

TE

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Printed Name	Date
J. Porter	461 FLORIDA SLO, 93401
Ann Porter	3/15/14
Paul Porter	" "
PAUL D PORTER	" "
Kathryn L. Evans	271 LONGVIEW LN. SLO 93405
KATHRYN L. EVANS	3-17-14
John H Evans	271 Longview.
John H Evans	3-17-14
Shirley R Somogyi	
SHIRLEY SOMOGYI	
Rosemary Somogyi	

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Printed Name	Address	Date
[signature]	Mickie Clem	459 Woodbridge St	459 Woodbridge St
Mary Mulineau	Mary Mulineau	1324 Ella St. SLO	3/12/14
[signature]	James C. Sawyer	3038 Bahia Ct SLO	3/12/14
[signature]	J. French, Jr.	9300 Santa Cruz Atas, CA 93422	3/12/14
Amparo Del Real	Amparo Del Real	1837 Thelma Dr San Luis Obispo	3/19/2014
James Shea	James J. Shea	1256 Pismo St 93401	3/21/2014
Nicolette Hightower	NICOLETTE HIGHTOWE	4990 Caballeros 93401	3/20/14
Elna [illegible]	ELNA [illegible]		
[illegible]	[illegible]	[illegible]	[illegible]

27

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Austin Bertucci	250 Grand Avenue
Printed Name: Austin Bertucci	Date: 3/8/14
Signature	Address: 250 Grand Ave
Printed Name: Richard Galati	Date: 3/8/14
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date

28

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Printed Name	Address	Date
Susan Applegarth	Susan Applegarth	185 Penman Way San Luis Obispo 93405	3-15-2014
Susan Applegarth	Susan Applegarth aa	185 Penman SLO	3-15-2014
Alfred Applegarth aa	Alfred Applegarth aa		
Susan Applegarth	Susan Applegarth	185 Penman Way San Luis Obispo CA 93	3-15-2014
Alfred Applegarth	Alfred Applegarth		
Alfred Applegarth	Alfred Applegarth	185 Penman Way San Luis Obispo CA 93	3-15-2014
Jennifer Applegarth	Jennifer Applegarth	185 Penman Way San Luis Obispo CA 93405	3-20-2014
Joanne M Mullis	Joanne Mullis	2691 Del Mar Ct San Luis Obispo CA 93405	3-21-2014
James M Mullis	James Mullis	2691 Del Mar Ct. San Luis Obispo CA 93405	3-21-2014
Clara Applegarth	Clara Applegarth	~~[illegible]~~ 185 Penman Way San Luis Obispo CA 93405	3/22/14

27 NOTE - SIGNERS had difficulty with signature line before Printed name.

THM-58 (continued)

WE, THE UNDERSIGNED, ARE UNITED IN OUR OPPOSITION TO THE LOCATION OF THE 1475-PERSON DORM COMPLEX PROPOSED FOR GRAND AVE. AND SLACK ST.

Signature	Address
Nick Cirone	405 Buena Vista
Printed Name	Date
	2/17/14
Signature	Address
Paul H. Allen III	191 Lunesta Drive
Printed Name	Date
	3/19/14
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date
Signature	Address
Printed Name	Date

AGENDA CORRESPONDENCE
Date 3-25-14 Item# 7h

MAR 27 2014
SLO CITY CLERK

Submitted by Laura White

Good Evening. My name is Laura White and I live at 2299 Santa Ynez in Monterey Heights. I was born in San Luis Obispo and raised on Slack St. My father graduated from Cal Poly. My brother graduated from Cal Poly. I graduated from Cal Poly with degrees in Psychology and Philosophy. In May, I will graduate from the Cuesta College Nursing program.

THM-59(a)

I recently attended the Brian Lawler exhibit at the San Luis Museum of Art and these two photos on display are prints of his work. This is what we are trying to preserve, our views of the incomparable Morros, peaks and foothills not only for ourselves but for the entire community and visitors.

The close up photo of the Poly Campus very graphically shows the low lying single family homes that will be towered over by seven, 5-story towers the equivalent of six Walmarts. The new towers will even dwarf the existing 3-story on-campus dorms on Grand Ave.

Cal Poly definitely needs more on-campus housing but this project is not compatible next to an R-1 neighborhood. I would support this project if it was located within the campus rather than adjacent to the City.

In e-mail communications with Brian Lawler, who is also a photography instructor at Cal Poly, it was discovered that he had been a neighbor on McCollum St. for 22 years. However, the influx of students into our neighborhood prompted his move from my neighborhood.

THM-59(b)

Brian Lawler and many of my neighbors are reacting to a phenomenon known as *Studentification*. Simply, Studentification is a key process that transforms neighborhoods within cities with Higher Education Institutions. Studentification brings economic opportunities for these areas, but also issues of social conflict with existing residents, as well as visual and noise pollution.

Studentification is too important an issue to discuss in three minutes so I have copies of some articles that discuss Studentification in detail for your use. I also have links to other studies on Studentification. We need to work aggressively to preserve our Alta Vista/Monterey Heights Neighborhood Wellness which is one of the stated goals of this City Council. Studentification needs to be included in responding to this EIR.

Thank You.

http://www.universitiesuk.ac.uk/highereducation/Documents/2006/StudentificationGuide.pdf
http://www.statecollegepa.us/DocumentCenter/Home/View/1738
http://www.statecollegepa.us/index.aspx?NID=2059
http://www.cityofeastlansing.com/Home/Departments/Police/ImportantOrdinances/
http://www.cityofeastlansing.com/Home/Departments/PlanningBuildingDevelopment/ResidentialRentalRestrictionOverlayDistrict/

THM-59 (continued)

GEOGRAPHY

CARDIFF CASE STUDIES

CARDIFF UNIVERSITY
PRIFYSGOL CAERDYDD

Case Study: Studentification

Author: Dr. Jon Anderson

Year: 2013

INTRODUCTION

'Studentification': ***the process by which specific neighbourhoods become dominated by student residential occupation.***

The term 'studentification' was established by Smith (2002) to describe the growth of high concentrations of students within the localities of Higher Education Institutions, often accommodated within Houses of Multiple Occupancy (HMOs), but increasingly in purpose built student flats. According to the Higher Education Statistics Agency, in 2011-12 there were 2,496,645 students in higher education, and 1,928,140 of these were undergraduates (www.hesa.ac.uk).

FINDINGS

There are four dimensions to the studentification process:

- **Social:** the replacement and/or displacement of established residents with a transient, generally young and single, social grouping
- **Cultural:** the growth of concentrations of young people with shared cultures and lifestyles, and consumption practices, which in turn results in the increase of certain types of retail and service infrastructure
- **Physical:** the downgrading or upgrading of the physical environment, depending on the local context;
- **Economic:** the inflation of property prices and a change in the balance of the housing stock resulting in neighbourhoods becoming dominated by private rented accommodation and houses in multiple occupation, and decreasing levels of owner-occupation.

On the whole, students tend to increase the levels of spending in the local economy and improve the opportunities for spin-off companies, educational, cultural and other arts events, concerts and performances, sporting events and facilities and so on. However, the negative effects of 'studentification' are evident in several towns and cities across the UK. These are inter-connected and can be summarised in the following way:

Social effects

In line with the geographic trend of the concentration of social groups in society, some common perceptions of change in student areas point to an increase in low level anti-social behaviour. This can sometimes include issues such as noise nuisance emanating from houses, streets or gardens, vandalism of vehicles, street furniture, private property, and vomiting and urination in the streets. Of course, such behaviour is not synonymous with students per se, but more widely linked to some youth cultures and increasing behaviour within wider society.

Cultural effects

Many of the challenges associated with 'studentification' are a result of different cultures clashing. Whilst social, economic and physical changes may be the key concerns of local community groups during the early

THM-59 (continued)

phases of 'studentification', research has shown that when large communities of students become deeply embedded within a location, significant cultural change may occur. The expansion of HMOs in traditional owner-occupied, family areas can lead to a change in the nature of communities. Transient occupation engenders a lack of community integration and cohesion and less commitment to maintain the quality of the local environment and there develops a gradually self-reinforcing unpopularity of the area for families wishing to bring up children.

Physical effects

There can be physical disadvantages of having large concentrations of students in a neighbourhood. A general decline in the proportion of owner-occupiers can lead to physical changes including generally unkempt properties, squalor and dereliction. Such neighbourhoods can also suffer more permanent 'street blight', which may include estate agents' letting boards, neglected/concreted over front gardens and unsightly extensions. Large concentrations of young people living in households with a high density can contribute to physical mess and noise, increased pressure on public services (policing, cleansing, etc) and traffic problems.

There are key geographies to studentification:

> *"In Cardiff, students tend to share three and four bedroomed terraced housing although in the popular Roath areas there are larger houses that can accommodate up to nine students... Lincoln's students tend to be in two and three bedroomed terraced housing...In Tower Hamlets, the properties tended to be a mix of terraced houses, flats and 1960s maisonettes..."* (Rugg et al., 2000, p. 19).

In some areas the consequences of studentification have been reported to be nothing short of catastrophic:

> *"Undergraduates have moved into areas of Britain's big cities, ripping the heart out of communities and leaving devastation... As student numbers have grown, so parts of Leeds, Birmingham, Nottingham and Newcastle have been taken over by a transitory population of young people who aren't interested in tending the gardens or cutting the hedges. Moreover, they keep odd hours, throw late-night parties and spend much of their time elsewhere... Some streets resemble slums; the roads are potholed and litter-strewn, the grass uncut and the fences broken"* (The Independent 2004, page 11).

CONCLUSIONS

Studentification is a key process that transforms neighbourhoods within cities with Higher Education Institutions. Studentification brings economic opportunities for these areas, but also issues of social conflict with existing residents, as well as visual and noise pollution. Some areas of cities are becoming 'student ghettoes', which are thriving during term time, but 'ghost towns' over the summer.

References

Sage, J., Smith, D., Hubbard, P. 2012 The Diverse Geographies of Studentification: Living Alongside People Not Like Us. *Housing Studies*, 27 (8), pp. 1057-1078.

Sage, J., Smith, D., Hubbard, P. 2012 The rapidity of studentification and population change: There goes the (Student)hood. *Population, Space and Place*, 18 (5), pp. 597-613.

Hubbard, P. 2008 Regulating the social impacts of studentification: A Loughborough case study. *Environment and Planning A*, 40 (2), pp. 323-341.

Holmes, D. 2007 Practical geography: Investigating 'studentification'. *Geography Review*, 21 (1), pp. 12-15.

Rugg, J., Rhodes, D. & Jones, A. (2000) The Nature and Impact of Student Demand on Housing Markets. (York: York Publishing Services for the Joseph Rowntree Foundation).

THM-59 (continued)

National HMO Lobby

Symptoms of Studentification

RISE OF PROBLEMS

Social Problems

01 Anti-Social Behaviour: endemic low-level ASB, including noise nuisance, minor vandalism, evacuation.
02 Crime: high rates, especially burglary.
03 Insurance: owners pay top premiums for house, contents, vehicle insurance.

Environmental Problems

04 Squalor: surrounded by litter, rubbish, flytipping.
05 Dereliction: neglect of houses and gardens, development of houses and gardens.
06 Street Blight: letting boards, flyposting, grilles.

Economic Problems

07 Distorted Retail: orientation towards a very specific market, manifest in the particular range of lines in shops, and the range of retail outlets (especially increased numbers of pubs, take-aways and letting agencies).
08 Fluctuating Market: from high demand (term) to low demand (vacation).
09 Casualised Employment: local employment becomes increasingly seasonal (term) and part-time (evening).

Generic Problems

10 Carparking: obstructs pavements for pedestrians, and access by emergency vehicles, cleansing, buses, and residents.
11 Services Overwhelmed: not only disproportionate demands on public services like cleansing and policing, housing and planning, but also indirectly the drain of resources away from provision in other areas [and neither students nor landlords pay Council Tax or Business Tax].

DECLINE OF COMMUNITY

12 Decimation: student demand gives rise to high property prices and low amenity, encouraging emigration and making immigration almost impossible, with the result that there are fewer elders (retaining past memories), fewer adults (present activists) and fewer children (the community's future).
13 Disruption: most owners and occupiers are absentees (hence disengaged), the young and the old especially are isolated (losing their peers), and the neighbourhood loses its social capital or 'community spirit' (its social networks, social norms and social sanctions).
14 Distress: deep and rapid changes are felt acutely: the population imbalance itself is stressful (public oppression, private isolation), the declining amenity is alienating (fear of crime, revulsion from squalor, exclusion by the economy), and residents feel anger and despair at their disempowerment.
15 Services Underwhelmed: school closures (ironically, reducing education).

National HMO Lobby
June 2005

THM-59 (continued)

National HMO Lobby
email: hmolobby@hotmail.com website: www.hmolobby.org.uk

THM-59
(continued)

National HMO Lobby

Home
What is a HMO?
Local HMO Plans
Ten Point Plan

Lobby
Aims
Constitution
Members
Regions
History
Papers

Leeds HMO Lobby
Nottingham Action Group

Lobbying
National Developments
Sustainable Communities
Use Classes Order
HMO Licensing
Taxation of HMOs
Students & Community

Contact
National HMO Lobby
Links

What is a HMO?
Briefing Paper

What is a '**HMO**'? When the National HMO Lobby began lobbying in 2000, we said, "There is a short answer, and a long answer. The short answer is that 'HMO' (sometimes 'HIMO') stands for 'house in multiple occupation'. The long answer is that there is no short answer, it all depends on your perspective, on where you stand (in some respects, this is quite literally the case, as different parts of the UK give different answers)."

After ten years of lobbying, however, a consensus has been achieved. The **common-sense** answer is that a HMO is a house shared by a number of unrelated people (like a shared student house). But all three components are debatable – what constitutes a *house*? what qualifies as a single household, in contrast to *multiple*? what counts as *occupation*? (For instance, in the notorious Barnes versus Sheffield case of 1995 the court ruled that a house shared by five students was deemed not to be a HMO as they were living as a single household.) However, throughout the UK, there is now basic agreement, and the debatable components have been clarified. Broadly, a HMO is 'a dwelling shared by three or more unrelated people.'

In **housing** terms, the concept of HMO was introduced by the Housing Act 1985, where Section 345 identifies HMO as a house occupied by persons who do not form a single household. But the Act did not define this term. The Housing Act 1996 (Part II) enabled local authorities to register HMOs – but it still failed to define what they were. The new government of 1997 was elected on a manifesto commitment to license HMOs, and in 1999 a Consultation Paper was published on *Licensing HMOs in England & Wales*. Finally, the Housing Act 2004 provided for licensing, and introduced a lengthy definition – effectively, any house (or flat) which is the main occupation of three or more people who are not a single household (i.e. family) sharing amenities. (There are certain qualifications and exceptions: see Sections 77 and 254-259 and Schedule 14 of the Act.) (Only larger HMOs are subject to mandatory licensing. Local authorities currently have to apply to the government for additional licensing of other HMOs in designated areas; but the government is consulting on giving councils a general consent to do so.) The Act applies in England & Wales, from 6 April 2006. [The National HMO Lobby has produced a *Notification* Form for residents to notify their local authority of HMOs liable to licensing.]

In the mean time, HMO licensing was introduced in Scotland by the Civic Government (Scotland) Act 1982 (Licensing of Houses in Multiple Occupation) Order 2000 (Scottish Statutory Instrument 2000 No. 177). Here, HMO is defined as "a house (or flat) occupied by more than two persons, who are not all members either of the same family or of one or other of two families." All HMOs are subject to licensing. (Part 5 of the Housing (Scotland) Act 2006 consolidates the definition and licensing in primary legislation; implementation is anticipated in 2007.) In Northern Ireland, HMOs were defined in the Housing (Northern Ireland) Order 2003 (SI 2003 412) as "a house occupied by more than two persons, who are not all members of the same family." (The following year, the Statutory Registration Scheme for Houses in Multiple Occupation in

THM-59 (continued)

Northern Ireland 2004 came into effect, wherein all HMOs in five designated HMO Action Areas must be registered, as well as all HMOs with more than ten occupants.) In 2012, a *Fundamental Review of the Regulation of Houses in Multiple Occupation* was begun.

There is therefore now a clear (though not identical) definition of HMO in housing legislation in all parts of the UK. (All make it clear that the definition includes student houses.) And all parts of the UK have a licensing or registration scheme, whose purpose is to protect the interests of *occupants* of HMOs.

In **planning** terms, until recently, the situation was much less clear. Planning legislation in the UK did not explicitly recognise HMOs. The way land and property is used is classified by Use Class Orders (one Order for each part of the UK). Change of use from one class to another usually requires planning permission. England & Wales were covered by the Town & Country Planning (Use Classes) Order 1987 (SI 1987 764). Residential uses were grouped in Class C, comprising C1 (Hotels), C2 (Residential Institutions) and C3, Dwelling Houses – meaning six or less residents, unless living together as a family. So planning permission was needed only for houses with more than six residents, who were not living as a family – by default, this was the planning definition of HMO (what counts as living together as a family remained debatable) [see footnote 1].

Scotland is covered by the Town & Country Planning (Use Classes) (Scotland) Order 1997 (SI 1997 3061 [S.195]), and the situation is similar, except that the threshold is five residents. Class 9 covers Houses occupied by a family or not more than five residents living together [and also small B&Bs]; again therefore, by default, a HMO is a house with more than five residents not living together. (Flats are excepted: local authorities therefore have the discretion to decide what constitutes development; most concur with the Order, but there are exceptions.)

The exception in planning terms was Northern Ireland. A new Use Class Order came into effect in 2004 (The Planning [Use Classes] Order [Northern Ireland] 2004, Statutory Rule 2004 458). This Order adopted the definition of HMO from housing legislation, the Housing Order of 2003: 'house in multiple occupation' means a house occupied by more than two persons who are not all members of the same family. Furthermore, HMOs were specifically excluded from Class C, Residential Uses (meaning that any change of use to HMO requires planning permission).

However, on 27 January 2010, John Healey MP, Minister for Planning, announced that the Use Class Order in England would be amended, to define HMOs and subject them to planning permission. Statutory Instrument 2010 No. 653 *The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010* was made on 8 March: first of all, Class C3 adopted the definition in the Housing Act 2004 of 'single household' (a couple and/or immediate relatives); secondly, a new Class C4 HMOs was introduced; and finally, this Class adopted the definition in the Housing Act of 'HMO' (three or more unrelated people sharing a dwelling). The new Order came into force on 6 April 2010. Any change of use to HMO required planning permission. However, on 1 October, the new government made change of use to HMO permitted development, with Statutory Instrument 2010 No. 2134 *The Town and*

THM-59 (continued)

Country Planning (General Permitted Development) (Amendment) (no 2) (England) Order 2010. (This permitted development right may be withdrawn by means of an Article 4 Direction.)

In most of the UK therefore there is now an identical definition of HMO in both housing and planning legislation. Scotland and Wales await alignment.

Regardless of the legislation, in terms of actual **use**, a HMO is a unique class of property (as is now largely recognised). The use of HMOs is distinctive in four different ways.
· *Occupancy*: the occupation of HMOs is intensive, higher than an ordinary dwelling house, and equal to a high-season hotel. (This entails high levels of noise, traffic and waste.)
· *Occupants*: typically, the occupants of a HMO are from one narrow age range (young adults), unlike the wider mix in most other residential uses (two or even three generations). (This has lifestyle implications, with higher than usual levels of noise, traffic and waste.)
· *Occupiers*: by the very fact of multiple occupation, HMOs lack the internal structure of a single household (or the management of a residential institution). (This makes harder the management of noise, traffic and waste.)
· *Occupation*: typically, tenancies in HMOs (like the private rented sector in general) are short-term. (This necessarily entails a lower level of engagement with the neighbourhood.)
A HMO therefore is a very different dwelling from any other form of residential accommodation. If change-of-use from a house to a hotel or a residential institution needs planning permission (as is required by all the Use Class Orders in the UK), then so too should change-of-use to HMO – in order to protect the interests of *neighbours* of HMOs.

In **market** terms, HMOs are the quintessence of the private rented sector (PRS) of housing. Tenancies are short-term, and this is typical of private renting as a whole. In Britain, the private rented sector is largely used for temporary accommodation – in 2003, over half of all moves were to, in or from the PRS; 45% of all new households were in the PRS; and the average length of stay was eighteen months. (Social renting and owner-occupation is much more permanent.) So, the PRS in general, and HMOs in particular, give rise to *transience*. Furthermore, all markets tend towards *concentrations* of supply and demand, and the housing market is no exception. Concentrations of claimant HMOs were noted in the DETR's Consultation Paper on HMOs in 1999. Concentrations of student HMOs in university towns have led the ODPM to set up a research project into the problems which arise [the report on *Studentification* was published in January 2006; the Lobby's own proposal is the *Ten Point Plan*]. (Similar problems have developed in USA and Canada.) Concentrations of transient populations are detrimental to the sustainability of communities. In the interests of *neighbourhoods* as a whole, therefore, controls on proportions of HMOs are necessary (Glasgow has a policy of no more than 5% HMOs in any one street) – but such policies in turn rely on planning control of individual HMOs. [See also footnote 2.]

All these issues raise questions about HMOs in **policy** terms. The Consultation Paper *Licensing in the Private Rented Sector: Consultation on the Implementation of HMO Licensing* (ODPM, 2004) asserts "HMOs ... provide affordable housing options for some of the most vulnerable

THM-59 (continued)

and disadvantaged groups in society, including benefit claimants or those on low incomes, students and asylum seekers ... We therefore recognise the vital importance of this sector in providing housing for these groups and in particular to meet the growing demand for student accommodation. We want to see this sector continue to play its valuable role ..." (p18). The Paper notes three main markets for the PRS in general, and for HMOs in particular, "those who would otherwise be homeless ... students ... and young professionals" (p11). However, it is debatable whether HMOs are the best response to these demands. Should vulnerable people, who would otherwise be homeless, be dependant on the private sector (rather than social housing)? HMOs are almost entirely conversions of former family homes. In an era of housing shortage, is this the best way to accommodate students (rather than in purpose-built accommodation)? Again, is the young professional market best served by conversions, or by new housing development? Are HMOs the best policy option at all?

The question then is not only '***What*** is a HMO?' but also '***Why*** HMOs?'

Footnote 1: In 2002, DTLR undertook a consultation on the Use Classes Order in England & Wales, and an amended Order was made on 21 January 2005 (Statutory Instrument 2005 No. 84, *The Town and Country Planning [Use Classes] [Amendment] [England] Order 2005*). Despite much lobbying, the Order made no change to Class C. ODPM has published guidance to the amended Order in Circular 03/2005 *Changes of Use of Buildings & Land* (paragraphs 74-77 refer to HMOs).

Footnote 2: The social impacts of HMOs have been recognised by a number of government publications, including -
- Housing Research *Summary* 228 *Dealing with 'Problem' Private Rented Housing* DCLG 2006
- House of Commons, Communities & Local Government Committee *Coastal Towns* (HC 351) The Stationery Office, London, 2007
- CLG, *Evaluating the impact of HMO and Selective Licencing: the baseline before licencing in April 2006*. August, 2007
- CLG, *Evidence Gathering - Housing in Multiple Occupation and possible planning responses*, September 2008
- CLG, *Introducing a definition of houses in multiple occupation into the Use Classes Order: Impact assessment*, March 2010

National HMO Lobby
email: hmolobby@hotmail.com website: www.hmolobby.org.uk

National HMO Lobby

National HMO Lobby

Ten Point Plan
and 57 Varieties of Action
Briefing Bulletin

1 What's the Problem? All local communities, as communities, want to be sustainable. The government has a definition of a *sustainable community*, with eight characteristics. But this definition entirely overlooks the obvious fact that what's necessary for a sustainable community is a resident population willing and able to sustain that community. Local populations can be disabled in a number of ways, all of which are types of **polarisation**. Polarisation can mean *opposition* – where the neighbourhood becomes a place of contest between competing factions. Or polarisation can mean *one-sidedness*. Again, this can take a variety of forms – exclusive communities (dominated by gated enclaves of the privileged) or excluded communities (dominated by ghettos of the deprived). Another is domination by *transience*. A transient population lacks the *ability* to be sustainable (community campaigns often take years of concerted action). It also lacks the *will* (clearly, members of the population are only briefly committed to the neighbourhood). (Of course, one type of polarisation can easily slide into the other.) ***Studentification*** is one form of transient polarisation (similar in many ways to the part-time populations of coastal resorts and rural resorts). It is defined by the National HMO Lobby as *the substitution of a local community by a student community* - that is, of a balanced resident population by a one-sided transient population. (NB the measures considered here could be applied to any form of polarisation caused by high turnover.) Dealing with the problems of polarisation, and restoring sustainability, requires concerted action. No one policy will resolve polarisation, nor will one party. Everyone concerned must act together.

1.1 What can be done? Since polarisation in general, and studentification especially, involve a particular pattern of land-use, *planning* measures are crucial. At the same time, *housing* measures have a vital bearing. Finally, if cumulative action is necessary, it needs to be co-ordinated – so *management* measures are needed. In all, ten key actions need to be taken: see 2 below.

1.2 Who can do it? Five local stakeholders are involved in studentification, and one national. The local stakeholders include both sides of Higher Education, *Universities* and *Students*, local *Councils* and their *Communities*, and the *Private Rented Sector* (PRS), which dominates studentified housing. The national stakeholder is the *Government*. Each of these may *act* as leader in some actions, while others provide *support* – or *lobby* for action to be taken: see 3 below. So, ten lines of action, and five local actors (with additional national acts), together generate *fifty-seven varieties* of action to tackle HMO-based polarisation. [For further discussion, see the Lobby's *Balanced Communities & Studentification*.]

2 What can be done? Tackling studentification as a form of polarisation needs a range of measures, concerned with managing, housing and planning. Together they make a ***Ten Point Plan***.

2.1 Accommodation Audit The first requirement is to establish the breadth and depth of the problem – where is the transient population located, and to what degree of penetration? The local university is the

THM-59 (continued)

THM-59 (continued)

key actor here, as it knows where its students live (of course, collective not individual data on distribution is what is needed). Students of course provide their university with this information. If necessary, the council and the community may need to lobby the university to provide it.

The University of Leeds provides annual data on the distribution throughout the city of its students.

2.2 Co-ordination In order to work together, stakeholders need some form of forum. All are responsible for actively engaging, but it is up to the local authority to set up such a forum.

Leeds City Council has established a Shared Housing Group, comprising representatives of all local stakeholders, and Nottingham has Student Strategy Leadership Group.

2.3 Action Plan Each stakeholder will need its own strategy (see 3 below). But these will be ineffective without coordination. Again, the local authority needs to take the initiative, but other stakeholders must support the council.

Nottingham is drafting a Student Housing Action Plan.

(National government is not directly involved in any of these first three action-lines.)

2.4 Mandatory HMO Licensing Through the Housing Act 2004, the government has introduced licensing of HMOs, where most students live. With regard to polarisation, licensing's most useful role is in identifying the location of HMOs, hence where the transient population is located. By law, local authorities now have to issue licences, and the PRS has to apply for them. (HEIs are also required to adopt codes of practice for their properties.) Communities and students have a shared interest in supporting licensing – for instance, by reporting licensable HMOs to the council.

Leeds HMO Lobby has produced a Notification Form for this purpose.

2.5 Additional HMO Licensing Mandatory licensing applies only to larger HMOs. But the Housing Act provides also for the licensing of all additional HMOs in designated areas. Additional HMO licensing is essential, to take full advantage of licensing (and to remove an escape route for any landlords trying to avoid mandatory licensing). Since April 2010, local authorities in England have a 'general consent' to introduce additional licensing. Responsible members of the PRS can support the council. The community, students and universities have a shared interest in lobbying the authority to take action. (In Scotland, *all* HMOs are already subject to licensing. In Northern Ireland, *all* are in selected areas, and *very large* HMOs elsewhere. In Wales, additional HMO licensing is already delegated to local authorities.)

Oxford is consulting on introducing additional HMO licensing throughout the city (2010).

2.6 Restoration of Balance A destabilised neighbourhood will not easily re-balance itself. Studentification makes this very difficult. In due course, 'de-studentification' may provide opportunities. Only the resident population itself can restore sustainability to a community. Above all, it needs commitment, in order to do so. But all stakeholders can lobby for, and provide support to, the re-introduction of long-term residents, especially families (whether partners only, or partners with dependants, or single people with dependants), especially within policy frameworks set by local and national government.

Headingley Development Trust in Leeds is hoping to be involved in the local housing market, to this end.

2.7 Areas of Restraint Local planning authorities around the country are adopting a range of local HMO plans to deal with the problems of

THM-59 (continued)

concentrations of HMOs or student accommodation (the new planning regime of Local Development Frameworks gives opportunities to do this). One of these plans is the idea of an 'Area of Restraint', in order to resist further development where there are already high concentrations. The council is of course the lead actor here. Community associations can lobby for some form of restraint, while universities, students and the PRS can offer their support. National government too, through the Planning Inspectorate, can support such policy initiatives.

The best-known such policy is Leeds ASHORE (Area of Student Housing Restraint), which has been supported by Planning Inspectors, though modified as an 'Area of Housing Mix'.

2.8 Threshold Policy Another measure that has been proposed by local councils is the idea of some sort of threshold, beyond which further development of HMOs or student accommodation will be resisted. This is meant to prevent concentrations developing in the first place. Again, the council takes the lead. Universities, students and the PRS can support the council by encouraging the dispersal of student accommodation. The community can lobby for both. And the Planning Inspectorate can support such a policy initiative.

Glasgow and Fife have set ceilings for the proportion of HMOs in a neighbourhood. Loughborough is adopting a series of thresholds which will govern planning permission. In Leeds, Unipol has published a guide to neighbourhoods throughout the city suitable for student accommodation.

2.9 Purpose Built Development Some councils also support the development of purpose-built housing for students. Such housing takes the pressure off conversion of family homes into HMOs (and in a time of housing shortage, this is far better than the conversion of family homes into seasonally-occupied second homes). At the same time, the siting of purpose-built development has to be carefully handled, so that it does not in fact increase polarisation. Universities, student unions and developers can take initiatives, independently or together. The council can suggest locations, and communities can lobby for this sort of development. The Planning Inspectorate can be supportive of developments endorsed locally.

There are many joint HEI/PRS ventures of this sort.

2.10 Use Classes Order Many council ideas have hamstrung by national planning legislation. They could control only developments which needed planning permission. Restraint and threshold policies in particular were undermined by the limitations of the Use Classes Order – which allowed family homes to be converted to HMOs without planning permission. However, on 6 April 2010, the Use Classes Order in England was amended, defining HMOs, placing them in a new Use Clas C4, and subjecting them to planning permission. Action by the government was a belated response to lobbying by stakeholders, especially communities and councils, and their elected representatives.

In Northern Ireland, the Dept of the Environment changed its Use Classes Order in 2004. The National HMO Lobby has lobbied for years, for changes elsewhere: in 2010, the government changed the Use Classes Order in England. Scotland and Wales still await amendment.

3 Who can do it? All stakeholders supporting this Ten Point Plan need to adopt a strategy towards the polarisation which arises from concentrations of student housing.

3.1 Community Associations The local community has the strongest motive to do so, as its very survival depends on resisting polarisation –

THM-59 (continued)

yet at the same time, it is the weakest of the stakeholders. The community's first job therefore is to build its capacity – organisation is essential (and in a large town, where more than one community association may be involved, co-ordinated action is invaluable). The community may look for outside help – it may even consider setting up a local Development Trust. Otherwise, the local community depends on lobbying – for local housing and planning policies especially – and community associations can support their council's initiatives (especially the introduction of a local Student Housing Strategy). It is important therefore to adopt a clear guiding strategy.

Leeds HMO Lobby and the Nottingham Action Group are examples of umbrella community organisations. Leeds HMO Lobby has adopted a Grand Strategy. The council has appointed a dedicated Community Planning Officer, to advise residents. Also in Leeds, the community has established Headingley Development Trust, which aims to intervene locally.

3.2 Local Authorities The council is the local ringmaster. It has a responsibility to its communities (not to mention a self-interest) to maintain their sustainability. It also has many powers and resources (though not as many as it needs). So, frequently the local council has to take the initiative – in setting up a management structure, in licensing HMOs, and in introducing planning policies. It can support initiatives by other local stakeholders, and it can lobby local universities and national government for supportive action. All councils have a housing strategy – this should include a specific *Student Housing Strategy*, so that developments take place to benefit both students and communities.

Leeds City Council has established a Shared Housing Group, which has adopted a Shared Housing Action Plan, and is preparing a Student Housing Strategy.

3.3 Higher Education Institutions For too long, universities kept aloof from their effect on their host communities (and their government department, the DfES, still does). But their organisation, Universities UK, has now acknowledged the problems, in their report *Studentification: a guide to opportunities, challenges and practices* (2006): "it is incontrovertible that the negative effects of studentification are evident in several towns and cities across the UK" (para 3.12). Universities can of course provide accommodation for their students, and indeed most do – though rarely for more than a minority. So universities should also support initiatives taken by their local councils to deal with the problems raised by their students living in the private rented sector – 'in the community'. Indeed, since it is universities which recruit students, they have an obligation to develop a strategy for housing them.

Leeds University has indeed produced a Housing Strategy.

3.4 Student Unions Regrettably, NUS remains in denial over the issue of studentification, though it is students who are at its sharp end (see NUS Report *Students in the Community*, 2007). This is not always the case however with local student unions (and not at all with many individual students). Student unions can support housing and planning initiatives by their local councils, and there are some issues where they share an interest with the local community (like additional HMO licensing). Certainly, they too have an interest and an obligation in preparing a strategy for the accommodation of their members.

Leeds University Union's Housing Guide *has included advice to students to look for accommodation outside the areas of concentration.*

3.5 Private Rented Sector It is both practically and logically difficult

for the PRS to develop a strategy. Logically, the PRS is the main agent in developing studentification, and it has the least interest in doing anything about it (in fact, many landlords vigorously oppose local housing and planning strategies). At the same time, practically, the PRS is the least co-ordinated stakeholder – it is made up not only of landlords in competition with each other, but also increasingly with the developers of large-scale purpose-built housing (it also includes letting and managing agents). Nevertheless, responsible landlords and developers can act on and support local council strategies, such as local voluntary accreditation schemes.

A unique organisation grounded in the PRS is Unipol, the student housing charity based in Leeds, which has now organised three national conferences on the issue of studentification.

3.6 Her Majesty's Government The ultimate responsibility for the mess of studentification however lies with the government, and its incoherent policy development. On the one hand, the government has (laudably) promoted access to higher education – but without a moment's thought to its housing implications, still less to the local effects these will have. On the other hand, national government has steadfastly resisted giving local government the powers it needs to pick up the pieces. Government has turned a deaf ear to lobbying over studentification, and a blind eye to its consequences. (Indeed, ODPM commissioned Universities UK's *Studentification* Guide – but specifically excluded any attention to changes in legislation from its terms of reference.) Stakeholders around the country badly need a coherent strategy for student accommodation from the government.

In 2010, the government in England finally accepted that there was a problem - and agreed to planning control of shared houses.

National HMO Lobby, June 2006 (amended 2010)

See also, *Balanced Communities & Studentification*, 2008

National HMO Lobby
email: hmolobby@hotmail.com website: www.hmolobby.org.uk

THM-59 (continued)

THM-59
(continued)

User:Jamse/Studentification

From Wikipedia, the free encyclopedia
< User:Jamse

Studentification is a neologism, coined to describe the effects that a large student population can have on an area. Possibly the first university researcher to use the term studentification was Dr. Darren Smith of the School of Environment at the University of Brighton, who in 2002 published the first of his research[1] on the topic. As of 2005, the term is gaining in popularity within its field, particularly amongst permanent residents who live in 'studentified' areas.

Contents

Symptoms

A range of symptoms have been identified / proposed for studentification. They include factors caused both directly and indirectly by students. For example, the presence of a large population of students will often attract many take-away eateries, displacing traditional family-oriented retail outlets - this is not a direct action taken by students, but is an indirect reaction to their presence; similarly, house prices may rise substantially in the area making it unaffordable for families - this is another 'indirect' symptom, which is caused by the reaction of property investors to students' presence; student rental properties usually bring a higher-than-average return on investment. This effect ultimately can snowball, forcing year-round residents out of near-campus areas because of growing student numbers and property prices rising beyond the reach of families.

Examples of 'direct' results of students' presence could include their drunken and noisy behaviour late at night, or their persistent failure to remove 'wheely bins' from the pavement after emptying. (This is not to indicate that these are inevitable in every area where students are based, rather that if these things do occur, they are the results of the students' own actions, rather than indirect responses to their presence).

Cities and Towns noted for studentification

The following is a list of some cities (and areas thereof) that have been identified as showing some of the typical symptoms of studentification.

- Aberystwyth, Wales. The student population is close to that of the seaside town, and in a recent study, 67% of all housing in the town was a house of multiple occupancy.
- Cardiff, specifically the area of Cathays, located close to the university.
- Hull in particular Newland area of the city (e.g. Newland Avenue, Beverley Road and the surrounding areas)

THM-59 (continued)

which happens to be close to the main Hull University campus. Cottingham Village is home to the Lawns, a student village home to 7 halls of residence contaning 1300 students. George Street in the city centre has recently became a student zone due the relocation of the city's University of Lincoln campus.

- Leeds, particularly Hyde Park and Headingley
- Loughborough, particularly the areas around the university and the town centre. The presence of such a large university in such a (relatively) small town has led to several court cases between 'locals' and students over the past few years. There are more security staff at Loughborough University than there are police officers in the town, and residents finding students committing anti-social behaviour more commonly telephone campus security directly for a faster response time.
- Manchester, particularly Fallowfield
- Newcastle, particularly Jesmond, Sandyford and Heaton
- Norwich, especially the Golden Triangle area of the city.
- Nottingham, particularly The Arboretum, Dunkirk and Lenton
- Sheffield, particularly Hunter's Bar
- Southampton, generally in all parts of the city due to Southampton University being on one side and Southampton Solent University on the other.

See also

- College town - this term is used particularly in the USA to indicate a town or small city with a dominant student population. Many UK cities have smaller student populations that have studentified one or more sections of the city.
- Student ghetto
- Town and gown

References

1. ^ http://www.brighton.ac.uk/environment/personal/darren_smith/media.htm

External links

- Guardian article on the new report on studentification 24 January 2006 - Doner Your Way (http://society.guardian.co.uk/print/0,3858,5381436-117219,00.html)
- 'Studentification': a guide to opportunities, challenges and practice. Extensive overview of studentification in UK cities. Report released Jan 2006. Report may be downloaded in PDF here. (http://bookshop.universitiesuk.ac.uk/latest/)
- HMO Lobby paper (http://hmolobby.org.uk/lobbystudentif.htm) on studentification. Very detailed description of the process and effects.
- Symptoms of Studentification (http://hmolobby.org.uk/lobbystudentifsymptoms.htm) from the same site.
- Studentification (http://www.geographyinthenews.rgs.org/news/article/?id=205) from Geography in the News (8 September 2003).
- Gown Planning (http://www.geographyinthenews.rgs.org/news/article/default.aspx?id=297) from Geography in the News (2 October 2004).
- Studentification (http://www.collegetownlife.com/college/CT_Studentification.htm) information from

THM-59 (continued)

CollegeTownLife (http://www.collegetownlife.com/).
- Guide to studentification aimed at students (http://www.letsuni.org/information/communityrelations/studentification.html).

Category:Neologisms category:Student culture *

Retrieved from "http://en.wikipedia.org/w/index.php?title=User:Jamse/Studentification&oldid=158034780"

THM-59 (continued)

Student quarter

From Wikipedia, the free encyclopedia
(Redirected from Student ghetto)

A **student quarter** or a **student ghetto** is a residential area, usually in proximity to a college or university, that houses mostly students. Due to the youth and relative low income of the students, most of the housing is rented, with some cooperatives. Landlords have little incentive to properly maintain the housing stock, since they know that they can always find tenants. Non-students tend to leave the area because of the noise and raucous behavior of the students.

Most modern student ghettos arose from the rise in post-secondary enrollment after World War II. Many colleges and universities became unable to house all their students, while homeowners in adjacent neighborhoods fled from the influx of students. Such neighborhoods often took over from faculty and other affluent (permanent) residents, as the housing stock in these areas deteriorated. Many local governments have worked to control the spread of student ghettos and improve their appearance. Fire safety is a special concern.

Examples

A high-end example of a purpose-built, student residential neighborhood is The Cotton District in Starkville, Mississippi, which was privately developed by a former university faculty member who was elected the city's mayor in 2005.

A hybrid of this is the University of Dayton Ghetto in Dayton, Ohio, where the school bought formerly privately owned houses in an adjacent neighborhood to house its upperclassmen. Today over 95% of the houses in that area are owned by the school.

United States

- Isla Vista, an unincorporated town near Goleta, California (University of California, Santa Barbara)
- North University Park in Los Angeles, California, directly north of University of Southern California
- Parkmerced in San Francisco, California (San Francisco State University)
- Southside in Berkeley, California (University of California, Berkeley)
- Westwood in Los Angeles, California (University of California, Los Angeles)
- University Hill in Boulder, Colorado (University of Colorado at Boulder)
- Portions of Alafaya in Orlando, Florida (University of Central Florida)
- Indian Village in Tallahassee, Florida (Florida State University)
- Portions of NW 13th Street, Main Street, and University Avenue in Gainesville, Florida (University of Florida)
- Home Park in Atlanta, Georgia (Georgia Tech)
- Gentilly Road in Statesboro, Georgia (Georgia Southern University)
- Campustown in Champaign (University of Illinois at Urbana-Champaign)
- Hyde Park in Chicago, Illinois (University of Chicago)

Contents

THM-59 (continued)

- Courtyard Residence Hall in Chicago, Illinois (University of Illinois at Chicago)
- The Oread Neighborhood of Lawrence, Kansas near the University of Kansas
- Portions of Old Louisville in Louisville, Kentucky (University of Louisville)
- Scotlandville (B.R. community) in Baton Rouge, Louisiana (Southern University)
- Allston, Brighton, Mission Hill, Fenway–Kenmore in Boston, Massachusetts (most Boston-based universities, particularly Boston University and Northeastern University)
- Hobart Lane in Amherst, Massachusetts
- Cedar Village in East Lansing, Michigan (Michigan State University)
- Cass Corridor in Detroit, Michigan (Wayne State University)
- Vine Neighborhood of Kalamazoo, Michigan near Western Michigan University and Kalamazoo College
- Dinkytown, Stadium Village, in Minneapolis, Minnesota (University of Minnesota)
- North Bottoms in Lincoln, Nebraska (University of Nebraska-Lincoln)
- Main Street and the surrounding areas, the Beau Rivage townhomes, and Campus Crossings apartments of Glassboro, New Jersey. (Rowan University)
- The Sixth Ward, New Brunswick, New Jersey (Rutgers University)
- University Avenue area in Las Cruces, New Mexico (New Mexico State University)
- Collegetown and South Hill in Ithaca, New York (Cornell University and Ithaca College, respectively)
- Pine Hills section of Albany, New York (University at Albany and College of Saint Rose)
- University Heights in Buffalo, New York (University at Buffalo)
- University Hill and University Neighborhood in Syracuse, New York (Syracuse University)
- The Mile Square in Oxford, Ohio (Miami University)
- University District in Columbus, Ohio (Ohio State University)
- West University in Eugene, Oregon (University of Oregon)
- Central and South Oakland in Pittsburgh, Pennsylvania (Carnegie Mellon University, Point Park University, and University of Pittsburgh)
- State College, Pennsylvania (Penn State University)
- Templetown, Philadelphia, Pennsylvania (Temple University)
- Fort Sanders in Knoxville, Tennessee (University of Tennessee)
- Fort Wood in Chattanooga, Tennessee (University of Tennessee at Chattanooga)
- Northgate in College Station, Texas (Texas A&M University)
- Overton in Lubbock, Texas (Texas Tech University)
- West Campus in Austin, Texas (University of Texas at Austin)
- Oregon Hill in Richmond, Virginia (Virginia Commonwealth University)
- College Hill in Pullman, Washington (Washington State University)
- University District in Seattle, Washington (University of Washington)
- Sunnyside Neighborhood in Morgantown, West Virginia (West Virginia University)
- Bassett, Mansion Hill, and East Johnson Street neighborhoods in Madison, Wisconsin (University of Wisconsin–Madison)
- Upper East Side, Brady St, Riverwest neighborhoods of Milwaukee near University of Wisconsin–Milwaukee
- Wilbur Street in Newark, Delaware (University of Delaware)

Canada

- The Annex and Harbord Village in Toronto, Ontario (University of Toronto)

THM-59 (continued)

- Churchill Park in St. John's, Newfoundland and Labrador (Memorial University of Newfoundland)
- College Hill and Forest Hill in Fredericton, New Brunswick (University of New Brunswick)
- Kingston Student Ghetto in Kingston, Ontario (Queen's University)
- McGill Ghetto in Montreal, Quebec (McGill University)
- Sandy Hill in Ottawa, Ontario (University of Ottawa)
- South End in Halifax, Nova Scotia (Dalhousie University and St. Mary's University)
- Huron Heights and Argyle neighbourhoods in London, Ontario (Fanshawe College)
- University Heights and Oxford Park in London, Ontario (The University of Western Ontario)
- Westdale in Hamilton, Ontario (McMaster University)
- York University Heights in Toronto, Ontario (York University)
- Northdale in Waterloo, Ontario (University of Waterloo and Wilfrid Laurier University)
- Sackville New Brunswick (Mount Allison University)

United Kingdom

- Lenton in Nottingham, University of Nottingham UK
- Jesmond in Newcastle upon Tyne, (Newcastle University), (Northumbria University), UK
- Heaton in Newcastle upon Tyne, (Newcastle University), (Northumbria University), UK
- Burley in Leeds, (University of Leeds), (Leeds Metropolitan University), UK
- Hyde Park in Leeds, (University of Leeds), (Leeds Metropolitan University), UK
- Headingley in Leeds, (University of Leeds), (Leeds Metropolitan University), UK
- Cowley Road in Oxford, UK
- Fallowfield in Manchester, (University of Manchester), UK
- Old Aberdeen in Aberdeen, (University of Aberdeen)
- Bournbrook in Birmingham (University of Birmingham), UK
- The Holylands, Belfast, near Queens University.
- Cathays in Cardiff, Wales, (Cardiff University), (Cardiff Metropolitan University)
- Mill Road in Cambridge, England, (Anglia Ruskin University)
- Kensington in Liverpool, England, (University of Liverpool and JMU)
- Wavertree (especially off Smithdown Road) in Liverpool, England (Liverpool Hope University and University of Liverpool)
- St Johns in Worcester (University of Worcester)
- Ecclesall Road in Sheffield, (Sheffield Hallam University), (University of Sheffield), UK
- Broomhill in Sheffield (University of Sheffield), UK
- Brynmill in Swansea, Wales, (Swansea University)
- Mount Pleasant in Swansea, Wales, (Swansea Metropolitan University/Swansea University)
- Crookesmoor Road in Sheffield (University of Sheffield), UK
- Oadby in Leicester, (University of Leicester), UK
- Hales Place in Canterbury, (University of Kent), UK
- New Cross in London, (Goldsmiths, University of London), UK
- Redland, Bristol (University of Bristol, University of the West of England)
- Portswood, in Southampton, (University of Southampton)
- Stanmore, in Winchester, (University of Winchester)

Hong Kong

THM-59 (continued)

- Chek Nai Ping
- Tai Po Tsai
- Shek Tong Tsui

Elsewhere

- Dunedin North and North East Valley, Dunedin, New Zealand (University of Otago and Otago Polytechnic)
- Studentenstadt, Munich, Germany (LMU München and TU München)
- Ålidhem, Umeå, Sweden (Umeå University and Swedish University of Agricultural Sciences)

See also

- College town
- Town and gown

Notes

References

- Gumprecht, Blake. "Fraternity Row, the Student Ghetto, and the Faculty Enclave: Characteristic Residential Districts in the American College Town." *Journal of Urban History*, v.32, no.2, January 2006.

External links

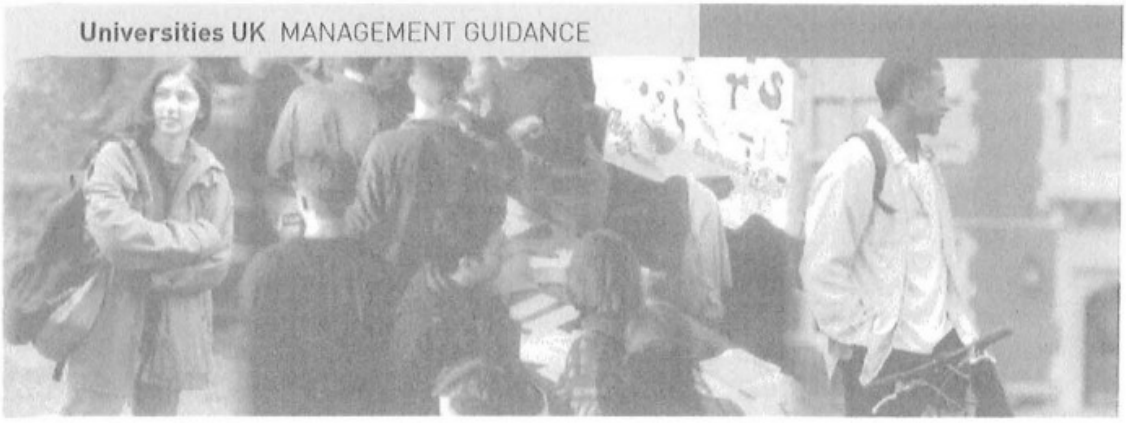
- Town & Gown (http://www.dailyinfo.co.uk/guide/cartoonist/townandgown.html) information from Daily Information (http://www.dailyinfo.co.uk/), Oxford, UK
- College Town Issues (http://www.collegetownlife.com/college/index.html) Town/Gown Issues
- Town and Gown Association of Ontario (http://www.tgao.ca/)
- Student advice on maintaining good neighbourly relations (http://www.letsuni.org/nottingham/information/communityrelations/neighbours.html)

Retrieved from "http://en.wikipedia.org/w/index.php?title=Student_quarter&oldid=600801641"
Categories: Student quarters | Urban studies and planning

THM-59 (continued)

Universities UK

'Studentification': a guide to opportunities, challenges and practice



SCOP

THM-59 (continued)

Universities UK

'Studentification':
a guide to opportunities, challenges and practice

SCOP

THM-59 (continued)

THM-59 (continued)

Contents

THM-59 (continued)

Foreword

The growing numbers of students gaining access to higher education in recent years has had the effect of increasing concentrations of students in many towns and cities across the UK. The changes this has brought have been interpreted and experienced differently by local communities. Some local communities have witnessed largely negative and detrimental impacts in areas where relatively high concentrations of students have settled. In other contexts, some local communities, particularly within declining areas, have welcomed rising numbers of students. As this phenomenon of 'studentification' is relatively recent, there is no blueprint for a tried and tested approach effectively to manage high concentrations of students within houses in multiple occupation (HMOs) in local neighbourhoods. However, many higher education institutions (HEIs) and students' unions, local authorities and communities have developed and are using innovative practice that could be useful to others. This guide should therefore be viewed as a starting point for HEIs and stakeholders planning to initiate or extend discussions and joined-up working, and to establish good practice that is sensitive to the local context.

'*Studentification*': *a guide to opportunities, challenges and practice* has been published by Universities UK in partnership with the Standing Conference of Principals (SCOP) and in association with the Department for Education and Skills (DfES), the Office of the Deputy Prime Minister (ODPM) and the Local Government Association (LGA). The guide provides examples from a range of current practice. These, if applied in a way that is appropriate to their local context and circumstances, could have a major benefit for all local stakeholders and organisations.

THM-59
(continued)

Executive summary

This guide draws upon the findings of research that was carried out during 2005. This sought the perceptions of a wide range of stakeholders and consisted of an analysis of existing literature and secondary sources and survey questionnaires to UK HEIs, all houses in multiple occupation (HMO) lobby groups within the national network and selected local authorities. In-depth case studies were also carried out in Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham. The six case studies enabled the identification of a range of innovative practice which had been developed in response to diverse local contexts and circumstances. The project was funded by the DfES and was therefore primarily focused upon practice in England, although the survey questionnaires were issued to HEIs and lobby groups UK-wide.

The guide provides a range of examples and practice upon which stakeholders can draw. It includes a checklist of activities as a basis for stimulating discussion among stakeholders, which can be used to support the effective management and integration of students into local communities.

THM-59
(continued)

Acknowledgements

These guidelines have been produced in partnership with the Standing Conference of Principals (SCOP) and the Local Government Association.

Universities UK and its partners wish to acknowledge

Dr. Darren P. Smith	Reader in Human Geography, University of Brighton, with support from Jane Denholm (Critical Thinking, Edinburgh), who researched and drafted the guide;

The members of the Steering Group

Ms Helen Bowles	Policy Adviser, Standing Conference of Principals
Mr John Daniels	Principal Policy Officer on the Private Rented Sector, The Office of the Deputy Prime Minister
Mr Barry Keight	Policy Officer, Department for Education and Skills
Mr Dan Lucas	Policy and Research Officer, Housing Direct, representing Local Government Association
Ms Vivienne Stern	Senior Public Affairs Officer, Universities UK
Mr Derek Stroud	Planning Adviser, Universities UK
Ms Fiona Waye	Policy Adviser, Universities UK

The respondents involved in the survey and case studies and the examples of current practice, many of which have informed the guide; and the Department for Education and Skills for its financial support.

THM-59 (continued)

THM-59 (continued)

1 Introduction

Why is a guide needed?

1.1 The expansion of higher education has had the effect of increasing concentrations of students in residential areas in many towns and cities. This phenomenon, sometimes called 'studentification', has, in many places, led to profound cultural, social, physical and economic transformations. These have been experienced differently by local communities and other stakeholders. For some individuals and groups the added dynamism, and other positive effects which students can bring (including the impact on the local economy), appear to have outweighed any disadvantages. For others, changes to the characteristics of local neighbourhoods have been interpreted as largely detrimental. This emphasises the diverse impacts that students can bring to university towns and cities, depending on the local context.

1.2 It has been claimed that some local authorities and HEIs have neither acknowledged nor addressed these problems, and this has led to resentment among local communities. In extreme cases this has manifested itself in frictions between established communities and their local HEIs, with serious implications for community cohesion and well-being in the longer term. The National HMO (houses in multiple occupation) Lobby – a formally constituted organisation with representation from 27 towns and cities – has been campaigning for a number of legislative changes to address these effects.

1.3 The research conducted for this guide shows that there is significant variation in the scale and pace of 'studentification' throughout the UK and that it occurs in different ways in different places. Experiences of the issues and challenges also vary. The research concluded that the issues therefore need local attention and local solutions, which are sensitive to the neighbourhoods and established communities. As the phenomenon is relatively recent, there is no blueprint for a tried and tested approach. Nonetheless, a number of HEIs, local authorities and communities have developed a range of practices that could be of benefit to others who are considering how best to respond to these challenges. The guide therefore represents a 'stepping-stone' to support the effective management and integration of students into local communities, and seeks to stimulate local initiatives that ensure the benefits that students can bring to university towns and cities are nurtured. Since the changes are clearly dynamic, it may be beneficial for future research to monitor and evaluate the effectiveness of this innovative practice in various contexts in the mid- to longer-term and to share evidence between and across different locations.

THM-59 (continued)

Who should use this guide?

1.4 This guide is aimed at HEIs and local authorities but will be useful to other stakeholders including students' unions and local residents' groups. Within HEIs it will be of particular interest to accommodation officers, community liaison officers, estates, strategic planning and marketing officers. Local authority officials who may be interested will include those working in planning, housing, environmental health, regeneration and development and community relations. The guide outlines the key issues and the nature of challenges. It highlights examples of practice that should assist stakeholders in devising strategies to influence the impact of concentrations of students on established communities. This is not an exhaustive or prescriptive list but is intended to be a helpful starting-point for activities.

What does the guide include?

1.5 The guide has been developed as part of a research project, commissioned and funded by the Department for Education and Skills. Its remit was to scope and assess the scale and nature of the challenges associated with large concentrations of student populations, and to identify current practice to address these through consideration of some case study examples. Further information about the project and the methodology is found at Appendix I. In summary, the research gathered the views of a wide range of stakeholders – HEIs, local authorities, students' unions, residents' groups, the National HMO Lobby and private sector organisations. It consisted of analyses of existing literature and secondary sources, survey questionnaires to UK HEIs, all HMO lobby groups within the national network and selected local authorities. This was followed up with in-depth qualitative fieldwork – interviews and focus groups – investigating six case studies in greater depth: Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham.

THM-59 (continued)

2 Key findings

2.1 The key findings of the research undertaken for this project are:

- 'Studentification' is a relatively new concept which is not yet well-understood and measures to ameliorate its challenges and realise opportunities are still being piloted. It is therefore difficult to say definitively at this stage 'what works' but the emerging evidence provides some indications;
- In considering possible action that they may take, HEIs and local authorities should recognise the needs and welfare of both students and established residential communities;
- Partnership working is the key to addressing the challenges of 'studentification', as well as fully realising the opportunities. The complexity of the issues of 'studentification' can be considered only by a series of interlocking strategies;
- Effective communication channels are essential to foster consultation and discussions between different organisations and stakeholders. Processes to ensure a formal dialogue are very important;
- Achieving a consensual view of the issues and a common vision requires respect, transparency and trust between the stakeholder organisations – HEIs, local authorities, community groups, central government, students' unions, and private rented sector;
- The development of initiatives or strategies to address 'studentification' must be sensitive to the local context, given 'studentification' is expressed in diverse forms and occurs in different ways in different places, and is a dynamic process;
- There is a great deal of innovative practice addressing issues of 'studentification' in local contexts, such as the creation of neighbourhood helplines and community liaison officers;
- There is a need for all stakeholders to recognise that the growth of student populations can have both positive and negative effects, and that these will be perceived differently by different groups;
- Sharing of experience and practice between organisations and stakeholders, for example via regional networks and conferences, could be helpful.

THM-59 (continued)

THM-59
(continued)

3 Context

What is 'studentification'?

3.1 The term 'studentification' was established by Smith (2002) to describe the growth of high concentrations of students within the localities of HEIs, often accommodated within HMOs. There are four dimensions to the process with the social tier being the primary factor:

- **Social:** the replacement and/or displacement of established residents with a transient, generally young and single, social grouping
- **Cultural:** the growth of concentrations of young people with shared cultures and lifestyles, and consumption practices, which in turn results in the increase of certain types of retail and service infrastructure
- **Physical:** the downgrading or upgrading of the physical environment, depending on the local context;
- **Economic:** the inflation of property prices and a change in the balance of the housing stock resulting in neighbourhoods becoming dominated by private rented accommodation and houses in multiple occupation, and decreasing levels of owner-occupation.

What are the effects of 'studentification'?

3.2 As can be seen from this outline, and as the research conducted for this project showed, the growth of student populations can have different impacts. In addition, the research found that how the effects are interpreted often varies depending upon the perspective of the viewer. Nonetheless, the term 'studentification' tends to be used as if it is synonymous with 'problems' and this guide concentrates on addressing the negative effects of high concentrations of students. It is therefore important to note that growing student populations can yield benefits for university towns and cities. For example, many communities currently without HEIs are actively supporting their creation, partly because of the many benefits that large student communities bring to an area, and the fact that student accommodation has helped to regenerate areas that might otherwise have declined. In addition, local authorities and communities in some towns and cities have recorded negative effects as a result of students and landlords moving away from particular enclaves.

THM-59 (continued)

On the whole, studies of the advantages of increasing numbers of students have tended to focus on benefits such as increasing spending levels in the local economy, prestige and recognition, lifelong learning opportunities, wider economic contribution to the community, spin-off companies, educational, cultural and other arts events, concerts and performances, sporting events and facilities and so on. There is often an underlying assumption that these benefits will 'trickle down' to the level of neighbourhoods. As such, benefits tend to be broad and not clearly definable (whilst disadvantages tend to be narrow and very clearly definable). However, understandings of the specific benefits of communities of students and how they could be nurtured at neighbourhood level are not well-developed. Future research could be helpful in deepening knowledge of the ways in which local neighbourhoods can proactively share these benefits. 3.3

The positive effects are summarised in Table 1.

Table 1: Student populations – positive effects

Social	Cultural	Physical	Economic
Student volunteering makes an important contribution to many aspects of social life Student housing needs prevent serious depopulation in many inner-city areas Increases the range of goods, services and attractions available to the town/city's population A critical mass of students can ensure transport links to the benefit of the whole community Student communities can also support nurseries and multi faith centres	Create a critical mass and demand for diverse range of cultural events Enhances reputation of city/town as vibrant, dynamic location and as an attractive destination for eg, night-clubbing, evening economy, or tourism Creates an international/ cosmopolitan feel/ outlook	Higher/rising property prices provide a level of incentive for upgrading properties which might otherwise remain empty, languish in a neglected state or be generally unfit for habitation Many older properties receive considerable investment by private landlords which extends their life The existence of large numbers of young people help to make city centres attractive to social and retail spaces Changes in type of retail and entertainment services available – eg, local shops becoming cafes, bookshops, live music venues	High demand for student housing and the stimulus to private rented sector leads to rising house prices Growth in buy-to-let market and private investment opportunities Students constitute a flexible part-time labour force undertaking seasonal employment Student presence can help stimulate urban regeneration Goods purchased locally by students make a significant contribution to the local economy Student presence ensures the viability of some retail businesses Repairs, renovations and extensions to student properties benefits the construction and service sector of the economy Availability of a graduate workforce

THM-59 (continued)

What are the challenges of 'studentification'?

3.4 The research for this guide shows the challenges of 'studentification' are experienced differently in various parts of the UK. Nevertheless, there are some generic challenges which have been extensively documented. Drawing on local authority documentation, experiences of HEIs, academic investigation and the work of local community groups – in particular the useful suggestions of the Leeds, Nottingham and Loughborough HMO lobbies – this guide considers what action might be taken to address the main social, cultural, physical and economic impacts of students in their communities.

Structural issues

3.5 'Studentification' is occurring nationally as a result of a number of wider, often unrelated, economic and social trends and aspects of policy including:

- the growth of knowledge-based economies and societies, and the imperatives of economic competitiveness;
- the expansion of higher education by government in pursuit of a well-educated and highly-skilled workforce;
- raised aspirations and attainment levels leading to increased demand for higher education;
- an increased supply, and accessibility to, economic capital and mortgage finance, in conjunction with relatively low interest rates;
- the deregulation of the private rented housing sectors, and the encouragement of the private sector to meet current and future housing demands; and
- the rise of 'investment cultures' (eg, increase of private landlords linked to buy-to-let mortgages).

3.6 A significant feature of the recent increase in numbers and widening participation in higher education is that the characteristics of the student body have diversified. A single characterisation of the idea of 'a student' is no longer possible. Two-fifths of UK higher education students are studying part-time and are therefore already likely to be part of an established community.[1] Fifty-nine per cent of all students are mature.[2]

THM-59 (continued)

3.7 There has also, however, been an increase in the number of young, full-time undergraduate students living away from home. To cater for their accommodation needs, many HEIs and private companies have developed halls of residence, often locating them alongside residential neighbourhoods. Students leaving residences often wish to settle in the same local neighbourhood, finding accommodation in the private rented sector (Smith, 2002). As a result, the demographic composition of such neighbourhoods can change and become characterised by a population which is predominantly '*young* (late teens/early twenties), *seasonal* (here for only two-thirds of the year) and *transient* (moving every year, leaving after three)'.[3] The issues, from the perspective of some local communities, 'arise precisely when students cease to be in the community because their numbers increase so much that they outnumber the resident population – and the community finds itself ***in*** the students'.[4] It is important to note, however, that in other places, the changing nature of the student body in higher education, and coming to fruition of widening access policies, means that the students ***are*** the community.

The expansion in the numbers of young 'traditional' students in a community can bring a range of, often interrelated, effects. These are summarised at Table 2.

THM-59 (continued)

Table 2: Communities of students – challenges

Social	Cultural	Physical	Economic
Increase in low-level anti-social behaviour Concentration of vulnerable young people with low awareness of security and highly attractive possessions leading to increased levels of crime. This can result in higher insurance premiums (ie, house, contents, vehicle) Decreased demand for some local services leading to closure – particularly educational services Residents feel pressure to move to avoid becoming marginalised and isolated as permanent residents. This can lead to the demoralisation of established residents Increased competition for private rented houses Pressure for greater provision of establishments catering for night time entertainment and consequent detrimental impact on residential amenity Seasonal availability of some retail and service provision – development of a 'resort economy'	Expansion of HMOs in traditional owner-occupied, family areas can lead to change in nature of communities Gradually self-reinforcing unpopularity of area for families wishing to bring up children Conversion of houses into student residences, often make difficult transformation back into family homes Transient occupation engenders a lack of community integration and cohesion and less commitment to maintain the quality of local environment Turnover and short stay are disincentive and barrier to self-policing and aversion to crime Different perceptions of what is considered acceptable behaviour and communal obligations by different social groups Lifestyle frictions – late night student culture disturbs children and working people	Reduction in quality of housing stock and neglect of external appearance to properties including gardens, due to lack of investment by absentee landlords Turnover of properties and preponderance of property letting boards – recurring annually – detract from streetscape Increased population density and increased pressures on services (policing, cleansing, highways, planning, public transport) Increased on-street parking pressures arising from shared households and seasonal traffic congestion (eg, at graduations, end of term) Increase of squalor (litter/refuse), as infrastructure is designed for lower density usage, low awareness of refuse collection arrangements and different conceptions of what is tolerable Noise between dwellings at all times especially music and at night – parties and gatherings and late night street noise disturbance	High demand for student housing and the stimulus to private rented sector leads to a rise in house prices, deterring access to housing ladder for other sections of community A rising concentration of students in particular streets acts as a strong inducement to owner-occupiers of non-student properties to take advantage of a lucrative sale to private student landlords Changes in type of retail and entertainment services available – eg, local shops becoming take-aways and cafes, and re-orientation of stock Fluctuating demand for private rented housing Seasonal employment (in shops, pubs) and provision of retail and leisure services

16 Universities UK management guidelines

THM-59 (continued)

It is clear from this listing that many of the disadvantages of concentrations of students in communities (such as landlord negligence), are the product of wider forces and not within the powers of HEIs and local authorities to address directly and also that many are not confined to students as a group – they could equally apply to concentrations of young people, or to tenants, generally. However, as the guide shows, there are actions that HEIs and local authorities can take to help prevent or ameliorate problems. 3.8

Many of the listed disadvantages are linked and it is often their combined impact which can cause concern and resentment in local communities. Whereas certain problems can be tackled individually, this guide also suggests ways that HEIs and their partners can take a more comprehensive approach. 3.9

What is the scale of the issues?

The research for this guide suggests that the negative effects of 'studentification' are not felt evenly across the UK. The cities of Brighton and Manchester/Salford, for example, appear to absorb and manage their student populations with little complaint from established residential communities. Although further research would need to be carried out to ascertain exactly why this is the case, it appears that, despite having large concentrations of students in specific neighbourhoods, local authorities and local communities consider that the benefits outweigh the disadvantages. In London, students tend to be dispersed into the wider housing market, leading to limited student concentrations, and few complaints. On the other hand, Leeds, Nottingham, Loughborough and Belfast have each been the focus of highly-publicised problems. 3.10

There are issues about perception and communication that need to be addressed in towns and cities with large concentrations of students. The research to underpin this guide found that the incidence of local community groups raising concerns associated with student populations was more widely distributed throughout the UK than HEI responses had acknowledged. Whilst almost two-thirds of HEIs stated that local community groups had voiced some concerns to them about the impact of students in their area, almost 40 per cent of those HEIs did not believe that students had negative effects in their locality. At the same time, findings from the survey of HMO lobby groups revealed that local communities in many towns and cities had long held concerns about concentrations of students. 3.11

THM-59 (continued)

3.12 These findings serve to emphasise that perception plays a very important part in any discussions about 'studentification' and indicates that 'studentification' does not necessarily bring significant negative effects. On the other hand, although HEIs may not perceive that there may be negative effects of 'studentification' taking place, local communities may take a different view. It is incontrovertible, however, that the negative effects of 'studentification' are evident in several towns and cities across the UK. These are inter-connected and can be summarised in the following way:

Social effects

3.13 In line with the geographic trend of the concentration of social groups in society[7], some common perceptions of change in student areas point to an increase in low-level anti-social behaviour. This can sometimes include issues such as noise-nuisance emanating from houses, streets or gardens, vandalism of vehicles, street furniture, private property, and vomiting and urination in the streets. Of course, such behaviour is not synonymous with students *per se*, but more widely linked to some youth cultures and increasing behaviour within wider society (ie, the 'Respect' agenda).

Cultural effects

3.14 Many of the challenges associated with 'studentification' are a result of different cultures clashing. Whilst social, economic and physical changes may be the key concerns of local community groups during the early phases of 'studentification', research has shown that when large communities of students become deeply embedded within a location, significant cultural change may occur. The expansion of HMOs in traditional owner-occupied, family areas can lead to a change in the nature of communities. Transient occupation engenders a lack of community integration and cohesion and less commitment to maintain the quality of the local environment and there develops a gradually self-reinforcing unpopularity of the area for families wishing to bring up children.

THM-59 (continued)

Physical effects

3.15

There can be physical disadvantages of having large concentrations of students in a neighbourhood. A general decline in the proportion of owner-occupiers can lead to physical changes including generally unkempt properties, squalor and dereliction. Such neighbourhoods can also suffer more permanent 'street blight', which may include estate agents' letting boards, neglected/concreted over front gardens and unsightly extensions. There is very little that HEIs can do directly to influence landlord behaviour although local authorities may be able to counteract some of the worst excesses through HMO licensing and planning regulations. Large concentrations of young people living in households with a high density can contribute to physical mess and noise, increased pressure on public services (policing, cleansing, etc) and traffic problems. Several HEIs have devised ways to ameliorate this.

THM-59 (continued)

4 Responding to the challenges of 'Studentification'

4.1 As described earlier, the capacity of all stakeholders effectively to manage students and housing within the neighbourhoods of established residential communities is affected by national policies and economic trends over which local HEIs have no control. These include, for example, the policy of expansion of higher education or low interest rates for buy-to-rent property over which local HEIs have no control. Indeed, many interviewees noted that preventing or alleviating the challenges presented by high concentrations of students will only be realised if some of the relevant legislation is amended. Such action is outside the remit of the project.

4.2 This guide therefore concentrates on the practical short to medium-term gains that may be achieved by HEIs and local authorities giving greater priority to implementing innovative practice. These can be divided into two main areas: Principles of a strategic approach; and, Local-level initiatives.

Principles of a strategic approach

Acknowledging the issues

4.3 HEIs and other stakeholders need to become fully aware of the issue of 'studentification' and to recognise that negative effects might be occurring, or in danger of unfolding, in their locality, even if there has been no organised community response.

4.4 HEIs, in partnership with other stakeholders, should also recognise that they have a responsibility towards the established residential communities into which their students migrate to help to redress any negative aspects of 'studentification'. The research showed that some HEIs have not been receptive to this on the grounds that they are not responsible for the off-campus behaviour of students. The evidence suggests that if HEIs do not act, it can cause and entrench resentment in the local community which may be more difficult to address at a later date. However, more positively, there has clearly been a marked shift in the cultures of HEIs since the late-1990s, with many HEIs accepting their part in addressing the impact of 'studentification', and formalising their responses within local housing and community strategies.

4.5 At the same time, it is crucial that local authorities recognise the phenomenon of 'studentification' within their locality and facilitate appropriate solutions in consultation with HEIs. Local authorities are often the pivotal 'neutral' brokers when issues of 'studentification' are to be addressed. This requires the adoption of a coordinated approach – most notably between the planning, housing and environment departments. Local authorities, HEIs and other stakeholders are already making use of existing planning and development powers, housing and environmental health legislation – some quite creatively – to address the challenges of 'studentification'.

THM-59 (continued)

Partnership working

It is clear from the research that the disadvantages of 'studentification' are most effectively tackled through a range of stakeholders working together. Many interviewees stressed the need for effective coordination and shared visions, and organisational structures which foster such arrangements. The research indicated that where relationships between HEIs and local communities have been less effective, this has often been a function of a lack of effective communication. 4.6

Common vision

A shared vision is not always easy to achieve but a good starting point for partnership working is the identification of shared principles. These can be derived through consultation between the different stakeholders, but will require commitment by all participants – 'whilst the Council can exercise its community leadership role through brokerage and arbitration between stakeholders, it is clear that unless there is a balanced and widespread consensus on the way forward, such brokerage and arbitration is fruitless.'[5] 4.7

An important underpinning principle is a recognition by all stakeholders that large concentrations of students do not inevitably lead to detrimental outcomes, and do also result in many benefits for localities. 4.8

Establishing a shared definition of a 'balanced community' is important although clearly 'balance' is a matter of perception. Existing practice suggests that parties can begin to overcome such ambiguities by seeking agreement on appropriate indicators. Useful precedents have already been established in Glasgow (no more than five per cent of HMOs in a street) and Loughborough (consultation proposes a maximum of 25 per cent students in a street in an inner zone and 10-24 per cent in an outer zone)[6]. It is essential that any initiatives that seek to encourage the dispersal of students away from existing residential student clusters, are well-planned, coherent and built into wider strategic objectives. It will be important to minimise the economic disadvantages which a loss of critical mass provided by students can accelerate in terms of a fall in demand for transport, shops and services. 4.9

Practice: The University of Leeds' housing strategy 2003/04 - 2007/08 states that 'both universities in Leeds, (the University of Leeds and Leeds Metropolitan University) are agreed on the need to avoid random dispersal as this can be at the expense of creating a critical mass of students which can accelerate regeneration and ensure appropriate transport links are in place.'

THM-59 (continued)

Local student housing strategies

4.10 The research revealed that many of the strategies which bear on student accommodation-related issues, have been developed by HEIs and various local authority departments without coordination. As a result, contradictory statements and visions can arise within a particular locality. In local government, the research revealed significant differences of opinion between environmental health, housing, and planning and regeneration departments. Stakeholders are therefore encouraged to share the relevant aspects of their strategies with each other.

Practice: Canterbury City Council has developed an overview and scrutiny committee, and one of its remits is to examine the impact of the student population on the district, and to review of performance of departments within the Council.

Source: Canterbury City Council. 2004. *Overview and Scrutiny: Investigating The Issues That Matter.*

4.11 Ideally, common principles should be enshrined in regional and local housing strategies, and in appropriate structural plans. Anecdotal evidence from the research project has consistently pointed to student accommodation issues being excluded from local housing strategies and from forecasts of local housing supply and demand. Local authorities could usefully initiate action to include student accommodation in their local housing strategies. The introduction of Local Development Frameworks in England may provide opportunities for local government to tighten up strategic thinking about student housing and related issues. This could include the identification of sensitive locations for student housing developments which marry up with growth and expansion aspirations, and information on numbers and trends.

Local student housing groups

4.12 Ineffective communication underlies many of the problems of 'studentification'. The research showed that whilst some locations have well-developed and established arrangements, resulting in effective communication channels, others rely on more informal arrangements. In particular, the research showed a need for improved communication between different stakeholders and that the establishment of a student housing group was an effective approach. In some places, in recognition that communication, dialogue, consultation and action are different activities, more than one group has been established – with membership drawn from different stakeholder constituencies. It may be appropriate that local authorities take the lead in organising such groups involving different stakeholders.

THM-59 (continued)

Practice: Durham City Council, the University of Durham and others have established a group to ensure that the community does not become 'imbalanced' as a result of the size or distribution of its student elements. Representation includes private landlord providers, as well as resident stakeholders.

Source: Durham City Council. 2004. *Student Households. Discussion Paper.*

Local authorities and HEI action

4.13 This guide has highlighted that it can be difficult for an HEI to address the impact of 'studentification' particularly if this involves responding to activities off campus. There are, however, a number of powers available to local authorities to ameliorate its effects, for example, the Use Classes Order and HMO Licensing. New legislation could have a significant bearing on the incentives for private sector landlords to supply student accommodation, for students to participate in higher education and move into particular areas and for local government to regulate and control processes of 'studentification'. Legislation has provided local authorities with duties and powers to act (some of which are discretionary) in the fields of local planning, housing management, housing fitness, community services and anti-social behaviour. Housing, planning, environment and economic development are therefore the key service areas where policies are brought to bear on the issues of 'studentification'. Given that the powers and jurisdiction of the HEI are limited when responding to activities, it may be useful for the HEI to have a role in supporting and assisting the agencies, such as local authorities and the police, that already have the powers and procedures in place to address the issues concerned.

4.14 Empirical findings suggest that it is helpful for local authorities and HEIs to review their informal and formal actions, procedures and powers to see if they are working to address problems that might be prevalent in 'studentified' neighbourhoods. These powers and procedures can be outlined to all interested parties including students' unions and local residents' groups. Although solutions to problems may not warrant the use of formal powers at first, it may be helpful if all parties are aware at the earliest point of the formal powers that exist. HEIs and public bodies such as local authorities and the police may wish to consider drawing up written protocols that outline the actions that can be taken by individual agencies and at what point. There are other areas where it is important to recognise the distinction between legislation and persuasive powers. Accommodation accreditation schemes, for example, may largely rely on voluntary membership although some of their conditions (such as gas safety, for example) will be mandatory based on legislative powers.

THM-59 (continued)

4.15 Such reviews are best done in the spirit of local partnership, through channels that allow partners to be frank about what they are to do and what is likely to work. It may be necessary for partners to experiment with best practice examples from other areas and be prepared to assess their effectiveness in the local context.

Practice: University of Leeds Neighbourhood Helpline. This is run by the University of Leeds in conjunction with Leeds City Council and responds to issues and concerns such as noise and environmental problems. Regular review and planning meetings are held between the University and Council.

Practice: The University of Salford works very closely in partnership with Salford City Council and has established many links with the local community to help ensure the integration of students into the locality.

Planning for change

4.16 Large concentrations of students affect market demand for housing and often lead to a rise in house prices to the advantage of owner-occupiers and private landlords. It also creates investment opportunities in the buy-to-let market, and may lead to increased investment in and improvement of housing stock. However, it may also restrict access to the housing ladder for other sections of the community – for example, low-income families and key workers. Added to this, the repairs, renovation and extension to student properties can benefit the construction and service sector of the local economy, but again, communities may be unhappy about physical changes to their neighbourhoods.

4.17 Concentrations of students form a pool of flexible labour and as such are often welcomed by local employers, and many graduates work in the region where they studied. In turn, the availability of a graduate workforce encourages businesses to locate near HEIs thus boosting the local economy and providing additional employment. Considered as part of a local student housing strategy (see above) and other appropriate local strategies, a large student presence can be used to positive effect by local authorities to help regenerate declining areas and stimulate urban regeneration.

THM-59 (continued)

Local-level initiatives

Student accommodation strategy

4.18 The research revealed that there has recently been a dramatic growth in the number of student accommodation strategies developed by HEIs in many towns and cities. These vary in content and detail. Over 60 per cent of survey respondents noted that their HEI has a strategy for student accommodation. However, a third of HEIs reported that they did not have a strategy. Most accommodation strategies were first developed after 1999 but the survey found that the majority of HEIs that first developed strategies more than 11 years ago also reported that the negative aspects of 'studentification' have not become evident in their locality. This seems to point to the value of well-established student accommodation strategies in helping to manage the impact of 'studentification' in specific locations. On the other hand, simply having a strategy may not be sufficient in itself. Over 60 per cent of the respondents who stated that disadvantages were being felt in their locality had an accommodation strategy. However, the HEIs that are clearly at the forefront of tackling the detrimental facets of 'studentification' have accommodation strategies. It may be helpful for HEIs to review whether it would be useful for them to develop detailed strategies relating to both institutionally owned and managed accommodation and wider off-campus provision, including private sector accommodation.

4.19 As discussed earlier, many structural issues – relating to population density, for example – are beyond the remit of HEIs to tackle. However, HEIs could usefully ensure that their accommodation strategies are fully informed by the actual and predicted effects of other local policies and strategies. For example, many HEIs are reshaping their recruitment patterns to attract more postgraduate students. Such students are likely to be more mature than undergraduates, with different behaviour and lifestyles. A major implication of widening access policies is that more people drawn from the local community will be going into higher education. These changes in admissions will have an effect upon the pattern of the student population living in a community.

4.20 HEIs may wish to use their accommodation strategies and work with local authorities, local property owners associations and other interested parties to consider the supply, management and control and demand for student accommodation. Student demand is likely to be diverse and evidence suggests that preferences shift over a student's course of study. Different approaches will suit different student communities. For example, 2nd and 3rd year students may choose not to want to live in purpose built apartments but choose instead, having formed a freindship group, to rent a house or smaller property which is less institutional and where they can exercise their independence. In larger cities students will often have a wide choice of private rented accommodation. Where this is the case HEIs may tend not to provide accommodation for returning students, other than those with special needs, and or a small proportion of final year students who find a return to 'institutional accommodation' helps them to focus on their studies.

THM-59 (continued)

Practice: The University of Leeds Housing Strategy, the first outward community facing University accommodation plan which was developed in consultation with the community and local authority.

Student strategy managers/community liaison officers

4.21 Many local authorities and HEIs are deploying strategies to manage the effects of 'studentification' and to promote community cohesion. At local authority level, evidence suggests that relations are best co-ordinated and communicated across the authority by a designated official, who is relatively senior, and who can effectively feed back into policy formulation.

Practice: Nottingham City Council has employed a Student Strategy Manager, whilst in Durham a named student representative and named Council officer are the key points of contact for liaison on student housing issues.

4.22 Several HEIs themselves have appointed officers at strategic level to relate to local communities, and this practice is welcomed by residents' groups which say that they value having a named contact. Evidence suggests that it is preferable for such a designated person to have a solid knowledge of the local context, and well-established relationships with external agencies and key stakeholders.

Practice: Loughborough University has created the senior post of Community Relations Officer as a point of contact and with a budget to undertake community activities – good neighbour guide, newsletter for residents about the university, website for the community with information about university facilities they can use, alerting them to key dates – RAG activities, degree ceremonies, term dates and other major events (for parking and traffic purposes). The officer also takes a strategic overview of issues and monitors and acts upon trends in complaints.

Practice: The University of Nottingham has created the post of Manager for off-campus students with the support of the Students' Union, with the aim of building more positive relationships between students and their neighbours.

THM-59 (continued)

Accommodation bureaux

Many HEIs have long assumed a responsibility to accommodate first year students. In recent years they have been increasingly advising second and third year students, as well as supplying institution-owned accommodation for students in their later years of study. HEI accommodation offices can be a key influence on students' choices about where to live. Their advice can mitigate the adverse effects of 'studentification'. This appears to be most effective when co-ordinated by an institutional accommodation bureau, which has designated staff. Such an organisation, either within the structure of the HEI or at arms-length, provides a reputable central point for students searching for private rented accommodation. Working closely with students' unions, and in partnership with local authorities and local communities, as well as external agencies such as the police, primary care trusts and the local media, accommodation bureaux can influence the market demand for student accommodation, as well as the relations between students and residential communities, through the dissemination of information and advice. It is one major way in which the effective management of students and housing in local communities can be achieved through non-legislative, non-regulatory solutions. In larger towns and cities HEIs often collaborate to provide such services. 4.23

Practice: The University of Manchester, Manchester Metropolitan University and the University of Salford, and their students' unions, collaborate through Manchester Student Homes 'the only place you will need to go to find housing. It is owned and managed by your universities and students' unions. This means that it is accountable, independent and does not exist to make a profit!'.

Source: University of Manchester and Manchester Metropolitan University 2005. *Student Housing Guide: The Essential Guide To Renting Student Housing In The Private Sector.*

Practice: Unipol is a charitable organisation established jointly by the University of Leeds and Leeds Metropolitan University. It has been running since the 1970s. Unipol provides an accommodation bureau, redevelops and regenerates property for the student housing market and operates a code of standards for landlords.

Source: Unipol 2005. *A Guide To Housing. Returning To Leeds.*

Student housing handbook guides and guidance

One of the most effective forms of practice is the production of student housing guides, with some excellent current collaborative examples by students' unions and HEIs. This is particularly effective when they are distributed to all students when enrolling and registering at the beginning of each academic year. In addition, house-hunting talks (incorporating 'being a good neighbour' information) are offered in some HEIs to students as they near the end of their first year. 4.24

THM-59 (continued)

Practice: When first year students leave halls of residence at the end of the year, Loughborough University, in collaboration with the students' union, gives them a keyring promoting the Silent Students Happy Homes (SSHH!) campaign and a leaflet about being a good neighbour. Students are also targeted with similar information at registration the following year.

4.25 Other examples of practice include information stalls at freshers' events, advertisements in local and student newspapers, and leaflets to student and non-student populations. There is also increasing use of the internet to disseminate advice and information.

4.26 As described above, one of the most effective informal ways of affecting the growth of residential student clusters is for HEI accommodation offices to influence demand by briefing students on a wide range of residential locations. This can be achieved by house-hunting talks, a student housing guide and other means. There are many examples of accommodation offices deepening students' knowledge and awareness of options by promoting the appeal of alternative residential locations.

Practice: The Leeds Housing Guide 2005 advises 'the popular areas with students (Headingley, Hyde Park) attract a high weekly rent and LS6 has the worst crime rate. So don't just limit yourself to these areas. Leeds has a very good bus network and by moving further away from the immediate areas around the university you could find better, cheaper accommodation in an area with more local diversity and cheaper insurance. In Beeston Hill, just south of the city centre, many properties have recently been renovated and improved. This has resulted in more students in more quality rented accommodation becoming available and students beginning to choose to live in this area attracted by competitive rents and the other positive characteristics of the area; including good sports facilities'.
Source: Leeds University Union and Student Advice Centre 2005. *Leeds Housing Guide 2005*

Cohesive Student Households

4.27 Promoting 'happy homes', where students respect each other, can help to reduce friction which might otherwise, affect neighbours through, for example, high turnover and noise-related problems. Several HEIs actively encourage students to think carefully about the choice of co-residents and cost before searching for accommodation.

THM-59 (continued)

Practice: Leeds Housing Guide 2005 advises students to 'find a property that meets your budget not the other way round. It can be the cause of many inner house conflicts when one or more housemates cannot afford to pay all of the rent and the landlord expects the other tenants to pay what is owed'.
Source: Leeds University Union Welfare Services 2004. *Scrap the Urban Myths*

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union suggests 'don't assume that you suddenly have to decide upon your 'friends for life' to live with next year. It's a strange situation when you have lived with people for only a few months and then have to commit to them for an entire year'.
Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005.*

Being a good neighbour

The research showed that issues of student behaviour are central to friction between students and resident communities. As well as explaining their rights when they rent a property, HEIs can inform students of their responsibilities as tenants and neighbours. Many already emphasise to students the need to respect the cultures of established residential communities. 4.28

Practice: The Leeds Housing Guide 2005 says 'remember that wherever you move to, you are part of that community. So be a considerate neighbour'.
Source: Leeds University Union and Student Advice Centre 2005. *Leeds Housing Guide 2005*

Practice: Loughborough University produces a good neighbour guide which is issued to students: 'welcome to the Storer Road area, people have lived and worked here for 100 years! Enjoy a historic part of town where you too can make a positive contribution to community life'.
Source: Loughborough University with Loughborough Students' Union and Storer Area Community 2001. *Life in Loughborough: The Good Neighbourhood Guide.* The guide is endorsed by Loughborough Students' Union and the Storer Area Community.

THM-59 (continued)

4.29 Developing this theme, there is a role for HEIs to promote neighbourliness amongst the student population. In one major example of practice identified by the research students were asked to introduce themselves to their neighbours, and to try to develop good relations.

Practice: As part of the 'education' strand of its 'education, discipline, partnership' strategy, Queens University Belfast, jointly with the University of Ulster, commissioned a public relations agency to design a campaign to help them raise awareness among students about anti-social behaviour and the problems it causes. They then flooded the city with the visually striking 'Do you turn into a monster after dark?' posters, leaflets and beer mats. The campaign has received a positive evaluation in terms of changing attitudes and behaviour among students and will run again in the new academic session in 2005. A university Pro-Vice-Chancellor commented that 'the aim is to make sure that not a single student in South Belfast doesn't know what their responsibilities are'.

Codes of behaviour

4.30 Some HEIs sign students up to a code of behaviour, as a prerequisite of their registration.

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union reminds students 'when you registered as a student at the University of Nottingham you signed up to this statement: 'I also acknowledge that I have responsibilities to the communities of Nottingham in which I am temporarily resident and undertake to act with consideration and respect for the welfare and interests of the wider community and my fellow students''.

Source: University of Nottingham and University of Nottingham Students' Union 2005, *Housing Handbook 2005*.

Practice: The community strategy of the University of Leeds (2000) states that Hall Wardens and Flat Advisers in university owned-accommodation are charged with seeking to foster good relations between students and their neighbours. Where there are examples of inconsiderate or anti-social behaviour originating from university accommodation, and those responsible for the nuisance can be identified, the university will intervene and, if necessary, institute disciplinary proceedings. Local residents are asked to report incidents to the university's accommodation services'.

THM-59 (continued)

Some HEIs support their code of behaviour with detailed information so that students can be in no doubt of what is expected of them. It can also be helpful for established residential households to be aware of the details of the code and know how to gain access to it. 4.31

There is currently limited evidence of practice and many English and Welsh HEIs are currently exploring the legal aspects of what action might be taken when students do not abide by the HEI's code of behaviour. One example is provided in Queen's University Belfast's strategic response to 'studentification', entitled 'education, discipline, partnership'. The 'discipline' element of the strategy involves verification of reports of anti-social behaviour, followed up by various actions from warnings and fines to suspension and expulsion. Given that the student population is transient, its collective memory works differently from that of more established residential communities. HEIs, therefore, have to be persistent in reinforcing messages if they wish to promote and sustain certain forms of behaviour. 4.32

Practice: At Loughborough University, the Registrar, security section and Community Warden are empowered to impose fines on students found to be in breach of its 'disreputable behaviour' ordinances. The university has also employed a case officer to deal with the hearing of evidence and due processes which have been developed to support this system.

Community strategy

Several HEIs have also developed community strategies that seek to widen the engagement of students in the community. This has been shown to be particularly effective in helping communities to cohere. Other HEIs might find it useful to consider whether it would be helpful to develop a community strategy. 4.33

Practice: The University of Leeds' community relations strategy 'outlines the role of the university in the city; considers the benefits resulting from that presence, including activity directly relevant to local communities; and outlines the action being taken by the university to improve its relations with the local community'.

Most HEIs and their students' unions facilitate student volunteering and there are many examples of students taking part in a variety of local community projects. Some interviewees reported that the positive atmosphere engendered by such activities is very valuable when problem arise. Sometimes such projects are deliberately aimed at tackling the negative effects associated with high concentrations of students. 4.34

THM-59 (continued)

Practice: As part of the 'Manchester 100 Days Challenge' run by the City Council to promote 100 days to clean up the city, Manchester students helped with the project and two days were designated for neighbourhoods with high numbers of student residents.

Practice: The Up Your Street project is a partnership led by students from the University of Leeds and Leeds Metropolitan University, aiming to improve the visual environment of Burley and Hyde Park and improve community relations between students and long-term residents. Projects include a winter festival for students and local people, graffiti clean-ups, bargain hunt events and landscape architecture projects.

Source: University of Leeds 2004. *City and Regional Annual Report 2003/4.*

Complaint response strategies

4.35 Several HEIs have appointed community wardens to respond to day-to-day concerns including noise nuisance, and refuse and crime-related problems. In some cases the designated individual lives in the 'student area' so that they can be contacted day and night by residents. They can visit and discuss issues with students, as well as being proactive and helpful to students and promoting neighbourly behaviour.

Practice: Loughborough University has appointed a Community Warden. The Warden, together with a Sub-warden, liaises with the University, and between residents and students living in private accommodation in certain parts of the local community (where many, but not all students live), with the aim of helping the university to improve communication with local residents, and maintaining a good relationship between all groups.

Neighbourhood Helplines

4.36 A major development which has improved relations between HEIs, students and resident populations is the creation of neighbourhood helplines. These allow HEIs to listen to their local communities, and to understand more fully the relationship between students and the community. Evidence shows that these work best where the HEI closely monitors the extent of their use and the nature of the feedback being received. This enables the HEI to respond to users' needs, as well as continuously improving the service.

THM-59 (continued)

Practice: The University of Leeds has established neighbourhood helplines for communities with high proportions of students. The service provides a 24-hour voicemail and email service to raise issues and concerns.

Experience shows that it is important to publicise the neighbourhood helpline as well as developing a web site which provides useful contact numbers. 4.37

Practice: Loughborough University uses its campus security service – which operates 24/7 – as an 'on-call' service for the community. Residents can call and security will attend and intervene. Loughborough's Community Warden or Security Manager – with power to issue fines – will follow up in the daytime if the problem was serious or if it is persistent.

Crime prevention

Student households are likely to contain a high proportion of electronic consumer goods and as such they can attract burglars. In addition, students sometimes attract physical violence just because they are students. The perception of an increased risk of crime can be an important influence on the attitudes of established residential communities. Most HEIs have good partnerships with local government and the police with the aim of heightening student understanding of crime-related prevention strategies. 4.38

Practice: The community safety unit of Newcastle City Council coordinates the student community safety strategy. It works with the police, HEIs, colleges, students' unions and other departments to run education and awareness campaigns relating to all areas of student safety and also good neighbourliness and citizenship. Campaigns are run through student media and a student safety website and are jointly funded by Newcastle City Council, Northumbria Police, the University of Northumbria at Newcastle and Newcastle Students' Union.

Practice: The University of Manchester Students' Union ran a 'can you spot a student house' anti-crime campaign with picture of an unkempt property, doors and windows open, old mattress in untidy garden, rubbish bags festering etc. A beneficial side-effect is that students will tidy up the appearance of their property, to avoid being burgled.

THM-59 (continued)

Accreditation schemes

4.39 One area where HEIs can have an influence is by developing accreditation schemes for private landlords. The effectiveness of these schemes is inherently linked to students restricting their search for accommodation to accredited properties. HEIs have often been in the vanguard of developing such schemes and some are run in partnership with the local authority. In some areas, accreditation schemes apply to landlords more generally – ie, whether or not the landlord is renting to students – for example there is a London-wide accreditation scheme to which all 33 London boroughs are signed up.[8] Accreditation schemes supply high-quality student accommodation by rewarding private landlords whose accommodation complies with a code. Accredited property receives priority on accommodation bureau lists, and this acts as an incentive for private landlords to obtain membership of the scheme. Such schemes therefore have a dual benefit of affording students some protection from unscrupulous landlords as well as raising the quality of the housing stock. HEIs could consider developing, reviewing and improving accreditation schemes, in partnership with local authorities, students' unions and landlord groups.

4.40 Accreditation schemes are only successful if effectively policed on a regular basis by HEIs, and students are encouraged to inform them of problems as part of this process. It is therefore important that monitoring systems are effective and that sanctions are applied in cases of persistent non-compliance.

Practice: Manchester Student Homes awards 'code compliant' and 'code plus' recognition to accredited landlords (who have met a basic standard) in recognition of the provision of additional features such as mortice locks, burglar alarms etc.

Practice: In Leeds, Unipol's voluntary code of standards requires properties to meet standards beyond legal requirements, and students are encouraged to rent properties covered by the code. Although the code is not legally binding, if landlords are found to be in breach of the agreement, they may be prevented from advertising their properties through Unipol in the future.
Source: Unipol 2005. *A Guide To Housing. Returning To Leeds.*

THM-59 (continued)

HEI-managed accommodation

The Housing Act 2004 introduced compulsory licensing for houses of multiple occupation (HMOs) in England and Wales. However, student HMOs that are managed or controlled by further or higher education establishments may be exempt from licensing, subject to compliance with a national code of practice that has been approved by the Office of the Deputy Prime Minister (ODPM). 4.41

A draft code of practice designed to apply to all HEI managed and controlled student housing in England and Wales has been prepared by Universities UK in conjunction with the Standing Conference of Principals, (SCOP), the Association of University Directors of Estates (AUDE), the Association for Student Residential Accommodation (ASRA), the Conference of University Business Officers (CUBO), the University Safety and Health Association (USHA), the Association of Heads of University Administration (AHUA), the Association of University Chief Security Officers (AUCSO) and the Association of Managers of Student Services (AMOSSHE). There are two other Codes that are also awaiting approval from the Office of the Deputy Prime Minister. Both of these are organised by the Accreditation Network UK (ANUK): one code is for HEI-managed accommodation and another for large-scale student accommodation run by private landlords. ANUK and Universities UK have drawn up a protocol to ensure optimal co-operation between the various codes. 4.42

Practice: The University of Brighton provides information for both students and owners of property which is managed by the university. This provides information on safety requirements and regulations, taxes and other payments and furniture requirements.

Sources: University of Brighton 2005 *University Managed Housing 2005 Information For Owners*; University of Brighton 2005 *University Managed Housing A Student Guide To University Managed Flats And Houses*.

Raising expectations of quality and management of accommodation

HEIs can help to improve the physical and management standards of student accommodation by ensuring that students are familiar with the appropriate quality and standards of housing. They can play a major role in raising student expectations of the quality of private rented accommodation, and extend knowledge of housing legislation and 'what to look for'. This, in turn, encourages private landlords to improve the quality of accommodation for a more discerning student clientele. 4.43

THM-59 (continued)

Practice: The University of Nottingham and its students' union advise students to 'make sure the property property [they] choose is of an acceptable standard using the checklist enclosed and all other guidelines in this handbook'.
Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005*

Practice: The University of Brighton provides detailed information of agreements and payment, length of tenancy and cancellation, what rents include, deposits, rent guidelines, inventories, safety and council tax.
Source: University of Brighton, *2005 Accommodation Handbook*

Information directories

4.44 Lack of consideration and ignorance often contribute to problems with the physical environment. Some students may not notice or mind litter or noise as much as other more established residents and other students. HEIs can help by bringing such issues to students' attention and explaining why they are considered to be a problem, as well as disseminating information about refuse days and other initiatives. A growing number of HEIs provide student information directories, which explain why it is important to address these issues, and detail all relevant contact numbers of organisations that students may require during their period of study. Such messages are sometimes more appropriately delivered by students' unions.

THM-59 (continued)

Practice: In Students and The Community 2004/05, a guide prepared by the University of Nottingham, it is pointed out that: 'There are many ways in which students can make a positive contribution:

- Don't leave your dustbin on the street – it can block the way for people with disabilities, and for people with prams and young children.
- Don't leave your rubbish in your garden or outside your property. It is easy to clear it up or to arrange for it to be taken away.
- Do not forget you are living in a residential area – your neighbours may work shifts, have to get up early in the morning, or put children to bed early at night when you are just coming to life!
- At certain times of the day there are large numbers of students walking between the campuses and their homes. Be considerate to other pedestrians, particularly those who are elderly or infirm, or have young children.
- Cycling or skateboarding on the areas reserved for pedestrians can be dangerous, cyclists should stick to the roads or, better still, to the designated cycle lanes.
- Do let your neighbours know if you are planning a party that might go on until late at night – try and agree a mutually acceptable time for it to end.
- Do get involved in your local community – there are lots of opportunities.
- Do take an interest and pride in where you live – it is your home and your neighbourhood too.
- Do frequent local businesses – they welcome your custom'.

Source: University of Nottingham *Students and the Community 2004/05*

Environmental blight

Many HEIs and local authorities have made significant efforts to ensure that student households are aware of the need to minimise environmental degradation, refuse and litter. Local authority cleansing departments can circulate information to local HEIs to remind the students of bin days. Some have a regular feature in the student magazine and the local paper. Many inform students that they must not dump rubbish, and should minimise recycling and waste disposal problems. 4.45

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union states 'do NOT leave large items such as sofas, mattresses and tables out on the street with the assumption that they will be taken away with the rest of your rubbish. They won't. You need to call to get it taken away (see Contacts List)'.

Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005*

THM-59 (continued)

Practice: In Headingley in Leeds, the Council piloted the Streetscene initiative from January 2003 which it believes has been very successful in limiting the amount of refuse on the streets and making Headingley a cleaner environment. The Council promoted a multi-agency approach encompassing all street services (refuse collection, street cleaning, bulky household collection, graffiti removal, and weed control).

Source: University of Leeds. 2004. *City and Regional Annual Report 2003/4.*

4.46 The end of term can be a particularly bad time for rubbish and HEIs have adopted a range of strategies to tackle this, often in collaboration with local authorities, including arranging special collections. As a group, students are generally well-disposed towards the idea of recycling and respond positively to opportunities to do so.

Practice: Leeds City Council works with the HEIs to arrange student clean-ups at the end of the academic year. Charity shops are being encouraged to distribute and collect bags from student properties at the end of each academic year as a large amount of the items thrown away by students could be used by others.

Practice: In Nottingham, in recognition of the specific waste management issues in student areas, dedicated crews have been established to respond to student generated litter and fly-tipping. The special collections service and improving waste management arrangements features as an ongoing item of discussion with student landlords at regular liaison meetings.

4.47 Estate agents' boards, and the use of fly-posting and posters and signs in windows to promote student leisure and recreational activities can annoy established residential communities and detract from the environment.

Practice: Leeds City Council is working with landlords to restrict the display of estate agents' boards in specified areas of Leeds.

4.48 Untidy gardens can be a source of annoyance to established residents. Although many HEI accommodation bureaux do not expect students to maintain gardens, many encourage them to keep front gardens free of litter. At the same time, HEIs (possibly in collaboration with local authorities) could usefully introduce regular garden surveys (eg, the garden survey carried out by Unipol in Leeds), to exert pressure on private landlords.

THM-59 (continued)

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union encourages students to 'keep your front garden free of any litter. Although it's probably not yours, it makes the neighbourhood look unpleasant'.

Noise

What constitutes a noise nuisance is often subjective. HEIs use a variety of routes to stress the need to maintain noise at levels that do not cause friction between students and established residential communities. Silent Students Happy Homes (SSHH!) campaigns have been initiated by students' unions in a number of HEIs. 4.49

Practice: The University of Nottingham Students' Union's Silent Students Happy Homes – SSHH! Campaign encourages students as a group to be more considerate in their communities generally, eg, 'if you are living in a terraced or semi-detached house, remember that the walls may be quite thin so any slamming doors, shouting, loud music, etc is likely to be heard by your neighbours. If there are six of you all coming home at different times in the night and you all slam the door, there is the potential for your neighbours to be woken up six times'.

Source: The University of Nottingham and University of Nottingham Students' Union 2005. *The Housing Handbook 2005. The essential guide to moving off campus – Told like it is*

Practice: Many students going home from campus events take a route through residential communities. The Silent Students Happy Homes – SSHH! Campaign run by Loughborough University Students' Union aims to raise awareness through providing free merchandise including lollipops ('if the students have something in their mouths they can't be making a noise') and cards to hang on their door handles 'LSU politely requests that you respect your neighbours and keep noise to a minimum whilst walking home tonight' and including a number of useful phone numbers.

THM-59 (continued)

Traffic and parking

4.50 In residential neighbourhoods with limited kerb space and a growth in HMOs, parking is likely to become an area of conflict. There are many examples where local authorities have encouraged students to limit their use of private vehicles through the strategic deployment of car parking permit schemes. In addition, HEIs are increasingly seeking to restrict the use of private vehicles by students and encouraging considerate parking. Many HEIs are recognising the need to promote student use of public transport and cycling as an alternative. In this way, HEIs and local authorities can work together and this partnership approach can facilitate local authorities in negotiating with providers of local public transport to ensure that there is an adequate service and if possible to justify funding for dedicated public transport routes that could require subsidy to operate.

Practice: Students in Nottingham are advised 'how you move around the city and the surrounding areas has an impact on pollution and congestion. You are strongly advised not to bring your car to Nottingham unless there are special circumstances. In addition to adding to pollution and congestion, you should bear in mind that parking permits for university campuses are only given to students under very special circumstances. Residents' permits for parking on the streets where you live also quite restricted. Do use public transport where this is possible. If you do use a car, please make sure you drive and park with consideration'.

Source: University of Nottingham *Students and the Community 2004/05*

4.51 Traffic congestion is often experienced at specific times of year – such as the beginning and end of term and around major events such as graduations. HEIs can help local communities to manage this problem by publicising term dates and dates of major events.

Shops and services

4.52 Goods purchased locally by students make a significant contribution to the local economy and a student presence can ensure the viability of some retail businesses. HEIs can also assist by making students aware of their important economic role and encouraging them to patronise local shops.

4.53 A changing population can lead to changes in the types of shops and services available locally. Most commonly-cited examples include local shops becoming take-aways and cafés. Local authorities can use their powers to limit changes of use of retail properties to certain categories such as fast-food outlets, and local authorities may find it helpful to have policies that seek to maintain an appropriate retail balance in such neighbourhoods.

THM-59 (continued)

Demand for leisure and recreation services has other knock-on benefits for the community. In cities such as Sheffield and Manchester a large student population has contributed to the development of a vibrant nightlife, for example supporting live music performances and the growth of a club scene which draws people to the city – both as visitors and residents. The negative effects of such growth may include an increase in public disorder associated with such venues, although this is linked to wider youth cultures.

4.54

THM-59 (continued)

5 Conclusion

5.1 Although activities aimed at promoting the benefits and addressing the challenges of high concentrations of students are relatively new and untested, there is clearly a range of actions which can be taken by HEIs and local authorities at both a strategic and practical local level. This guide provides examples of a range of practice which could bring short to medium-term gains to communities, if implemented in a way which is appropriate to the local circumstances. The following section provides a checklist of activities, derived from the research, as a basis for discussion among local stakeholders.

THM-59 (continued)

THM-59 (continued)

6 Checklist for stakeholders

6.1 This checklist poses a series of questions, in no particular order of priority, which have been drawn from the examples of innovative practice outlined in this guide. The list provides a resource for those concerned with the challenges of 'studentification'. It is not intended to be prescriptive but rather to stimulate consideration and discussion. Although some of the issues are clearly more relevant to particular organisations and locations, they are of general interest to all the stakeholders. One of the main findings of the research is the need for appropriate multi-agency partnerships and effective coordination. The checklist might therefore usefully form the basis for local consultation and the creation of multi-agency partnerships. It is also intended to help individual stakeholders seeking to develop their own strategies.

All stakeholders

- Do stakeholders have firm evidence upon which they can base their understanding of the impacts of 'studentification' within their locality?
- Do stakeholders share a common understanding of whether the impact of 'studentification' is/is not being felt in the locality?
- Do stakeholders share a common understanding of the wider benefits and challenges of high concentrations of students in the locality?
- Is there agreement and common ground about the causes and effects of 'studentification' amongst stakeholders?
- Has a partnership framework been established for stakeholders to ensure there can be a coordinated approach to tackling issues of 'studentification'?
- Have a shared vision and general principles been agreed between stakeholders?
- Is there evidence of respect and trust between stakeholders?
- Have stakeholders agreed some objectives and exit strategies, and established mechanisms to review and monitor social, economic, cultural and physical changes within locations?

Higher education institutions

- Have HEIs considered and agreed their responsibilities to students and established residential communities?

THM-59 (continued)

- Have HEIs developed student accommodation strategies? If so, are they effective?
- Are the student accommodation strategies of HEIs and other local stakeholders consistent?
- Have HEIs and other stakeholders explored the scope for the dispersal of students from areas of high concentration where this may be desirable?
- Have HEIs and other stakeholders considered the promotion of alternative residential locations to encourage the dispersal of students?
- Have HEIs and other stakeholders considered the adoption of an accreditation scheme for private student accommodation? If so, are mechanisms in place to monitor and review compliance?
- Have HEIs and other stakeholders encouraged students to move into accredited property?
- Have HEIs listed only accredited property, or has it been separately identified, on their housing lists?
- Have HEIs considered the development of a central accommodation bureau to advise students when searching for private accommodation? Have HEIs and other stakeholders considered the production of a student housing guide?
- Have HEIs and other stakeholders provided effective house-hunting talks on a regular basis? If so, do these events reach the target student groups?
- Have HEIs encouraged students to think carefully about their choice of co-residents, in order to reduce the turnover of student households?
- Have HEIs sought to promote and raise students' expectations of the quality and affordability and suitability of accommodation?
- Have HEIs informed students of their responsibilities as tenants?
- Have HEIs sought to heighten students' awareness of the legal responsibilities of landlords?
- Have HEIs sought to inform students of their responsibilities through a written code of behaviour?
- Have HEIs encouraged students to introduce themselves to their neighbours and to foster other forms of neighbourliness?

THM-59 (continued)

- Have HEIs raised awareness of the need for reasonable noise levels?
- Have HEIs and other stakeholders considered preparing and issuing information directories detailing contact numbers and addresses of key services?
- Have HEIs and other stakeholders considered the appointment of community liaison officers to foster cohesive relations between students and established residential communities? If so, are there mechanisms in place for community liaison officers to respond effectively to issues as they arise?
- Have HEIs considered the development of neighbourhood helplines? If so, is effectiveness monitored?
- Have HEIs considered the appointment of off-campus wardens to regulate student behaviour?
- Have HEIs explored their powers to control and reprimand students who undertake anti-social behaviour?

Local authorities

- Has the local authority established appropriate mechanisms and communication channels for stakeholders to discuss issues of 'studentification'? If so, are these mechanisms open to all stakeholders?
- Has the local authority explored opportunities to share innovative and good practice with other local authorities through local authority networks?
- Are the initiatives to regulate processes of 'studentification' included in wider local authority strategies?
- Are the activities of different departments within the local authority mutually supportive and integrated?
- Has the local authority fully considered student accommodation issues in preparing the Local Development Framework?
- Has the local authority considered the appointment of a student strategy manager to manage initiatives to regulate 'studentification'?
- Has the local authority fully reviewed and assessed whether they are making effective use of all their available planning, housing management and environmental health-related powers to regulate 'studentification'?

THM-59 (continued)

- Has the local authority considered the implications of the powers introduced by the Housing Act (2004), and in particular the mandatory licensing of HMOs?
- Has the local authority considered strategies to minimise visual pollution associated with to-let signs and fly-posting?
- Has the local authority considered implementing appropriate methods to inform residents of the services (eg, cleaning, refuse, recycling, burglary reduction advice) which are available in neighbourhoods with high residential turnover and population change?

HEIs and local authorities

- Have HEIs, local authorities and other stakeholders actively promoted crime prevention strategies to students?
- Have HEIs and local authorities considered strategies to minimise problems of refuse collection and litter?
- Have HEIs and local authorities encouraged student volunteering and engagement within established residential communities?
- Have HEIs and local authorities implemented schemes/annual surveys to encourage students and landlords to maintain gardens and to keep them free of litter and refuse?
- Have HEIs and local authorities considered strategies to reduce private vehicle usage by students?
- Have HEIs and local authorities as appropriate considered the use of parking permit schemes to encourage more considerate parking of private vehicles?
- Have HEIs and local authorities considered strategies for limiting local traffic congestion?

THM-59 (continued)

Appendix I

Terms of reference and methodology

The research project was commissioned in December 2004 by Universities UK and SCOP, in collaboration with the Local Government Association. The project was led by Dr Darren Smith (University of Brighton), with support from Jane Denholm (Critical Thinking, Edinburgh), and was funded by the Department for Education and Skills, in partnership with the Office of the Deputy Prime Minister. The primary research was undertaken between January and March 2005.

Methodology

The project involved two major phases of research:

- The first phase involved postal (or email) questionnaire surveys of all HEIs and local community groups captured by the network of the National HMO Lobby – a formally constituted organisation. The former was distributed to Vice-Chancellors' and Principals' offices, with a request for the survey to be forwarded to an appropriate officer. This strategy proved relatively successful with a response rate of 62 per cent, and 85 per cent of surveys being completed by an individual who self-defined themselves as an HEI accommodation officer or manager. The survey of local community groups also yielded an impressive response rate with completions from 17 university towns and cities. Both surveys captured a substantial depth of qualitative comments from open-ended questions, reaffirming the emotive and experiential effects of 'studentification' for many individuals and social groups.
- The second phase of the project involved follow-up, in-depth qualitative (semi-structured interviews and focus groups) research with a range of organisations and stakeholders in the six case study locations of Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham. A major focus here was to identify examples of practice to prevent or mitigate the adverse effects of 'studentification'. Official documentation, reports and an email survey of selected local authorities in December 2004 provided examples of practice.
- In addition, the study was supplemented by interviews with representatives of national interest groups (eg, HMO lobby, NUS) and key individuals.

THM-59 (continued)

Case studies

A major objective of the research project was to identify in-depth issues and examples of practice from six case studies. These were selected by the Steering Group, following the analysis of the survey questionnaires and based on previous research into the issues. The rationale for selecting the six case studies was that all concurred with the following criteria, they should:

- Show evidence of practice and innovative responses to 'studentification';
- Point to different levels of 'studentification' and community concerns;
- Provide a breadth of different geographic and regional contexts;
- Provide a range of historical and diverse HEI contexts;
- Show that practice is influenced by 'external' contingent factors (eg, local economies, housing markets); and
- Were willing to participate in follow-up research.

The six case studies enabled the research team to identify a range of practices and explore processes of 'studentification' in diverse geographic contexts, and to consider the influence of different contingent conditions. There were substantial differences between the percentages of students and student households, the age profiles, tenurial structures and presence of local community resistance to 'studentification' within the six case study areas.

Case Study Area	Total Population (2001 GB Census)	% Population Aged 18-29 (2001 GB Census)	Total Student Population (HESA, 2001/02)	Total Student Population (HESA, 2003/04)	Membership of National HMO Lobby (National HMO Lobby)
Brighton	247,817	19.7%	30,010	31,630	No
Canterbury	135,278	17.3%	29,180	32,310	Yes
Leeds	715,402	18.3%	81,455	88,890	Yes
Loughborough	55,492[i]	28.0%	13,855	16,860	Yes
Manchester/ Salford	608,922[ii]	23.7%	87,250	92,015	Yes
Nottingham	266,988	23.5%	52,815	60,290	Yes

i Source: http://www.lsics.gov.uk/kindas/your_council/about_leicestershire/statistics/research_info_population.htm

ii Aggregation of total population for Manchester and Salford

iii This total student population is an approximation

THM-59 (continued)

Appendix II

Suggested reading

Chatterton, P. (1999) *University students and city centres – the formation of exclusive geographies. The case of Bristol, UK.* Geoforum 30 117-133
Chatterton, P. (2000) *The cultural role of universities in the community: revisiting the university-community debate.* Environment and Planning A 17 685-699
Chatterton, P. Hollands, R. (2003) *Urban Nightscapes: Youth Cultures, Pleasure Spaces and Corporate Power.* Routledge, London
Kenyon, E.L. (1997) *Seasonal sub-communities: the impact of student households on residential communities.* British Journal of Sociology 48: 286-301.
Kenyon, E. Heath, S. (2001) *Choosing this life: narratives of choice amongst house sharers.* Housing Studies 16 619-635
Rugg, J., Rhodes, D. & Jones, A. (2000) *The Nature and Impact of Student Demand on Housing Markets.* Joseph Rowntree Foundation, York.
Rugg, J., Rhodes, D & Jones, A. (2002) *Studying a niche market: UK students and the private rented sector.* Housing studies. 17 (2): 289-303.
Rugg, J. & Rhodes, D. (2003) *Between a Rock and a Hard Place: The Failure to Agree on Regulation for the Private Rented Sector in England* Housing Studies. 18: 937–946.
Smith, D.P. (2002) *Processes of Studentification In Leeds.* Report presented to the City and Regional Office, University of Leeds, Leeds.
Smith, D.P. (2005) *'Studentification': the gentrification factory?* in *Gentrification In A Global Context: The New Urban Colonialism.* Eds Atkinson R, Bridge G, Routledge, London pp 72-89
Smith D.P., Holt, L. 2004, *Processes of Studentification In Brighton and Eastbourne.* Report presented to the Vice-Chancellors Office, University of Brighton, Brighton.

Useful Websites

Anti-Social Behaviour Orders and Acceptable Behaviour Contracts
http://www.crimereduction.gov.uk/asbos9.htm?fp

Definitions of HMOs
http://www.odpm.gov.uk/index.asp?id=1155307

HMO Licensing
http://www.odpm.gov.uk/index.asp?id=1152003
http://www.landlords.org.uk/presentations/LICENSING%20PROCEDURE%20RG.ppt#278,7,Are all HMOs licensable?

Macmillan English Dictionary
http://www.macmillandictionary.com/New-Words/040124-studentification.htm

National HMO Lobby
http://hmolobby.org.uk/

National Landlords Association
http://www.landlords.org.uk

THM-59 (continued)

Noise Abatement Society
http://www.noiseabatementsociety.com/tcms/home

Noise Network
http://www.valweedon.org.uk

Nottingham City Council
http://www.nottinghamcity.gov.uk

Student behaviour
http://www.lboro.ac.uk/admin/ar/policy/behaviour/4policy.html

The Housing Act 2004
http://www.odpm.gov.uk/index.asp?id=1150528

The National Union of Students
http://www.nusonline.co.uk/info/housing

The UK Accreditation Network
http://www.anuk.org.uk

UK Noise Association
www.ukna.org.uk

University of Leeds Housing Strategy
http://www.leeds.ac.uk/about/housing/action.htm

University of Nottingham Accommodation Strategy
https://www.nottingham.ac.uk/marketing/ocsa/resources/The%20University%20and%20the%20Community-Strategy-.pdf

Use Classes Order
http://www.planning-applications.co.uk/uco.htm

THM-59 (continued)

Notes

1 Universities UK Factsheet 2005 Students at UK HEIs AY 2003/04
2 HESA figures for 2003/04
3 Leeds HMO Lobby Introduction webpage
4 Richard Tyler National HMO Lobby
5 Leeds City Council 2002. Privately Rented Shared Housing In Leeds: A Review Paper And Action Plan
6 Charnwood Borough Council 2005 Student Housing in Loughborough Consultation on proposals for Supplementary Planning Document (closed 24.03.05)
7 Dorling, D and Thomas, 2004, People and Places: A 2001 Census Atlas of the UK (Policy Press, Bristol)
8 Accreditation Network UK (ANUK) 2004. Accreditation Today

THM-59 (continued)

Universities UK

Universities UK
Woburn House, 20 Tavistock Square, London WC1H 9HQ
Tel +44 (0)20 7419 4111 **Fax** +44 (0)20 7388 8649
Email info@UniversitiesUK.ac.uk **Web** www.UniversitiesUK.ac.uk

ISBN 1 84036 127 1
January 2006 £10.00

THM-59 (continued)

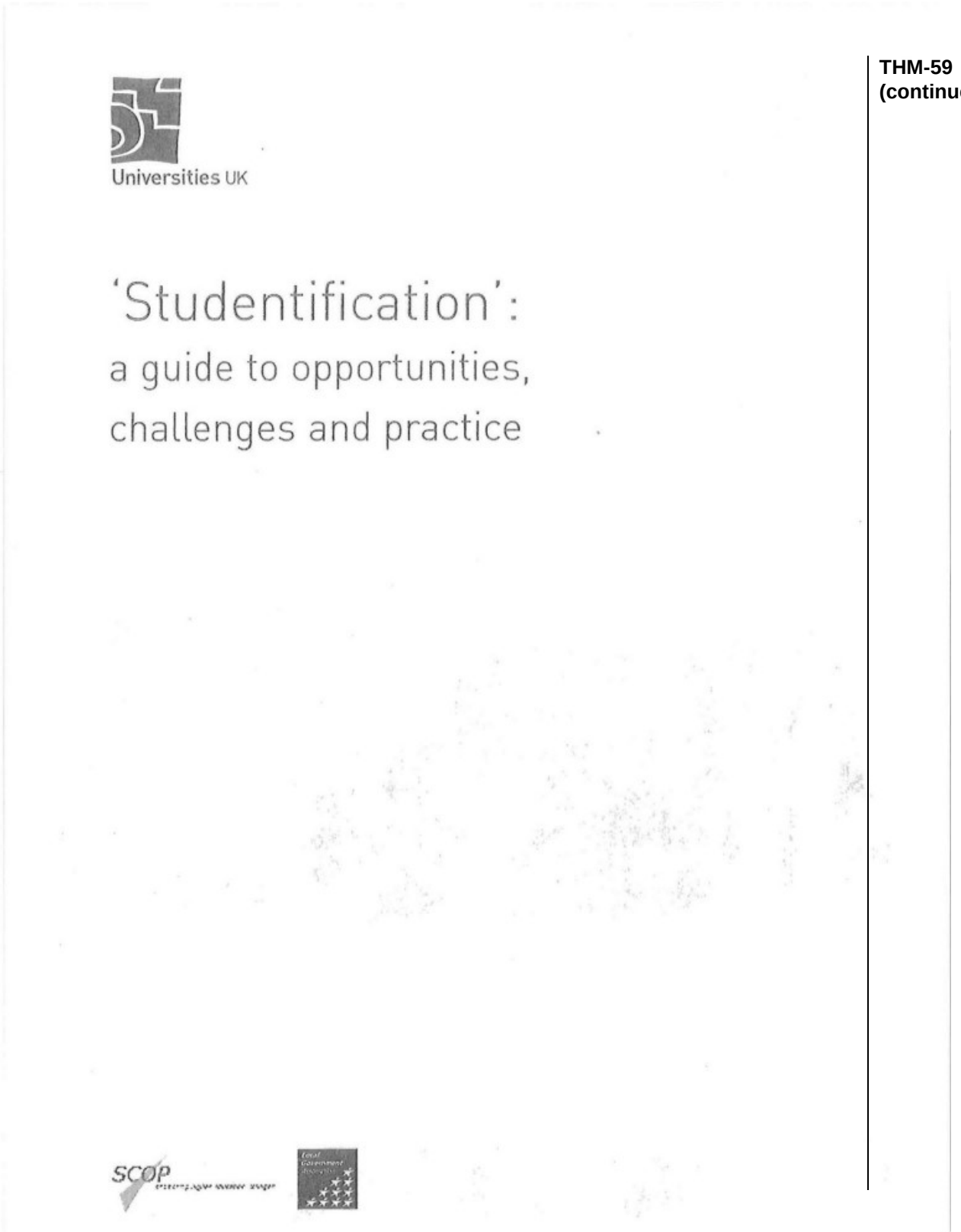
Universities UK

'Studentification': a guide to opportunities, challenges and practice

Universities UK MANAGEMENT GUIDANCE

SCOP

THM-59 (continued)



THM-59 (continued)

THM-59 (continued)

Contents

THM-59 (continued)

Foreword

The growing numbers of students gaining access to higher education in recent years has had the effect of increasing concentrations of students in many towns and cities across the UK. The changes this has brought have been interpreted and experienced differently by local communities. Some local communities have witnessed largely negative and detrimental impacts in areas where relatively high concentrations of students have settled. In other contexts, some local communities, particularly within declining areas, have welcomed rising numbers of students. As this phenomenon of 'studentification' is relatively recent, there is no blueprint for a tried and tested approach effectively to manage high concentrations of students within houses in multiple occupation (HMOs) in local neighbourhoods. However, many higher education institutions (HEIs) and students' unions, local authorities and communities have developed and are using innovative practice that could be useful to others. This guide should therefore be viewed as a starting point for HEIs and stakeholders planning to initiate or extend discussions and joined-up working, and to establish good practice that is sensitive to the local context.

'*Studentification*': *a guide to opportunities, challenges and practice* has been published by Universities UK in partnership with the Standing Conference of Principals (SCOP) and in association with the Department for Education and Skills (DfES), the Office of the Deputy Prime Minister (ODPM) and the Local Government Association (LGA). The guide provides examples from a range of current practice. These, if applied in a way that is appropriate to their local context and circumstances, could have a major benefit for all local stakeholders and organisations.

THM-59 (continued)

Executive summary

This guide draws upon the findings of research that was carried out during 2005. This sought the perceptions of a wide range of stakeholders and consisted of an analysis of existing literature and secondary sources and survey questionnaires to UK HEIs, all houses in multiple occupation (HMO) lobby groups within the national network and selected local authorities. In-depth case studies were also carried out in Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham. The six case studies enabled the identification of a range of innovative practice which had been developed in response to diverse local contexts and circumstances. The project was funded by the DfES and was therefore primarily focused upon practice in England, although the survey questionnaires were issued to HEIs and lobby groups UK-wide.

The guide provides a range of examples and practice upon which stakeholders can draw. It includes a checklist of activities as a basis for stimulating discussion among stakeholders, which can be used to support the effective management and integration of students into local communities.

THM-59 (continued)

Acknowledgements

These guidelines have been produced in partnership with the Standing Conference of Principals (SCOP) and the Local Government Association.

Universities UK and its partners wish to acknowledge

Dr. Darren P. Smith	Reader in Human Geography, University of Brighton, with support from Jane Denholm (Critical Thinking, Edinburgh), who researched and drafted the guide;

The members of the Steering Group

Ms Helen Bowles	Policy Adviser, Standing Conference of Principals
Mr John Daniels	Principal Policy Officer on the Private Rented Sector, The Office of the Deputy Prime Minister
Mr Barry Keight	Policy Officer, Department for Education and Skills
Mr Dan Lucas	Policy and Research Officer, Housing Direct, representing Local Government Association
Ms Vivienne Stern	Senior Public Affairs Officer, Universities UK
Mr Derek Stroud	Planning Adviser, Universities UK
Ms Fiona Waye	Policy Adviser, Universities UK

The respondents involved in the survey and case studies and the examples of current practice, many of which have informed the guide; and the Department for Education and Skills for its financial support.

THM-59 (continued)

THM-59 (continued)

1 Introduction

Why is a guide needed?

1.1 The expansion of higher education has had the effect of increasing concentrations of students in residential areas in many towns and cities. This phenomenon, sometimes called 'studentification', has, in many places, led to profound cultural, social, physical and economic transformations. These have been experienced differently by local communities and other stakeholders. For some individuals and groups the added dynamism, and other positive effects which students can bring (including the impact on the local economy), appear to have outweighed any disadvantages. For others, changes to the characteristics of local neighbourhoods have been interpreted as largely detrimental. This emphasises the diverse impacts that students can bring to university towns and cities, depending on the local context.

1.2 It has been claimed that some local authorities and HEIs have neither acknowledged nor addressed these problems, and this has led to resentment among local communities. In extreme cases this has manifested itself in frictions between established communities and their local HEIs, with serious implications for community cohesion and well-being in the longer term. The National HMO (houses in multiple occupation) Lobby – a formally constituted organisation with representation from 27 towns and cities – has been campaigning for a number of legislative changes to address these effects.

1.3 The research conducted for this guide shows that there is significant variation in the scale and pace of 'studentification' throughout the UK and that it occurs in different ways in different places. Experiences of the issues and challenges also vary. The research concluded that the issues therefore need local attention and local solutions, which are sensitive to the neighbourhoods and established communities. As the phenomenon is relatively recent, there is no blueprint for a tried and tested approach. Nonetheless, a number of HEIs, local authorities and communities have developed a range of practices that could be of benefit to others who are considering how best to respond to these challenges. The guide therefore represents a 'stepping-stone' to support the effective management and integration of students into local communities, and seeks to stimulate local initiatives that ensure the benefits that students can bring to university towns and cities are nurtured. Since the changes are clearly dynamic, it may be beneficial for future research to monitor and evaluate the effectiveness of this innovative practice in various contexts in the mid- to longer-term and to share evidence between and across different locations.

THM-59 (continued)

Who should use this guide?

1.4

This guide is aimed at HEIs and local authorities but will be useful to other stakeholders including students' unions and local residents' groups. Within HEIs it will be of particular interest to accommodation officers, community liaison officers, estates, strategic planning and marketing officers. Local authority officials who may be interested will include those working in planning, housing, environmental health, regeneration and development and community relations. The guide outlines the key issues and the nature of challenges. It highlights examples of practice that should assist stakeholders in devising strategies to influence the impact of concentrations of students on established communities. This is not an exhaustive or prescriptive list but is intended to be a helpful starting-point for activities.

What does the guide include?

1.5

The guide has been developed as part of a research project, commissioned and funded by the Department for Education and Skills. Its remit was to scope and assess the scale and nature of the challenges associated with large concentrations of student populations, and to identify current practice to address these through consideration of some case study examples. Further information about the project and the methodology is found at Appendix I. In summary, the research gathered the views of a wide range of stakeholders – HEIs, local authorities, students' unions, residents' groups, the National HMO Lobby and private sector organisations. It consisted of analyses of existing literature and secondary sources, survey questionnaires to UK HEIs, all HMO lobby groups within the national network and selected local authorities. This was followed up with in-depth qualitative fieldwork – interviews and focus groups – investigating six case studies in greater depth: Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham.

THM-59 (continued)

2 Key findings

2.1 The key findings of the research undertaken for this project are:

- 'Studentification' is a relatively new concept which is not yet well-understood and measures to ameliorate its challenges and realise opportunities are still being piloted. It is therefore difficult to say definitively at this stage 'what works' but the emerging evidence provides some indications;
- In considering possible action that they may take, HEIs and local authorities should recognise the needs and welfare of both students and established residential communities;
- Partnership working is the key to addressing the challenges of 'studentification', as well as fully realising the opportunities. The complexity of the issues of 'studentification' can be considered only by a series of interlocking strategies;
- Effective communication channels are essential to foster consultation and discussions between different organisations and stakeholders. Processes to ensure a formal dialogue are very important;
- Achieving a consensual view of the issues and a common vision requires respect, transparency and trust between the stakeholder organisations – HEIs, local authorities, community groups, central government, students' unions, and private rented sector;
- The development of initiatives or strategies to address 'studentification' must be sensitive to the local context, given 'studentification' is expressed in diverse forms and occurs in different ways in different places, and is a dynamic process;
- There is a great deal of innovative practice addressing issues of 'studentification' in local contexts, such as the creation of neighbourhood helplines and community liaison officers;
- There is a need for all stakeholders to recognise that the growth of student populations can have both positive and negative effects, and that these will be perceived differently by different groups;
- Sharing of experience and practice between organisations and stakeholders, for example via regional networks and conferences, could be helpful.

THM-59 (continued)

THM-59 (continued)

3 Context

What is 'studentification'?

3.1 The term 'studentification' was established by Smith (2002) to describe the growth of high concentrations of students within the localities of HEIs, often accommodated within HMOs. There are four dimensions to the process with the social tier being the primary factor:

- **Social:** the replacement and/or displacement of established residents with a transient, generally young and single, social grouping
- **Cultural:** the growth of concentrations of young people with shared cultures and lifestyles, and consumption practices, which in turn results in the increase of certain types of retail and service infrastructure
- **Physical:** the downgrading or upgrading of the physical environment, depending on the local context;
- **Economic:** the inflation of property prices and a change in the balance of the housing stock resulting in neighbourhoods becoming dominated by private rented accommodation and houses in multiple occupation, and decreasing levels of owner-occupation.

What are the effects of 'studentification'?

3.2 As can be seen from this outline, and as the research conducted for this project showed, the growth of student populations can have different impacts. In addition, the research found that how the effects are interpreted often varies depending upon the perspective of the viewer. Nonetheless, the term 'studentification' tends to be used as if it is synonymous with 'problems' and this guide concentrates on addressing the negative effects of high concentrations of students. It is therefore important to note that growing student populations can yield benefits for university towns and cities. For example, many communities currently without HEIs are actively supporting their creation, partly because of the many benefits that large student communities bring to an area, and the fact that student accommodation has helped to regenerate areas that might otherwise have declined. In addition, local authorities and communities in some towns and cities have recorded negative effects as a result of students and landlords moving away from particular enclaves.

THM-59 (continued)

On the whole, studies of the advantages of increasing numbers of students have tended to focus on benefits such as increasing spending levels in the local economy, prestige and recognition, lifelong learning opportunities, wider economic contribution to the community, spin-off companies, educational, cultural and other arts events, concerts and performances, sporting events and facilities and so on. There is often an underlying assumption that these benefits will 'trickle down' to the level of neighbourhoods. As such, benefits tend to be broad and not clearly definable (whilst disadvantages tend to be narrow and very clearly definable). However, understandings of the specific benefits of communities of students and how they could be nurtured at neighbourhood level are not well-developed. Future research could be helpful in deepening knowledge of the ways in which local neighbourhoods can proactively share these benefits. 3.3

The positive effects are summarised in Table 1.

Table 1: Student populations – positive effects

Social	Cultural	Physical	Economic
Student volunteering makes an important contribution to many aspects of social life Student housing needs prevent serious depopulation in many inner-city areas Increases the range of goods, services and attractions available to the town/city's population A critical mass of students can ensure transport links to the benefit of the whole community Student communities can also support nurseries and multi faith centres	Create a critical mass and demand for diverse range of cultural events Enhances reputation of city/town as vibrant, dynamic location and as an attractive destination for eg, night-clubbing, evening economy, or tourism Creates an international/ cosmopolitan feel/ outlook	Higher/rising property prices provide a level of incentive for upgrading properties which might otherwise remain empty, languish in a neglected state or be generally unfit for habitation Many older properties receive considerable investment by private landlords which extends their life The existence of large numbers of young people help to make city centres attractive to social and retail spaces Changes in type of retail and entertainment services available – eg, local shops becoming cafes, bookshops, live music venues	High demand for student housing and the stimulus to private rented sector leads to rising house prices Growth in buy-to-let market and private investment opportunities Students constitute a flexible part-time labour force undertaking seasonal employment Student presence can help stimulate urban regeneration Goods purchased locally by students make a significant contribution to the local economy Student presence ensures the viability of some retail businesses Repairs, renovations and extensions to student properties benefits the construction and service sector of the economy Availability of a graduate workforce

THM-59 (continued)

What are the challenges of 'studentification'?

3.4 The research for this guide shows the challenges of 'studentification' are experienced differently in various parts of the UK. Nevertheless, there are some generic challenges which have been extensively documented. Drawing on local authority documentation, experiences of HEIs, academic investigation and the work of local community groups – in particular the useful suggestions of the Leeds, Nottingham and Loughborough HMO lobbies – this guide considers what action might be taken to address the main social, cultural, physical and economic impacts of students in their communities.

Structural issues

3.5 'Studentification' is occurring nationally as a result of a number of wider, often unrelated, economic and social trends and aspects of policy including:

- the growth of knowledge-based economies and societies, and the imperatives of economic competitiveness;
- the expansion of higher education by government in pursuit of a well-educated and highly-skilled workforce;
- raised aspirations and attainment levels leading to increased demand for higher education;
- an increased supply, and accessibility to, economic capital and mortgage finance, in conjunction with relatively low interest rates;
- the deregulation of the private rented housing sectors, and the encouragement of the private sector to meet current and future housing demands; and
- the rise of 'investment cultures' (eg, increase of private landlords linked to buy-to-let mortgages).

3.6 A significant feature of the recent increase in numbers and widening participation in higher education is that the characteristics of the student body have diversified. A single characterisation of the idea of 'a student' is no longer possible. Two-fifths of UK higher education students are studying part-time and are therefore already likely to be part of an established community.[1] Fifty-nine per cent of all students are mature.[2]

THM-59 (continued)

3.7 There has also, however, been an increase in the number of young, full-time undergraduate students living away from home. To cater for their accommodation needs, many HEIs and private companies have developed halls of residence, often locating them alongside residential neighbourhoods. Students leaving residences often wish to settle in the same local neighbourhood, finding accommodation in the private rented sector (Smith, 2002). As a result, the demographic composition of such neighbourhoods can change and become characterised by a population which is predominantly '*young* (late teens/early twenties), *seasonal* (here for only two-thirds of the year) and *transient* (moving every year, leaving after three)'.[3] The issues, from the perspective of some local communities, 'arise precisely when students cease to be in the community because their numbers increase so much that they outnumber the resident population – and the community finds itself ***in*** the students'.[4] It is important to note, however, that in other places, the changing nature of the student body in higher education, and coming to fruition of widening access policies, means that the students ***are*** the community.

The expansion in the numbers of young 'traditional' students in a community can bring a range of, often interrelated, effects. These are summarised at Table 2.

THM-59 (continued)

Table 2: Communities of students – challenges

Social	Cultural	Physical	Economic
Increase in low-level anti-social behaviour Concentration of vulnerable young people with low awareness of security and highly attractive possessions leading to increased levels of crime. This can result in higher insurance premiums (ie, house, contents, vehicle) Decreased demand for some local services leading to closure – particularly educational services Residents feel pressure to move to avoid becoming marginalised and isolated as permanent residents. This can lead to the demoralisation of established residents Increased competition for private rented houses Pressure for greater provision of establishments catering for night time entertainment and consequent detrimental impact on residential amenity Seasonal availability of some retail and service provision – development of a 'resort economy'	Expansion of HMOs in traditional owner-occupied, family areas can lead to change in nature of communities Gradually self-reinforcing unpopularity of area for families wishing to bring up children Conversion of houses into student residences, often make difficult transformation back into family homes Transient occupation engenders a lack of community integration and cohesion and less commitment to maintain the quality of local environment Turnover and short stay are disincentive and barrier to self-policing and aversion to crime Different perceptions of what is considered acceptable behaviour and communal obligations by different social groups Lifestyle frictions – late night student culture disturbs children and working people	Reduction in quality of housing stock and neglect of external appearance to properties including gardens, due to lack of investment by absentee landlords Turnover of properties and preponderance of property letting boards – recurring annually – detract from streetscape Increased population density and increased pressures on services (policing, cleansing, highways, planning, public transport) Increased on-street parking pressures arising from shared households and seasonal traffic congestion (eg, at graduations, end of term) Increase of squalor (litter/refuse), as infrastructure is designed for lower density usage, low awareness of refuse collection arrangements and different conceptions of what is tolerable Noise between dwellings at all times especially music and at night – parties and gatherings and late night street noise disturbance	High demand for student housing and the stimulus to private rented sector leads to a rise in house prices, deterring access to housing ladder for other sections of community A rising concentration of students in particular streets acts as a strong inducement to owner-occupiers of non-student properties to take advantage of a lucrative sale to private student landlords Changes in type of retail and entertainment services available – eg, local shops becoming take-aways and cafes, and re-orientation of stock Fluctuating demand for private rented housing Seasonal employment (in shops, pubs) and provision of retail and leisure services

THM-59 (continued)

It is clear from this listing that many of the disadvantages of concentrations of students in communities (such as landlord negligence), are the product of wider forces and not within the powers of HEIs and local authorities to address directly and also that many are not confined to students as a group – they could equally apply to concentrations of young people, or to tenants, generally. However, as the guide shows, there are actions that HEIs and local authorities can take to help prevent or ameliorate problems. 3.8

Many of the listed disadvantages are linked and it is often their combined impact which can cause concern and resentment in local communities. Whereas certain problems can be tackled individually, this guide also suggests ways that HEIs and their partners can take a more comprehensive approach. 3.9

What is the scale of the issues?

The research for this guide suggests that the negative effects of 'studentification' are not felt evenly across the UK. The cities of Brighton and Manchester/Salford, for example, appear to absorb and manage their student populations with little complaint from established residential communities. Although further research would need to be carried out to ascertain exactly why this is the case, it appears that, despite having large concentrations of students in specific neighbourhoods, local authorities and local communities consider that the benefits outweigh the disadvantages. In London, students tend to be dispersed into the wider housing market, leading to limited student concentrations, and few complaints. On the other hand, Leeds, Nottingham, Loughborough and Belfast have each been the focus of highly-publicised problems. 3.10

There are issues about perception and communication that need to be addressed in towns and cities with large concentrations of students. The research to underpin this guide found that the incidence of local community groups raising concerns associated with student populations was more widely distributed throughout the UK than HEI responses had acknowledged. Whilst almost two-thirds of HEIs stated that local community groups had voiced some concerns to them about the impact of students in their area, almost 40 per cent of those HEIs did not believe that students had negative effects in their locality. At the same time, findings from the survey of HMO lobby groups revealed that local communities in many towns and cities had long held concerns about concentrations of students. 3.11

THM-59 (continued)

3.12 These findings serve to emphasise that perception plays a very important part in any discussions about 'studentification' and indicates that 'studentification' does not necessarily bring significant negative effects. On the other hand, although HEIs may not perceive that there may be negative effects of 'studentification' taking place, local communities may take a different view. It is incontrovertible, however, that the negative effects of 'studentification' are evident in several towns and cities across the UK. These are inter-connected and can be summarised in the following way:

Social effects

3.13 In line with the geographic trend of the concentration of social groups in society[7], some common perceptions of change in student areas point to an increase in low-level anti-social behaviour. This can sometimes include issues such as noise-nuisance emanating from houses, streets or gardens, vandalism of vehicles, street furniture, private property, and vomiting and urination in the streets. Of course, such behaviour is not synonymous with students *per se*, but more widely linked to some youth cultures and increasing behaviour within wider society (ie, the 'Respect' agenda).

Cultural effects

3.14 Many of the challenges associated with 'studentification' are a result of different cultures clashing. Whilst social, economic and physical changes may be the key concerns of local community groups during the early phases of 'studentification', research has shown that when large communities of students become deeply embedded within a location, significant cultural change may occur. The expansion of HMOs in traditional owner-occupied, family areas can lead to a change in the nature of communities. Transient occupation engenders a lack of community integration and cohesion and less commitment to maintain the quality of the local environment and there develops a gradually self-reinforcing unpopularity of the area for families wishing to bring up children.

THM-59 (continued)

Physical effects

3.15 There can be physical disadvantages of having large concentrations of students in a neighbourhood. A general decline in the proportion of owner-occupiers can lead to physical changes including generally unkempt properties, squalor and dereliction. Such neighbourhoods can also suffer more permanent 'street blight', which may include estate agents' letting boards, neglected/concreted over front gardens and unsightly extensions. There is very little that HEIs can do directly to influence landlord behaviour although local authorities may be able to counteract some of the worst excesses through HMO licensing and planning regulations. Large concentrations of young people living in households with a high density can contribute to physical mess and noise, increased pressure on public services (policing, cleansing, etc) and traffic problems. Several HEIs have devised ways to ameliorate this.

THM-59 (continued)

4 Responding to the challenges of 'Studentification'

4.1 As described earlier, the capacity of all stakeholders effectively to manage students and housing within the neighbourhoods of established residential communities is affected by national policies and economic trends over which local HEIs have no control. These include, for example, the policy of expansion of higher education or low interest rates for buy-to-rent property over which local HEIs have no control. Indeed, many interviewees noted that preventing or alleviating the challenges presented by high concentrations of students will only be realised if some of the relevant legislation is amended. Such action is outside the remit of the project.

4.2 This guide therefore concentrates on the practical short to medium-term gains that may be achieved by HEIs and local authorities giving greater priority to implementing innovative practice. These can be divided into two main areas: Principles of a strategic approach; and, Local-level initiatives.

Principles of a strategic approach

Acknowledging the issues

4.3 HEIs and other stakeholders need to become fully aware of the issue of 'studentification' and to recognise that negative effects might be occurring, or in danger of unfolding, in their locality, even if there has been no organised community response.

4.4 HEIs, in partnership with other stakeholders, should also recognise that they have a responsibility towards the established residential communities into which their students migrate to help to redress any negative aspects of 'studentification'. The research showed that some HEIs have not been receptive to this on the grounds that they are not responsible for the off-campus behaviour of students. The evidence suggests that if HEIs do not act, it can cause and entrench resentment in the local community which may be more difficult to address at a later date. However, more positively, there has clearly been a marked shift in the cultures of HEIs since the late-1990s, with many HEIs accepting their part in addressing the impact of 'studentification', and formalising their responses within local housing and community strategies.

4.5 At the same time, it is crucial that local authorities recognise the phenomenon of 'studentification' within their locality and facilitate appropriate solutions in consultation with HEIs. Local authorities are often the pivotal 'neutral' brokers when issues of 'studentification' are to be addressed. This requires the adoption of a coordinated approach – most notably between the planning, housing and environment departments. Local authorities, HEIs and other stakeholders are already making use of existing planning and development powers, housing and environmental health legislation – some quite creatively – to address the challenges of 'studentification'.

THM-59 (continued)

Partnership working

It is clear from the research that the disadvantages of 'studentification' are most effectively tackled through a range of stakeholders working together. Many interviewees stressed the need for effective coordination and shared visions, and organisational structures which foster such arrangements. The research indicated that where relationships between HEIs and local communities have been less effective, this has often been a function of a lack of effective communication. 4.6

Common vision

A shared vision is not always easy to achieve but a good starting point for partnership working is the identification of shared principles. These can be derived through consultation between the different stakeholders, but will require commitment by all participants – 'whilst the Council can exercise its community leadership role through brokerage and arbitration between stakeholders, it is clear that unless there is a balanced and widespread consensus on the way forward, such brokerage and arbitration is fruitless.'[5] 4.7

An important underpinning principle is a recognition by all stakeholders that large concentrations of students do not inevitably lead to detrimental outcomes, and do also result in many benefits for localities. 4.8

Establishing a shared definition of a 'balanced community' is important although clearly 'balance' is a matter of perception. Existing practice suggests that parties can begin to overcome such ambiguities by seeking agreement on appropriate indicators. Useful precedents have already been established in Glasgow (no more than five per cent of HMOs in a street) and Loughborough (consultation proposes a maximum of 25 per cent students in a street in an inner zone and 10-24 per cent in an outer zone)[6]. It is essential that any initiatives that seek to encourage the dispersal of students away from existing residential student clusters, are well-planned, coherent and built into wider strategic objectives. It will be important to minimise the economic disadvantages which a loss of critical mass provided by students can accelerate in terms of a fall in demand for transport, shops and services. 4.9

Practice: The University of Leeds' housing strategy 2003/04 – 2007/08 states that 'both universities in Leeds, (the University of Leeds and Leeds Metropolitan University) are agreed on the need to avoid random dispersal as this can be at the expense of creating a critical mass of students which can accelerate regeneration and ensure appropriate transport links are in place.'

THM-59 (continued)

Local student housing strategies

4.10 The research revealed that many of the strategies which bear on student accommodation-related issues, have been developed by HEIs and various local authority departments without coordination. As a result, contradictory statements and visions can arise within a particular locality. In local government, the research revealed significant differences of opinion between environmental health, housing, and planning and regeneration departments. Stakeholders are therefore encouraged to share the relevant aspects of their strategies with each other.

Practice: Canterbury City Council has developed an overview and scrutiny committee, and one of its remits is to examine the impact of the student population on the district, and to review of performance of departments within the Council.

Source: Canterbury City Council. 2004. *Overview and Scrutiny. Investigating The Issues That Matter.*

4.11 Ideally, common principles should be enshrined in regional and local housing strategies, and in appropriate structural plans. Anecdotal evidence from the research project has consistently pointed to student accommodation issues being excluded from local housing strategies and from forecasts of local housing supply and demand. Local authorities could usefully initiate action to include student accommodation in their local housing strategies. The introduction of Local Development Frameworks in England may provide opportunities for local government to tighten up strategic thinking about student housing and related issues. This could include the identification of sensitive locations for student housing developments which marry up with growth and expansion aspirations, and information on numbers and trends.

Local student housing groups

4.12 Ineffective communication underlies many of the problems of 'studentification'. The research showed that whilst some locations have well-developed and established arrangements, resulting in effective communication channels, others rely on more informal arrangements. In particular, the research showed a need for improved communication between different stakeholders and that the establishment of a student housing group was an effective approach. In some places, in recognition that communication, dialogue, consultation and action are different activities, more than one group has been established – with membership drawn from different stakeholder constituencies. It may be appropriate that local authorities take the lead in organising such groups involving different stakeholders.

THM-59 (continued)

Practice: Durham City Council, the University of Durham and others have established a group to ensure that the community does not become 'imbalanced' as a result of the size or distribution of its student elements. Representation includes private landlord providers, as well as resident stakeholders.

Source: Durham City Council. 2004. *Student Households. Discussion Paper.*

Local authorities and HEI action

4.13 This guide has highlighted that it can be difficult for an HEI to address the impact of 'studentification' particularly if this involves responding to activities off campus. There are, however, a number of powers available to local authorities to ameliorate its effects, for example, the Use Classes Order and HMO Licensing. New legislation could have a significant bearing on the incentives for private sector landlords to supply student accommodation, for students to participate in higher education and move into particular areas and for local government to regulate and control processes of 'studentification'. Legislation has provided local authorities with duties and powers to act (some of which are discretionary) in the fields of local planning, housing management, housing fitness, community services and anti-social behaviour. Housing, planning, environment and economic development are therefore the key service areas where policies are brought to bear on the issues of 'studentification'. Given that the powers and jurisdiction of the HEI are limited when responding to activities, it may be useful for the HEI to have a role in supporting and assisting the agencies, such as local authorities and the police, that already have the powers and procedures in place to address the issues concerned.

4.14 Empirical findings suggest that it is helpful for local authorities and HEIs to review their informal and formal actions, procedures and powers to see if they are working to address problems that might be prevalent in 'studentified' neighbourhoods. These powers and procedures can be outlined to all interested parties including students' unions and local residents' groups. Although solutions to problems may not warrant the use of formal powers at first, it may be helpful if all parties are aware at the earliest point of the formal powers that exist. HEIs and public bodies such as local authorities and the police may wish to consider drawing up written protocols that outline the actions that can be taken by individual agencies and at what point. There are other areas where it is important to recognise the distinction between legislation and persuasive powers. Accommodation accreditation schemes, for example, may largely rely on voluntary membership although some of their conditions (such as gas safety, for example) will be mandatory based on legislative powers.

THM-59 (continued)

4.15 Such reviews are best done in the spirit of local partnership, through channels that allow partners to be frank about what they are to do and what is likely to work. It may be necessary for partners to experiment with best practice examples from other areas and be prepared to assess their effectiveness in the local context.

Practice: University of Leeds Neighbourhood Helpline. This is run by the University of Leeds in conjunction with Leeds City Council and responds to issues and concerns such as noise and environmental problems. Regular review and planning meetings are held between the University and Council.

Practice: The University of Salford works very closely in partnership with Salford City Council and has established many links with the local community to help ensure the integration of students into the locality.

Planning for change

4.16 Large concentrations of students affect market demand for housing and often lead to a rise in house prices to the advantage of owner-occupiers and private landlords. It also creates investment opportunities in the buy-to-let market, and may lead to increased investment in and improvement of housing stock. However, it may also restrict access to the housing ladder for other sections of the community – for example, low-income families and key workers. Added to this, the repairs, renovation and extension to student properties can benefit the construction and service sector of the local economy, but again, communities may be unhappy about physical changes to their neighbourhoods.

4.17 Concentrations of students form a pool of flexible labour and as such are often welcomed by local employers, and many graduates work in the region where they studied. In turn, the availability of a graduate workforce encourages businesses to locate near HEIs thus boosting the local economy and providing additional employment. Considered as part of a local student housing strategy (see above) and other appropriate local strategies, a large student presence can be used to positive effect by local authorities to help regenerate declining areas and stimulate urban regeneration.

THM-59 (continued)

Local-level initiatives

Student accommodation strategy

4.18 The research revealed that there has recently been a dramatic growth in the number of student accommodation strategies developed by HEIs in many towns and cities. These vary in content and detail. Over 60 per cent of survey respondents noted that their HEI has a strategy for student accommodation. However, a third of HEIs reported that they did not have a strategy. Most accommodation strategies were first developed after 1999 but the survey found that the majority of HEIs that first developed strategies more than 11 years ago also reported that the negative aspects of 'studentification' have not become evident in their locality. This seems to point to the value of well-established student accommodation strategies in helping to manage the impact of 'studentification' in specific locations. On the other hand, simply having a strategy may not be sufficient in itself. Over 60 per cent of the respondents who stated that disadvantages were being felt in their locality had an accommodation strategy. However, the HEIs that are clearly at the forefront of tackling the detrimental facets of 'studentification' have accommodation strategies. It may be helpful for HEIs to review whether it would be useful for them to develop detailed strategies relating to both institutionally owned and managed accommodation and wider off-campus provision, including private sector accommodation.

4.19 As discussed earlier, many structural issues – relating to population density, for example – are beyond the remit of HEIs to tackle. However, HEIs could usefully ensure that their accommodation strategies are fully informed by the actual and predicted effects of other local policies and strategies. For example, many HEIs are reshaping their recruitment patterns to attract more postgraduate students. Such students are likely to be more mature than undergraduates, with different behaviour and lifestyles. A major implication of widening access policies is that more people drawn from the local community will be going into higher education. These changes in admissions will have an effect upon the pattern of the student population living in a community.

4.20 HEIs may wish to use their accommodation strategies and work with local authorities, local property owners associations and other interested parties to consider the supply, management and control and demand for student accommodation. Student demand is likely to be diverse and evidence suggests that preferences shift over a student's course of study. Different approaches will suit different student communities. For example, 2nd and 3rd year students may choose not to want to live in purpose built apartments but choose instead, having formed a freindship group, to rent a house or smaller property which is less institutional and where they can exercise their independence. In larger cities students will often have a wide choice of private rented accommodation. Where this is the case HEIs may tend not to provide accommodation for returning students, other than those with special needs, and or a small proportion of final year students who find a return to 'institutional accommodation' helps them to focus on their studies.

THM-59 (continued)

Practice: The University of Leeds Housing Strategy, the first outward community facing University accommodation plan which was developed in consultation with the community and local authority.

Student strategy managers/community liaison officers

4.21 Many local authorities and HEIs are deploying strategies to manage the effects of 'studentification' and to promote community cohesion. At local authority level, evidence suggests that relations are best co-ordinated and communicated across the authority by a designated official, who is relatively senior, and who can effectively feed back into policy formulation.

Practice: Nottingham City Council has employed a Student Strategy Manager, whilst in Durham a named student representative and named Council officer are the key points of contact for liaison on student housing issues.

4.22 Several HEIs themselves have appointed officers at strategic level to relate to local communities, and this practice is welcomed by residents' groups which say that they value having a named contact. Evidence suggests that it is preferable for such a designated person to have a solid knowledge of the local context, and well-established relationships with external agencies and key stakeholders.

Practice: Loughborough University has created the senior post of Community Relations Officer as a point of contact and with a budget to undertake community activities – good neighbour guide, newsletter for residents about the university, website for the community with information about university facilities they can use, alerting them to key dates – RAG activities, degree ceremonies, term dates and other major events (for parking and traffic purposes). The officer also takes a strategic overview of issues and monitors and acts upon trends in complaints.

Practice: The University of Nottingham has created the post of Manager for off-campus students with the support of the Students' Union, with the aim of building more positive relationships between students and their neighbours.

THM-59 (continued)

Accommodation bureaux

Many HEIs have long assumed a responsibility to accommodate first year students. In recent years they have been increasingly advising second and third year students, as well as supplying institution-owned accommodation for students in their later years of study. HEI accommodation offices can be a key influence on students' choices about where to live. Their advice can mitigate the adverse effects of 'studentification'. This appears to be most effective when co-ordinated by an institutional accommodation bureau, which has designated staff. Such an organisation, either within the structure of the HEI or at arms-length, provides a reputable central point for students searching for private rented accommodation. Working closely with students' unions, and in partnership with local authorities and local communities, as well as external agencies such as the police, primary care trusts and the local media, accommodation bureaux can influence the market demand for student accommodation, as well as the relations between students and residential communities, through the dissemination of information and advice. It is one major way in which the effective management of students and housing in local communities can be achieved through non-legislative, non-regulatory solutions. In larger towns and cities HEIs often collaborate to provide such services. 4.23

Practice: The University of Manchester, Manchester Metropolitan University and the University of Salford, and their students' unions, collaborate through Manchester Student Homes 'the only place you will need to go to find housing. It is owned and managed by your universities and students' unions. This means that it is accountable, independent and does not exist to make a profit!'.

Source: University of Manchester and Manchester Metropolitan University 2005. *Student Housing Guide: The Essential Guide To Renting Student Housing In The Private Sector.*

Practice: Unipol is a charitable organisation established jointly by the University of Leeds and Leeds Metropolitan University. It has been running since the 1970s. Unipol provides an accommodation bureau, redevelops and regenerates property for the student housing market and operates a code of standards for landlords.

Source: Unipol 2005. *A Guide To Housing. Returning To Leeds.*

Student housing handbook guides and guidance

One of the most effective forms of practice is the production of student housing guides, with some excellent current collaborative examples by students' unions and HEIs. This is particularly effective when they are distributed to all students when enrolling and registering at the beginning of each academic year. In addition, house-hunting talks (incorporating 'being a good neighbour' information) are offered in some HEIs to students as they near the end of their first year. 4.24

THM-59 (continued)

Practice: When first year students leave halls of residence at the end of the year, Loughborough University, in collaboration with the students' union, gives them a keyring promoting the Silent Students Happy Homes (SSHH!) campaign and a leaflet about being a good neighbour. Students are also targeted with similar information at registration the following year.

4.25 Other examples of practice include information stalls at freshers' events, advertisements in local and student newspapers, and leaflets to student and non-student populations. There is also increasing use of the internet to disseminate advice and information.

4.26 As described above, one of the most effective informal ways of affecting the growth of residential student clusters is for HEI accommodation offices to influence demand by briefing students on a wide range of residential locations. This can be achieved by house-hunting talks, a student housing guide and other means. There are many examples of accommodation offices deepening students' knowledge and awareness of options by promoting the appeal of alternative residential locations.

Practice: The Leeds Housing Guide 2005 advises 'the popular areas with students (Headingley, Hyde Park) attract a high weekly rent and LS6 has the worst crime rate. So don't just limit yourself to these areas. Leeds has a very good bus network and by moving further away from the immediate areas around the university you could find better, cheaper accommodation in an area with more local diversity and cheaper insurance. In Beeston Hill, just south of the city centre, many properties have recently been renovated and improved. This has resulted in more students in more quality rented accommodation becoming available and students beginning to choose to live in this area attracted by competitive rents and the other positive characteristics of the area; including good sports facilities'.

Source: Leeds University Union and Student Advice Centre 2005. *Leeds Housing Guide 2005*

Cohesive Student Households

4.27 Promoting 'happy homes', where students respect each other, can help to reduce friction which might otherwise, affect neighbours through, for example, high turnover and noise-related problems. Several HEIs actively encourage students to think carefully about the choice of co-residents and cost before searching for accommodation.

THM-59 (continued)

Practice: Leeds Housing Guide 2005 advises students to 'find a property that meets your budget not the other way round. It can be the cause of many inner house conflicts when one or more housemates cannot afford to pay all of the rent and the landlord expects the other tenants to pay what is owed'.

Source: Leeds University Union Welfare Services 2004. *Scrap the Urban Myths*

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union suggests 'don't assume that you suddenly have to decide upon your 'friends for life' to live with next year. It's a strange situation when you have lived with people for only a few months and then have to commit to them for an entire year'.

Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005.*

Being a good neighbour

The research showed that issues of student behaviour are central to friction between students and resident communities. As well as explaining their rights when they rent a property, HEIs can inform students of their responsibilities as tenants and neighbours. Many already emphasise to students the need to respect the cultures of established residential communities. 4.28

Practice: The Leeds Housing Guide 2005 says 'remember that wherever you move to, you are part of that community. So be a considerate neighbour'.

Source: Leeds University Union and Student Advice Centre 2005. *Leeds Housing Guide 2005*

Practice: Loughborough University produces a good neighbour guide which is issued to students: 'welcome to the Storer Road area, people have lived and worked here for 100 years! Enjoy a historic part of town where you too can make a positive contribution to community life'.

Source: Loughborough University with Loughborough Students' Union and Storer Area Community 2001. *Life in Loughborough: The Good Neighbourhood Guide.* The guide is endorsed by Loughborough Students' Union and the Storer Area Community.

THM-59 (continued)

4.29 Developing this theme, there is a role for HEIs to promote neighbourliness amongst the student population. In one major example of practice identified by the research students were asked to introduce themselves to their neighbours, and to try to develop good relations.

Practice: As part of the 'education' strand of its 'education, discipline, partnership' strategy, Queens University Belfast, jointly with the University of Ulster, commissioned a public relations agency to design a campaign to help them raise awareness among students about anti-social behaviour and the problems it causes. They then flooded the city with the visually striking 'Do you turn into a monster after dark?' posters, leaflets and beer mats. The campaign has received a positive evaluation in terms of changing attitudes and behaviour among students and will run again in the new academic session in 2005. A university Pro-Vice-Chancellor commented that 'the aim is to make sure that not a single student in South Belfast doesn't know what their responsibilities are'.

Codes of behaviour

4.30 Some HEIs sign students up to a code of behaviour, as a prerequisite of their registration.

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union reminds students 'when you registered as a student at the University of Nottingham you signed up to this statement: 'I also acknowledge that I have responsibilities to the communities of Nottingham in which I am temporarily resident and undertake to act with consideration and respect for the welfare and interests of the wider community and my fellow students''.

Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005.*

Practice: The community strategy of the University of Leeds (2000) states that Hall Wardens and Flat Advisers in university owned-accommodation are charged with seeking to foster good relations between students and their neighbours. Where there are examples of inconsiderate or anti-social behaviour originating from university accommodation, and those responsible for the nuisance can be identified, the university will intervene and, if necessary, institute disciplinary proceedings. Local residents are asked to report incidents to the university's accommodation services'.

THM-59 (continued)

Some HEIs support their code of behaviour with detailed information so that students can be in no doubt of what is expected of them. It can also be helpful for established residential households to be aware of the details of the code and know how to gain access to it. 4.31

There is currently limited evidence of practice and many English and Welsh HEIs are currently exploring the legal aspects of what action might be taken when students do not abide by the HEI's code of behaviour. One example is provided in Queen's University Belfast's strategic response to 'studentification', entitled 'education, discipline, partnership'. The 'discipline' element of the strategy involves verification of reports of anti-social behaviour, followed up by various actions from warnings and fines to suspension and expulsion. Given that the student population is transient, its collective memory works differently from that of more established residential communities. HEIs, therefore, have to be persistent in reinforcing messages if they wish to promote and sustain certain forms of behaviour. 4.32

Practice: At Loughborough University, the Registrar, security section and Community Warden are empowered to impose fines on students found to be in breach of its 'disreputable behaviour' ordinances. The university has also employed a case officer to deal with the hearing of evidence and due processes which have been developed to support this system.

Community strategy

Several HEIs have also developed community strategies that seek to widen the engagement of students in the community. This has been shown to be particularly effective in helping communities to cohere. Other HEIs might find it useful to consider whether it would be helpful to develop a community strategy. 4.33

Practice: The University of Leeds' community relations strategy 'outlines the role of the university in the city; considers the benefits resulting from that presence, including activity directly relevant to local communities; and outlines the action being taken by the university to improve its relations with the local community'.

Most HEIs and their students' unions facilitate student volunteering and there are many examples of students taking part in a variety of local community projects. Some interviewees reported that the positive atmosphere engendered by such activities is very valuable when problem arise. Sometimes such projects are deliberately aimed at tackling the negative effects associated with high concentrations of students. 4.34

THM-59 (continued)

Practice: As part of the 'Manchester 100 Days Challenge' run by the City Council to promote 100 days to clean up the city, Manchester students helped with the project and two days were designated for neighbourhoods with high numbers of student residents.

Practice: The Up Your Street project is a partnership led by students from the University of Leeds and Leeds Metropolitan University, aiming to improve the visual environment of Burley and Hyde Park and improve community relations between students and long-term residents. Projects include a winter festival for students and local people, graffiti clean-ups, bargain hunt events and landscape architecture projects.

Source: University of Leeds 2004. *City and Regional Annual Report 2003/4.*

Complaint response strategies

4.35 Several HEIs have appointed community wardens to respond to day-to-day concerns including noise nuisance, and refuse and crime-related problems. In some cases the designated individual lives in the 'student area' so that they can be contacted day and night by residents. They can visit and discuss issues with students, as well as being proactive and helpful to students and promoting neighbourly behaviour.

Practice: Loughborough University has appointed a Community Warden. The Warden, together with a Sub-warden, liaises with the University, and between residents and students living in private accommodation in certain parts of the local community (where many, but not all students live), with the aim of helping the university to improve communication with local residents, and maintaining a good relationship between all groups.

Neighbourhood Helplines

4.36 A major development which has improved relations between HEIs, students and resident populations is the creation of neighbourhood helplines. These allow HEIs to listen to their local communities, and to understand more fully the relationship between students and the community. Evidence shows that these work best where the HEI closely monitors the extent of their use and the nature of the feedback being received. This enables the HEI to respond to users' needs, as well as continuously improving the service.

THM-59 (continued)

Practice: The University of Leeds has established neighbourhood helplines for communities with high proportions of students. The service provides a 24-hour voicemail and email service to raise issues and concerns.

Experience shows that it is important to publicise the neighbourhood helpline as well as developing a web site which provides useful contact numbers. 4.37

Practice: Loughborough University uses its campus security service – which operates 24/7 – as an 'on-call' service for the community. Residents can call and security will attend and intervene. Loughborough's Community Warden or Security Manager – with power to issue fines – will follow up in the daytime if the problem was serious or if it is persistent.

Crime prevention

Student households are likely to contain a high proportion of electronic consumer goods and as such they can attract burglars. In addition, students sometimes attract physical violence just because they are students. The perception of an increased risk of crime can be an important influence on the attitudes of established residential communities. Most HEIs have good partnerships with local government and the police with the aim of heightening student understanding of crime-related prevention strategies. 4.38

Practice: The community safety unit of Newcastle City Council coordinates the student community safety strategy. It works with the police, HEIs, colleges, students' unions and other departments to run education and awareness campaigns relating to all areas of student safety and also good neighbourliness and citizenship. Campaigns are run through student media and a student safety website and are jointly funded by Newcastle City Council, Northumbria Police, the University of Newcastle, the University of Northumbria at Newcastle and Newcastle Students' Union.

Practice: The University of Manchester Students' Union ran a 'can you spot a student house' anti-crime campaign with picture of an unkempt property, doors and windows open, old mattress in untidy garden, rubbish bags festering etc. A beneficial side-effect is that students will tidy up the appearance of their property, to avoid being burgled.

THM-59 (continued)

Accreditation schemes

4.39 One area where HEIs can have an influence is by developing accreditation schemes for private landlords. The effectiveness of these schemes is inherently linked to students restricting their search for accommodation to accredited properties. HEIs have often been in the vanguard of developing such schemes and some are run in partnership with the local authority. In some areas, accreditation schemes apply to landlords more generally – ie, whether or not the landlord is renting to students – for example there is a London-wide accreditation scheme to which all 33 London boroughs are signed up.[3] Accreditation schemes supply high-quality student accommodation by rewarding private landlords whose accommodation complies with a code. Accredited property receives priority on accommodation bureau lists, and this acts as an incentive for private landlords to obtain membership of the scheme. Such schemes therefore have a dual benefit of affording students some protection from unscrupulous landlords as well as raising the quality of the housing stock. HEIs could consider developing, reviewing and improving accreditation schemes, in partnership with local authorities, students' unions and landlord groups.

4.40 Accreditation schemes are only successful if effectively policed on a regular basis by HEIs, and students are encouraged to inform them of problems as part of this process. It is therefore important that monitoring systems are effective and that sanctions are applied in cases of persistent non-compliance.

Practice: Manchester Student Homes awards 'code compliant' and 'code plus' recognition to accredited landlords (who have met a basic standard) in recognition of the provision of additional features such as mortice locks, burglar alarms etc.

Practice: In Leeds, Unipol's voluntary code of standards requires properties to meet standards beyond legal requirements, and students are encouraged to rent properties covered by the code. Although the code is not legally binding, if landlords are found to be in breach of the agreement, they may be prevented from advertising their properties through Unipol in the future.

Source: Unipol 2005. *A Guide To Housing. Returning To Leeds.*

THM-59 (continued)

HEI-managed accommodation

The Housing Act 2004 introduced compulsory licensing for houses of multiple occupation (HMOs) in England and Wales. However, student HMOs that are managed or controlled by further or higher education establishments may be exempt from licensing, subject to compliance with a national code of practice that has been approved by the Office of the Deputy Prime Minister (ODPM). 4.41

A draft code of practice designed to apply to all HEI managed and controlled student housing in England and Wales has been prepared by Universities UK in conjunction with the Standing Conference of Principals, (SCOP), the Association of University Directors of Estates (AUDE), the Association for Student Residential Accommodation (ASRA), the Conference of University Business Officers (CUBO), the University Safety and Health Association (USHA), the Association of Heads of University Administration (AHUA), the Association of University Chief Security Officers (AUCSO) and the Association of Managers of Student Services (AMOSSHE). There are two other Codes that are also awaiting approval from the Office of the Deputy Prime Minister. Both of these are organised by the Accreditation Network UK (ANUK): one code is for HEI-managed accommodation and another for large-scale student accommodation run by private landlords. ANUK and Universities UK have drawn up a protocol to ensure optimal co-operation between the various codes. 4.42

Practice: The University of Brighton provides information for both students and owners of property which is managed by the university. This provides information on safety requirements and regulations, taxes and other payments and furniture requirements.

Sources: University of Brighton 2005 *University Managed Housing 2005 Information For Owners*; University of Brighton 2005 *University Managed Housing A Student Guide To University Managed Flats And Houses*.

Raising expectations of quality and management of accommodation

HEIs can help to improve the physical and management standards of student accommodation by ensuring that students are familiar with the appropriate quality and standards of housing. They can play a major role in raising student expectations of the quality of private rented accommodation, and extend knowledge of housing legislation and 'what to look for'. This, in turn, encourages private landlords to improve the quality of accommodation for a more discerning student clientele. 4.43

THM-59 (continued)

Practice: The University of Nottingham and its students' union advise students to 'make sure the property property [they] choose is of an acceptable standard using the checklist enclosed and all other guidelines in this handbook'.
Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005*

Practice: The University of Brighton provides detailed information of agreements and payment, length of tenancy and cancellation, what rents include, deposits, rent guidelines, inventories, safety and council tax.
Source: University of Brighton, *2005 Accommodation Handbook*

Information directories

4.44 Lack of consideration and ignorance often contribute to problems with the physical environment. Some students may not notice or mind litter or noise as much as other more established residents and other students. HEIs can help by bringing such issues to students' attention and explaining why they are considered to be a problem, as well as disseminating information about refuse days and other initiatives. A growing number of HEIs provide student information directories, which explain why it is important to address these issues, and detail all relevant contact numbers of organisations that students may require during their period of study. Such messages are sometimes more appropriately delivered by students' unions.

THM-59 (continued)

Practice: In Students and The Community 2004/05, a guide prepared by the University of Nottingham, it is pointed out that: 'There are many ways in which students can make a positive contribution:

- **Don't leave your dustbin on the street – it can block the way for people with disabilities, and for people with prams and young children.**
- **Don't leave your rubbish in your garden or outside your property. It is easy to clear it up or to arrange for it to be taken away.**
- **Do not forget you are living in a residential area – your neighbours may work shifts, have to get up early in the morning, or put children to bed early at night when you are just coming to life!**
- **At certain times of the day there are large numbers of students walking between the campuses and their homes. Be considerate to other pedestrians, particularly those who are elderly or infirm, or have young children.**
- **Cycling or skateboarding on the areas reserved for pedestrians can be dangerous, cyclists should stick to the roads or, better still, to the designated cycle lanes.**
- **Do let your neighbours know if you are planning a party that might go on until late at night – try and agree a mutually acceptable time for it to end.**
- **Do get involved in your local community – there are lots of opportunities.**
- **Do take an interest and pride in where you live – it is your home and your neighbourhood too.**
- **Do frequent local businesses – they welcome your custom'.**

Source: University of Nottingham *Students and the Community 2004/05*

Environmental blight

Many HEIs and local authorities have made significant efforts to ensure that student households are aware of the need to minimise environmental degradation, refuse and litter. Local authority cleansing departments can circulate information to local HEIs to remind the students of bin days. Some have a regular feature in the student magazine and the local paper. Many inform students that they must not dump rubbish, and should minimise recycling and waste disposal problems. 4.45

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union states 'do NOT leave large items such as sofas, mattresses and tables out on the street with the assumption that they will be taken away with the rest of your rubbish. They won't. You need to call to get it taken away (see Contacts List)'.

Source: University of Nottingham and University of Nottingham Students' Union 2005. *Housing Handbook 2005*

THM-59 (continued)

Practice: In Headingley in Leeds, the Council piloted the Streetscene initiative from January 2003 which it believes has been very successful in limiting the amount of refuse on the streets and making Headingley a cleaner environment. The Council promoted a multi-agency approach encompassing all street services (refuse collection, street cleaning, bulky household collection, graffiti removal, and weed control).

Source: University of Leeds. 2004. *City and Regional Annual Report 2003/4.*

4.46 The end of term can be a particularly bad time for rubbish and HEIs have adopted a range of strategies to tackle this, often in collaboration with local authorities, including arranging special collections. As a group, students are generally well-disposed towards the idea of recycling and respond positively to opportunities to do so.

Practice: Leeds City Council works with the HEIs to arrange student clean-ups at the end of the academic year. Charity shops are being encouraged to distribute and collect bags from student properties at the end of each academic year as a large amount of the items thrown away by students could be used by others.

Practice: In Nottingham, in recognition of the specific waste management issues in student areas, dedicated crews have been established to respond to student generated litter and fly-tipping. The special collections service and improving waste management arrangements features as an ongoing item of discussion with student landlords at regular liaison meetings.

4.47 Estate agents' boards, and the use of fly-posting and posters and signs in windows to promote student leisure and recreational activities can annoy established residential communities and detract from the environment.

Practice: Leeds City Council is working with landlords to restrict the display of estate agents' boards in specified areas of Leeds.

4.48 Untidy gardens can be a source of annoyance to established residents. Although many HEI accommodation bureaux do not expect students to maintain gardens, many encourage them to keep front gardens free of litter. At the same time, HEIs (possibly in collaboration with local authorities) could usefully introduce regular garden surveys (eg, the garden survey carried out by Unipol in Leeds), to exert pressure on private landlords.

THM-59 (continued)

Practice: The Housing Handbook 2005 prepared by the University of Nottingham and its students' union encourages students to 'keep your front garden free of any litter. Although it's probably not yours, it makes the neighbourhood look unpleasant'.

Noise

What constitutes a noise nuisance is often subjective. HEIs use a variety of routes to stress the need to maintain noise at levels that do not cause friction between students and established residential communities. Silent Students Happy Homes (SSHH!) campaigns have been initiated by students' unions in a number of HEIs. 4.49

Practice: The University of Nottingham Students' Union's Silent Students Happy Homes – SSHH! Campaign encourages students as a group to be more considerate in their communities generally, eg, 'if you are living in a terraced or semi-detached house, remember that the walls may be quite thin so any slamming doors, shouting, loud music, etc is likely to be heard by your neighbours. If there are six of you all coming home at different times in the night and you all slam the door, there is the potential for your neighbours to be woken up six times'.

Source: The University of Nottingham and University of Nottingham Students' Union 2005. *The Housing Handbook 2005. The essential guide to moving off campus – Told like it is*

Practice: Many students going home from campus events take a route through residential communities. The Silent Students Happy Homes – SSHH! Campaign run by Loughborough University Students' Union aims to raise awareness through providing free merchandise including lollipops ('if the students have something in their mouths they can't be making a noise') and cards to hang on their door handles 'LSU politely requests that you respect your neighbours and keep noise to a minimum whilst walking home tonight' and including a number of useful phone numbers.

THM-59 (continued)

Traffic and parking

4.50 In residential neighbourhoods with limited kerb space and a growth in HMOs, parking is likely to become an area of conflict. There are many examples where local authorities have encouraged students to limit their use of private vehicles through the strategic deployment of car parking permit schemes. In addition, HEIs are increasingly seeking to restrict the use of private vehicles by students and encouraging considerate parking. Many HEIs are recognising the need to promote student use of public transport and cycling as an alternative. In this way, HEIs and local authorities can work together and this partnership approach can facilitate local authorities in negotiating with providers of local public transport to ensure that there is an adequate service and if possible to justify funding for dedicated public transport routes that could require subsidy to operate.

Practice: Students in Nottingham are advised 'how you move around the city and the surrounding areas has an impact on pollution and congestion. You are strongly advised not to bring your car to Nottingham unless there are special circumstances. In addition to adding to pollution and congestion, you should bear in mind that parking permits for university campuses are only given to students under very special circumstances. Residents' permits for parking on the streets where you live also quite restricted. Do use public transport where this is possible. If you do use a car, please make sure you drive and park with consideration'.

Source: University of Nottingham *Students and the Community 2004/05*

4.51 Traffic congestion is often experienced at specific times of year – such as the beginning and end of term and around major events such as graduations. HEIs can help local communities to manage this problem by publicising term dates and dates of major events.

Shops and services

4.52 Goods purchased locally by students make a significant contribution to the local economy and a student presence can ensure the viability of some retail businesses. HEIs can also assist by making students aware of their important economic role and encouraging them to patronise local shops.

4.53 A changing population can lead to changes in the types of shops and services available locally. Most commonly-cited examples include local shops becoming take-aways and cafés. Local authorities can use their powers to limit changes of use of retail properties to certain categories such as fast-food outlets, and local authorities may find it helpful to have policies that seek to maintain an appropriate retail balance in such neighbourhoods.

THM-59 (continued)

4.54 Demand for leisure and recreation services has other knock-on benefits for the community. In cities such as Sheffield and Manchester a large student population has contributed to the development of a vibrant nightlife, for example supporting live music performances and the growth of a club scene which draws people to the city – both as visitors and residents. The negative effects of such growth may include an increase in public disorder associated with such venues, although this is linked to wider youth cultures.

THM-59 (continued)

5 Conclusion

5.1 Although activities aimed at promoting the benefits and addressing the challenges of high concentrations of students are relatively new and untested, there is clearly a range of actions which can be taken by HEIs and local authorities at both a strategic and practical local level. This guide provides examples of a range of practice which could bring short to medium-term gains to communities, if implemented in a way which is appropriate to the local circumstances. The following section provides a checklist of activities, derived from the research, as a basis for discussion among local stakeholders.

THM-59 (continued)

THM-59 (continued)

6 Checklist for stakeholders

6.1 This checklist poses a series of questions, in no particular order of priority, which have been drawn from the examples of innovative practice outlined in this guide. The list provides a resource for those concerned with the challenges of 'studentification'. It is not intended to be prescriptive but rather to stimulate consideration and discussion. Although some of the issues are clearly more relevant to particular organisations and locations, they are of general interest to all the stakeholders. One of the main findings of the research is the need for appropriate multi-agency partnerships and effective coordination. The checklist might therefore usefully form the basis for local consultation and the creation of multi-agency partnerships. It is also intended to help individual stakeholders seeking to develop their own strategies.

All stakeholders

- Do stakeholders have firm evidence upon which they can base their understanding of the impacts of 'studentification' within their locality?
- Do stakeholders share a common understanding of whether the impact of 'studentification' is/is not being felt in the locality?
- Do stakeholders share a common understanding of the wider benefits and challenges of high concentrations of students in the locality?
- Is there agreement and common ground about the causes and effects of 'studentification' amongst stakeholders?
- Has a partnership framework been established for stakeholders to ensure there can be a coordinated approach to tackling issues of 'studentification'?
- Have a shared vision and general principles been agreed between stakeholders?
- Is there evidence of respect and trust between stakeholders?
- Have stakeholders agreed some objectives and exit strategies, and established mechanisms to review and monitor social, economic, cultural and physical changes within locations?

Higher education institutions

- Have HEIs considered and agreed their responsibilities to students and established residential communities?

THM-59 (continued)

- Have HEIs developed student accommodation strategies? If so, are they effective?
- Are the student accommodation strategies of HEIs and other local stakeholders consistent?
- Have HEIs and other stakeholders explored the scope for the dispersal of students from areas of high concentration where this may be desirable?
- Have HEIs and other stakeholders considered the promotion of alternative residential locations to encourage the dispersal of students?
- Have HEIs and other stakeholders considered the adoption of an accreditation scheme for private student accommodation? If so, are mechanisms in place to monitor and review compliance?
- Have HEIs and other stakeholders encouraged students to move into accredited property?
- Have HEIs listed only accredited property, or has it been separately identified, on their housing lists?
- Have HEIs considered the development of a central accommodation bureau to advise students when searching for private accommodation? Have HEIs and other stakeholders considered the production of a student housing guide?
- Have HEIs and other stakeholders provided effective house-hunting talks on a regular basis? If so, do these events reach the target student groups?
- Have HEIs encouraged students to think carefully about their choice of co-residents, in order to reduce the turnover of student households?
- Have HEIs sought to promote and raise students' expectations of the quality and affordability and suitability of accommodation?
- Have HEIs informed students of their responsibilities as tenants?
- Have HEIs sought to heighten students' awareness of the legal responsibilities of landlords?
- Have HEIs sought to inform students of their responsibilities through a written code of behaviour?
- Have HEIs encouraged students to introduce themselves to their neighbours and to foster other forms of neighbourliness?

THM-59 (continued)

- Have HEIs raised awareness of the need for reasonable noise levels?
- Have HEIs and other stakeholders considered preparing and issuing information directories detailing contact numbers and addresses of key services?
- Have HEIs and other stakeholders considered the appointment of community liaison officers to foster cohesive relations between students and established residential communities? If so, are there mechanisms in place for community liaison officers to respond effectively to issues as they arise?
- Have HEIs considered the development of neighbourhood helplines? If so, is effectiveness monitored?
- Have HEIs considered the appointment of off-campus wardens to regulate student behaviour?
- Have HEIs explored their powers to control and reprimand students who undertake anti-social behaviour?

Local authorities

- Has the local authority established appropriate mechanisms and communication channels for stakeholders to discuss issues of 'studentification'? If so, are these mechanisms open to all stakeholders?
- Has the local authority explored opportunities to share innovative and good practice with other local authorities through local authority networks?
- Are the initiatives to regulate processes of 'studentification' included in wider local authority strategies?
- Are the activities of different departments within the local authority mutually supportive and integrated?
- Has the local authority fully considered student accommodation issues in preparing the Local Development Framework?
- Has the local authority considered the appointment of a student strategy manager to manage initiatives to regulate 'studentification'?
- Has the local authority fully reviewed and assessed whether they are making effective use of all their available planning, housing management and environmental health-related powers to regulate 'studentification'?

THM-59 (continued)

- Has the local authority considered the implications of the powers introduced by the Housing Act (2004), and in particular the mandatory licensing of HMOs?
- Has the local authority considered strategies to minimise visual pollution associated with to-let signs and fly-posting?
- Has the local authority considered implementing appropriate methods to inform residents of the services (eg, cleaning, refuse, recycling, burglary reduction advice) which are available in neighbourhoods with high residential turnover and population change?

HEIs and local authorities

- Have HEIs, local authorities and other stakeholders actively promoted crime prevention strategies to students?
- Have HEIs and local authorities considered strategies to minimise problems of refuse collection and litter?
- Have HEIs and local authorities encouraged student volunteering and engagement within established residential communities?
- Have HEIs and local authorities implemented schemes/annual surveys to encourage students and landlords to maintain gardens and to keep them free of litter and refuse?
- Have HEIs and local authorities considered strategies to reduce private vehicle usage by students?
- Have HEIs and local authorities as appropriate considered the use of parking permit schemes to encourage more considerate parking of private vehicles?
- Have HEIs and local authorities considered strategies for limiting local traffic congestion?

THM-59 (continued)

Appendix I

Terms of reference and methodology

The research project was commissioned in December 2004 by Universities UK and SCOP, in collaboration with the Local Government Association. The project was led by Dr Darren Smith (University of Brighton), with support from Jane Denholm (Critical Thinking, Edinburgh), and was funded by the Department for Education and Skills, in partnership with the Office of the Deputy Prime Minister. The primary research was undertaken between January and March 2005.

Methodology

The project involved two major phases of research:

- The first phase involved postal (or email) questionnaire surveys of all HEIs and local community groups captured by the network of the National HMO Lobby – a formally constituted organisation. The former was distributed to Vice-Chancellors' and Principals' offices, with a request for the survey to be forwarded to an appropriate officer. This strategy proved relatively successful with a response rate of 62 per cent, and 85 per cent of surveys being completed by an individual who self-defined themselves as an HEI accommodation officer or manager. The survey of local community groups also yielded an impressive response rate with completions from 17 university towns and cities. Both surveys captured a substantial depth of qualitative comments from open-ended questions, reaffirming the emotive and experiential effects of 'studentification' for many individuals and social groups.

- The second phase of the project involved follow-up, in-depth qualitative (semi-structured interviews and focus groups) research with a range of organisations and stakeholders in the six case study locations of Brighton, Canterbury, Leeds, Loughborough, Manchester/Salford, and Nottingham. A major focus here was to identify examples of practice to prevent or mitigate the adverse effects of 'studentification'. Official documentation, reports and an email survey of selected local authorities in December 2004 provided examples of practice.

- In addition, the study was supplemented by interviews with representatives of national interest groups (eg, HMO lobby, NUS) and key individuals.

THM-59 (continued)

Case studies

A major objective of the research project was to identify in-depth issues and examples of practice from six case studies. These were selected by the Steering Group, following the analysis of the survey questionnaires and based on previous research into the issues. The rationale for selecting the six case studies was that all concurred with the following criteria, they should:

- Show evidence of practice and innovative responses to 'studentification';
- Point to different levels of 'studentification' and community concerns;
- Provide a breadth of different geographic and regional contexts;
- Provide a range of historical and diverse HEI contexts;
- Show that practice is influenced by 'external' contingent factors (eg, local economies, housing markets); and
- Were willing to participate in follow-up research.

The six case studies enabled the research team to identify a range of practices and explore processes of 'studentification' in diverse geographic contexts, and to consider the influence of different contingent conditions. There were substantial differences between the percentages of students and student households, the age profiles, tenurial structures and presence of local community resistance to 'studentification' within the six case study areas.

Case Study Area	Total Population (2001 GB Census)	% Population Aged 18-29 (2001 GB Census)	Total Student Population (HESA, 2001/02)	Total Student Population (HESA, 2003/04)	Membership of National HMO Lobby (National HMO Lobby)
Brighton	247,817	19.7%	30,010	31,630	No
Canterbury	135,278	17.3%	29,180	32,310	Yes
Leeds	715,402	18.3%	81,455	88,890	Yes
Loughborough	55,492[i]	28.0%	13,855	16,860	Yes
Manchester/ Salford	608,922[ii]	23.7%	87,250	92,015	Yes
Nottingham	266,988	23.5%	52,815	60,290	Yes

i Source: http://www.lpcs.gov.uk/edav/your_council/about_leicestershire/statistics/research_info_population.htm

ii Aggregation of total population for Manchester and Salford

iii The total student population is an approximation

THM-59 (continued)

Appendix II

Suggested reading

Chatterton, P. (1999) *University students and city centres – the formation of exclusive geographies. The case of Bristol, UK.* Geoforum 30 117-133

Chatterton, P. (2000) *The cultural role of universities in the community: revisiting the university-community debate.* Environment and Planning A 17 685-699

Chatterton, P. Hollands, R. (2003) *Urban Nightscapes: Youth Cultures, Pleasure Spaces and Corporate Power.* Routledge, London

Kenyon, E.L. (1997) *Seasonal sub-communities: the impact of student households on residential communities.* British Journal of Sociology 48: 286-301.

Kenyon, E. Heath, S. (2001) *Choosing this life: narratives of choice amongst house sharers.* Housing Studies 16 619-635

Rugg, J., Rhodes, D. & Jones, A. (2000) *The Nature and Impact of Student Demand on Housing Markets.* Joseph Rowntree Foundation, York.

Rugg, J., Rhodes, D & Jones, A. (2002) *Studying a niche market: UK students and the private rented sector.* Housing studies. 17 (2): 289-303.

Rugg, J. & Rhodes, D. (2003) *Between a Rock and a Hard Place: The Failure to Agree on Regulation for the Private Rented Sector in England* Housing Studies. 18: 937–946.

Smith, D.P. (2002) *Processes of Studentification In Leeds.* Report presented to the City and Regional Office, University of Leeds, Leeds.

Smith, D.P. (2005) *'Studentification': the gentrification factory?* in *Gentrification In A Global Context: The New Urban Colonialism.* Eds Atkinson R, Bridge G, Routledge, London pp 72-89

Smith D.P., Holt, L. 2004, *Processes of Studentification In Brighton and Eastbourne.* Report presented to the Vice-Chancellors Office, University of Brighton, Brighton.

Useful Websites

Anti-Social Behaviour Orders and Acceptable Behaviour Contracts
http://www.crimereduction.gov.uk/asbos9.htm?fp

Definitions of HMOs
http://www.odpm.gov.uk/index.asp?id=1155307

HMO Licensing
http://www.odpm.gov.uk/index.asp?id=1152003
http://www.landlords.org.uk/presentations/LICENSING%20PROCEDURE%20RG.ppt#278,7,Are all HMOs licensable?

Macmillan English Dictionary
http://www.macmillandictionary.com/New-Words/040124-studentification.htm

National HMO Lobby
http://hmolobby.org.uk/

National Landlords Association
http://www.landlords.org.uk

THM-59 (continued)

Noise Abatement Society
http://www.noiseabatementsociety.com/tcms/home

Noise Network
http://www.valweedon.org.uk

Nottingham City Council
http://www.nottinghamcity.gov.uk

Student behaviour
http://www.lboro.ac.uk/admin/ar/policy/behaviour/4policy.html

The Housing Act 2004
http://www.odpm.gov.uk/index.asp?id=1150528

The National Union of Students
http://www.nusonline.co.uk/info/housing

The UK Accreditation Network
http://www.anuk.org.uk

UK Noise Association
www.ukna.org.uk

University of Leeds Housing Strategy
http://www.leeds.ac.uk/about/housing/action.htm

University of Nottingham Accommodation Strategy
https://www.nottingham.ac.uk/marketing/ocsa/resources/The%20University%20and%20the%20Community-Strategy-.pdf

Use Classes Order
http://www.planning-applications.co.uk/uco.htm

THM-59 (continued)

Notes

1 Universities UK Factsheet 2005 Students at UK HEIs AY 2003/04
2 HESA figures for 2003/04
3 Leeds HMO Lobby Introduction webpage
4 Richard Tyler National HMO Lobby
5 Leeds City Council 2002. Privately Rented Shared Housing In Leeds: A Review Paper And Action Plan
6 Charnwood Borough Council 2005 Student Housing in Loughborough Consultation on proposals for Supplementary Planning Document (closed 24.03.05)
7 Dorling, D and Thomas, 2004, People and Places: A 2001 Census Atlas of the UK (Policy Press, Bristol)
8 Accreditation Network UK (ANUK) 2004. Accreditation Today

THM-59 (continued)

Universities UK

Universities UK
Woburn House, 20 Tavistock Square, London WC1H 9HQ
Tel +44 (0)20 7419 4111 **Fax** +44 (0)20 7388 8649
Email info@UniversitiesUK.ac.uk **Web** www.UniversitiesUK.ac.uk

ISBN 1 84036 127 1
January 2006 £10.00

AGENDA
CORRESPONDENCE
Date 3-25-14 Item# TH

03/25/2014
Submitted by Hayley Town

THM-60

I pledge to do everything in my power to protect the quality of life for all residents of the City of San Luis Obispo, including residents of the Monterey Heights and Alta Vista neighborhoods.

Mayor Jan Marx

Vice-Mayor Carlyn Christianson

Council Member John Ashbaugh

Council Member Dan Carpenter

Council Member Kathy Smith

Submitted by Hayley Townle

I pledge to do everything in my power to protect the quality of life for all residents of the City of San Luis Obispo, including residents of the Monterey Heights and Alta Vista neighborhoods.

THM-60 (continued)

Mayor Jan Marx

Vice-Mayor Carlyn Christianson

Council Member John Ashbaugh

Council Member Dan Carpenter

Council Member Kathy Smith

THM-61


03/25/2014
Submitted by Carolyn Smith
September 2013
Calls placed : 0
Dac's / Cita's : 0
237 calls
RECEIVED
MAR 27 2014
CITY CLERK
AGENDA CORRESPONDENCE
Date 3-25-14 Item# Th
CALIFORNIA POLYTECHNIC STATE UNIVERSITY
CERRO SAN LUIS NATURAL RESERVE
TERRACE HILL OPEN SPACE
SOUTH HILLS OPEN SPACE
RAILROAD RECREATION TRAIL
Tank Farm
Tank Farm Road
ISLAY HILL OPEN SPACE
City of
San Luis Obispo
N
W
E
S

10.1.2 Response to Letter from City of San Luis Obispo City Council – Town Hall Meeting Comments

Comment No.	Response
THM-1	This is the cover letter to the package submitted. The City provides the University notification of the town hall meeting, and encloses minutes, a DVD, and written correspondence received. The City further supports the University's compliance with CEQA and notes a separate letter will be forwarded from the City. These statements are noted.
Note: Items 2-42 comprise the draft minutes of the town hall meeting, and are a summary of the DVD recording, which has been viewed by SWCA staff. The following comprise the responses to both the minutes and the DVD recording.	
THM-2	City staff introduced the session and gave a general outline of project status and the evening's proceedings.
THM-3	SW makes statements regarding nighttime light, growth inducement, and desires to see a concurrent Master Plan/LUCE update. Comments noted; the evaluation of the severity of impacts related to lighting are based in part on existing lighting in the area; Section 4.1 of the EIR finds that there are substantial existing lighting sources in the area; the project lighting, as mitigated, is determined not to constitute a substantial increase over existing conditions. The EIR addresses growth inducement in Chapters 2 and 6. The project does not increase enrollment. Impacts related to backfill of housing vacated by project residents are considered speculative. The City is currently updating the Land Use and Circulation Elements. The proposed project does not alter enrollment or bedcount projected in the Master Plan and EIR.
THM-4	PV is concerned with Grand Avenue Traffic. The commenter is referred to MR-1 (Chapter 10.2).
THM-5	SH is concerned with driveways and other factors complicating travel along Grand Avenue. The commenter is referred to MR-1 (Chapter 10.2). The commenter is also concerned with noise and air quality impacts during construction, particularly related to the Old Pacheco School. The presence of the school and sensitive receptors is disclosed in both Sections 4-2 and 4-4. The commenter references statements attributed to the University President regarding future enrollment. The commenter is referred to MR-5 (Chapter 10.2).
THM-6	SC desires consideration of alternatives, and is concerned with impacts to city infrastructure. These comments are noted. The EIR addresses alternatives in Chapter 5, and discloses impacts to city infrastructure and services in Sections 4-5 and 4-7. The commenter references statements attributed to the University President regarding future enrollment. The commenter is referred to MR-5 (Chapter 10.2).
THM-7	SC reads a letter from TC which outlines concerns over traffic congestion and deterioration of quality of life; the commenter urges City opposition to the project. The commenter is referred to MR-1, regarding Grand Avenue traffic impacts, and MR-2 and

Comment No.	Response
	MR-4 regarding nuisances and social issues (Chapter 10.2).
THM-8	PA urges buffers as part of the project, supports alternatives, including specifically the Parking Structure location alternative, and opines that this project will force neighborhood homeowners to sell. The commenter is referred to MR-3 regarding buffers. Comments in support of alternatives are noted. The commenter is referred to MR-4 regarding social and economic impacts (Chapter 10.2).
THM-9	JA suggested use of planning commission staff expertise in evaluating the project. This is not a specific comment regarding environmental issues or the EIR.
THM-10	GP discusses problems of studentification, prefers alternative sites. Comments regarding alternatives are noted. The commenter is referred to MR-4 regarding social and economic impacts (Chapter 10.2).
THM-11	DH expresses concerns with student behavior, impacts to City services, including water supply, and potential for increased traffic. The commenter is referred to MR-2 regarding student-related nuisances (Chapter 10.2). Impacts to City services are addressed in Sections 4-5 and 4-7. The commenter is referred to MR-1 in response to concerns over traffic.
THM-12	RK states concerns over long term negative impacts (demise of neighborhoods), prefers alternatives, and submits a petition. Comment noted. The commenter is referred to MR-4.
THM-13	JD states selection of alternate sites should consider other lands. Notes role of politics and supports inclusion of amenities. Comment noted. The process for selection of alternatives for evaluation is outlined in Section 5. Amenities to be included in the project are outlined in the Project Description.
THM-14	DG states general opposition, concerns over lack of employment for new enrollment, and general opposition to design directions on campus. Comment noted. The project would not increase enrollment.
THM-15	MT questions information being spread about the project. Notes the University is a state agency and not subject to local approval. Comment noted.
THM-16	KB states University should mitigate for financial impacts to the City, including police, fire, emergency facilities, traffic control, protective barriers at Slack. Response: Impacts to City services are addressed in Section 4-5. The University has existing agreements for fire and emergency response services, and compensates the City pursuant to the terms of the agreements. The traffic section has been amended to include in-lieu fees options for mitigation (refer to MR-10). The EIR does

Comment No.	Response
	not identify the need for protective barriers at Slack Street. Concerns over Future Enrollment. Response: Please refer to MR-5 (Chapter 10.2) Concerns constructing freshman housing will increase availability of residences for upperclassmen and result in net growth locally. Response: The project will not increase enrollment. The total student population residing in private residences will decrease as a result of the project. Backfill is addressed in the Executive Summary of the EIR.
THM-17	CA states that discouragement of alcohol use by University and local policing is not effective, cites police calls. Expresses general concerns with student behavior, degradation of neighborhood. The commenter is referred to MR-2 (Chapter 10.2).
THM-18	IM states the topography/location are not appropriate for dorms. Response: The existing topography will be altered through the development of the project as described in Section 2 of the EIR. IM states the parking structure size is not adequate. Response: An analysis of the sufficiency of parking supplies is provided in Section 4.6. The analysis determines there is sufficient available parking to accommodate demand. IM expresses concerns regarding view blockage and supports alternatives. Response: Comment noted. IM expresses concerns over traffic and pedestrians in light of Pacheco reuse. Response: As noted in Section 4.6 and MR-1, the project will decrease vehicle traffic along Grand Avenue. Operation of the Teach School has been included in the analysis.
THM-19	KA generally opposes site, prefers H12 and H16. Comment noted.
THM-20	LW expresses concern over impacts to views and “Studentification.” Response: The University and its consultants have reviewed attached materials related to “Studentification.” The project aims, in part, to relieve pressure on housing stock in existing residential neighborhoods by providing on campus housing. The commenter is referred to MR-4. Concerns over impacts to views are noted. Additional mitigation will be included in the Final EIR to further address impacts.
THM-21	LW states concern over impacts to Grand Avenue, and impacts related to Pacheco operations. The commenter is referred to MR-1 (Chapter 10.2). The EIR incorporates existing and proposed use of the Old Pacheco School into analyses where relevant.

Comment No.	Response
THM-22	JK generally opposes the site and prefers H12/H16. Response: Comment noted.
THM-23	TE states the EIR omitted discussion of parking needs/management during construction Response: Construction-related traffic is addressed in Section 4.6.5.5 of the EIR. The circulation plan typically includes designation of staging and parking areas for a particular project. The commenter is concerned regarding impacts to Grand Avenue. Response: The commenter is referred to MR-1 (Chapter 10.2). The commenter makes general statements that the project review is "piecemealed." Response: Comment noted. The project is an amendment to the existing Master Plan. The reasonably foreseeable cumulative scenario is outlined in Chapter 3. The commenter notes overarching goals of CEQA to balance environmental and social and other impacts, including privacy and lowered property values. Response: The commenter is referred to MR-4 regarding economic and social impact. Findings regarding social and economic benefits and impacts are addressed in the findings and statements of overriding considerations, which will be developed by the Board of Trustees.
THM-24	GM opposes site, requests consultation between Cal Poly and the City. Response: Comment noted.
THM-25	SR supports alternative sites, and seeks City support. Response: Comment noted.
THM-26	EM states the traffic analysis needs to address east-west circulation, which causes cut-through traffic in neighborhood streets Response: The traffic analysis in Section 4.6 uses current models to assess impacts and redistribution of traffic, including dispersal along smaller streets. The analysis finds traffic will be routed predominantly to other major campus entry points, where more direct routes and wayfinding are available. EM further opposes project, seeks City support in opposition. Response: Comment noted.
THM-27	CR states the Chamber has no policy position, supports on campus housing, amenities and student population growth. Response: Comment noted.
THM-28	RV refers to obligations of public agencies, questions "rejection" of alternative sites, mitigation. Response: The EIR did not reject environmentally superior alternatives. The CSU Board of Trustees will evaluate alternatives as part of their decision-making process, where findings and statements of overriding considerations will be developed and

Comment No.	Response
	acted upon. The Board will also evaluate the feasibility of mitigation. RV states impacts to Grand Avenue were omitted. Response: The commenter is referred to MR-1 (Chapter 10.2).
THM-29	JL supports selection of H12/H16 Response: Comment noted. JL wants City to evaluate consistency with City policies Response: Comment noted. The University is not subject to local land use authority. General consistency information is provided in Section 3. JL states concerns related to aesthetic, pedestrian safety, and traffic impacts Response: Specific responses are provided to separate correspondence provided by the commenter (refer to Chapter 10-2). JL states that mitigation for aesthetic and pedestrian impacts insufficient. Response: Specific responses are provided to separate correspondence provided by the commenter (refer to Chapter 10-2).
THM-30	CS opines project would significantly increase noise and other public safety calls. Response: The commenter is referred to MR-2 (Chapter 10.2).
THM-31	MH voiced concerns regarding proximity of Old Pacheco, including impacts related to air quality, noise, and pedestrian safety. Response: Operations at Old Pacheco have been incorporated into the analysis. MH is concerned regarding potential wind tunnels, glare Response: Specific responses are provided to separate correspondence provided by the commenter (refer to Chapter 10-2). MH seeks City support for opposition and supports alternative sites. Response: Comment noted.
THM-32	RH states general opposition to Cal Poly plans, concerns over noise and dust impacts during construction, and concerns over noise, trash and drug use near Old Pacheco School long term. Response: Comments are noted. Noise and dust during construction are analyzed in the EIR. The commenter is referred to MR-2 (Chapter 10.2).
THM-33	MVLB states concerns over height, shape, location and massing of project, consistency with local character. Response: Comment noted. The EIR discloses impacts related to aesthetics. Additional mitigation will be incorporated into the EIR to address impacts (the commenter is referred to MR-9). MVLB states concerns over impacts to noise, traffic, public safety, and air circulation Response: Comment noted. The EIR analyzes discloses impacts related to the

Comment No.	Response
	issues above. Provision of emergency response is subject to agreements with the City; the EIR determines emergency access is adequate for the project (Section 4-5 and 4-8). The commenter is referred to MR-1, which addresses Grand Avenue. Proximity to the elementary school is addressed where relevant in the EIR. MVLB supports alternative sites. Response: Comment noted.
THM-34	LS expresses concern over negative impacts to cyclist safety, quality of life, and property values. Response: The commenter is referred to MR-2 (Chapter 10.2).
THM-35	TT opposes the location. Opines existing parking lot is heavily used and questions where parking will be relocated, urges City opposition. Response: Comment noted. An analysis of parking demand, redistribution, and supply is provided in the EIR in Section 4.6. The analysis finds sufficient parking supply to accommodate demand and redistributed parking. The project does not increase enrollment.
THM-36	HT references a letter (material #60) and seeks council support. Response: Comment noted. Statement is attached (material #60).
THM-37	EW questions whether students want to live in dorms. Response: The University has performed market research to determine housing needs and demand, as noted in the Project Description. EW recommends update of the Master Plan prior to new housing. Response: The University is pursuing bedcount projected under the existing Master Plan; the University continually evaluates the need to update the Master Plan. The commenter is referred to MR-5 regarding growth.
THM-38	SL expresses concerns over long term negative impacts to ambient noise and traffic intensity. Response: The commenter is referred to MR-1 and MR-2 (Chapter 10.2). Dispersal of traffic is addresses in Section 4-6.
THM-39	JD recommends the City and Cal Poly negotiate regarding site selection, City should consider closure of Grand Avenue as leverage. Response: Land use and development on campus are not subject to City approval.
THM-40	AA states disappointment that the meeting was conducted during spring break. The commenter opines near or on-campus housing is important, and suggests improving relationships. Response: Comments noted. The commenter does not raise environmental issues.
THM-41	KS seeks evaluation of impacts to populations and housing and backfill. Opines City is

Comment No.	Response
	subsidizing students because they do not contribute sufficiently to the tax base. Response: The EIR provides discussion of impacts to population and housing backfill, concluding the topic is speculative. The commenter is referred to MR-4 regarding economic and social issues.
THM-42	DF expresses concerns regarding Grand Avenue, including pedestrian and cyclist safety. The commenter is referred to MR-1.
THM-43	The City concludes the meeting and summarizes next steps. No response is needed.
The following are attachments to the cover letter and minutes consisting of correspondence submitted to the city for the town hall meeting.	
THM-44	The material is a copy of a letter submitted separately to the University; specific responses are provided in Chapter 10.2.
THM-45	The material is a copy of a letter submitted separately to the University; specific responses are provided in Chapter 10.2.
THM-46	a. The commenter quotes regarding a public agency's obligation to comply with CEQA, and guidance therein. Response: Comment noted. b. The commenter notes several significant impacts were identified in the EIR, and states that findings for rejection of alternatives were not provided. Response: The EIR did not reject environmentally superior alternatives. The CSU Board of Trustees will evaluate alternatives as part of their decision-making process, where findings and statements of overriding considerations will be developed and acted upon. The Board will also evaluate the feasibility of mitigation. c. The commenter states that alternatives should include redesigning the site to provide an open space buffer. Response: The commenter is referred to MR-3 (Chapter 10.2). d. The commenter provides further discussion of the CEQA process. Response: Comment noted. The development and approval of appropriate findings and statements of overriding consideration is a function of the CSU Board of Trustees. e. The commenter opines that the lack of information regarding Grand Avenue traffic constitutes a deficiency in the document. Response: Please refer to MR-1 (Chapter 10.2).
THM-47	The document is a letter submitted by Roger and Linda Bishop, not in attendance at the meeting. a. The commenters state concerns over Grand Avenue, including pedestrians and bicyclists.

Comment No.	Response
	Response: The commenters are referred to MR-1 (Chapter 10.2). b. The commenters generally state concerns with noise, construction traffic, and air quality during construction, proximity to Teach program, and view obstruction. Response: Comments are noted. Each topic raised is addressed in the EIR in respective sections. Construction traffic is addresses in Section 4.6.5.5 of the EIR. c. The commenters address buffers. Response: The commenters are referred to MR-3 (Chapter 10.2). d. Comments regarding participation/response of City Response: Comment noted. e. The commenters list several off-site mitigation or funding issues, including city police, city fire, expansion of emergency/hospital facilities, traffic control, and barriers for pedestrians along Slack Street. Response: The EIR finds no significant impacts related to city police or fire service. The project will not increase enrollment or significantly increase staffing therefore expansion of emergency or hospital facilities is not considered a potential impact of the project. The EIR mitigation for traffic impacts has been amended; the commenter is referred to MR-10. Costs related to pedestrian facilities north of Slack Street will be borne by the University and occur on University property in this area. Construction hours and limits on operations are discussed in Section 4-4 of the EIR. f. The commenter opines the project will not move students on to campus because it serves freshmen. Response: The project will increase the total percentage of students living on campus. g. The commenters address future growth. Response: The commenters are referred to MR-5 (Chapter 10.2).
THM-48	The commenter attaches a copy of a notice provided to the neighborhood. Response: Noted.
THM-49	The material is a copy of an email notice of the meeting. Response: Noted.
THM-50	The commenter suggests the City oppose the project. Response: Noted.
THM-51	The material is a letter from Mr. French. a. The commenter opposes the project's location. Response: Comment noted.

Comment No.	Response
THM-52	The material is a letter from Mr. Ortiz. Mr. Ortiz has submitted a separate letter, however, this letter is slightly different and therefore separate responses are provided. a. The commenter supports City comments on the EIR. Response: Comment noted. b. The commenter states the project will add to operating costs of the city, relating to water, utilities, and emergency services, and increase disruption in local neighborhoods. Response: Information regarding sources and provision of water and utilities is provided in Section 4-7 of the EIR. The University maintains its own supplies and infrastructure for water and utilities. The University has an agreement with the City to provide emergency response to the campus. The EIR addresses impacts to neighborhoods in several locations. c. The commenter opines the University is in conflict with its own plans and guidelines in terms of use, impacts to communities, and impacts to Grand Avenue. Response: An evaluation of planning consistency is provided in Chapter 3. d. The commenter supports City response to the EIR. Response: Noted.
THM-53	The material is a repeat of a letter submitted directly to the University as a comment letter on the EIR. Responses are provided in Chapter 10.2.
THM-54	The material is a repeat of a letter submitted directly to the University as a comment letter on the EIR. Responses are provided in Chapter 10.2.
THM-55	The material is a letter from Sharon Whitney. a. The commenter opposes the project and supports the City's comment letter. Response: Comment noted. b. The commenter states the EIR should address disposition of existing housing sites. Response: The RDEIR includes the following specific language in both the Executive Summary and the Project Description to address disposition of existing sites: "Under the current proposal, the bed count identified in the Master Plan for housing sites H-4 through H-7 would be consolidated at the current site and the complexes at sites H-4 through H-7 would not be pursued under the current Master Plan. The project is intended to meet existing and projected demand for housing. The project does not increase enrollment over current levels. The Poly Canyon Village project, developed in 2008, included an amendment to the total Master Plan bed count, and an EIR was certified for the project. The proposed housing does not increase bed count over projections in the Master Plan, as amended." The above language specifically commits the University to forego development of previously identified housing sites under the current Master Plan. c. The commenter refers to future growth on campus. Response: The commenter is referred to MR-5 (Chapter 10-2).

Comment No.	Response
	d. The commenter states that b. and c. above warrant alterations in other sections of the EIR. Response: Please see responses above, no additional changes are proposed. e. The commenter states that the document should reference the City's LUCE update. Response: The update is referenced on page 3-5. Ms. Whitney's letter is repeated as an additional attachment.
THM-56	The material is a letter submitted by Donley Winger. a. The commenter opposes the project and is not satisfied with outreach. Response: Comment noted. b. The commenter outlines issues related to the operation of Grand Avenue. Response: The commenter is referred to MR-1 (Chapter 10-2); pedestrians, cyclists, and off peak resident trips are addressed in Section 4-6. c. The commenter reiterates opposition. Response: Noted.
THM-57	The material is a letter submitted by Paul Allen. a. The commenter opposes the location, citing student behavior. Response: The commenter is referred to MR-2. b. The commenter opines the project is not consistent with the character of the area, and that the project will result in homeowners feeling increased pressure to sell. Response: The commenter is referred to MR-4. c. The commenter reiterates issues related to owners selling or moving out in lieu of renters. Response: On-campus housing is proposed, in part, to alleviate pressure on neighborhood housing stock. The pattern of owner to renter conversion is subject to a variety of forces. The commenter is referred to MR-4. d. The commenter addresses future growth. Response: The commenter is referred to MR-5. e. The commenter is concerned about the view of the project in the area. Response: Comment noted. Aesthetic impacts are outlined in Section 4.1. Mitigation has been amended (refer to MR-9). f. The commenter addresses Grand Avenue. Response: The commenter is referred to MR-1. g. The commenter seeks discussion of impacts to residential neighborhoods in the cultural resources section. The commenter also supports a larger buffer. Response: The commenter is referred to MR-3. Cultural resources are defined in Section 4-8.

Comment No.	Response
	h. The commenter states that population and housing discussions should include displacement of owner-occupied residence in favor of renters. Response: On-campus housing is proposed, in part, to alleviate pressure on neighborhood housing stock. The pattern of owner to renter conversion is subject to a variety of forces. The commenter is referred to MR-4. i. The commenter supports the H12/H16 site alternative, stating that the alternative was rejected because it was inconvenient and far from dining. Response: The alternative has not been rejected; the Board of Trustees will consider all material in the record in making a decision on the project. Further information about the feasibility of alternatives is provided in MR-8. j. The commenter states that the parking structure location alternative would be preferable as the structure would act as a buffer. Response: Comment noted.
THM-58	The material is a signed petition opposing the project. Response: Noted.
THM-59	The material is a letter from L. White accompanied by reference materials on the subject of "studentification." a. The commenter shows panoramic photographs of the San Luis Obispo area, and states that the scale of the project is incompatible with the surrounding density. Response: The commenter is referred to MR-9. b. The commenter refers to materials appended which define and discuss "studentification." Response: The University and its consultants have reviewed the materials submitted, including materials which provide definitions of the terms, and materials which expand upon the issue and strategies to address the phenomenon as defined. The University pursues the construction of additional on-campus housing in part to relieve pressures associated with housing students in off-campus neighborhoods. Commenters have stated that the placement of housing in this location would disproportionately lead to student access and nuisance behavior in the adjoining neighborhoods, and this location would be relatively worse in terms of creating this condition than other locations on campus. The EIR addresses impacts related to nuisance noise, public safety, and related issues in several sections of the EIR. The commenter is referred to MR-2 for more detail. It remains that the population to be housed is existing enrollment; and an existing component of the off-campus resident population. The EIR notes this in several sections, and states that drawing the line between the relocation of this population and significant environmental impacts related to nuisances is either speculative or not quantifiable.
THM-60	The material is a sheet including signatures of council members under a pledge to "protect the quality of life for all residents." Response: Noted.

Comment No.	Response
THM-61	The material is referenced in Carolyn Smiths presentation (comment #30) and consists of a map of calls placed regarding noise complaints. Response: Noted.

From:	Murry, Kim
To:	Nicole Carter; Joel Neel; snosek@calpoly.edu
Cc:	Johnson, Derek; Lichtig, Katie; Codron, Michael
Subject:	Housing South - City"s comments on Recirculated Draft EIR
Date:	Monday, March 31, 2014 4:05:35 PM
Attachments:	image001.png SLOCity-CommentLetter_Attachments.pdf

Nicole:
Attached please find the City's comments on the recirculated Draft EIR for the Housing Project South dorm project proposed by Cal Poly. Please be in touch if you have questions. Thank you.

Kim Murry
Deputy Director

CITY OF
SAN LUIS OBISPO

Community Development
Long Range Planning
919 Palm Street, San Luis Obispo, CA 93401-3249
E kmurry@slocity.org
T 805.781.7274
slocity.org

Community Development
919 Palm Street, San Luis Obispo, CA 93401-3218
805.781.7170
slocity.org

March 31, 2014

CSU Board of Trustees
Nicole Carter, Senior Planner ncarter@swca.com
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo CA 93401

SUBJECT: Recirculated Draft Environmental Impact Report for Cal Poly Student Housing South Project

SLO-1

This letter serves as the City of San Luis Obispo's technical response to the Recirculated Draft Environmental Impact Report (RDEIR) for the proposed Cal Poly Student Housing South Project. The Vice Mayor of the City has separately transmitted a summary of citizen concerns about the project presented to the City Council at a Town Hall meeting held on March 25, 2014.

SLO-2

The City was deeply disappointed that the RDEIR failed to address many of the technical deficiencies contained in the City's original comment letter dated January 24, 2014 (Attachment 1). As you will note in our more detailed comments in this letter and the associated attachments, the City of San Luis Obispo believes the RDEIR is inadequate in its analysis of the impacts of the project and the associated mitigation measures. Moreover, the City questions the legal sufficiency and compliance with the California Environmental Quality Act (CEQA) of the RDEIR.

SLO-3

The University has a legal obligation to address the project's potential impacts to the community and to propose associated mitigation measures. The City believes this is especially true for those impacts and mitigations affecting adjacent residential neighborhoods. This is required in order to have a legally defensible environmental document which will be used to inform a future decision by the Board of Trustees. Additionally, the Final EIR (FEIR) represents an issue of trust between the University and the community. The FEIR must represent the University's best efforts to assess and mitigate the impacts of this project. This is true both on and off site. The RDEIR fails to establish the foundation that will lead to a FEIR that meets either the spirit or the requirement to inform decision makers of the environmental impacts associated with the project and mitigations to address any impacts. In the case of the RDEIR, it fails to analyze the range of reasonable and foreseeable impacts and in some cases, identifies impacts, but does not incorporate mitigation measures that the City has identified. The City expects the University to do better than the work reflected in the RDEIR. Our hope is that the University re-evaluates the viability of an alternative site that might be environmentally superior. Short of that, the University must fully disclose and discuss potential impacts and propose mitigations in the FEIR.

By attachment to this letter, we are resubmitting our comments contained in the January 24, 2014 letter. We will identify below where responses contained in the RDEIR were inadequate and where new areas of concern have been identified. We understand the University has committed to respond to all comments submitted to the Draft EIR and the RDEIR in the Final EIR. Our hope is that the University not only responds but corrects inaccuracies, supports conclusions with facts and data as well as incorporates mitigation measures that are required to address project impacts, both on and off campus. This is an opportunity for the University to be an integral partner and good neighbor as well as contribute to the individual and mutual success of the City and the University. The City implores the University to seize this opportunity and address these serious concerns in a meaningful, thoughtful and thorough way. The City believes that a thorough incorporation and consideration of comments into the proposed final EIR will build community trust and confidence that will help with the planned update of the Cal Poly Campus Master Plan. **SLO-4**

General Comments:

Master Plan: We continue to assert that an update of the Master Plan to accommodate the proposed Housing Project South needs to address disposition of the identified housing sites in the existing Master Plan (see page 2, Attachment 1). Creating a new site for housing without retiring existing housing sites reflects increased housing capacity not addressed in either the original or recirculated Draft EIR. These cumulative impacts need to be discussed and addressed. The RDEIR reference to draft Design Guidelines developed by the University in 2010 is not an adequate response to cumulative impacts of increased housing capacity. **SLO-5**

Off-site Impacts: In addition, the RDEIR identifies several off-site impacts. The ruling of *City of Marina v. Board of Trustees of California State University* determined the CSU has a duty to mitigate off-site impacts. The City is willing to work with the University to implement off-site mitigations to address both cumulative and project-specific impacts, but the University needs to ensure the EIR adequately identifies potential impacts and offers mitigations, even if those mitigations will not reduce the impacts to less than significant levels (PRC §15126.2b). **SLO-6**

Plans and Policies:
The RDEIR refers to the City of San Luis Obispo General Plan Land Use (LUE) and Circulation (CE) Elements and provides a brief discussion of how the proposed project impacts the City's policy direction. However, there are other applicable policies that were not mentioned. Specifically:
LUE 2.1.3: Neighborhoods should be protected from intrusive traffic.
LUE 2.2.10: All multi-family development and large group-living facilities should be compatible with any nearby, lower density development.
CE 5.0.3: New Development shall provide sidewalks and pedestrian paths consistent with City policies, plans, programs and standards. **SLO-7**

The City's General Plan contains policies regarding transitions between uses to guide decision-making regarding compatibility of uses. The proposed project at an equivalent of 75 units/acre **SLO-8**

(748 units[1]/10 acres) is of vastly different intensity than the adjoining Residential Single Family neighborhood which is developed with low-profile houses at a density of six units/acre. With this over ten-fold increase in intensity, associated impacts of traffic, noise, light, glare, visual, and building forms that are out of scale with the adjoining neighborhood are more pronounced. The RDEIR needs to fully scrutinize and address these impacts. **SLO-8 (continued)**

Alternatives:
The RDEIR identifies several alternatives that are environmentally superior to the proposed project and meet the project objectives. The RDEIR indicates that one of the reasons these sites are less suitable is their lack of proximity to dining facilities. The evaluation should include discussion of existing dining facilities' location and capacity to serve the increased population associated with the 1,475 new students and 30 additional staff. With shuttle service and other transportation improvements called out in the Master Plan, location of the existing dining facilities may be acceptable to serve the needs of the intended on-campus population. The City strongly urges the University to pursue these sites instead of the less suitable site that negatively impacts the surrounding community. **SLO-9**

More details may be found in subsequent sections of this letter.

Cumulative Impacts not elsewhere addressed

The City reiterates its comments contained on page 2 of Attachment 1 regarding cumulative impacts. The announced increase in enrollment for the campus of 4,000-5,000 students has not been addressed (Tribune article 9-16-13), nor has the projected growth identified in the draft Land Use and Circulation Elements. The cumulative analysis section is inadequate as it fails to address both university growth and the growth identified in the City's Land Use and Circulation draft elements. **SLO-10**

Aesthetics

The RDEIR has concluded that cumulative visual impacts are significant and unavoidable due to blocked views of identified scenic resources and lack of compatibility with scale and character of adjacent development in the City neighborhoods. This conclusion was based upon additional visual simulations included in the RDEIR. **SLO-11**

Page 103 of the RDEIR indicates that the City's Conservation and Open Space Element designation of Grand Avenue as a scenic roadway is a function of Grand Avenue's "boulevard" aesthetic along the roadway and the prominent campus gateway." This is an inaccurate statement and needs to be corrected and addressed. The General Plan designates this as a scenic roadway due to the views from the street and the visual quality of the resources viewed (Final EIR August 1994 – Land Use and Circulation Elements update 6.12.2.1b).

[1] 1,475 beds/2 beds per room = 738 dwellings. Appendix C of RDEIR

Recirculated Draft Environmental Impact Report (RDEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
March 31, 2014
Page 4

SLO-11 (continued)

The cumulative impacts identified in the RDEIR need to be accompanied by mitigation measures even if there is no ability to mitigate to less than significant levels. Mitigations need to be offered to address the transition between the adjoining neighborhood and the proposed project as described in AES Impact 2. There may be site design and building design features that comply with both the City's Community Design Guidelines and Cal Poly's own Master Plan (which call for land use compatibility and being sensitive to impacts on adjacent neighborhoods) that could provide some mitigation to long-term aesthetic concerns.

SLO-12

While landscaping is offered as a mitigation to soften the impression of a continuous building surface, this does not address loss of views. Alternatives discussed in Chapter 5 of the RDEIR do not specifically address increased setback along Slack Street or explore ideas of clustering the buildings. The evaluation only addresses increased setback as a function of a reduced project alternative (which did not meet the project objectives). Building design direction could include stepped buildings, wall and roof articulation, color, and style. At the very least, the Final EIR needs to explore mitigations of site and building design options to address the visual impact of four and five story buildings atop a bank slope on Slack Street adjacent to a single family residential neighborhood.

SLO-13
SLO-4
SLO-15

The discussion under 4.1.5.3 of light and glare is not sufficient. No night-time simulations were provided to show how light from the tall structures in this location will impact nighttime ambient light levels in the adjacent neighborhood. The Master Plan direction regarding lighting addresses the requirement to hood exterior lighting sources and provides direction regarding lighting of the parking structure, but concludes that the impact of lights from upper floor windows and on ambient light in the area is less than significant. This conclusion is not supported by the limited range of mitigations and does not incorporate other mitigating methods related to the buildings themselves, such as their orientation, fenestration, and amount of glazing that faces the adjacent residential neighborhoods in order to address light intrusion.

SLO-16

Greenhouse Gas Emissions

Please see the comments on page 3 of Attachment 1. In addition, the City questions the conclusion that the project would fall under the service population threshold for Greenhouse Gas (GHG) emissions, even with the acknowledgement that there will be some off-set from existing emissions associated with the existing parking lot use. The assumptions used in the CalEEMod modeling program (as described in Appendix C) indicate trip generation rates from the Master

SLO-17

Plan assumptions were used and then further reduced by applying a commute reduction factor to arrive at a daily trip rate of 1.1 (.550 per occupant multiplied by an estimate of two occupants per room) to generate the operational GHG emissions output. With the concern about the accuracy of the Master Plan trip generation rates, applying a further reduction that concatenates through the topical evaluation is not appropriate.

SLO-17 (continued)

The City continues to offer that identified significant cumulative GHG emissions impacts have reasonable mitigation options in the form of off-site sequestration through open space or conservation easements (PRC §15126.4 C4).

Land Use/Population and Housing

Appendix C of the RDEIR indicates the dorm project is equivalent to approximately 738 dwelling units[2] (not counting the addition of 30 professional staff associated with the project). The project will relocate students who might otherwise live somewhere else in the city/county onto campus, however, the growth-inducing impacts of the project have been dismissed as too speculative for analysis; and the addition of 30 new staff positions has been determined to be less than significant. The City contends that the RDEIR needs to include analysis of backfill of vacated housing. With assumptions about numbers of dwelling unit equivalents, the University can also make some informed assumptions about distribution of student housing in the area to understand the order of magnitude of the impact to the City of San Luis Obispo. The housing units not used by the freshmen relocated to the on-campus dorms will be refilled by others, and the 30 new professional staff will have housing needs. This growth-inducement must be addressed in the RDEIR.

SLO-18

Noise

The RDEIR's response to initial comments regarding nuisance noise is inadequate. CEQA indicates that social effects of a project may be used to determine the significance of physical changes caused by a project (PRC §15131b). In this instance, the addition of 1,475 residents immediately adjacent to a single family residential neighborhood has negative social effects associated with nuisance noise, especially during nighttime hours. This can be seen in the history of noise complaints and police calls to the neighborhood immediately surrounding Cal Poly (see the section on Public Services on pages 5- 6 of Attachment 1 and below). The RDEIR can and should evaluate impacts regarding nuisance noise rather than indicate that it is too difficult to predict. The City's experience has been that concentrations of transitory renters, whether in dorms or other living situations, generate noise impacts in neighborhoods.

SLO-19

Public Services

Police

[2] 1,475 beds/2 beds per room = 738 dwellings

Please refer to comments provided on pages 5-7 of Attachment 1. The Cal Poly Police Department is the lead law enforcement agency on the Cal Poly campus. An increase in on campus population will create a need for personnel to adequately patrol and address enforcement issues at the proposed dorm location as well as campus wide. The DEIR indicates the impact to this concern is "*less than significant and no additional equipment or facilities are required*". **SLO-20**

The analysis that forms this conclusion is unsupported. If the increase of the on-campus population is not addressed properly, both in short and long term planning, there may be a need for City of San Luis Obispo police resources to respond more frequently on campus to provide law enforcement assistance and in the neighborhoods directly surrounding the proposed dorm. The hiring of appropriate police personnel and staff to adapt to this increase must seriously be addressed by Cal Poly to maintain service levels to address activities that may have an impact on the environment, such as noise traffic and criminal activity. The RDEIR indicates that recruitment is underway for two additional Police personnel. These positions are not new positions but rather are reinstatements of positions lost in previous budget years (Chief Hughes, personal communication) and will not address the concerns of additional campus population.

A concentration of first year students adjacent to City residential areas may generate an increased demand for services by the City of San Luis Obispo Police Department. The DEIR has indicated that the population of students is simply shifting from the neighborhoods onto campus, thus there is no growth in population or adverse impact. Although there may be no increase in enrollment, concentrating this larger population into one area directly next to a low density residential neighborhood will concentrate a larger flow of students as they exit campus to saturate the neighborhoods to look for parties or other social opportunities. This flow will continue as students return to campus and could likely result in increased noise, traffic and criminal activity levels. Shifting students to campus housing from off campus housing will result in off-campus housing vacancies and public safety services will continue to be needed to respond to these locations. It will be imperative for Cal Poly to continue to expand efforts to engage students involved in off-campus adverse behavior. A mitigation measure that includes a commitment for on campus housing social programming and for University law enforcement staff to partner and augment policing levels in the adjacent neighborhoods could mitigate these impacts. **SLO-21**

The City has reviewed its public safety calls for service within a ½ mile semi-circle radius (excluding Cal Poly property) from the intersection of Slack and Grand over the last three years. These numbers represent both Police and Fire responses, however, the bulk of the responses are police related. **SLO-22**

Recirculated Draft Environmental Impact Report (RDEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
March 31, 2014
Page 7

Police and Fire Calls for Service

Location – ½ mile semicircle radius	2013	2012	2011
Grand & Slack - Total	1431	1359	1689
7AM - 7PM Day	609	605	820
7PM – 7AM Night	**822**	**754**	**869**

SLO-22 (continued)

Although the City is not able to conclude that all of these calls for service are the result of Cal Poly student related activity, approximately 1/3 of the calls are noise and alcohol violations which are predominantly associated with the college age population. These numbers do not represent most officer self-initiated activity pertaining to minor traffic violations, other minor infractions, or incidental police contacts. However, it is recognized and expected by citizens that the department intensify its enforcement efforts towards this particular area of town regularly.

The Police Department analyzed like data for other areas of the City during this same time period for comparative purposes (Tassajara & Ramona, Broad & Higuera, Laguna & LOVR, and Pointsettia & Bluebell). Each of these areas represents different demographics with some areas having a higher concentration of college age residential and activity. Of the five areas analyzed, the area of Grand and Slack is the only location where night time activity increased when compared to daytime activity.

City impacts for the projected student population adjustment and growth at the selected site will alter the traffic and pedestrian patterns on the City surface streets adjacent to this area. Student egress and ingress of this concentrated population into the City of San Luis Obispo will likely create several concerns to include safety lighting, safe pedestrian access and effective traffic engineering design to mitigate potential criminal activity or vehicle/pedestrian collisions.

Although the current EIR suggests a movement of this select population onto campus will mitigate a higher concentration of vehicles/bikes traveling to campus for classes it does not recognize the "social implications" associated with the movement of pedestrians, bicycles and vehicles impacting the area outside of "normal business hours". The north end of the City adjacent to the campus has a significant amount of night time pedestrian and vehicle traffic that impacts the surrounding residential areas. The shifting of this population will affect both Cal Poly and SLO Police resources and response to the area. Ensuring adequate personnel are available for the concentration of this population will help mitigate some concerns; however, there will continue to be impacts as students migrate on and off campus.

SLO-23

The EIR should incorporate a comprehensive study of Grand and Slack, and Grand and the Freeway on/off ramps at Grand as well as all the impacted adjacent intersections and roadways to address vehicle, bicycle and pedestrian movement patterns to determine adequate engineering and lighting necessary for optimal vehicle/people safety and movement. It is imperative that Cal Poly engage these efforts jointly with the City in the development of plans for optimal student safety and residential wellness. The RDEIR provides mitigation measures under TC/mm-1 that calls for sidewalk installation, marked crosswalks, pedestrian scale lighting, and enhanced

features in heavily traveled pedestrian areas to improve circulation and safety. The City contends that these may not be the only mitigation measures necessary and that any mitigations must be implemented prior to project occupancy in order to address impacts.

SLO-23 (continued)

Fire

The University's recirculated draft EIR disregarded many of the factual details included in the City's January 24, 2014 response, including emergency response frequency. The University's recirculated draft EIR also included language that decreased the perceived impact the campus has on the City Fire Department's operations. The City's commitment is to work collaboratively and positively with the University on this proposed project to ensure the safety of all residents and the continued delivery of effective fire and advanced life support medical care. Downplaying the significance of this proposed project is contrary to this goal.

SLO-24

4.5.1.1 Fire Protection

As stated in the January 24, 2014 response letter, the University contracts with the City Fire Department to provide fire and emergency response on campus. Please refer to that letter for additional details regarding fire protection. A fire occurring on the project site would be the primary responsibility of the City Fire Department. This contract also covers emergency medical services, which the City provides via cross-trained firefighter-paramedics in an advanced life support (ALS) capacity. All emergency medical services in the project site would be the responsibility of the City Fire Department.

The RDEIR inaccurately represents the resources for the City's Fire Department. Page 175 of the RDEIR indicates staffing levels of 55 employees, 45 of which are firefighters and 10 administrative and fire prevention personnel. The information should be corrected to show a staff of 51 employees, comprised of 42 firefighters and 9 administrative and fire prevention personnel.

The City Fire Department responded to the University 271 times in calendar year 2013. Calls for service to the University campus accounted for approximately 23.6% of all incidents managed by the closest fire station, Fire Station 2. In calendar year 2013, Fire Station 2 was dispatched to 1,149 incidents. The vast majority of these emergency responses to the University were medical in nature. Medical emergency responses are typically managed by one fire crew. The campus currently has 6,239 beds of student housing. The addition of 1,475 beds represents an almost 24% increase in on-campus housing. To the extent that these new beds result in a net increase of on-campus student residents, there will be an increase in calls for service for the City Fire Department. The University's conclusion that emergency incident frequency at the campus is "low" is a false assumption. The City Fire Department responds to an emergency on campus an average of once every 32 hours.

SLO-25

Approximately ten fire or fire system related emergencies occurred on the University property in 2013. These resulted in a response by several City Fire emergency response crews. Fire responses garner a large response from the City. The initial dispatch to a structure fire or fire alarm on the University property calls for two fire engines, one 100' aerial ladder truck, and a

SLO-26

battalion chief. The addition of multiple buildings in this project will result in an increase in buildings protected by the City Fire Department. **SLO-26 (continued)**

The project site is served by existing fire suppression infrastructure (i.e., hydrant systems). The project is required to comply with existing Fire and Building Code regulations intended to reduce risk of damage to property and persons. Applicable regulations address roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. The project must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space. Preliminary engineering studies indicate adequate fire flow (water volume and pressure) at the project site (Joel Neel, Director, Facilities Planning and Capital Projects, personal communication). As proposed, the project does not comply with City Fire Department access requirements, and thus exceeds the threshold of operational significance unless mitigated. Mitigations suggested by the City may be found in Attachment 1, pages 8-9. **SLO-27**

4.5.5.1 Fire Protection

The project will introduce additional nighttime residents to the campus, and will increase the total number of buildings requiring fire protection. The project will not increase enrollment, but it will increase the nighttime population on campus. Therefore, the project will increase potential calls for health and safety related to the resident population. It is reasonably anticipated that the project will increase nighttime call volume at the University to a greater extent than daytime call volume. **SLO-28**

The assessment of impacts related to public services, as set forth in the CEQA Guidelines, is focused on the environmental impact of any expanded or new facilities required to achieve performance standards. The Fire Department has indicated that Fire Station 2 is most likely to serve the project, and is 10 years past its operating life. The Fire Department has indicated in comment letters that the additional on-campus population will increase wear and tear on this facility. The University regularly negotiates a service contract with the City Fire Department to cover service and associated costs of facility maintenance. During the most recent contract negotiation, no specific additional improvements to facilities which could have an environmental impact were identified. The RDEIR indicates the proposed housing does not increase bed count, enrollment, or estimates of built space beyond Master Plan projections. The University's conclusion that the current contract for fire, rescue, and medical services accounted for yet-to-be-realized development from the University's Master Plan is erroneous. It has been to the University's advantage that the City Fire Department has not negotiated contracts based on a vision document, but rather on actual risks and resource needs associated with existing development on campus. Any subsequent updates or amendments to the University's Master Plan would necessitate a review of the fire, rescue, and medical services contract between the University and the City. Ongoing contract negotiation and revision will need to address the University's contribution to wear and tear on existing facilities and demand for service. **SLO-29**

The Fire Department raised concerns regarding provision of adequate access to the proposed buildings and asks that the Final EIR address this issue directly. The project does not introduce **SLO-30**

new structural heights; existing buildings on campus, including student residences, include five-story structures. Therefore, the project will not generate the need for new taller ladder fire equipment to serve the proposed structures. The project will be fully sprinklered and otherwise comply with provisions of the Fire Code. Access is proposed in several locations throughout the site. Final plans will be subject to approval by the State Fire Marshal and the City will have approval authority over final proposals for access, fire sprinkler protection, construction type, fire access stairwells and access hatches to roof tops, and fire hydrant locations.

SLO-30 (continued)

Transportation/Traffic

Comments not addressed from January 24th, 2014 Comment Letter

1. Trip Rates & Commute Reduction: The EIR carries forward trip rates from the 2000 Cal Poly Master Plan Update. These rates are less than 10% of the ITE apartment trip generation rates and are further reduced based on findings that "…a combination TDM measures would be implemented to decrease the number of trips generated" (Attachment 2: Cal Poly Master Plan Update EIR, Traffic & Parking Study). These TDM measures outlined in the Cal Poly Master Plan include "on-campus parking restrictions for resident freshman, commuter control measures which incorporate restricted parking permits for students that live within a certain distance of the campus; and implementation of a transit/shuttle service to serve key campus areas" (Attachment 2). However, to our knowledge these TDM measures have not been implemented and based on a review of traffic volumes in the vicinity; those reduced trip generation rates have not been realized. Therefore use of these trips rates may considerably under-forecast traffic changes that will result from implementation of this project. It is incumbent of the University to validate these trip assumptions rather than rely on forecasts from an aged document and assumptions within.

SLO-31

City Recommendations: Use ITE approved trip generation rates for this type of use or conduct a trip generation analysis of the campus to develop a trip generation rate based on actual conditions, and then apply those rates in this EIR. The City's analysis is that the proposed trip generations are not factually supported and therefore the RDEIR's conclusions regarding severity of traffic impacts are deficient, incomplete, and inaccurate. The RDEIR should evaluate the effects of the TDM measures called for in the 2000 Cal Poly master plan and identify these measures as required mitigations along with an ongoing TDM monitoring plan if in fact the measures address identified significant impacts.

2. Parking: The parking analysis does not apply a reduction for effective capacity of parking locations, which is industry standard practice. Quite simply, the analysis fills up every single parking space in order to reassign existing and forecast parking demand. In reality, parkers begin searching for alternative locations when parking utilization get closer to full use – prior to 100% they often look for alternative parking locations. In his book "The High Cost of Free Parking" Donald Shoup estimates that "cruising" for available parking spaces may be as high as 8% of total traffic. Currently the cruising aspect of parking is somewhat limited by available supply of parking on the University. Filling the parking lots and structures to 100% capacity will result in more "cruisers" looking for alternative parking locations – including surrounding neighborhood

SLO-32

areas. Applying an effective capacity factor (typically 80% - 90%) increases the projected parking shortfall in the vicinity of the project. There is already an established practice of students parking within the adjacent neighborhoods, and lack of parking at the project location will drive additional student into the surrounding areas searching for parking. The project also discusses parking lots that are approximately 1 mile or more away as available capacity for resident parking displaced by the conversion of the parking lot. However the Shared Parking Manual published by the Urban Land Institute and studies conducted by Walker Parking Consultants (Attachment 3) have found that the maximum acceptable distance for walking from parking to a destination under outdoor uncovered conditions for a long term, low turnover, and young demographic is .3 miles. Therefore parking outside .3 miles of a destination should not be considered as available capacity given both the effective capacity factor and acceptable walking distance there is an overall parking shortfall. Because there are still locations in the adjacent neighborhoods that have non-restricted parking, the project could cause a significant impact by generating excessive parking demand in the surrounding neighborhoods and on limited parking enforcement resources.

SLO-32 (continued)

City Recommendations: Reevaluate parking capacity with an appropriate effective capacity factor and for a distance of no more than .3 miles to a given destination. Identify additional parking capacity, additional parking enforcement resources, and an on-campus shuttle system between parking facilities and residences as mitigation measures if they resolve these significant impacts. The University should recirculate this section of the RDEIR after correcting the analysis and incorporating the full range of mitigation measures.

3. Transit: On-campus residents are less likely to own or drive their own car as identified in other sections of the EIR. Although a zero net increase in enrollment is proposed by shifting students' residences from off-campus to on-campus, this will increase ridership demand on routes that are already near capacity. Therefore a finding that transit ridership will not increase conflicts with other findings in the EIR and is invalid.

SLO-33

City Recommendations: Evaluate impacts to ridership and transit capacity of shifting off-campus students to on-campus in the same or similar manner that was done as part of the Master Plan Update EIR. Identify any augmented transit service/capacity needs, local shuttle programs, and a transit monitoring program as mitigation if they resolve these significant impacts.

New Comments on the Recirculated EIR

1. Intersections Not Included in Analysis: There are several intersections that are not included in the analysis that would otherwise be required under the City's traffic impact guidelines. These include Grand & Slack (the intersection immediately adjacent to the proposed project and a Gateway entrance into the University's core) and Grand & 101 (the only Hwy 101 off-ramp serving the University – located approximately 1,300 ft. from the project site). While the general conclusion of the traffic consultant may be that trip reductions from the project are low, under CEQA, the technical analysis should still include that analysis conclusion to fully inform the

SLO-34

public of potential changes. Include the basis for any analysis and conclusions in the technical appendices of the RDEIR.

SLO-34 (continued)

City Recommendation: Refer to the City's traffic impact guidelines and include these two intersections in the EIR analysis. Additionally include all information that was used by the University to reach the conclusions of the signifigance of any and all impacts.

2. Significance Findings: There is inconsistency between Appendix F and Table 4.6-1 in regards to the determination of what intersections have a significant impact. Also an incorrect significance criterion was used for evaluating the California and Taft intersection in Appendix F.

SLO-35

City Recommendation: Update Appendix F to be consistent with Table 4.6-1

2. Class I Findings: There are inadequate findings to justify Class I impacts of the project. These include:

SLO-36

A. The finding that "*…because the effects of the TDM measures cannot be fully developed and quantified at this time, significant impacts to intersections in the project vicinity would remain significant and unavoidable (Class I)".* This statement is inaccurate and incorrect. There are many techniques that can be utilized at this time to analyze effectiveness of University TDM programs. The effects of a TDM measures can be developed and quantified at this time just as it was when the 2000 Master Plan Update EIR was completed.

B. The finding that *"..physical improvements could be funded through CSU fair-share percentage contribution to the costs to construct identified improvements. However, since an established City capital program for addressing such improvements is not in place, the potential impacts to intersections are identified as significant and unavoidable (Class I)".* This conclusion is inaccurate and incorrect. Mitigation measures identified in an EIR can be amended into impact fee and capital programs as part of certification of the EIR or conversely, the University can implement required projects if it so chooses to reduce these project impacts.

SLO-37

C. The finding that *"because mitigation will ultimately be formulated by what is determined to be feasible by project design, cost, campus goals, and guidelines in the master plan, there is insufficient evidence to assume the mitigation options will reduce potential impacts to intersections".* This conclusion is inaccurate and insufficient for a Class I impact. Design, cost, and consistency with policy are typically vetted during the EIR process during development of mitigation measures. This justification would otherwise apply to any mitigation measure in any EIR.

SLO-38

City Recommendation: Do the analysis to determine the effects of a TDM program, the feasibility of mitigation measures, and the amendment of mitigation projects into the City's impact fee program and pay that fee, pro rata share contributions to them with an implementation

SLO-39

agreement with the City or choose to implement all or part of these projects. If those measures are not feasible then evaluate and identify other measures that are. The City continues to put forward that we are willing to partner with the University to fund any public facilities, impacted by the project and to determine its fair share responsibility under CEQA.

SLO-39 (continued)

Identify the following as mitigation measures if they resolve these significant impacts.

- Foothill & Santa Rosa: Existing + project and cumulative intersection widening as identified in the Highway 1 Major Investment Study.
- California & Taft: Existing + project and cumulative signalization or roundabout control upgrade.
- US 101 & California: Existing + project modification of painted median / TWLTL to accommodate a two stage left turn. Cumulative signalization or roundabout control upgrade.

In response to a meeting with Cal Poly Staff, City staff provided information to document the City's concerns about assumptions in the previous draft EIR. This documentation was provided via email to the University's EIR consultant and traffic engineers working on the EIR. The email is provided as Attachment 4 and information provided in that email is attached to this letter as Attachments 5 through 12.

Conclusion

In conclusion, the City has identified several areas where the Draft EIR and Recirculated Draft EIR failed to adequately address potential impacts as well as areas where potential impacts have been identified but adequate mitigations have not been offered. This is unacceptable to the community. CEQA is integral to decision making (PRC § 21006). The Final EIR needs significant revisions in order to be considered a legally defensible document that can be used to inform both the public and the Board of Trustees about the environmental impacts associated with the project prior to any decision by the Board of Trustees on the proposed project.

SLO-40

Sincerely yours,

for

Derek Johnson
Community Development Director

CC: City Council
Planning Commission
Department Heads

Attachments:

1 City of San Luis Obispo comments on Housing South Project DEIR dated 1-24-14
2 Cal Poly Master Plan Update Traffic and Parking Study (updated 1-19-01)
3 Design, Operation, and Management of Shared Parking
4 Email from Jake Hudson, City of San Luis Obispo Traffic Operations Manager to Nicole Carter, SWCA, and Matt Haynes and Ian Barnes, Fehr and Peers traffic consultants
5 California and Taft intersection Signal Warrants
6 California and Taft Traffic Collisions
7 Gateway intersection counts – Foothill & California
8 Gateway intersection counts – Grand & Slack
9 Gateway intersection counts – Santa Rosa & Highland
10 National Highway Traffic Safety Administration – Bike and Pedestrian Behavior
11 How far should parkers have to walk – Smith and Butcher
12 Victoria Transport Policy Institute – Shared Parking

Attachment 1

city of san luis obispo

Community Development Department • 919 Palm Street, San Luis Obispo, CA 93401-3218

January 24, 2014

CSU Board of Trustees
Nicole Carter, Senior Planner ncarter@swca.com
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo CA 93401

SUBJECT: Draft Environmental Impact Report for Cal Poly Student Housing South Project

This letter serves as the City of San Luis Obispo's comment letter on the Draft Environmental Impact Report (DEIR) prepared for the Cal Poly Student Housing South Project.

The City greatly appreciates the opportunity to comment and for providing an extended comment period for the DEIR. We understand that the University intends to respond to all comments submitted on this draft of the DEIR and proposes to recirculate the DEIR and respond to these comments and future comments provided by the community and other responsible agencies.

The City of San Luis Obispo understands the need and desire to provide on-campus housing to increase student success and the City's own policies support on-campus housing for students. The City offered comments on the Notice of Preparation and found that while the DEIR acknowledged impacts in several of the categories identified as potential issues by the City, little or no mitigation was offered for impacts occurring within the City of San Luis Obispo. The direct and indirect impacts of the growth on campus have the potential to be incompatible with the surrounding neighborhoods unless effective mitigations are provided. It is essential that Cal Poly address and mitigate University impacts to ensure that both the University and the City's long range goals are achieved. Unless the University addresses project specific and cumulative impacts, there will be an incremental impact to services and needed facilities that will negatively affect the continued success of the City and University.

The project under review will address the University's need to address existing overcrowding in dorms and provide 1,475 new beds on campus for incoming first year students. However, this project has implications beyond the Cal Poly campus which is of concern to the City of San Luis Obispo. Specifically, the City has concerns related to impacts from redistribution of trips and impacts to intersections and street segments; need for improved bicycle and pedestrian facilities to address increased non-motorized traffic associated with the project; increased demand for City services – calls for public safety service in the adjoining neighborhoods as well as neighborhood wellness, noise, and gatherings; and increased demand on the City's open space and recreational facilities.

The City has determined that the DEIR inadequately analyzes and/or mitigates the impacts associated with the proposed project, and in some instances, does not offer mitigation even though significant impacts are recognized. The comments provided below are intended to offer

mitigations to address impacts as well as produce long-term benefits for both Cal Poly and the larger community in which it lives and thrives.

In the longer view, we look forward to working with the University through the process of updating its Master Plan and further developing its plans for additional student housing on campus to accommodate the recently announced growth in enrollment.

General Comments:
The required changes to the Master Plan to accommodate a new dorm at the proposed location should address disposition of the identified housing sites in the existing Master Plan. Unless, the land uses on the existing sites are addressed and modified in the Master Plan, the analysis should assume the cumulative impact of adding the Housing South site to the areas available for the development of student housing and therefore consider the cumulative impacts.

The City's comments are framed by the *City of Marina v. Board of Trustees of California State University,* where the California Supreme Court ruled that the CSU has a duty to mitigate off-site impacts of a project. The University has identified both project specific and cumulative impacts in the Draft EIR and should work with the City to implement mitigations that require City participation. This letter serves in addition to other discussions with the University that the City of San Luis Obispo is willing to engage in discussions to identify and implement off campus mitigations.

Cumulative Impacts (Section 6 of DEIR):
On September 16, 2013, President Armstrong announced that Cal Poly is intending to seek an increase in enrollment at the San Luis Obispo campus by 4,000-5,000 students. Please update and address the cumulative impacts of the projected increase in enrollment in addition to projected growth in the surrounding community as part of the cumulative impact evaluation. Moreover, please review and include the projected growth that is identified in the City's draft Land Use and Circulation Element update. These alternatives are available at the City's project website: www.slo2035.com.

Aesthetics: (section 4.1 of DEIR)
AES Impact 1 indicates that trees and other landscaping have the potential to block quality views of Bishop Peak and Cerro San Luis. The City asserts that both the buildings and the landscaping will block views, not only of Bishop Peak and Cerro San Luis, but of other open space vistas both on campus and off campus, especially looking north and west from the intersection of Grand and Slack. In addition to the mitigation measures proposed, Cal Poly should also implement or participate in open space conservation projects that permanently protect scenic resources themselves. Both on-site and off-site opportunities exist with geographical nexus to the project site that would represent a potential mitigation measure that is adequate and feasible; please coordinate with the City's Natural Resources Manager, Robert Hill (rhill@slocity.org or 805-781-7211).

Greenhouse Gas Emissions (Section 4.2 of DEIR):
The DEIR identifies Greenhouse Gas (GHG) Emissions that are significant and unavoidable (Class I). CEQA Guidelines section 15126.4c offers several possible mitigations for GHG impacts and the City recommends that Cal Poly explore off-site sequestration opportunities in addition to the project features that encourage building energy and water efficiency, bike parking, and use of green building materials.

Land Use Planning (Section 4.8 of DEIR):
The City's response to the Notice of Preparation requested the University address neighborhood issues such as noise, parking and maintenance due to new housing for 1,475 students immediately adjacent to an existing low density neighborhood. The EIR does not adequately address potential impacts such as displaced parking from campus to the neighborhoods; adequacy of bike and pedestrian connections to City destinations from this end of campus; and potential conflicts with applicable City land use plans for the existing neighborhood that abuts this new project.

Noise (Section 4.4 of DEIR):
The DEIR lists community members' concerns with potential increases in nighttime nuisance noise events associated with the project. While site development includes orientation of buildings internal to the site, there are still concerns that have not been addressed. The University's regulations, as outlined in the DEIR, indicates that outdoor activities with amplified music or speech may occur between 7:00 am and 10:00 pm; and that activities without amplification may be conducted between 7:00 am and midnight, seven days a week. General Policy Section 141.3.1 indicates that plans for outdoor events and activities should address potential impacts on residential communities, on and *off campus* - something the EIR does not address.

The EIR needs to address the potential noise impacts related to the introduction of 1,475 students directly adjacent to a residential neighborhood. The noise monitoring done to identify baseline noise did not establish the existing ambient noise for night-time hours along Slack Street – the residential neighborhood immediately adjacent to the project site.

An increase in night-time noise in the neighborhoods from students using the outdoor basketball courts, or from students traversing through adjacent neighborhoods on the way to and from destinations during night-time hours impacts neighborhood expectations of quiet during evening and night-time hours. The City's noise ordinance specifies exterior noise limits of 50 dBA between 10:00 pm and 7:00 am for low density residential neighborhoods like those adjacent to the project site. The City's code further specifies that repetitive noises such as music or speech or hammering (i.e. basketballs bouncing) are subject to a further reduction in threshold by 5 dB. While University staff will be responsible to enforce complaints on campus, City staff will be called upon to address nuisance noise in the neighborhoods and this in has not been addressed in the DEIR.

It is recommended that the University consider a wide range of mitigations such as relocating the basketball court and committing to long term social programming activities within the dorm facilities to provide on campus social activities which have the potential to alleviate noise impacts in the surrounding neighborhoods.

Parks and Open Space (Section 4.5 of DEIR):

Impacts will occur to Parks and Open Space resources if the project results in:

1. An increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Increase in demand to recreational facilities that require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

As noted in the DEIR, the proposed project relies upon on campus recreational facilities to meet the activity needs of the students who will reside in the new housing units. This will undoubtedly meet a significant portion of the on-campus resident student's recreation needs.

Because the City of San Luis Obispo offers a diverse and unique array of recreational activity due in large measure to City open space areas and programs there are many students both on and off campus who enjoy these community amenities on a daily basis. There are two areas where there will be ongoing impacts to existing City recreational facilities and/or programs. The first is with respect to existing open space areas. Cal Poly students use multiple modes of transportation (from cars to bikes to walking) to access the thousands of acres of open space that the City maintains for multipurpose uses.

This is an impact to the maintenance and use of these facilities. For instance, a significant portion of the users of the Bishop Peak Open Space area are students – more often than not this is a healthy and positive community activity but does come with wear and tear to the open space that requires ongoing maintenance and this is but one example. The second is with respect to programmatic use. The City will be opening a new Skate Park at Santa Rosa Park by 2015 (a facility currently not available at Cal Poly) and with this will come increased use by students because the activity is engaged in predominately by those under 30.

A potential mitigation measure to address this ongoing trail impact would be to acquire and install bike parking at several open space trails including Bishop Peak and to partner with the City to address longer term parking needs at two trail heads in the City's open space network. Other potential mitigations include a negotiation of a Joint Use Agreement to allow community use to campus recreation facilities to help comprehensively meet per capita park and recreation facility needs.

Draft Environmental Impact Report (DEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
January 24, 2014
Page 5

Population and Housing (Section 4.8 of DEIR):
The DEIR determined that the Population and Housing impacts are less than significant. The backfill of housing units currently occupied by students living in the City of San Luis Obispo is acknowledged in the DEIR, but it concludes that the impact is too speculative to address. However, the project will induce substantial population growth in an area (on campus) that was not previously identified for housing without a concomitant removal of the other housing sites offered in the Master Plan. There will be a net new amount of housing in the area and this housing will be concentrated immediately adjacent to an existing single family residential neighborhood. The addition of 30 new staff positions represents a 2 ½ % increase in staff levels.

The DEIR should estimate and address the cumulative increase in population and identify and mitigate the impacts associated with creating new housing supply. While the dorm project has the potential to reduce existing impacts in some locations, it also has the potential to create cumulative impacts and project specific impacts in terms of redistributing and concentrating existing impacts in the areas surround the dorm facility. The DEIR does not adequately analyze these potential impacts or offer adequate mitigations.

Public Services (Section 4.5 of DEIR):
Police
The Cal Poly Police Department is the lead law enforcement agency on the Cal Poly campus. An increase in on campus population will create a need for personnel to adequately patrol and address enforcement issues at the proposed dorm location as well as campus wide. The DEIR indicates the impact to this concern is "*less than significant and no additional equipment or facilities are required*".

The City is concerned that this conclusion was made and the analysis that forms this conclusion is unsupported. If the increase of the on-campus population is not addressed properly, both in short and long term planning, there may be a need for City of San Luis Obispo police resources to respond more frequently on campus to provide law enforcement assistance and in the neighborhoods directly surrounding the proposed dorm. The hiring of appropriate police personnel and staff to adapt to this increase must be addressed by Cal Poly to maintain service levels to address activitees that may have an impact on the environment, such as noise.

The City of San Luis Obispo has several active and vocal neighborhood wellness proponents. The City actively engages with many of these groups to address behaviors that impact neighborhoods. The residential areas surrounding the selected site (as well as the entire campus) generate discussions about "quality of life issues" such as noise complaints, parties, fights, vandalism, alcohol violations and general public disorder that impact these residential areas. An increase and adjustment of the on-campus student population has the potential to create additional impacts for the City. Cal Poly Police will need to have an adequate contingent of personnel to not only provide enforcement capabilities, but also to engage in the discussion process to address and mitigate these concerns with neighbors.

A concentration of first year students adjacent to City residential areas may generate an increased demand for services by the City of San Luis Obispo Police Department. It will be impetrative for Cal Poly to continue and expand efforts to engage students that are involved in off-campus adverse behaviors. A mitigation measure that includes a commitment for on campus housing social programming and for University law enforcement staff to partner and augment policing levels in the adjacent neighborhoods could mitigate these impacts.

The City has reviewed its public safety calls for service within a ½ mile radius from the intersection of Slack and Grand over the last three years. These numbers represent both Police and Fire responses, however, the bulk of the responses are police related.

.5 mi = Grand & Slack	2013	2012	2011
Calls for service	1431	1359	1689

Although the City is not able to conclude that all of these calls for service are the result of Cal Poly student related activity approximately 1/3 of the calls are noise and alcohol violations which are predominantly associated with the college age population. These numbers do not represent most officer self-initiated activity pertaining to traffic violations and minor infractions that take place in this heavily populated area where college age people live and travel. These dynamics require that the department regularly intensify enforcement efforts towards this particular area of the City.

City impacts for the projected student population adjustment and growth at the selected site will alter the traffic and pedestrian patterns on the City surface streets adjacent to this area. Student egress and ingress of this concentrated population into the City of San Luis Obispo will likely create several concerns including the need for safety lighting, safe pedestrian access and effective traffic engineering design to mitigate potential criminal activity or vehicle/pedestrian or bike collisions. A thoughtful consideration into these impacts will mitigate the need for response to the area to investigate these potential concerns.

Although the current EIR suggests a movement of this select population onto campus will mitigate a higher concentration of vehicles/bikes traveling to campus for classes it does not recognize the "social implications" associated with the movement of pedestrians, bicycles and vehicles impacting the area outside of "normal business hours". The north end of the City adjacent to the campus has a significant amount of night time pedestrian and vehicle traffic that impacts the surrounding residential areas. The shifting of this population will affect both Cal Poly and SLO Police resources and response to the area. Ensuring adequate personnel are available for the concentration of this population will help mitigate some concerns; however, there will continue to be impacts as students migrate on and off campus.

Historically the Police Department has had increased vehicle and pedestrian concerns centered on the arrival and departure of students to our various school sites. It is the desire of the San Luis

Coastal Unified School District to return elementary age school children to the old Pacheco school site located at Slack and Grand located directly across the street from the proposed dorm location. The DEIR must include the cumulative analysis of restoring the Pacheco campus to a functioning school site as is currently being contemplated by the School District.

A return of 150 elementary age students will impact the amount of non-motorized and vehicle traffic during the early morning drop off period, mid- afternoon pick up period and school special events. Potentially this mix will generate additional calls for service and the departments need to respond to collision investigations or other associated complaints.

The DEIR should incorporate mitigations in the City that address vehicle, bicycle and pedestrian movement patterns to determine adequate roadway engineering and lighting necessary for optimal vehicle/people movement and safety. It is imperative that Cal Poly engage these efforts jointly with the City in the development of plans for optimal student safety and residential wellness.

Fire(Section 4.5 of DEIR):

The University contracts with the City Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE) to provide fire and emergency response on campus. Cal Poly's contract with the City covers all structures on campus as well as grassland fire suppression up to 450 feet in elevation. Fires above this elevation fall under the jurisdiction of CAL FIRE. A fire occurring on the project site would be the responsibility of the City Fire Department. This contract also covers emergency medical services, which the City provides via cross-trained firefighter-paramedics in an advanced life support (ALS) capacity. All emergency medical services in the project site would be the responsibility of the City Fire Department.

The City Fire Department has a staff of approximately 50 employees, including 42 firefighters and 8 administrative and fire prevention personnel. The Department has four stations in the City. The nearest stations are Fire Station 2 at North Chorro, and Fire Station 1 at the intersection of Santa Barbara, Broad, and South Streets. Response time is measured as the time it takes for a dispatched emergency response vehicle to drive to the emergency scene using lights and siren. Current response times from Station 2 are approximately 4 minutes depending on the location of the emergency on campus. The next closest City fire station, Station 1 has an average response time to the University of between 6 and 7 minutes.

The CAL FIRE station is located at Highland Drive and Highway 1, at the Highland Drive entrance to campus.

The City Fire Department responded to the University 271 times in calendar year 2013. Calls for service to the University campus accounted for approximately 23.6% of all incidents managed by the closest fire station, Fire Station 2. In calendar year 2013, Fire Station 2 was dispatched to 1,149 incidents. The vast majority of these emergency responses to the University were medical in nature. Medical emergency responses are typically managed by one fire crew. The campus

currently has 6,239 beds of student housing. The addition of 1,475 beds represents an almost 24% increase in on-campus housing. To the extent that these new beds result in a net increase of on-campus students, there will be an increase in calls for service for the City Fire Department.

Approximately ten fire or fire system related emergencies occurred on the University property in 2013. These resulted in a response by several City Fire emergency response crews. Fire responses garner a large response from the City. The initial dispatch to a structure fire or fire alarm on the University property calls for two fire engines, one 100' aerial ladder truck, and a battalion chief. The addition of multiple buildings in this project will result in an increase in buildings protected by the City Fire Department. This fact warrants revisiting the assumptions and conclusions of the current fire, rescue and medical services contract between the University and the City.

The project site is served by existing fire suppression infrastructure (i.e., hydrant systems). The project is required to comply with existing Fire and Building Code regulations intended to reduce risk of damage to property and persons. Applicable regulations address roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. The project must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space. Preliminary engineering studies indicate adequate fire flow (water volume and pressure) at the project site. As proposed, the project does not comply with City Fire Department access requirements, and thus exceeds the threshold of operational significance unless mitigated. Mitigation may be accomplished through ensuring fire apparatus access to all buildings in the project, per the City Fire Department. Another mitigation option is through changes in construction characteristics and fire protection system installation. These construction and protection system changes should include, as a minimum, fire sprinkler protection for all structures to Type 13 system rating; Type IIIA construction; fire access stairwells and access hatches to the roof tops; and fire hydrants located within 40 feet of all building risers.

California Building Code
The project is required to comply with existing Fire and Building Code regulations intended to reduce risk of damage to property and persons. Applicable regulations address roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. The project must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space.

As proposed, the project does not comply with fire department access requirements and this situation needs to be mitigated. As previously stated, mitigation may be accomplished through ensuring fire apparatus access to all buildings in the project, per the City Fire Department. Another mitigation option is through changes in construction characteristics and fire protection system installation. These construction and protection system changes should include, as a minimum, fire sprinkler protection for all structures to Type 13 system rating; Type IIIA

construction; fire access stairwells and access hatches to the roof tops; and fire hydrants located within 40 feet of all building risers.

4.5.3 Thresholds of Significance

The thresholds of significance are based on the criteria set forth in Appendix G of the CEQA Guidelines. According to those criteria, a project would result in a fire, police protection or recreation-related impact if it would:

3. Result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities, need for new of physically altered fire or police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

As proposed, this project would negatively impact response times due to limited fire apparatus access and this situation needs to be mitigated.

4. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
5. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.5.5.1 Fire Protection

The project will introduce additional nighttime residents to the campus, and will increase the total number of buildings requiring fire protection and response. The project will not increase enrollment. While the project will not directly increase potential calls for health and safety related to the total population of enrolled University students, the project will increase calls for fire, rescue, and medical services provided by the City due to the increased population of on-campus students. It is anticipated that former off-campus student housing will be repopulated and these residents will require fire and emergency medical services as well. This project doesn't simply move emergency responses from City neighborhoods to the University; it also creates capacity for residents to repopulate City neighborhoods who will generate emergency incidents. Thus an impact of this project on the City Fire Department is a net increase in emergency incidents.

The assessment of impacts related to public services, as set forth in the CEQA Guidelines, is focused on the environmental impact of any expanded or new facilities required to achieve performance standards. The Fire Department is in dire need to construct a major renovation of Station 2. This structure is now 60 years old and greater than 10 years past its anticipated lifespan. Approximately one-quarter of all emergency response activity at Fire Station 2 is attributed to the University. This project will increase the percent of University-related emergency response activities at Fire Station 2. This will increase the wear and tear on Fire Station 2, and this will need to be mitigated.

The proposed housing is a consolidation of bed count approved under the existing Master Plan; the project does not increase bed count, enrollment, or estimates of built space beyond Master Plan projections; however, it would be inaccurate to assume that the City Fire Department's planning accounts for yet-to-be implemented development proposed by the Master Plan or that no additional impacts to facilities are anticipated. The City Fire Department has not proactively staffed and equipped, nor has the City negotiated the fire and medical services contract, based on proposed buildings in the University's Master Plan or amendments to that plan. The City has staffed, equipped and negotiated contract terms based on actual, not theoretic or unrealized infrastructure and population. This project represents a change to the infrastructure and population density on the University and this will need to be mitigated.

Students living off-campus are provided fire and emergency medical services as citizens of the City. When on-campus, including the population shift to more students living on campus, students are provided fire and emergency medical services through the contract between the City and the University. Given the forecasted shift of student population from the City to the University, the contract would need to be adjusted for the increased service demands created by the larger number of students serviced by the contract.

The Fire Department has raised concerns regarding provision of adequate access to the proposed buildings. The project does not introduce new structural heights; existing buildings on campus, including student residences, include five-story structures. Therefore, the project will not result in the need for new equipment. The project will be fully sprinklered to Type 13 standards and otherwise comply with provisions of the Fire Code. Access is proposed in several locations throughout the site, and Type IIIA construction will mitigate the negative effects of the limited fire access proposed. Final plans will be subject to approval by the City and State Fire Marshal.

Given the current layout of the proposed project, the City requests the following mitigating factors:

1. Option 1
    a. Collaborate with the City Fire Marshal to provide for the minimum required emergency response apparatus access to all structures OR;
2. Option 2
    a. Install fire sprinkler protection for all structures to Type 13 system rating; AND
    b. Construct with Type IIIA non-combustible building construction techniques and materials; AND
    c. Design and install fire access stairwells and access hatches to the roof tops; AND
    d. Install fire hydrants located within 40 feet of all building risers.

Transportation/Traffic (Section 4.6 of DEIR):

1. Trip Rates & Commute Reduction: The EIR carries forward assumed trip rates from the 2000/2001 CalPoly Master Update which assumes rates of less than 10% of the ITE apartment trip generation rates along with assumed further reductions from recommended TDM measures.

Draft Environmental Impact Report (DEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
January 24, 2014
Page 11

Based on current CalPoly gateway traffic volumes and student/faculty demographics those trip rates nor commute reductions have actually been realized and therefore should not be carried forward in this EIR as it may be considered an abuse of discretion in terms of estimating impacts to roadway and other transportation facilities.

Not realizing the originally assumed trips rates may be due in part to lack of implementation of several TDM measures identified in the 2000/2001 Master plan such as restricting parking permits for students that live within a certain distance off campus, and implementation of an on-campus transit/shuttle service that also provides service to key off-campus student destinations. Due to the unique nature of the development and the unrealized performance of past assumptions it is recommended that the campus be studied to develop new trip generation numbers based on current conditions and apply those rates in this EIR.

The EIR mitigation measures should include those TDM programs from the 2000/2001 master plan (i.e. Off-campus student parking pass restrictions & On-Campus shuttle) that have not yet been implemented as well as a bi-annual traffic and TDM monitoring and reporting program. The City is willing to partner with the University to implement a host of mitigation measures to address these impacts. Also these monitoring programs could be incorporated into Cal Poly academic curriculum for Transportation Engineering Courses.

2. Trip Distribution: Based on current gateway traffic volumes the trip distribution percentages are not reflective of actual conditions. It's recommended that these be adjusted to reflect current conditions.

3. Intersection Operations: There is significant inconsistency between the cumulative + project intersection levels of service of the 2000/2001 Master Plan EIR and this EIR despite proposing a zero net increase in student enrollment and minimal development in the surrounding City areas. It's recommended that the study intersections be reevaluated with the new trip generation and distribution numbers based on current conditions. Also an incorrect significance criterion was used for evaluating the California and Taft intersection and the EIR should refer to the City's Traffic Impact Guidelines. The EIR should address this project specific contribution to an already existing deficient condition and propose mitigations to address these levels of service deficiencies.

Depending on changes resulting from an update to trip rates and distribution, the DEIR should evaluate and identify operational and physical improvements at impacted intersections; Foothill & Santa Rosa, Walnut & Santa Rosa, California & Taft, and NB 101 & California Blvd. Other potential mitigations include partnering with the City to complete the sidewalk networks in the adjacent neighborhoods and to fund a fair share of bicycle facilities that will provide a range of mobility options to students, faculty and staff.

4. Parking: The parking analysis does not apply a reduction for effective capacity, which is industry standard practice. Applying an effective capacity factor (typically 80% - 90%) will increase the projected parking shortfall in the vicinity of the project.

The study incorrectly states that lots R-1 & R-2 can accommodate the displaced demand and the project's new demand; however those lots do not have the capacity. Also the project displaces parking by approximately one mile for more than 600 student residents; this distance is outside what would be a considered an acceptable distance between a parking space and the corresponding dwelling unit. All of these factors would put excessive parking demand on the surrounding residential neighborhoods impacting parking enforcement resources, neighborhood wellness resources, and neighborhood traffic conditions. Effective mitigation measures need to be implemented to address these impacts.

The EIR mitigation measures should include an augmentation of Cal Poly police resources to assist with parking enforcement and neighborhood wellness activities within the vicinity neighborhoods. Also the EIR mitigation measures should include an on-campus shuttle system providing service between student housing and remote parking facilities as previously identified, and a bi-annual parking & neighborhood traffic monitoring and reporting program.

4. Transit: On-campus residents are less likely to own or drive their own car as represented by applying trip rates below ITE rates. Although a zero net increase in enrollment is proposed by shifting students' residences from off-campus to on-campus, this will increase ridership demand on routes that are already near capacity.

The EIR mitigation measures should include a City transit monitoring program and Cal Poly participation in service augmentation if transit capacities are exceeded or services levels are degraded as a result of this project.

Utilities and Service Systems (Section 4.7 of DEIR):

The City's Utilities Department suggests the following edits to Section 4.7.1.1, Water:

> The University obtains water from both surface and groundwater sources. Cal Poly owns 33.71% capacity in Whale Rock Reservoir, located east of the town of Cayucos. The 33% ownership translates into approximately ~~13,707~~ 13,136 acre feet (AF) ~~in normal years~~. The City, which also has ownership in the reservoir, has modeled safe annual yields (SAY) for water users. The SAY for Cal Poly's share is currently estimated at ~~1,384~~ 1,306 AF per year (AFY). Average total demand for the last 3 years on record is 1,071 AF. Agricultural and landscape irrigation demand is a significant portion of the total; average agricultural demand for the same period was ~~501~~ 552 AF (~~47%~~ 50.3% of total) and annual water demand for irrigation averaged 280 AF (26%). Approximately 288 AFY (27%) was used for indoor or domestic purposes during that period…

The City's Utilities Department suggests that Cal Poly recalculate the current water surplus quantity based on the revised Safe Annual Yield figure provided above (1,306 AFY) and reference a specific year rather that state "current" or "currently" throughout this section.

The City's Utilities Department also suggests the following edits to Section 4.7.1.1, Water:

> Water from Whale Rock Reservoir is treated at the Stenner Canyon water treatment facility. Peak treatment capacity is 16 million gallons per day (mgd). Water treated at the plant comes from Whale Rock Reservoir, the Nacimiento Water Project, or the Salinas Reservoir. Cal Poly is entitled to 1,000 AFY in treatment at the plant. Domestic demand from the plant has averaged ~~568 AFY~~ 544 AFY (average of 551 in 2010, 552 in 2011, 529 in 2012) in the last 3 years, or ~~57%~~ 54.4% of Cal Poly's capacity.

Section 4.7, Utilities, does not provide information on available water storage within the campus's infrastructure or if it would rely on the City's tanks and reservoirs for adequate water storage to serve the proposed project. Consistent with the Thresholds of Significance described in Section 4.7.3 (2), please amend the EIR to address whether construction of new water storage facilities or pump stations or expansion of existing storage facilities or pump stations facilities, including those facilities operated by the City, would be required to serve the project.

Regarding the Wastewater Section on Page 4.7-5, per the City of San Luis Obispo and Cal Poly's agreement regarding water and sewer rates, dated January 5th, 1993, sewer charges will be assessed according to the metered effluent discharge flow. Wastewater from this project must be directed through Cal Poly's internal collection system to the effluent flow meter that measures the campuses wastewater flow.

Finally, the City has concluded that the development and analysis of altematives fails to comply with CEQA, which requires an EIR to describe a range of altematives that would avoid or substantially lessen one or more of the project's significant impacts. Portions of the proposed altematives are inherently inadequate due to the unrealistic assumptions made in the project descriptions to meet the objectives of the project.

The City is eager to collaborate with Cal Poly to identify and implement mitigation measures that the City believes can address impacts in the community. Any mitigation proposed should include substantial and viable measures that are subject to ongoing monitoring, as CEQA requires.

The City greatly appreciates the opportunity to and help identify mitigations identified a revised and recirculated DEIR. We provide the comments in this letter with the intention that they should assist Cal Poly with DEIR revisions needed to reasonably and foreseeably reduce impacts to less

than significant levels. The City looks forward to ongoing collaboration with Cal Poly and is available to identify and develop mitigations for the next iteration of the DEIR that will be released for public circulation.

Sincerely yours,

Derek Johnson
Community Development Director

CC: City Council
Planning Commission
Department Heads

ATTACHMENT 2

CAL POLY MASTER PLAN UPDATE
CAL POLY SAN LUIS OBISPO, CALIFORNIA

TRAFFIC AND PARKING STUDY

August 2, 2000
Updated January 19, 2001

ATE Project #99081

Prepared for:

Crawford, Multari, Clark & Mohr
641 Higuera Street, Suite 202
San Luis Obispo, CA 93401

ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110-1686 ? (805) 687-4418 ? FAX (805) 682-8509

ATTACHMENT 2

August 2, 2000

Chris Clark
Crawford, Multari, Clark & Mohr
641 Higuera Street, Suite 202
San Luis Obispo, CA 93401

TRAFFIC, CIRCULATION AND PARKING STUDY FOR THE CAL POLY MASTER PLAN UPDATE, SAN LUIS OBISPO, CALIFORNIA

Associated Transportation Engineers (ATE) is pleased to submit the following traffic, circulation and parking study for the Cal Poly Master Plan Update. It is our understanding that the results of the study will be incorporated into the EIR being prepared for the Master Plan Update.

We appreciate the opportunity to assist you and the University with the Master Plan Update.

Associated Transportation Engineers

Scott A. Schell, AICP
Principal Transportation Planner

Updated January 19, 2001 by Nicole Phillips based on new data from ATE

ATTACHMENT 2

Table 3
Master Plan Potential Trip Generation

Master Plan Component	Size	ADT		A.M. Peak		P.M. Peak	
		Rate	Trips	Rate	Trips	Rate	Trips
Upperclassmen	2,500 Students	2.504	6,260	0.074	185	0.192	480
Freshmen	500 Students	1.72	860	0.051	26	0.132	66
Faculty/Staff	465 Personnel	1.189	553	0.123	62	0.107	54
Total			**7,673**		**273**		**600**

As indicated in Table 3, the Master Plan could generate 7,673 ADT, 273 A.M. peak hour trips and 600 P.M. peak hour trips. These project-generated trips would be the number expected if the reduction measures that are part of the Master Plan are not implemented.

Table 4 shows the decrease in trips that would be associated with implementation of the policies and TDM trip reductions provided for in the Master Plan. Policy guidelines include implementation of the following measures: on-campus parking restrictions for resident freshman (limiting permits issued to freshman), commuter control measures which incorporate restricted parking permits for students that live within a certain distance of the campus; implementation of a transit/shuttle service to serve key campus areas and continuation of the successful faculty/staff incentives already in-place to promote car-pooling, van-pooling, bicycle use, telecommuting, etc. for new campus personnel.

ATTACHMENT 2

Table 4
Master Plan Potential Trip Reductions

Project Component	Size	ADT		A.M. Peak		P.M. Peak	
		Rate	Trips	Rate	Trips	Rate	Trips
Freshmen	1,200 Students	1.720	-2,064	0.051	-61	0.132	-158
Commute	650 Students	1.170	-761	0.117	-76	0.166	-108
Faculty/Staff TDM	150 Personnel	1.189	-178	0.123	-18	0.107	-16
Total			**-3,003**		**-155**		**-282**

The Master Plan trip reduction strategies rely on several elements. The trip generation analysis assumes that 10-15% of freshman would allowed to obtain parking permits (about 55% of resident freshman are currently issued parking permits). A combination of TDM measures would be implemented to decrease the number of trips generated by commuting students and faculty/staff members. Implementation of these measure would likely generate a demand for a local shuttle bus/transit service to transport those students to key campus areas during peak times. In addition to parking restrictions, enhanced bicycle facilities and an improved on-campus commercial environment and community atmosphere, as well as telecommuting incentives, would reduce trips to and from the campus. The trip generation analysis assumes continuation of the TDM program for faculty and staff. Survey data indicate that approximately 35-40% of faculty and staff members utilize alternative transportation modes (carpool, vanpool, bicycle, walk, local transit, etc). The trip generation analysis assumes between 30 and 35% of new faculty/staff personnel would continue in this same trend.

The net change in traffic expected by implementation of all the Master Plan components and policies is summarized in Table 5.

ATTACHMENT 2

Table 5
Master Plan Trip Generation

Project Component	ADT	A.M. Peak Hour Trips	P.M. Peak Hour Trips
Master Plan Additions Master Plan Reductions	7,673 -3,003	273 -155	600 -282
Net Project Change	**+4,670**	**+118**	**+318**

As shown, the Master Plan is expected to generate a net increase of 4,670 ADT, 118 A.M. peak hour trips and 318 P.M. peak hour trips.

Trip Distribution

Table 6 and Figure 8 show the trip distribution percentages used to assigned the Master Plan traffic to the project-area street system. Project trip distribution percentages are based on the analysis of existing trip distributions throughout the campus, the planned roadway extensions and realignments outlined in the Master Plan, as well as existing/proposed locations of on-campus housing and parking.

Table 6
Master Plan Trip Distribution

Origin/Destination	Direction	Percentage
California Boulevard	South	40%
Highland Drive	West	20%
Grand Avenue	Southeast	35%
Surrounding areas	Local	5%
Total		**100%**

The concentration of Master Plan traffic (as well as existing traffic rerouted due to roadway changes) would be expected on the extension of California Boulevard for several reasons: 1) new on-campus housing facilities are centralized northeast of N.

ATTACHMENT 3

facilitate better design, management, and operation of parking facilities. Adapting a shared parking plan to the needs of different users is further discussed later in this chapter.

Walking Distances

Among the more critical issues for parking design, which in turn affects its ability to be shared and managed, is the walking distance from the parking area to the destination. As stated by one of the most widely quoted experts on pedestrian design, John J. Fruin, "there are indications that the tolerable limit of human walking distance is more situation-related than energy-related."[1] The tolerable walking distance for "a given design situation is related to such factors as the trip purpose of the individual, the available time, and the walking environment."

A 300-foot walking distance may be unacceptable to a customer wishing to pick up a single product at a drug or convenience store. A 2,000-foot walking distance from a parking facility is generally considered acceptable for theme parks and event facilities; event parkers wishing to avoid parking fees may trek even farther. The weather and available protection from precipitation will affect acceptable walking distances, as will the "friction" along the walking path of travel. Walking through areas perceived as unsafe will significantly reduce acceptable walking distances. Having to cross major streets, railroad tracks, or bridges across freeways also can be less desirable than a more direct, pedestrian-friendly route. Another key factor is the visibility of the ultimate destination along the path of travel. The walking distances from the farthest spaces at a regional shopping center are often significantly longer than those in downtowns or other activity centers, but being able to see a mall entry from the parking space can make the long distance more acceptable.

Table 6-1 presents acceptable walking distances, employing a level-of-service (LOS) approach similar to the traffic engineering profession's level-of-service classification system. The LOS classification can be used to gauge the acceptability of a design component to its potential users. LOS A is the best or ideal performance, LOS B is good, LOS C is average, and LOS D is below average but minimally acceptable.

Table 6-1 Level-of-Service (LOS) Conditions for Walking Distances from Parking

Maximum Walking Distance	LOS D	LOS C	LOS B	LOS A
Within Parking Facilities				
Surface Lot	1,400 ft.	1,050 ft.	700 ft.	350 ft.
Structure	1,200 ft.	900 ft.	600 ft.	300 ft.
From Parking to Destination				
Climate-controlled	5,200 ft.	3,800 ft.	2,400 ft.	1,000 ft.
Outdoors, Covered	2,000 ft.	1,500 ft.	1,000 ft.	500 ft.
Outdoors, Uncovered	1,600 ft.	1,200 ft.	800 ft.	400 ft.

Mary S. Smith and Thomas A. Butcher, "How Far Should Parkers Have to Walk?" *Parking*, September 1994.

ATTACHMENT 3

Table 6-2 Factors Influencing Selection of Level of Service

LOS D	LOS C	LOS B	LOS A
Long Term			Short Term
Low Turnover			High Turnover
Familiar			Unfamiliar
Teenagers			Stress, Age, Disability
Just Glad to Find a Space			High Expectations
Urban			Rural
Speculative Office Building			Prestige Office Building

Table 6-2 suggests some factors for determining the appropriate level of service for a particular set of circumstances. For further discussion of the selection of an appropriate level of service, see *Parking Structures*.[2]

The level of service of the overall walking distance from a parking space to a destination's entry can be considered as the average of its parts. For example, if the walking distance from a parking space to an elevator tower is 600 feet or LOS B, and the walking distance from the pedestrian exit of the garage to the destination is 1,600 feet or LOS D, then the overall experience is LOS C.

Why More Parking Is Not Always Better

When parking is relatively inexpensive to develop and provided free to the users, most segments of the community (including residents who might be adversely affected by spillover parking, zoning staff and boards, lenders, and tenants) tend to believe that more is better. One has only to drive through suburban commercial areas to see that parking is generally oversupplied. The planning community has recognized that designing roadways for the peak-hour volume that may ever occur is not in the best interests of the community; this philosophy, however, is not nearly as widely accepted in parking planning. With free surface parking, developers have less incentive to argue with requirements that commonly result in significantly more parking spaces provided than are reasonably necessary for a design day. They can always seek permission to develop something additional after the initial project is fully leased and operating, if the parking supply proves to be excessive.

Developers, tenants, and lenders sometimes express concern about the competitive edge that the appearance of ample parking may give a competing development if their own site has a lower parking ratio. Developers and business owners do on occasion advertise "abundant free parking" when they perceive that their competitors are not able to equal that claim.

An unintended end result of surface parking, especially in excessive amounts, is an inherently lower-density development, which in turn means it may be difficult to serve it economically by transit. When buildings are surrounded by parking lots, pedestrian trips between nearby establishments become difficult. Pedestrian connections between buildings are rarely well-developed, which encourages many to get into their cars and drive a block or two for lunch or errands.

Parking structures are more commonly found in denser developments and particularly on sites with higher land costs. Higher-cost structured parking is more likely to be charged

ATTACHMENT 3

How Far Should Parkers Have to Walk?

By Mary S. Smith, P.E. and Thomas A. Butcher, P.E.

One of the most frequently asked questions in any parking planning process is: How far can we expect people to walk from a parking facility to their ultimate destinations? Yet while most parking consultants will tell you there are generally accepted rules of thumb, no two consultants answer that question in quite the same way.

The primary cause for lack of consensus is that there are different factors that affect different situations. For instance, parking designers usually call for maximum walking distances between 300 and 600 feet for retail customers, but between 1,200 and 1,500 feet for employee parking. Distances increase even more when you look at special event standards: maximum walking distances accepted for theme parks, stadiums and arenas reach as high as 2,000 feet.

One reason we talk in terms of "rules of thumb" is that there are no definitive standards or guidelines for the industry. The most widely quoted reference on pedestrian design in the architectural and transportation press is an older book, *Pedestrian Planning and Design*, by John J. Fruin, PhD, upon which we have relied heavily for this article.

In his book, Fruin asserts that "there are indications that the tolerable limit of human walking distance is more situation-related than energy-related." The tolerable walking distance for "a given design situation is related to such factors as the trip purpose of the individual, the available time and the walking environment," Fruin writes.

We would expand Fruin's list of variables affecting acceptable walking distance to include the types of users, frequency of occurrence or use, the familiarity of the user with the facility, the perception of security, the expectations and concerns of the user, the degree of weather protection provided along the path of travel, the perception or absence of barriers or conflicts along the past of travel, and the cost of alternatives to walking, if any.

Another reason we can rely only on rules of thumb is because until recently, parking facilities were considered to be little more than a necessary evil to any land-use development. As a result, many elements of functional design have been addressed with these rules of thumb, which are applied across the board to every type of parking project.

In recent years, however, property owners and developers have come to recognize that parking is the first and last impression afforded to both visitors and employees. As such, they are becoming increasingly determined to make the parking facility reflect and be compatible with the image of the complex as a whole.

ATTACHMENT 3

Because each owner has a different vision or mission for the property, the appropriate walking distance and other design parameters will not be the same even for complexes with the same land uses. For example, the neighborhood shopping center will have different parking convenience needs than either a high fashion center or regional mall.

With this change in philosophy, rules of thumb no longer provide adequate guides for parking design.

The LOS Approach

To evaluate the qualitative variables in parking design in a systematic and logical way, Walker Parking Consultants/ Engineers has developed the level of service (LOS) approach to parking design. Borrowed from the traffic engineering profession, it allows us to consider a variety of variables affecting acceptability of such design decisions as parking stall and aisle widths, turning radii, entry and exit queuing standards, and sloping of parking floors and express ramps.

The level of service classification system is similar to the grading system used in schools: LOS A is the best or ideal performance; LOS B is good; C is average; and D is below average but minimally acceptable. LOS E is the approximate point of failure, and LOS F describes gridlock conditions.

The LOS system is used to reflect the acceptability by the users of a community of certain parameters. Most roadways that are new or are being improved are designed to attain a LOS of C or better. LOS D is tolerated by commuters in our major urban centers like New York, Los Angeles and Chicago; and efforts to mitigate the conditions would not be initiated until the LOS drops to E or even F. In a small town, a street condition of LOS B may generate an outcry for traffic improvements.

Similarly, issues related specifically to the parking patron can be reflected by the level of service approach. In many cases the specific type of user plays a major role, even within the same land use type. Is the typical user a family going to a theme park (perhaps loaded down with strollers and diaper bags) or a group of adult friends going to a football game? Is it an elderly couple meeting the family at the airport or a business traveler? Are there transportation alternatives for the user? Is the user a shopper who has a number of location choices or a visitor who comes to the site for a specific reason that will not be heavily influenced by parking convenience, such as a visit to a specific doctor? How long is the person going to stay – a few minutes or all day? Are there a variety of parking options at various prices and walking distances such as in a central business district? How often does the user park in the same facility: every day or once a year? Is it a stressful situation, such as hurrying to the airport or going to the hospital, or a more routine commute or shopping trip?

The individual parker's expectations are also important. Is the location suburban or urban? Is the lot an overflow location at the regional shopping center used only at Christmas season or a lot in front of a strip/convenience center? Is it a special event where congestion and long walking distances, are anticipated or a suburban office park where convenience is part of the marketing of the building to tenants? Is it a corporate headquarters where the image of the corporation is an issues or a speculative office building.

Security also is an element perceived by the user; will he/ she be hurrying to traverse the area as quickly as possible, or will the person feel comfortable enough to walk a fairly long distance? Major factors that affect the perception of security include time of day, the neighborhood, the general activity levels and lighting.

With all these different variables, it is easy to see why it has been difficult to set precise standards. We do feel, however, that it is possible to develop such standards.

In each of the above questions and situations, a somewhat better level of service is needed to satisfy the former than the latter types of user. We also might design to different levels of service at different points within the system. For example, we consider that the parking used on average or typical days at shopping centers should be designed for LOS A; for busy Saturdays LOS B should be maintained; and the parking that only gets used for a few hours on the busiest days of the year might be designed for LOS C. We usually design airport parking for LOS A, although, occasionally, we drop to B for long-term, frequent flyer parking.

Other Issues

Other issues affecting walking distance are related to the path of travel itself. Based on our experience and available literature, we have determined there are at least four variables related to path of travel: degree of weather protection, climate, line of sight (can the parker see the destination from the parking space?) and "friction" (interruptions and constraints on the path of travel such as crossing streets with or without traffic signals, and natural and psychological barriers such as railroad tracks or a change in neighborhood).

To fully reflect all path-of-travel variables in a classification of walking distance by level of service would require an overly complex matrix. After some study, however, we found that the degree of weather protection is the most critical variable. We further decided that acceptable walking distances entirely within a parking facility are shorter than those for urban sidewalks, pedestrian bridges or inside buildings such as airports. Because the user of a facility walks down a parking aisle or follows a path between cars to reach the elevator, a high degree of "friction" exists for this system. Also, since parking structures are generally perceived as being less safe than open surface lots, the distinctions between walking within parking lots and structures should be recognized.

ATTACHMENT 3

Therefore, we have determined the level of service of walking distances for five different types of circumstances. The first three reflect degrees of protection along a dedicated path of travel (i.e., not within a parking facility):

1. **totally unprotected**
2. **covered to reduce the effects of rain or snow**
3. **climate controlled such as in a pedestrian bridge**

The final two categories are:

4. **walking within a surface parking lot**
5. **walking within a parking structure or garage**

The table below presents our recommended gradation of maximum acceptable walking distance for levels of service A through D, which is the lowest level that would be used under design circumstances. We have not tried to determine a distinction between E (the point of failure) and F (gridlock).

Level of Service Conditions	A	B	C	D
Climate Controlled	1,000 ft.	2,400 ft.	3,800 ft.	5,200 ft.
Outdoor/Covered	500	1,000	1,500	2,000
Outdoor/Uncovered	400	800	1,200	1,600
Through Surface Lot	350	700	1,050	1,400
Inside Parking Facility	300	600	900	1,200

Experience has shown that climate in the locality is not a primary factor. There are few, if any, places in the United States that have a truly ideal walking climate year round. Heat can be just as discouraging to walking as cold – rain just as discouraging as snow. Certainly a perfect day increases the acceptable walking distances and would probably increase to the maximum walking distances in climate controlled settings. In the few localities where perfect weather is the year-round norm, we recommend that the climate controlled figures on the table be used.

The maximum walking distance for an unprotected path of travel in a non-parking environment was determined first, using several different types of information.

Fruin's Data

The most important determinant was Fruin's data on the relationship between the walking distance and the proportion of people who choose to walk versus those who choose other modes of travel. This data came from an origin/destination survey at the Port Authority Bush Terminal in midtown-Manhattan. This mid-town terminal situation is probably as close to ideal for studying the point at which an unprotected walking distance goes from being minimally acceptable to unacceptable. With a walking distance of less than 1,000 feet, virtually everyone chose to walk, rather than catch a bus, take a taxi or other available alternatives.

A common criteria for design in the transportation and parking industry is the 85th percentile, i.e., one selects a parameter that is acceptable to 85 percent of the population. Designing for the 100th percentile is excessively expensive; designing for the mean results in problems for 50 percent of the population. In the mid-town bus terminal study, at a distance of about 2,500 feet, 85 percent chose to walk. If the walk was a mile, about half the people chose to walk. Fruin was careful to note that the data was collected on a "fair spring day, resulting in longer walking distances than would otherwise have occurred in New York City."

Fruin compared the above distances to the "severely criticized" maximum walking distances from curbside to gates at such airports as O'Hare (1735 feet), Atlanta (1730 feet), Dallas/Fort Worth (DFW) (1,650 feet) and San Francisco (1,300 feet). Los Angeles, Kennedy, Miami and Detroit each had maximum distances of about 1,100 feet.

The airport walking paths would be primarily in protected, climate controlled spaces. However, people may be hurrying to catch a plan; tired after a long business day; or toting children, strollers and carry-on luggage. Also, the total walking distances from parking space to gate would be substantially longer.

Fruin noted that inter-terminal distances at those airports range from 2,000 to more than 8,000 feet. Some of the inter-terminal pedestrian connections are indoors, while others are unprotected. Most people use the inter-terminal bus service at the longer distances. (It is interesting to note that since publication of Fruin's book, moving sidewalks have been added to O'Hare, both in the terminal and between elevator cores in the garages; and a people-mover has been added to the pedestrian terminal at the American concourse at DFW.)

For special events, several references have cited 1,500 to 2,000 feet as a reasonable walking distance.

For university campuses (usually a LOS C or D condition), our extensive experience with parking studies has found that a significant number of students will walk as far as a mile in good weather, rather than wait for the university shuttle bus. However, the usage of the shuttle system increases sharply in poor weather. The students will not park in distant lots (more than 1,500 to 2,000 feet) at all if shuttle service is not available to provide protection on poor weather days.

City Walking

In cities such as Chicago, anecdotal analysis of commuter walking distances indicates that 1,600 feet is a realistic maximum for LOS D for typical weather conditions.

The LOS A unprotected walking distances in our chart also were derived from sources that cited similar figures.

ATTACHMENT 3

Several cited an ideal walking distance inside the ring road at major shopping centers as 400 feet; this distance also has been found to be a reasonable walking distance for shoppers in central business districts. One source cited 350 feet as the ideal walking distance for hospital parking.

Therefore, the acceptable maximum unprotected walking distances have been scaled from LOS A of 400 feet to LOS D of 1,600 feet. The protected walking distances were scaled from 500 feet for LOS A to 2,000 feet for LOS D, an increase of 25 percent over the unprotected distances. The fair weather bus terminal study, our experiences with university student parking and the airport data cited by Fruin led us to scale the climate controlled walking distances from 1,000 feet for LOS A to 5,200 feet (just under a mile) for LOS D. We understand that it is considered "ideal" (i.e., LOS A) in the airport industry to provide a moving sidewalk or other people-mover if the walking distance inside the terminal, and thus under climate controlled circumstances, exceeds 1,000 feet.

Where there is friction along the pedestrian path of travel, such as streets to cross and traffic signals, the acceptable walking distance may be reduced by 25 percent or more.

For surface lot walking distances, we have relied on a number of experiences and anecdotes in the design of parking for shopping centers and other uses such as theme parks. We then further discounted the walking distances within parking structures. It should be noted that the acceptable walking distances we have given are substantially longer than those published by one of the authors because of additional experience gains with mega-structures (more than 3,000 parking spaces) since the book *Parking Structures* was published in 1989.

A path of travel often includes components from several of the above categories and conditions. In these cases acceptable total path is less than the total path in climate controlled circumstances for a LOS one notch below the LOS used for the individual components. For example, an airport to be designed for LOS A would want to have a maximum path of travel of 300 feet from the parking space to the elevator within a parking facility, and a weather-protected path of no more than 500 feet from the elevator lobby to the terminal. There may then be a climate controlled path of no more than 1,000 feet from the entrance to the terminal to the gate. The overall path of travel should not exceed 2,400 feet (LOS B).

This story was originally published in *Parking* magazine in 1994.
Mary S. Smith is senior vice president at Walker Parking Consultants. She can be reached at **mary.smith@walkerparking.com**. **Thomas A. Butcher** is executive vice president of Walker Parking Consultants. He can be reached at **tom.butcher@walkerparking.com**.

Attachment 4

Murry, Kim

From: Hudson, Jake
Sent: Thursday, March 27, 2014 7:32 AM
To: Murry, Kim
Subject: FW: Info Requested from Today's CP Meeting
Attachments: Cal Poly Info.zip

From: Hudson, Jake
Sent: Thursday, March 13, 2014 4:51 PM
To: Matt Haynes (M.Haynes@fehrandpeers.com); Ian Barnes (I.Barnes@fehrandpeers.com)
Cc: Ncarter@swca.com; Murry, Kim; Johnson, Derek
Subject: Info Requested from Today's CP Meeting

Attached is all the info requested of the City from Today's meeting.

1. Previous Cal Poly Master Plan EIR section stating that the reduced trip rates assumed TDM measures.
2. regarding TDM and how this was used to justify trip generation rate assumptions
3. Turning movement counts at CP gate ways
4. Studies and resources of walking distances for parking
5. Traffic Safety & Signal Warrant information for California & Taft

Thanks for meeting today; I think it was really productive... let me know if there is anything else you might need.

Thanks,

Jake Hudson
Traffic Operations Manager
City of San Luis Obispo
919 Palm Street, San Luis Obispo, Ca
Phone: 805.781.7255
Fax: 805.781.7198

1

Attachment 5

Warrants Summary Report

1: California & Taft

Intersection Information:

	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant	Met?	Notes
Warrant 1, Eight-Hour Vehicular Volume	Yes	
Condition A or B Met?	Yes	11 Hours met (8 required)
Condition A and B Met?	Yes	11 Hours met (8 required)
Warrant 2, Four-Hour Vehicular Volume	Yes	9 Hours met (4 required)
Warrant 3, Peak Hour	Yes	
Condition A Met?	No	0 Hours met (1 required)
Condition B Met?	Yes	5 Hours met (1 required)
Warrant 4, Pedestrian Volume	No	
Condition A Met?	No	0 Hours met (4 required)
Condition B Met?	No	0 Hours met (1 required)

California 2007/ 10 1

Intersection Information:

	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant	Met?	Notes
Warrant 6, Coordinated Signal System		
	No	
Warrant 7, Crash Experience		
	Yes	
Traffic Volume Condition?	No	1 Hours met (8 required)
Ped Condition?	Yes	11 Hours met (8 required)
Warrant 8, Roadway Network		
	Yes	
Warrant 9, Intersection Near a Grade Crossing		
	No	
AWSC Warrant, Multiway Stop Application		
	Yes	
Condition A Met?	Yes	
Condition B Met?	Yes	
Condition C Met?	No	

California 2007/ 10 2

Warrant 1: Eight-hour Vehicular Volume
1: California & Taft

Intersection Information:

Major Street	California
Major Direction	NB/SB
Minor Direction	WB

Warrant 1 Met? **Yes**

Details:

Condition A or B Met?	Yes	11 Hours met (8 required)
Condition A and B Met?	Yes	11 Hours met (8 required)

Hour	Major Street Vehicles (total of both approaches)	Condition A		Condition B		Condition A			Condition B		100% Standard Met? Cond. A OR Cond. B		80% Standard Met? Cond. A AND Cond. B	
		Volume >= 100% column (600)?	Volume >= 80% column (480)?	Volume >= 100% column (900)?	Volume >= 80% column (720)?	High-volume Minor Approach Vehicles	Volume >= 100% column (150)?	Volume >= 80% column (120)?	Volume >= 100% column (75)?	Volume >= 80% column (60)?	Condition A 100% Column	Condition B 100% Column	Condition A 80% Column	Condition B 80% Column
06:00 to 07:00	287	No	No	No	No	131	No	Yes	Yes	Yes	No	No	No	No
06:15 to 07:15	336	No	No	No	No	167	Yes	Yes	Yes	Yes	No	No	No	No
06:30 to 07:30	443	No	No	No	No	199	Yes	Yes	Yes	Yes	No	No	No	No
06:45 to 07:45	630	Yes	Yes	No	No	246	Yes	Yes	Yes	Yes	Yes*	No	Yes	No
07:00 to 08:00	844	Yes	Yes	No	Yes	254	Yes	Yes	Yes	Yes	Yes	No	Yes*	Yes*
07:15 to 08:15	1015	Yes	Yes	Yes	Yes	294	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
07:30 to 08:30	1111	Yes	Yes	Yes	Yes	334	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
07:45 to 08:45	1099	Yes	Yes	Yes	Yes	340	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
08:00 to 09:00	1067	Yes	Yes	Yes	Yes	355	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*
08:15 to 09:15	1009	Yes	Yes	Yes	Yes	294	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes

California 2007/ 10 3

08:30 to 09:30	923	Yes	Yes	Yes	Yes	237	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
08:45 to 09:45	857	Yes	Yes	No	Yes	188	Yes	Yes	Yes	Yes	Yes*	No	Yes	Yes
09:00 to 10:00	750	Yes	Yes	No	Yes	155	Yes	Yes	Yes	Yes	Yes	No	Yes*	Yes*
09:15 to 10:15	715	Yes	Yes	No	No	163	Yes	Yes	Yes	Yes	Yes	No	Yes	No
09:30 to 10:30	716	Yes	Yes	No	No	155	Yes	Yes	Yes	Yes	Yes	No	Yes	No
09:45 to 10:45	725	Yes	Yes	No	Yes	154	Yes	Yes	Yes	Yes	Yes*	No	Yes	Yes
10:00 to 11:00	718	Yes	Yes	No	No	147	No	Yes	Yes	Yes	No	No	Yes	No
10:15 to 11:15	753	Yes	Yes	No	Yes	152	Yes	Yes	Yes	Yes	Yes	No	Yes*	Yes*
10:30 to 11:30	775	Yes	Yes	No	Yes	161	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
10:45 to 11:45	847	Yes	Yes	No	Yes	194	Yes	Yes	Yes	Yes	Yes*	No	Yes	Yes
11:00 to 12:00	963	Yes	Yes	Yes	Yes	223	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
11:15 to 12:15	1069	Yes	Yes	Yes	Yes	261	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*
11:30 to 12:30	1111	Yes	Yes	Yes	Yes	276	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
11:45 to 12:45	1050	Yes	Yes	Yes	Yes	247	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
12:00 to 13:00	972	Yes	Yes	Yes	Yes	228	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
12:15 to 13:15	871	Yes	Yes	No	Yes	201	Yes	Yes	Yes	Yes	Yes	No	Yes*	Yes*
12:30 to 13:30	873	Yes	Yes	No	Yes	199	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
12:45 to 13:45	894	Yes	Yes	No	Yes	202	Yes	Yes	Yes	Yes	Yes*	No	Yes	Yes
13:00 to 14:00	933	Yes	Yes	Yes	Yes	203	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
13:15 to 14:15	1002	Yes	Yes	Yes	Yes	191	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*
13:30 to 14:30	1001	Yes	Yes	Yes	Yes	181	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
13:45 to 14:45	1020	Yes	Yes	Yes	Yes	192	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
14:00 to 15:00	1039	Yes	Yes	Yes	Yes	196	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
14:15 to 15:15	1028	Yes	Yes	Yes	Yes	194	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*
14:30 to 15:30	1079	Yes	Yes	Yes	Yes	197	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
14:45 to 15:45	1140	Yes	Yes	Yes	Yes	189	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
15:00 to 16:00	1171	Yes	Yes	Yes	Yes	187	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
15:15 to 16:15	1224	Yes	Yes	Yes	Yes	213	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*

15:30 to 16:30	1250	Yes	Yes	Yes	Yes	248	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15:45 to 16:45	1248	Yes	Yes	Yes	Yes	280	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
16:00 to 17:00	1268	Yes	Yes	Yes	Yes	319	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
16:15 to 17:15	1294	Yes	Yes	Yes	Yes	300	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes*
16:30 to 17:30	1322	Yes	Yes	Yes	Yes	268	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
16:45 to 17:45	1302	Yes	Yes	Yes	Yes	238	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
17:00 to 18:00	1290	Yes	Yes	Yes	Yes	195	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
17:15 to 18:15	940	Yes	Yes	Yes	Yes	143	No	Yes	Yes	Yes	No	Yes	Yes*	Yes*
17:30 to 18:30	599	No	Yes	No	No	88	No	No	Yes	Yes	No	No	No	No
17:45 to 18:45	318	No	No	No	No	42	No	No	No	No	No	No	No	No

Warrant 2: Four-hour Vehicular Volume

1: California & Taft

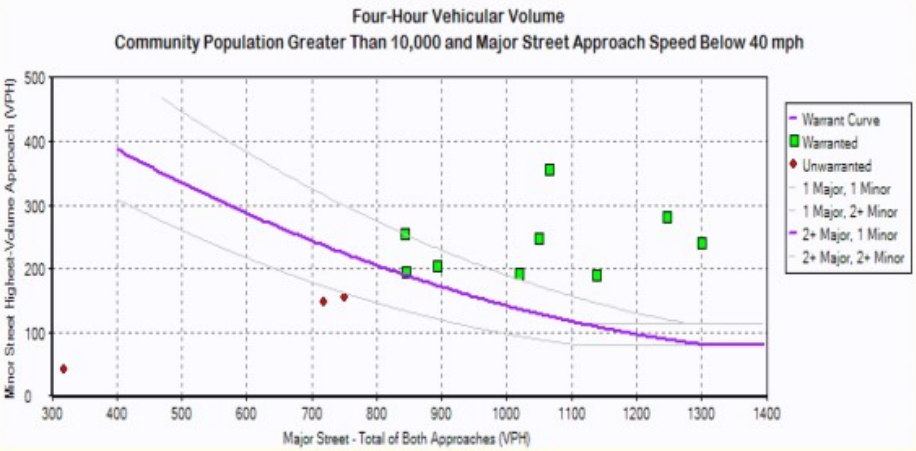
Intersection Information

	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant 2 Met? Yes

Details:

Notes:	9 Hours met (4 required)
Low Population?	No



California 2007/ 10 6

Hourly Volumes		
Hour	Major Street Total of both approaches (VPH)	Minor Street Highest volume approach (VPH)
00:00:00 - 01:00:00	0.00	0.00
01:00:00 - 02:00:00	0.00	0.00
02:00:00 - 03:00:00	0.00	0.00
03:00:00 - 04:00:00	0.00	0.00
04:00:00 - 05:00:00	0.00	0.00
05:00:00 - 06:00:00	0.00	0.00
06:00:00 - 07:00:00	293.00	125.00
07:00:00 - 08:00:00	854.00	244.00
08:00:00 - 09:00:00	1,116.00	306.00
09:00:00 - 10:00:00	765.00	140.00
10:00:00 - 11:00:00	741.00	124.00
11:00:00 - 12:00:00	1,038.00	148.00
12:00:00 - 13:00:00	1,053.00	147.00
13:00:00 - 14:00:00	975.00	161.00
14:00:00 - 15:00:00	1,105.00	130.00
15:00:00 - 16:00:00	1,239.00	119.00
16:00:00 - 17:00:00	1,448.00	139.00
17:00:00 - 18:00:00	1,358.00	127.00
18:00:00 - 19:00:00	0.00	0.00
19:00:00 - 20:00:00	0.00	0.00
20:00:00 - 21:00:00	0.00	0.00
21:00:00 - 22:00:00	0.00	0.00
22:00:00 - 23:00:00	0.00	0.00
23:00:00 - 00:00:00	0.00	0.00

Warranted Hours

Hour	Major Street Total of both approaches (VPH)	Minor Street Highest volume approach (VPH)

Note: Only data of hours warranted is represented in the above table.

Warrant 3: Peak Hour

1: California & Taft

Intersection Information:

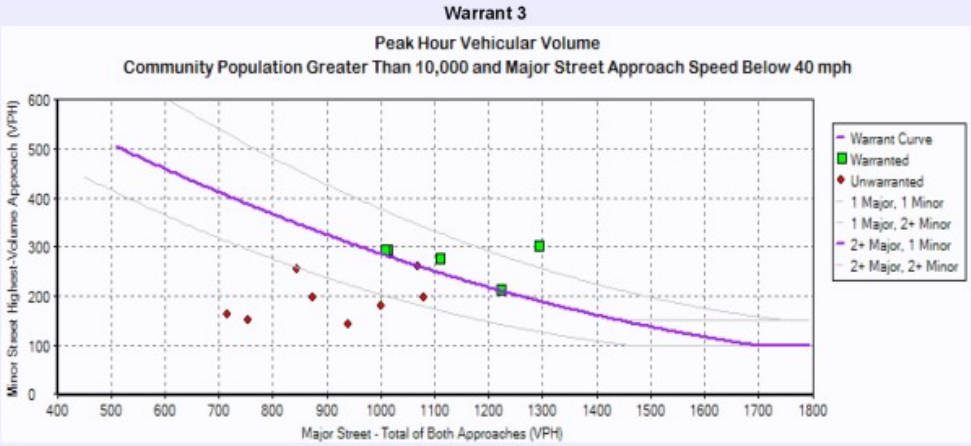
	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant 3 Met? Yes

Details:

Low Population?	No
Condition A Met?	No
Notes:	0 Hours met (1 required)
Minor Approach Time Delay Condition	Not Met
Minor Approach Volume Condition	Met
Total Entering Intersection Volume Condition	Not Met
Condition B Met?	Yes
Notes:	5 Hours met (1 required)

California 2007/ 10 9



California 2007/ 10 10

Warranted / Unwarranted

Hour	Major Street Total of both approaches (VPH)	Minor Street Highest volume approach (VPH)
6:00	287	131
7:00	844	254
7:15	1015	294
8:15	1009	294
9:15	715	163
10:15	753	152
11:15	1069	261
11:30	1111	276
12:30	873	199
13:30	1001	181
14:30	1079	197
15:15	1224	213
16:15	1294	300
17:15	940	143

Warrant 4: Pedestrian Volume
1: California & Taft

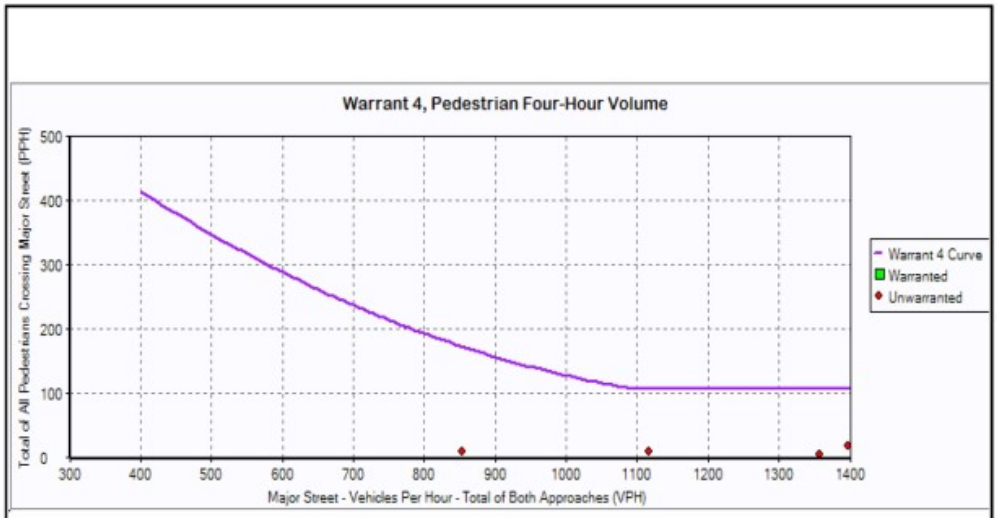
Intersection Information:

	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant 4 Met? **No**

Details:

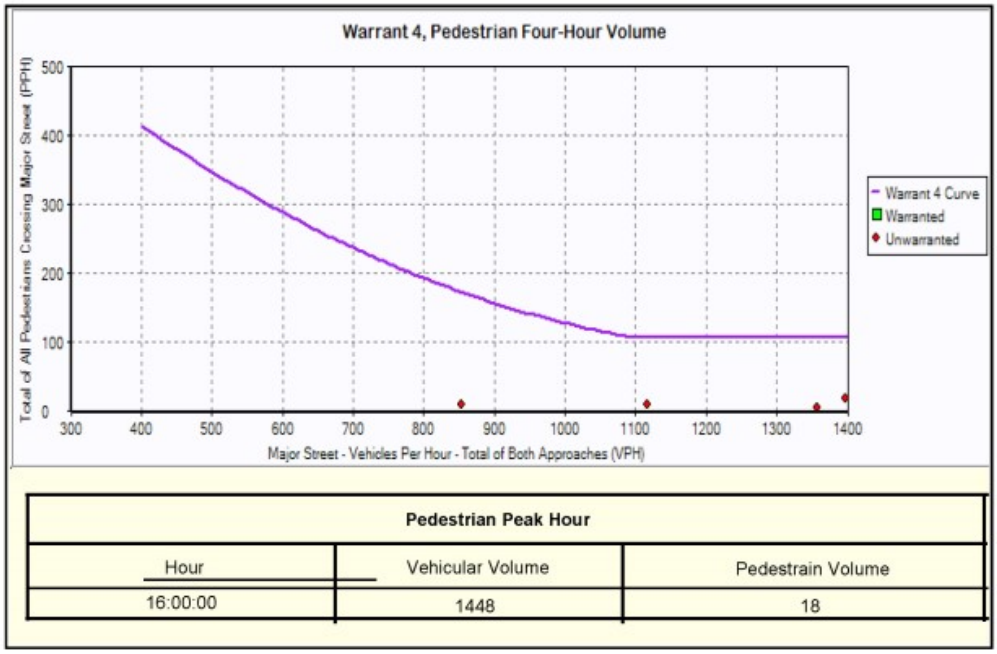
Pedestrian Four-Hour Volume Warrant met?	**No**
Pedestrian Peak Hour Warrant Met?	**No**
Notes:	0 Hours met (4 required)
Speed limit or 85th-percentile speed on the major street > 35 mph, or intersection lies within an isolated community with population < 10,000 ?	No



Warranted / Unwarranted

Hour	Major Street Vehicle Volume (VPH)	Volume of Pedestrians Crossing Major Street (VPH)
7:00 am	854	10
8:00 am	1,116	10
4:00 pm	1,448	18
5:00 pm	1,358	5

California 2007/ 10 13



Pedestrian Peak Hour		
Hour	Vehicular Volume	Pedestrain Volume
16:00:00	1448	18

California 2007/ 10 14

Warrant 5: School Crossing

1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB

Warrant 5 Met? **No**

Details:

Time Period Interval for Students Crossing (min)	**0**
Number of Students Crossing in Time Period	**0**
Number of Adequate Gaps in Time Period	**0**
Other Remedial Measures Attempted?	**No**
Adjacent Signal on NB approach?	**No**
Distance to signal on NB Approach (ft)	-
Adjacent Signal on SB approach?	**No**
Distance to signal on SB Approach (ft)	-
Will New Signal Restrict Progressive Traffic?	**Yes**

California 2007/ 10 15

Warrant 6: Coordinated Signal System

1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB

Warrant 6 Met? **No**

Details:

Approach Dir/Name	Acceptable Platooning?	Adjacent Coordinating Signal?	Adjacent Intersection Distance
WB Approach (Taft)	Yes	No	N/A
NB Approach (California)	Yes	No	N/A
SB Approach (California)	Yes	No	N/A

Unacceptable Platooning? (At least one approach)	**Distance to Closest Signal** (Must be N/A or >= 1000)
No	**N/A**

California 2007/ 10 16

Warrant 7: Crash Experience

1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB
Minor Direction	WB

Warrant 7 Met? **Yes**

Details:

Low Population?	**No**	
Major Street Speed Limit	**35**	
Major Street 85th-Percentile Speed	**35.00**	
Qualifying Crashes	**5**	
Adequate Alternative Trials?	**Yes**	
Traffic Volume Condition Met?	**Yes**	11 Hours Met (8 Required)
Ped Volume Condition Met?	**No**	1 Hours Met (8 Required)

Hour	Traffic Volumes		80% Standard Met? A OR B		Pedestrian Volumes			
					Westbound Ped Volumes			
	Major Street Vehicles	Minor Street Vehicles	Condition A	Condition B	Peds	> 80?	Peds	> 80?
06:00 to 07:00	293	0	No	No	0	No	0	No
06:15 to 07:15	341	0	No	No	0	No	0	No
06:30 to 07:30	449	0	No	No	0	No	0	No
06:45 to 07:45	639	0	No	No	0	No	0	No
07:00 to 08:00	854	0	No	No	0	No	0	No
07:15 to 08:15	1034	0	No	No	0	No	0	No
07:30 to 08:30	1141	0	No	No	0	No	0	No
07:45 to 08:45	1138	0	No	No	0	No	0	No

California 2007/ 10 17

08:00 to 09:00	1116	0	No	No	0	No	0	No
08:15 to 09:15	1050	0	No	No	0	No	0	No
08:30 to 09:30	956	0	No	No	0	No	0	No
08:45 to 09:45	880	0	No	No	0	No	0	No
09:00 to 10:00	765	0	No	No	0	No	0	No
09:15 to 10:15	735	0	No	No	0	No	0	No
09:30 to 10:30	736	0	No	No	0	No	0	No
09:45 to 10:45	747	0	No	No	0	No	0	No
10:00 to 11:00	741	0	No	No	0	No	0	No
10:15 to 11:15	780	0	No	No	0	No	0	No
10:30 to 11:30	810	0	No	No	0	No	0	No
10:45 to 11:45	902	0	No	No	0	No	0	No
11:00 to 12:00	1038	0	No	No	0	No	0	No
11:15 to 12:15	1173	0	No	No	0	No	0	No
11:30 to 12:30	1228	0	No	No	0	No	0	No
11:45 to 12:45	1150	0	No	No	0	No	0	No
12:00 to 13:00	1053	0	No	No	0	No	0	No
12:15 to 13:15	927	0	No	No	0	No	0	No
12:30 to 13:30	913	0	No	No	0	No	0	No
12:45 to 13:45	936	0	No	No	0	No	0	No
13:00 to 14:00	975	0	No	No	0	No	0	No
13:15 to 14:15	1050	0	No	No	0	No	0	No
13:30 to 14:30	1055	0	No	No	0	No	0	No
13:45 to 14:45	1081	0	No	No	0	No	0	No
14:00 to 15:00	1105	0	No	No	0	No	0	No
14:15 to 15:15	1089	0	No	No	0	No	0	No
14:30 to 15:30	1146	0	No	No	0	No	0	No

California 2007/ 10 18

14:45 to 15:45	1204	0	No	No	0	No	0	No
15:00 to 16:00	1239	0	No	No	0	No	0	No
15:15 to 16:15	1313	0	No	No	0	No	0	No
15:30 to 16:30	1376	0	No	No	0	No	0	No
15:45 to 16:45	1401	0	No	No	0	No	0	No
16:00 to 17:00	1448	0	No	No	0	No	0	No
16:15 to 17:15	1458	0	No	No	0	No	0	No
16:30 to 17:30	1450	0	No	No	0	No	0	No
16:45 to 17:45	1403	0	No	No	0	No	0	No
17:00 to 18:00	1358	0	No	No	0	No	0	No
17:15 to 18:15	987	0	No	No	0	No	0	No
17:30 to 18:30	623	0	No	No	0	No	0	No
17:45 to 18:45	328	0	No	No	0	No	0	No

Warrant 8: Roadway Network
1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB
Minor Direction	WB

Warrant 8 Met? (A or B) **Yes**

Details:

Growth Rates (per year)

NB		SB		WB	
L		L	0.00%	L	0.00%
T	0.00%	T	0.00%	T	
R		R		R	

Condition A, Total Entering Volume		Condition B, Non-normal Business Day	
		Existing	
Existing Peak Hour	1594	**Highest Hour**	0
Years	0.00	**Second Highest Hour**	0
Future Peak Hour	1594	**Third Highest Hour**	0
Warrant 1 in 5 Years?	Yes	**Fourth Highest Hour**	0
Warrant 2 in 5 Years?	Yes	**Fifth Highest Hour**	0
Warrant 3 in 5 Years?	Yes	**Yearly Growth Rate**	0.00%
		Years	0.00
		Future	
		Highest Hour	0
		Second Highest Hour	0
		Third Highest Hour	0
		Fourth Highest Hour	0
		Fifth Highest Hour	0

Condition A Met? **Yes** Condition B Met? **No**

California 2007/ 10 20

Warrant 9: Intersection Near a Grade Crossing

1: California & Taft

Intersection Information:

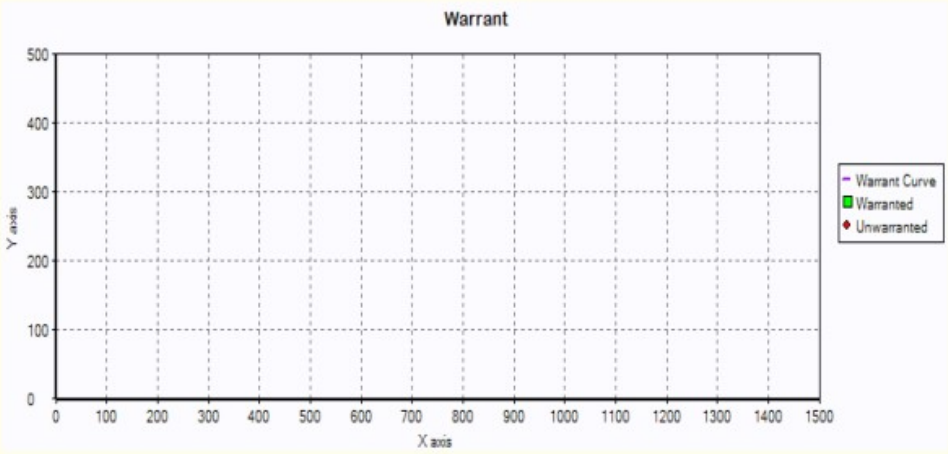
	Major Street	Minor Street
Street Name	California	Taft
Direction	NB/SB	WB
Number of Lanes	2	1
Approach Speed	35	25

Warrant 9 Met? **No**

Details:

Note: No approach with a railroad grade crossing		
Minor-street approach having a grade crossing		
Distance from the center of the track to the stop or yield line		interpolated
Number of occurences of rail traffic per day		Adjustment factor
Percentage of high-occupancy buses crossing the track	%	Adjustment factor
Percentage of tractor-trailer trucks crossing the track	%	Adjustment factor
The rail traffic arrival times are uknown, the highest traffic volume hour of the day is used		

California 2007/ 10 21



Warranted / Unwarranted		
Hour	Major Street Total of Both Approaches (VPH)	Adjusted Volume of Minor Approach Crossing the Track (VPH)

California 2007/ 10 22

Bicycle Warrant
1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB
Minor Direction	WB

Bicycle Warrant Met? **No**

Details:

Collision (two or more counts)	**0**
Geometric Path	**No**
Volume Condition Met?	**No** No hour met

Title:

Hour	Traffic Volumes: Vehicles entering the Intersection	Bicycle Volumes: Bicycles entering the Intersection (B)	Condition: B * V > 50000?	Condition: B >=50?
06:00 to 07:00	418	0	No	No
06:15 to 07:15	503	0	No	No
06:30 to 07:30	642	0	No	No
06:45 to 07:45	876	0	No	No
07:00 to 08:00	1098	0	No	No
07:15 to 08:15	1309	0	No	No
07:30 to 08:30	1445	0	No	No
07:45 to 08:45	1439	0	No	No
08:00 to 09:00	1422	0	No	No
08:15 to 09:15	1303	0	No	No
08:30 to 09:30	1160	0	No	No

California 2007/ 10 23

08:45 to 09:45	1045	0	No	No
09:00 to 10:00	905	0	No	No
09:15 to 10:15	878	0	No	No
09:30 to 10:30	871	0	No	No
09:45 to 10:45	879	0	No	No
10:00 to 11:00	865	0	No	No
10:15 to 11:15	905	0	No	No
10:30 to 11:30	936	0	No	No
10:45 to 11:45	1041	0	No	No
11:00 to 12:00	1186	0	No	No
11:15 to 12:15	1330	0	No	No
11:30 to 12:30	1387	0	No	No
11:45 to 12:45	1297	0	No	No
12:00 to 13:00	1200	0	No	No
12:15 to 13:15	1072	0	No	No
12:30 to 13:30	1072	0	No	No
12:45 to 13:45	1096	0	No	No
13:00 to 14:00	1136	0	No	No
13:15 to 14:15	1193	0	No	No
13:30 to 14:30	1182	0	No	No
13:45 to 14:45	1212	0	No	No
14:00 to 15:00	1235	0	No	No
14:15 to 15:15	1222	0	No	No
14:30 to 15:30	1276	0	No	No
14:45 to 15:45	1329	0	No	No
15:00 to 16:00	1358	0	No	No
15:15 to 16:15	1437	0	No	No
15:30 to 16:30	1498	0	No	No
15:45 to 16:45	1528	0	No	No
16:00 to 17:00	1587	0	No	No
16:15 to 17:15	1594	0	No*	No*
16:30 to 17:30	1590	0	No	No

16:45 to 17:45	1540	0	No	No
17:00 to 18:00	1485	0	No	No
17:15 to 18:15	1083	0	No	No
17:30 to 18:30	687	0	No	No
17:45 to 18:45	360	0	No	No

All-Way Stop Control Warrant : Multiway Stop Applications

1: California & Taft

Intersection Information:

Major Street Name	California
Major Direction	NB/SB
Minor Direction	WB

AWSC Warrant Met? **Yes**

Details:

Condition A Met?	**Yes**	
Condition B Met?	**Yes**	
Condition C Met?	**No**	3 Hours Met (8 Required)

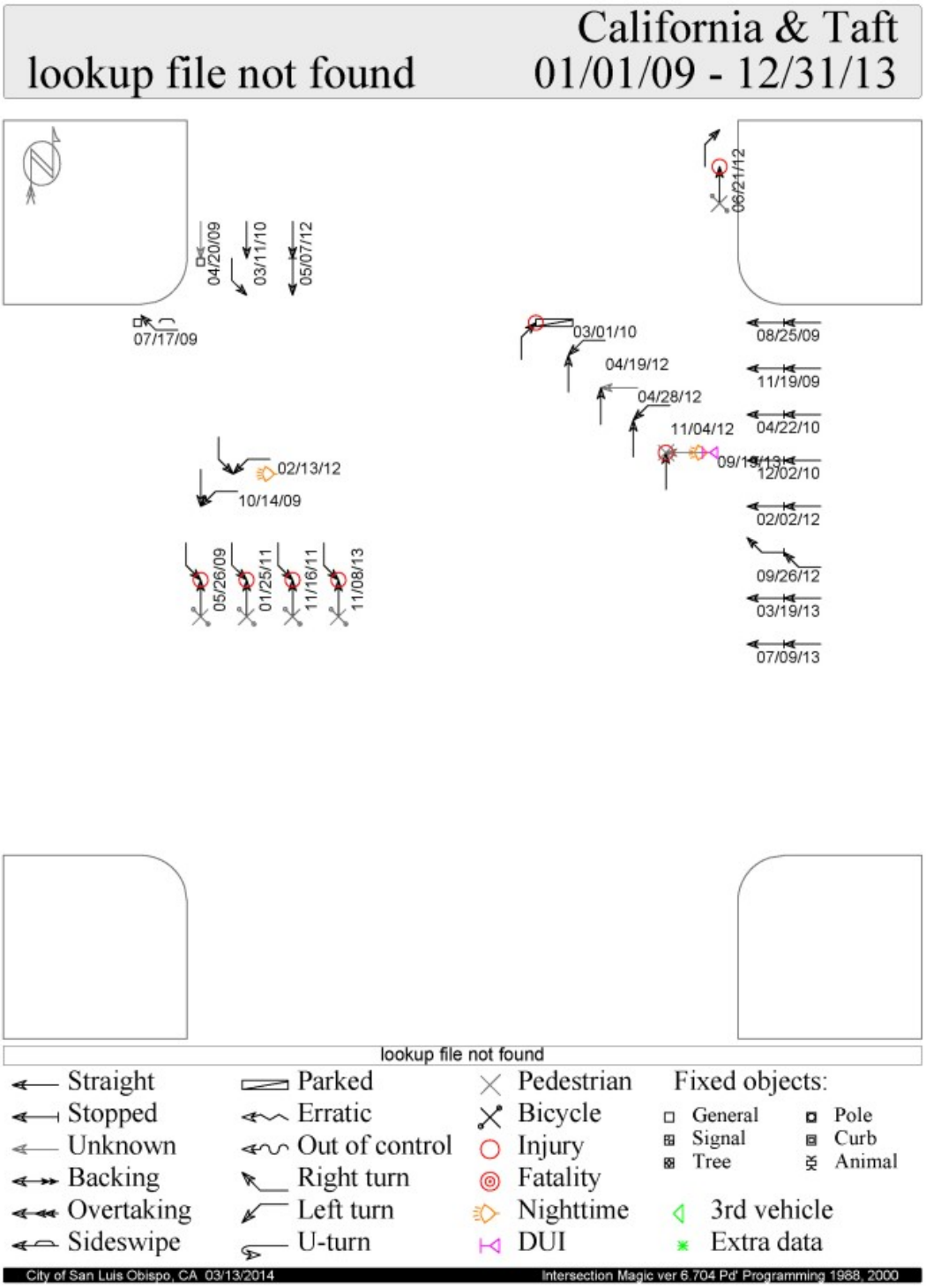
Qualifying Crashes	5
Major Street 85th-Percentile Speed	35.00
Major Street Speed Limit	35

California 2007/ 10 26

Hour	Traffic Volumes		Bicycle Volumes		Ped Volumes		Condition C		
	Major Street Vehicles	Minor Street Vehicles	Westbound Bicycle Volumes		Westbound Bicycle Volumes		Major Street	Minor Street	
							(Total Vehicle Volume) >= 300	Avg(Veh + Ped + Bicycle) >= 200	Delay >= 30
06:30 to 07:30	449	193	0	0	0	0	Yes	No	Yes
07:30 to 08:30	1,141	304	0	0	0	0	Yes	No	Yes
08:30 to 09:30	956	204	0	0	0	0	Yes	No	Yes

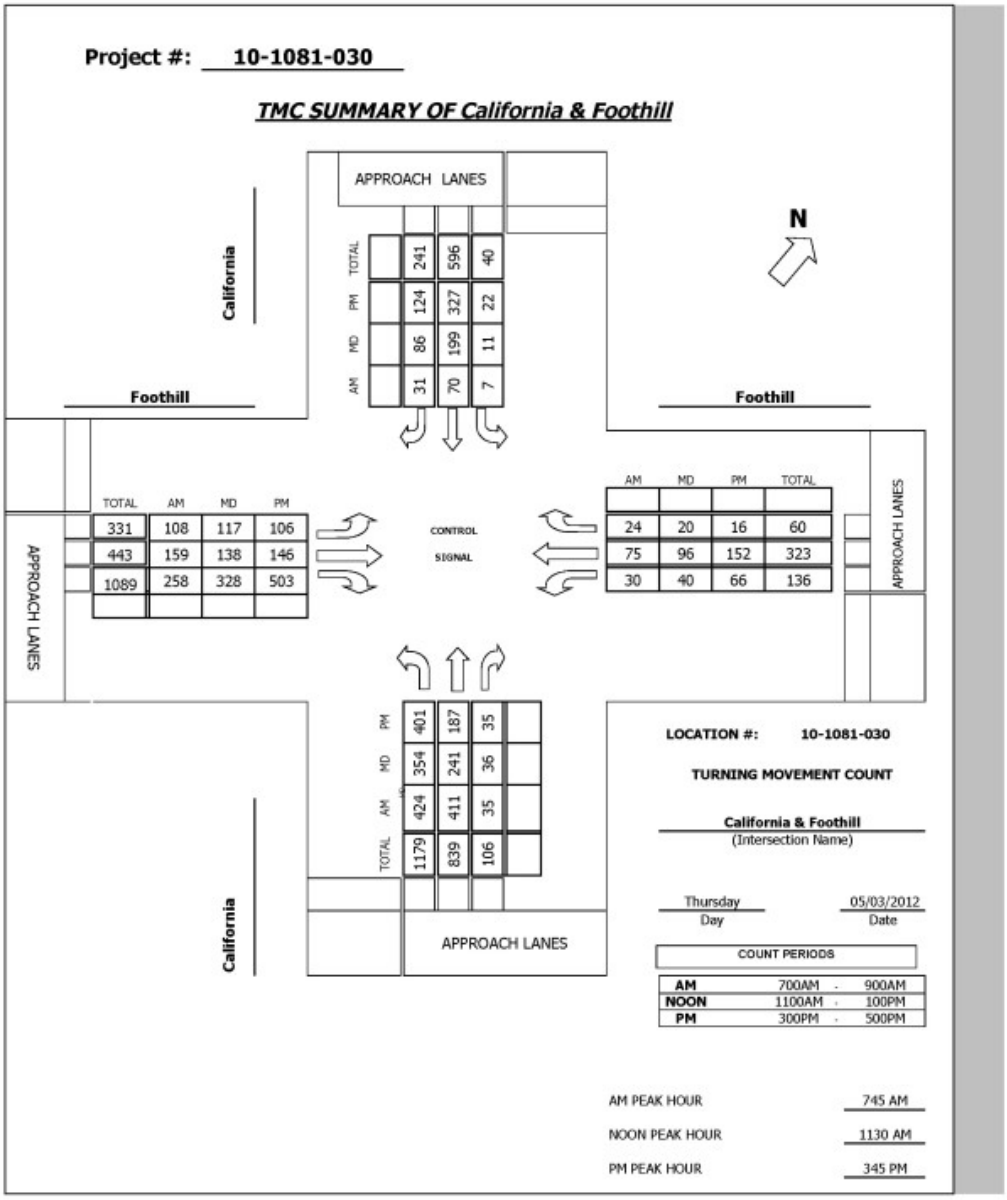
California 2007/ 10 27

Attachment 6



Intersection Turning Movement
Prepared by:
FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Attachment 7



Intersection Turning Movement
Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	California	DATE:	05/03/2012	LOCATION:	San Luis Obispo
E-W STREET:	Foothill	DAY:	Thursday	PROJECT#	10-1081-030

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	1.5	0.5	0.5	1.5	1	1.5	0.5	1	1	0.5	0.5	
6:00 AM													
6:15 AM													
6:30 AM													
6:45 AM													
7:00 AM	90	50	5	0	7	3	13	18	46	1	4	1	238
7:15 AM	92	80	6	0	5	4	19	23	61	6	6	2	304
7:30 AM	131	68	10	1	11	8	13	15	84	9	7	4	361
7:45 AM	89	142	11	3	18	4	39	64	62	4	14	10	460
8:00 AM	130	90	2	2	22	11	28	25	59	3	19	9	400
8:15 AM	87	70	10	0	18	5	21	33	81	12	25	1	363
8:30 AM	118	109	12	2	12	11	20	37	56	11	17	4	409
8:45 AM	88	110	6	4	25	7	26	53	75	10	21	6	431
9:00 AM													
9:15 AM													
9:30 AM													
9:45 AM													
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM													
11:15 AM													
11:30 AM													
11:45 AM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	825	719	62	12	118	53	179	268	524	56	113	37	2966
Approach %	51.37	44.77	3.86	6.56	64.48	28.96	18.43	27.60	53.96	27.18	54.85	17.96	
App/Depart	1606	/	935	183	/	698	971	/	342	206	/	991	

AM Peak Hr Begins at: 745 AM

PEAK													
Volumes	424	411	35	7	70	31	108	159	258	30	75	24	1632
Approach %	48.74	47.24	4.02	6.48	64.81	28.70	20.57	30.29	49.14	23.26	58.14	18.60	
PEAK HR. FACTOR:		0.899			0.771			0.795			0.849		0.887

CONTROL: Signal
COMMENT 1:
COMMENT 2:

Intersection Turning Movement

Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	California	DATE: 05/03/2012		LOCATION:	San Luis Obispo
E-W STREET:	Foothill	DAY: Thursday		PROJECT #	10-1081-030

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	1.5	0.5	0.5	1.5	1	1.5	0.5	1	1	0.5	0.5	
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM	78	37	5	7	62	31	19	31	65	6	36	3	380
11:15 AM	90	32	7	2	42	12	20	29	66	8	34	4	346
11:30 AM	74	64	15	2	35	21	22	32	61	10	28	4	368
11:45 AM	111	94	7	2	34	20	46	60	71	10	12	10	477
12:00 PM	100	49	7	4	79	30	30	25	100	12	32	5	473
12:15 PM	69	34	7	3	51	15	19	21	96	8	24	1	348
12:30 PM	88	36	8	0	33	16	28	29	74	10	20	4	346
12:45 PM	61	43	4	1	29	13	24	39	77	8	23	2	324
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM													
3:15 PM													
3:30 PM													
3:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	671	389	60	21	365	158	208	266	610	72	209	33	3062
Approach %	59.91	34.73	5.36	3.86	67.10	29.04	19.19	24.54	56.27	22.93	66.56	10.51	
App/Depart	1120	/	630	544	/	1047	1084	/	347	314	/	1038	

NOON Peak Hr Begins at: 1130 AM

PEAK													
Volumes	354	241	36	11	199	86	117	138	328	40	96	20	1666
Approach %	56.10	38.19	5.71	3.72	67.23	29.05	20.07	23.67	56.26	25.64	61.54	12.82	
PEAK HR. FACTOR:		0.744			0.655			0.823			0.796		0.873

CONTROL: Signal
COMMENT 1: 0
COMMENT 2: 0

HOURS:

	FROM:		TO:	
AM	700	AM	900	AM
NOON	1100	AM	100	PM
PM	300	PM	500	PM

Intersection Turning Movement

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	California	DATE:	05/03/2012	LOCATION:	San Luis Obispo
E-W STREET:	Foothill	DAY:	Thursday	PROJECT#	10-1081-030

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	1.5	0.5	0.5	1.5	1	1.5	0.5	1	1	0.5	0.5	
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM	90	29	10	7	82	30	17	25	116	13	32	3	454
3:15 PM	105	41	6	2	52	18	13	27	114	17	27	4	426
3:30 PM	111	56	7	5	46	17	24	26	117	9	29	6	453
3:45 PM	96	77	7	4	70	26	47	41	118	11	35	6	538
4:00 PM	107	36	7	7	88	37	13	41	134	21	44	2	537
4:15 PM	83	32	11	5	82	26	26	34	134	23	41	6	503
4:30 PM	115	42	10	6	87	35	20	30	117	11	32	2	507
4:45 PM	98	38	9	3	72	28	26	33	102	16	36	2	463
5:00 PM													
5:15 PM													
5:30 PM													
5:45 PM													
6:00 PM													
6:15 PM													
6:30 PM													
6:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	805	351	67	39	579	217	186	257	952	121	276	31	3881
Approach %	65.82	28.70	5.48	4.67	69.34	25.99	13.33	18.42	68.24	28.27	64.49	7.24	
App/Depart	1223	/	568	835	/	1652	1395	/	363	428	/	1298	

PM Peak Hr Begins at: 345 PM

PEAK													
Volumes	401	187	35	22	327	124	106	146	503	66	152	16	2085
Approach %	64.37	30.02	5.62	4.65	69.13	26.22	14.04	19.34	66.62	28.21	64.96	6.84	
PEAK HR. FACTOR:		0.865			0.896			0.916			0.836		0.969

CONTROL:	Signal
COMMENT 1:	0
COMMENT 2:	0

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Pedestrian & Bicycle Study

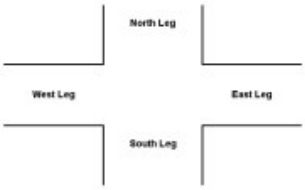
N-S STREET: California
E-W STREET: Foothill

Date: 05/03/2012
Day: Thursday

City: San Luis Obispo
Project #: 10-1081-030

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
7:00 AM	0	0	3	5
7:15 AM	0	0	8	10
7:30 AM	0	1	3	5
7:45 AM	0	8	28	20
8:00 AM	0	0	6	11
8:15 AM	0	2	3	0
8:30 AM	1	0	8	10
8:45 AM	0	5	34	39
TOTAL	1	16	94	100

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
7:00 AM	0	0	0	1
7:15 AM	0	0	3	2
7:30 AM	0	1	0	1
7:45 AM	0	8	7	5
8:00 AM	0	0	1	6
8:15 AM	0	2	0	2
8:30 AM	1	0	0	7
8:45 AM	0	5	0	9
TOTAL	1	16	11	33

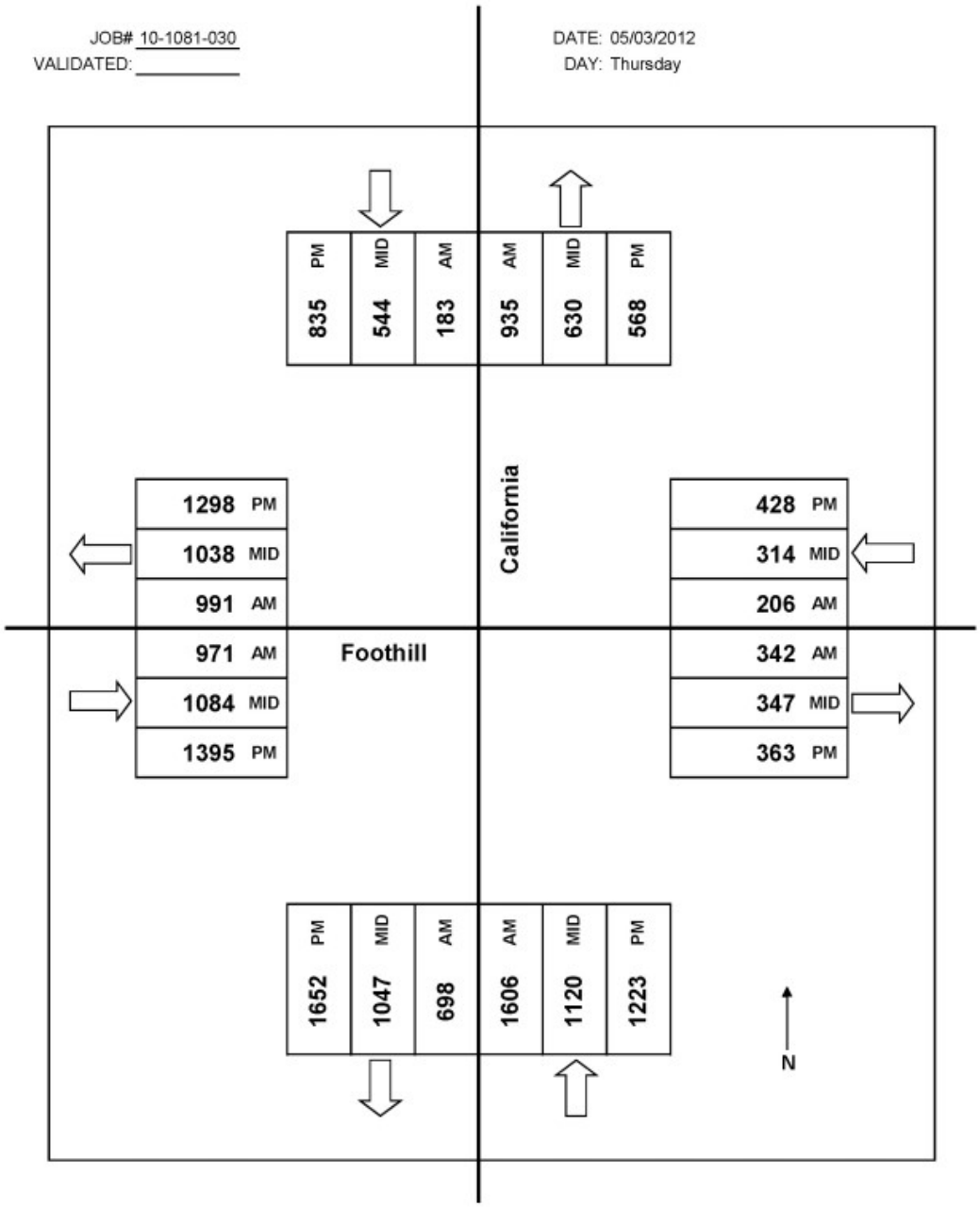


	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
11:00 AM	0	13	14	15
11:15 AM	0	14	3	8
11:30 AM	0	16	10	17
11:45 AM	0	31	36	52
12:00 PM	0	23	20	22
12:15 PM	0	14	11	7
12:30 PM	0	19	8	6
12:45 PM	0	10	4	10
TOTAL	0	139	105	140

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
11:00 AM	0	0	2	9
11:15 AM	0	0	1	3
11:30 AM	0	1	0	3
11:45 AM	0	4	2	7
12:00 PM	0	2	3	15
12:15 PM	0	0	1	6
12:30 PM	0	2	1	0
12:45 PM	0	0	0	5
TOTAL	0	9	10	47

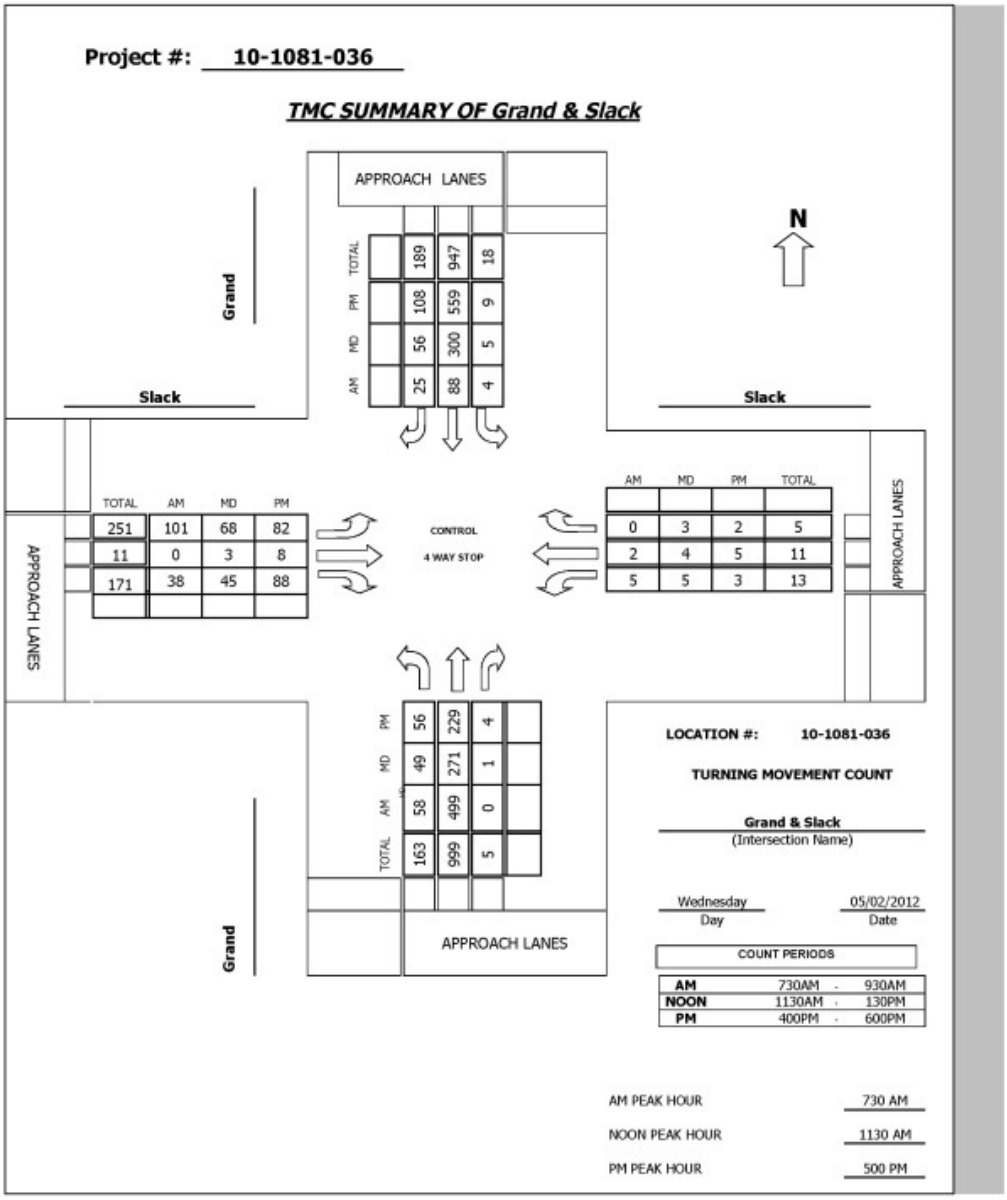
	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
3:00 PM	1	19	6	22
3:15 PM	0	11	3	9
3:30 PM	0	23	17	14
3:45 PM	0	29	28	31
4:00 PM	0	24	19	34
4:15 PM	0	17	5	7
4:30 PM	0	23	6	20
4:45 PM	0	17	5	16
TOTAL	1	183	89	153

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
3:00 PM	0	3	1	3
3:15 PM	0	1	1	1
3:30 PM	0	0	2	2
3:45 PM	1	1	1	9
4:00 PM	0	1	0	8
4:15 PM	0	1	1	4
4:30 PM	0	0	0	1
4:45 PM	0	1	0	4
TOTAL	1	8	6	32


JOB# 10-1081-030
VALIDATED:
DATE: 05/03/2012
DAY: Thursday
PM 835
MID 544
AM 183
AM 935
MID 630
PM 568
California
1298 PM
1038 MID
991 AM
428 PM
314 MID
206 AM
Foothill
971 AM
1084 MID
1395 PM
342 AM
347 MID
363 PM
PM 1652
MID 1047
AM 698
AM 1606
MID 1120
PM 1223
N

Intersection Turning Movement
Prepared by:
FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Attachment 8



Intersection Turning Movement
Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Grand	DATE:	05/02/2012	LOCATION:	San Luis Obispo
E-W STREET:	Slack	DAY:	Wednesday	PROJECT#	10-1081-036

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	0	0	2	1	0	1	0	0	1	0	
6:00 AM													
6:15 AM													
6:30 AM													
6:45 AM													
7:00 AM													
7:15 AM													
7:30 AM	17	107	0	1	18	8	11	0	4	1	0	0	167
7:45 AM	17	223	0	1	20	7	53	0	7	2	0	0	330
8:00 AM	15	87	0	1	23	6	23	0	12	1	2	0	170
8:15 AM	9	82	0	1	27	4	14	0	15	1	0	0	153
8:30 AM	16	87	0	1	12	2	25	1	13	1	1	0	159
8:45 AM	18	111	1	2	26	5	25	1	9	0	0	1	199
9:00 AM	7	66	0	0	41	7	22	0	7	1	0	0	151
9:15 AM	11	55	1	1	20	8	12	0	9	2	0	0	119
9:30 AM													
9:45 AM													
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM													
11:15 AM													
11:30 AM													
11:45 AM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	110	818	2	8	187	47	185	2	76	9	3	1	1448
Approach %	11.83	87.96	0.22	3.31	77.27	19.42	70.34	0.76	28.90	69.23	23.08	7.69	
App/Depart	930	/	1004	242	/	272	263	/	12	13	/	160	

AM Peak Hr Begins at: 730 AM

PEAK													
Volumes	58	499	0	4	88	25	101	0	38	5	2	0	820
Approach %	10.41	89.59	0.00	3.42	75.21	21.37	72.66	0.00	27.34	71.43	28.57	0.00	
PEAK HR. FACTOR:		0.580			0.914			0.579			0.583		0.621

CONTROL: 4 WAY STOP
COMMENT 1:
COMMENT 2:

Intersection Turning Movement

Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Grand	DATE:	05/02/2012	LOCATION:	San Luis Obispo
E-W STREET:	Slack	DAY:	Wednesday	PROJECT #	10-1081-036

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	0	0	2	1	0	1	0	0	1	0	
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM													
11:15 AM													
11:30 AM	9	84	0	1	46	10	15	0	12	1	0	0	178
11:45 AM	16	106	0	2	63	13	35	1	11	2	2	3	254
12:00 PM	14	38	0	2	138	23	9	2	9	0	1	0	236
12:15 PM	10	43	1	0	53	10	9	0	13	2	1	0	142
12:30 PM	5	53	1	0	59	13	6	2	8	0	2	1	150
12:45 PM	8	79	2	0	36	4	18	1	5	0	2	0	155
1:00 PM	7	57	0	1	73	15	19	2	4	2	0	0	180
1:15 PM	9	47	1	3	53	7	12	2	12	1	3	1	151
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM													
3:15 PM													
3:30 PM													
3:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	78	507	5	9	521	95	123	10	74	8	11	5	1446
Approach %	13.22	85.93	0.85	1.44	83.36	15.20	59.42	4.83	35.75	33.33	45.83	20.83	
App/Depart	590	/	635	625	/	603	207	/	24	24	/	184	

NOON Peak Hr Begins at: 1130 AM

PEAK													
Volumes	49	271	1	5	300	56	68	3	45	5	4	3	810
Approach %	15.26	84.42	0.31	1.39	83.10	15.51	58.62	2.59	38.79	41.67	33.33	25.00	
PEAK HR. FACTOR:		0.658			0.554			0.617			0.429		0.797

CONTROL: 4 WAY STOP
COMMENT 1: 0
COMMENT 2: 0

HOURS:

	FROM:		TO:	
AM	730	AM	930	AM
NOON	1130	AM	130	PM
PM	400	PM	600	PM

Intersection Turning Movement

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Grand	DATE:	05/02/2012	LOCATION:	San Luis Obispo
E-W STREET:	Slack	DAY:	Wednesday	PROJECT#	10-1081-036

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	0	0	2	1	0	1	0	0	1	0	
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM													
3:15 PM													
3:30 PM													
3:45 PM													
4:00 PM	13	49	1	6	179	32	15	9	7	0	2	2	315
4:15 PM	14	45	1	1	106	22	19	1	13	0	1	1	224
4:30 PM	13	56	2	1	107	12	13	1	14	2	1	1	223
4:45 PM	17	58	1	4	134	17	26	1	18	2	1	2	281
5:00 PM	15	44	1	2	167	36	14	0	19	0	0	0	298
5:15 PM	13	49	0	2	128	28	18	3	18	2	0	0	261
5:30 PM	18	55	1	2	125	25	16	4	28	0	3	0	277
5:45 PM	10	81	2	3	139	19	34	1	23	1	2	2	317
6:00 PM													
6:15 PM													
6:30 PM													
6:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	113	437	9	21	1085	191	155	20	140	7	10	8	2196
Approach %	20.21	78.18	1.61	1.62	83.65	14.73	49.21	6.35	44.44	28.00	40.00	32.00	
App/Depart	559	/	600	1297	/	1232	315	/	50	25	/	314	

PM Peak Hr Begins at: 500 PM

PEAK													
Volumes	56	229	4	9	559	108	82	8	88	3	5	2	1153
Approach %	19.38	79.24	1.38	1.33	82.69	15.98	46.07	4.49	49.44	30.00	50.00	20.00	
PEAK HR. FACTOR:		0.777			0.824			0.767			0.500		0.909

CONTROL:	4 WAY STOP
COMMENT 1:	0
COMMENT 2:	0

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Pedestrian & Bicycle Study

N-S STREET: Grand
E-W STREET: Stack

Date: 05/02/2012
Day: Wednesday

City: San Luis Obispo
Project #: 10-1081-036

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
7:30 AM	2	4	3	0
7:45 AM	4	6	1	5
8:00 AM	0	8	0	6
8:15 AM	2	1	1	0
8:30 AM	1	2	2	2
8:45 AM	2	6	4	0
9:00 AM	3	1	1	4
9:15 AM	3	4	2	5
TOTAL	17	31	14	22

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
7:30 AM	0	0	0	0
7:45 AM	0	1	0	0
8:00 AM	0	0	0	0
8:15 AM	0	0	0	0
8:30 AM	0	0	0	0
8:45 AM	0	0	0	0
9:00 AM	0	0	0	0
9:15 AM	0	0	0	1
TOTAL	0	1	0	1

North Leg

West Leg

East Leg

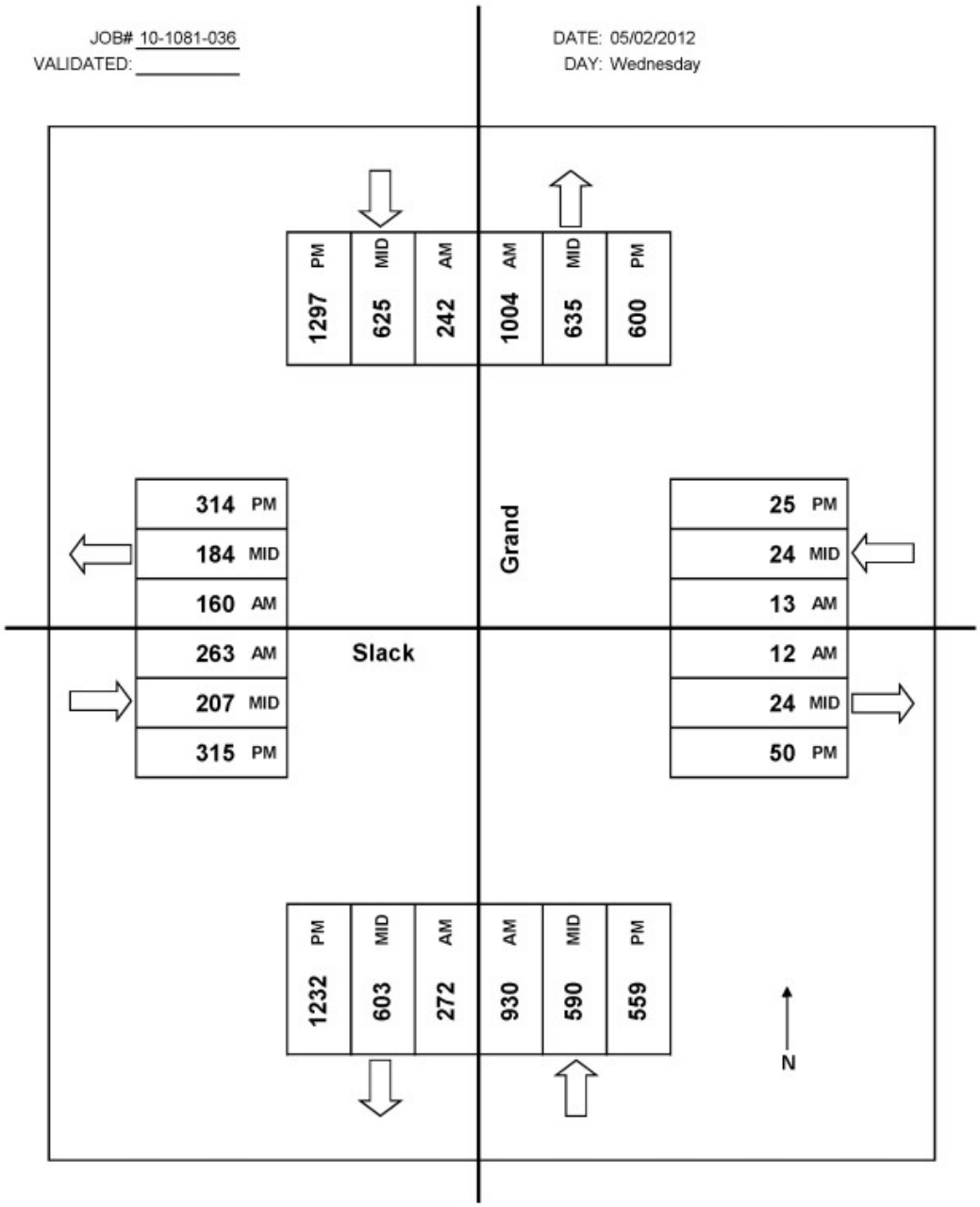
South Leg

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
11:30 AM	7	1	3	1
11:45 AM	1	3	3	1
12:00 PM	2	8	0	8
12:15 PM	0	1	1	6
12:30 PM	5	1	2	3
12:45 PM	3	0	2	1
1:00 PM	1	3	2	3
1:15 PM	0	0	1	2
TOTAL	19	19	14	25

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
11:30 AM	0	1	0	0
11:45 AM	0	0	0	1
12:00 PM	0	0	1	0
12:15 PM	0	0	0	0
12:30 PM	0	0	0	0
12:45 PM	0	0	0	0
1:00 PM	1	0	0	0
1:15 PM	0	0	0	0
TOTAL	1	1	1	1

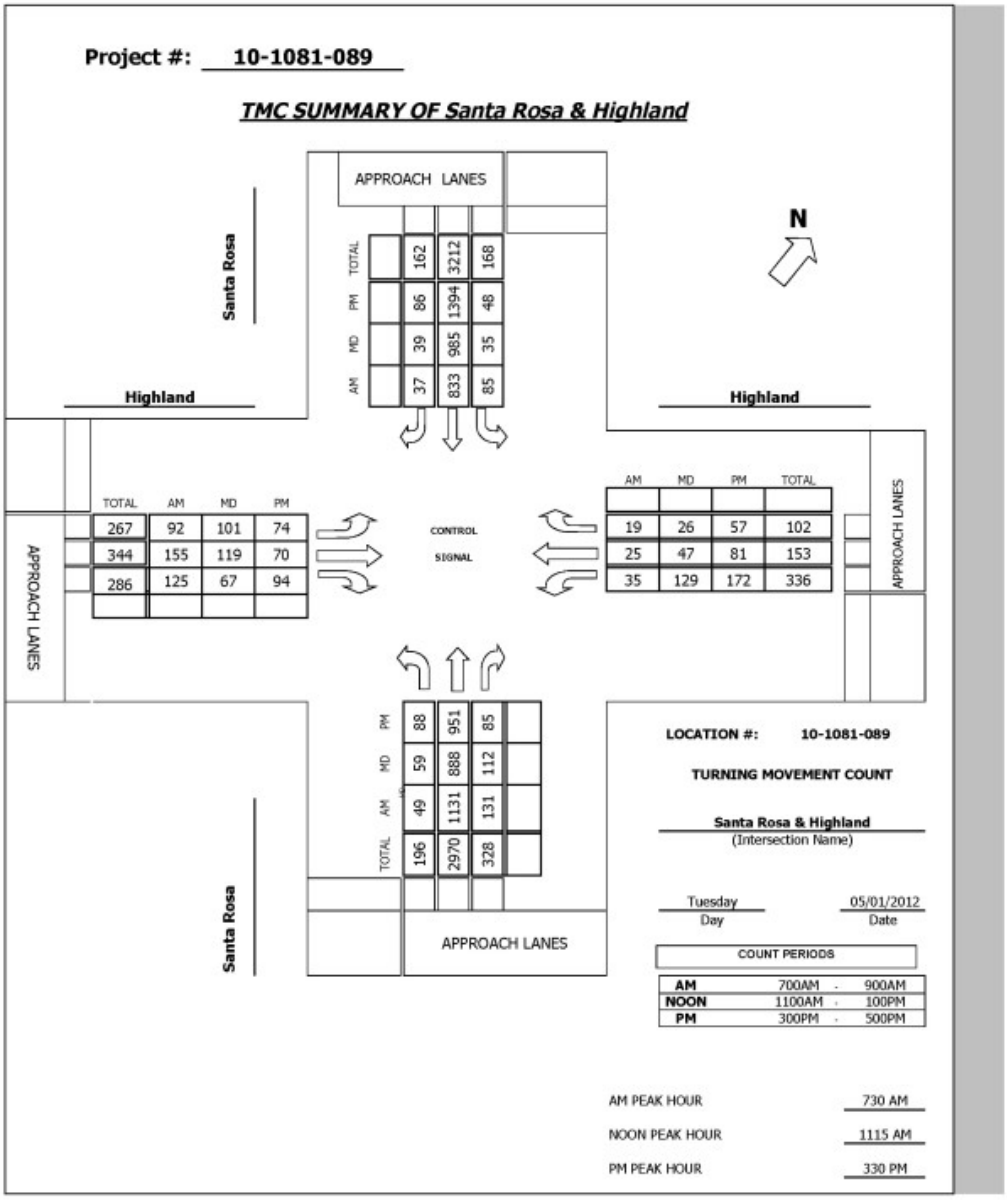
	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
4:00 PM	6	3	3	1
4:15 PM	0	9	2	5
4:30 PM	0	2	4	2
4:45 PM	2	2	1	3
5:00 PM	5	7	3	5
5:15 PM	1	3	2	3
5:30 PM	4	2	7	4
5:45 PM	5	7	5	7
TOTAL	23	35	27	30

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
4:00 PM	0	0	0	0
4:15 PM	0	1	0	0
4:30 PM	0	0	0	0
4:45 PM	0	0	0	0
5:00 PM	0	0	0	0
5:15 PM	0	0	0	0
5:30 PM	0	1	0	0
5:45 PM	0	0	0	0
TOTAL	0	2	0	0


JOB# 10-1081-036
VALIDATED:
DATE: 05/02/2012
DAY: Wednesday
PM 1297
MID 625
AM 242
AM 1004
MID 635
PM 600
314 PM
184 MID
160 AM
263 AM
207 MID
315 PM
Grand
Slack
25 PM
24 MID
13 AM
12 AM
24 MID
50 PM
PM 1232
MID 603
AM 272
AM 930
MID 590
PM 559
N

Intersection Turning Movement
Prepared by:
FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Attachment 9



Intersection Turning Movement
Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Santa Rosa	DATE:	05/01/2012	LOCATION:	San Luis Obispo
E-W STREET:	Highland	DAY:	Tuesday	PROJECT#	10-1081-089

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	1	1	2	1	1.5	1	0.5	1.5	0.5	1	
6:00 AM													
6:15 AM													
6:30 AM													
6:45 AM													
7:00 AM	20	294	28	14	188	16	22	31	24	9	9	9	664
7:15 AM	7	216	13	10	182	6	20	28	48	10	3	7	550
7:30 AM	9	354	25	24	245	9	23	32	37	10	4	2	774
7:45 AM	8	260	61	37	221	9	25	68	17	7	6	2	721
8:00 AM	20	293	26	13	181	14	22	28	24	8	10	9	648
8:15 AM	12	224	19	11	186	5	22	27	47	10	5	6	574
8:30 AM	8	291	36	17	184	3	33	37	20	7	4	6	646
8:45 AM	18	244	47	17	200	9	26	60	24	14	7	6	672
9:00 AM													
9:15 AM													
9:30 AM													
9:45 AM													
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM													
11:15 AM													
11:30 AM													
11:45 AM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	102	2176	255	143	1587	71	193	311	241	75	48	47	5249
Approach %	4.03	85.91	10.07	7.94	88.12	3.94	25.91	41.74	32.35	44.12	28.24	27.65	
App/Depart	2533	/	2416	1801	/	1903	745	/	709	170	/	221	

AM Peak Hr Begins at: 730 AM

PEAK													
Volumes	49	1131	131	85	833	37	92	155	125	35	25	19	2717
Approach %	3.74	86.27	9.99	8.90	87.23	3.87	24.73	41.67	33.60	44.30	31.65	24.05	
PEAK HR. FACTOR:		0.845			0.859			0.845			0.731		0.878

CONTROL: Signal
COMMENT 1:
COMMENT 2:

Intersection Turning Movement

Prepared by:

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Santa Rosa	DATE:	05/01/2012	LOCATION:	San Luis Obispo
E-W STREET:	Highland	DAY:	Tuesday	PROJECT#	10-1081-089

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	1	1	2	1	1.5	1	0.5	1.5	0.5	1	
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM	15	202	8	5	191	2	16	15	13	65	21	17	570
11:15 AM	7	207	25	7	285	7	18	12	7	30	12	8	625
11:30 AM	14	237	30	14	232	11	25	36	13	21	8	4	645
11:45 AM	21	228	38	10	251	13	31	57	25	22	11	8	715
12:00 PM	17	216	19	4	217	8	27	14	22	56	16	6	622
12:15 PM	8	187	17	2	245	6	9	9	16	26	17	8	550
12:30 PM	13	167	18	3	207	6	15	11	22	18	7	6	493
12:45 PM	16	202	17	5	220	7	14	19	13	21	5	3	542
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM													
3:15 PM													
3:30 PM													
3:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	111	1646	172	50	1848	60	155	173	131	259	97	60	4762
Approach %	5.75	85.33	8.92	2.55	94.38	3.06	33.77	37.69	28.54	62.26	23.32	14.42	
App/Depart	1929	/	1861	1958	/	2238	459	/	395	416	/	268	

NOON Peak Hr Begins at: 1115 AM

PEAK													
Volumes	59	888	112	35	985	39	101	119	67	129	47	26	2607
Approach %	5.57	83.85	10.58	3.31	93.01	3.68	35.19	41.46	23.34	63.86	23.27	12.87	
PEAK HR. FACTOR:		0.922			0.885			0.635			0.647		0.912

CONTROL: Signal
COMMENT 1: 0
COMMENT 2: 0

HOURS:

	FROM:		TO:	
AM	700	AM	900	AM
NOON	1100	AM	100	PM
PM	300	PM	500	PM

Intersection Turning Movement

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

N-S STREET:	Santa Rosa	DATE:	05/01/2012	LOCATION:	San Luis Obispo
E-W STREET:	Highland	DAY:	Tuesday	PROJECT#	10-1081-089

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	1	2	1	1	2	1	1.5	1	0.5	1.5	0.5	1	
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM	9	200	28	5	339	12	14	15	11	48	29	6	716
3:15 PM	29	163	10	3	306	13	14	10	14	24	11	9	606
3:30 PM	17	255	23	13	345	12	23	19	30	33	17	14	801
3:45 PM	30	230	33	9	334	18	21	27	29	35	15	10	791
4:00 PM	23	252	17	12	360	30	11	12	14	66	25	18	840
4:15 PM	18	214	12	14	355	26	19	12	21	38	24	15	768
4:30 PM	25	220	22	10	305	7	21	14	28	31	15	17	715
4:45 PM	22	201	15	3	261	7	16	9	23	41	13	12	623
5:00 PM													
5:15 PM													
5:30 PM													
5:45 PM													
6:00 PM													
6:15 PM													
6:30 PM													
6:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
Volumes	173	1735	160	69	2605	125	139	118	170	316	149	101	5860
Approach %	8.37	83.90	7.74	2.47	93.07	4.47	32.55	27.63	39.81	55.83	26.33	17.84	
App/Depart	2068	/	1975	2799	/	3091	427	/	347	566	/	447	

PM Peak Hr Begins at: 330 PM

PEAK													
Volumes	88	951	85	48	1394	86	74	70	94	172	81	57	3200
Approach %	7.83	84.61	7.56	3.14	91.23	5.63	31.09	29.41	39.50	55.48	26.13	18.39	
PEAK HR. FACTOR:		0.953			0.950			0.773			0.711		0.952

CONTROL:	Signal
COMMENT 1:	0
COMMENT 2:	0

FIELD DATA SERVICES OF ARIZONA, INC.
520.316.6745

Pedestrian & Bicycle Study

N-S STREET: Santa Rosa
E-W STREET: Highland

Date: 05/01/2012
Day: Tuesday

City: San Luis Obispo
Project #: 10-1081-089

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
7:00 AM	0	3	0	0
7:15 AM	0	6	0	4
7:30 AM	0	11	0	2
7:45 AM	0	12	0	0
8:00 AM	0	4	0	0
8:15 AM	0	7	0	2
8:30 AM	0	13	0	1
8:45 AM	0	4	0	0
TOTAL	0	60	0	9

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
7:00 AM	0	0	0	0
7:15 AM	0	0	0	0
7:30 AM	0	0	0	0
7:45 AM	0	0	0	0
8:00 AM	0	0	0	0
8:15 AM	0	0	0	0
8:30 AM	0	0	0	0
8:45 AM	0	0	0	0
TOTAL	0	0	0	0

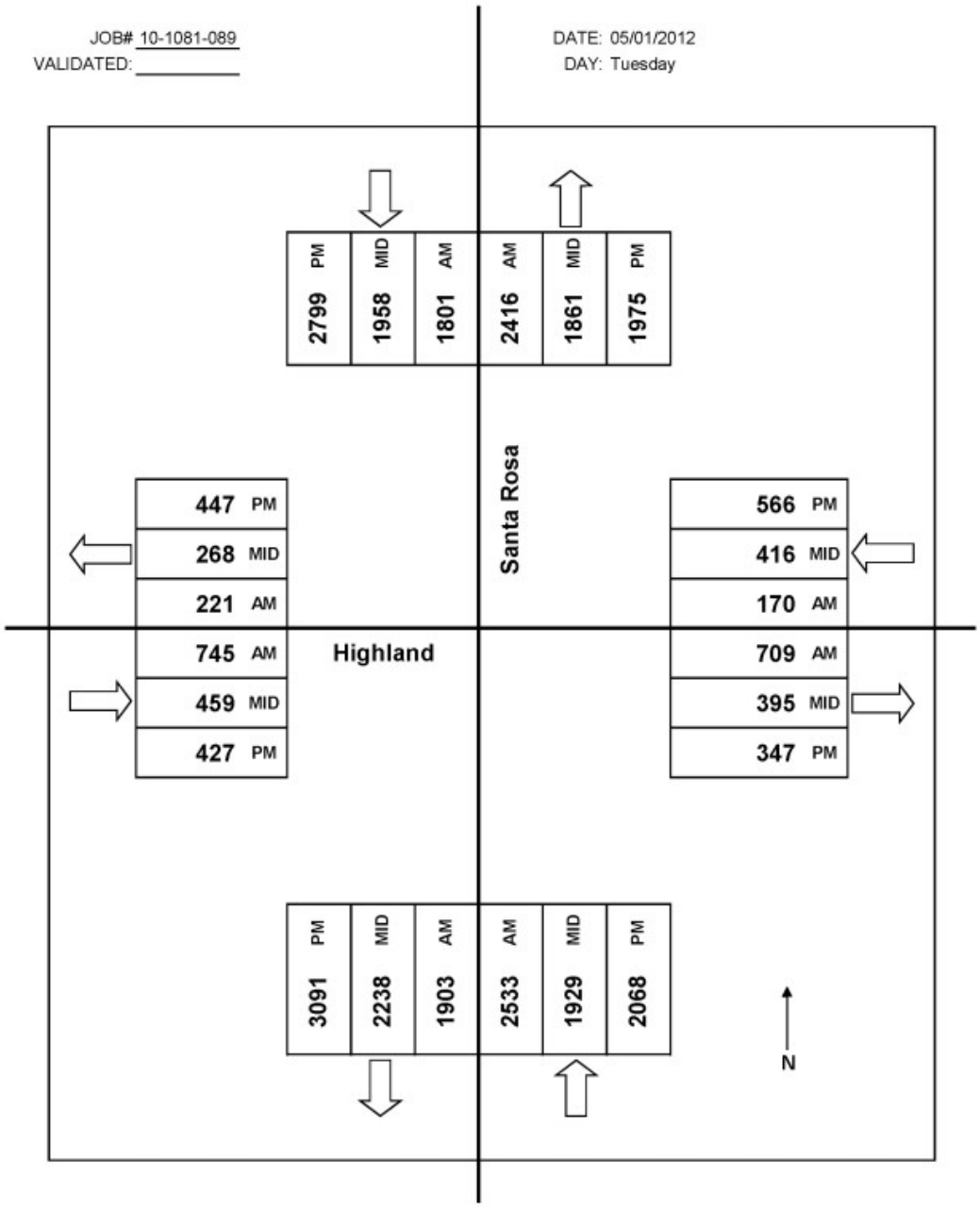
North Leg
West Leg
East Leg
South Leg

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
11:00 AM	0	9	0	0
11:15 AM	0	9	0	2
11:30 AM	0	6	0	0
11:45 AM	0	9	1	0
12:00 PM	0	4	0	0
12:15 PM	0	6	0	0
12:30 PM	0	4	0	2
12:45 PM	0	4	0	1
TOTAL	0	50	1	5

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
11:00 AM	0	0	0	0
11:15 AM	0	0	0	0
11:30 AM	0	0	0	0
11:45 AM	0	0	0	0
12:00 PM	0	0	0	0
12:15 PM	0	0	0	0
12:30 PM	0	0	0	0
12:45 PM	0	0	1	0
TOTAL	0	0	1	0

	PEDESTRIANS			
	N-LEG	S-LEG	E-LEG	W-LEG
3:00 PM	0	4	0	0
3:15 PM	0	4	0	2
3:30 PM	0	9	0	2
3:45 PM	0	11	0	2
4:00 PM	0	10	0	0
4:15 PM	0	8	0	0
4:30 PM	0	6	0	0
4:45 PM	0	7	0	0
TOTAL	0	59	0	6

	BICYCLES			
	N-LEG	S-LEG	E-LEG	W-LEG
3:00 PM	0	0	0	0
3:15 PM	0	1	0	1
3:30 PM	0	0	0	0
3:45 PM	0	2	0	1
4:00 PM	0	3	0	0
4:15 PM	0	1	0	0
4:30 PM	0	0	0	0
4:45 PM	0	0	0	0
TOTAL	0	7	0	2


JOB# 10-1081-089
VALIDATED:
DATE: 05/01/2012
DAY: Tuesday
PM 2799
MID 1958
AM 1801
AM 2416
MID 1861
PM 1975
Santa Rosa
447 PM
268 MID
221 AM
566 PM
416 MID
170 AM
745 AM
459 MID
427 PM
Highland
709 AM
395 MID
347 PM
PM 3091
MID 2238
AM 1903
AM 2533
MID 1929
PM 2068
N

Attachment 10

National Survey of Bicyclist and Pedestrian Attitudes and Behavior

VOLUME I
SUMMARY REPORT

Final Report

NHTSA
www.nhtsa.gov

Technical Report Documentation Page

1. Report No. DOT HS 810 971	2. Government Accession No.	3. Recipient's Catalog No.
4. Title and Subtitle Volume I: Summary Report National Survey of Bicyclist and Pedestrian Attitudes and Behavior		5. Report Date August 2008 6. Performing Organization Code
7. Author(s) Dawn Royal, Darby Miller-Steiger		8. Performing Organization Report No.
9. Performing Organization Name and Address The Gallup Organization 901 F Street NW. Suite 400 Washington, DC 20004 202-715-3030		10. Work Unit No. (TRAIS) 11. Contract or Grant No. DTNH22-01-F-05139
12. Sponsoring Agency Name and Address U.S. Department of Transportation National Highway Traffic Safety Administration (NHTSA) Office of Behavioral Safety Research 1200 New Jersey Avenue SE. Washington, DC 20590		13. Type of Report and Period Covered Final Report 14. Sponsoring Agency Code
15. Supplementary Notes Marvin M. Levy, Ph.D., was the Contracting Officer's Technical Representative		

16. Abstract

This report presents findings from the National Survey of Bicyclist and Pedestrian Attitudes and Behavior, jointly sponsored by the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and the Bureau of Transportation Statistics (BTS) and administered by The Gallup Organization. The goals of the survey were to ascertain the scope and magnitude of bicycle and pedestrian activity and the public's behavior and attitudes regarding bicycling and walking.

This report, Volume I: *Summary Report,* provides a top line summary of key data results regarding the behaviors and attitudes on various topics related to walking and bicycling including reported frequency of walking and bicycling during the summer months, trip purpose and characteristics, perceptions of safety, safety practices, facilities available and community design. Volume II: *Findings Report* presents a detailed analysis on these topics. Volume III: *Methods Report* describes the methods used to conduct the interviews and analyze the data. It also contains a copy of the questionnaire. The data come from a survey conducted among a representative sample of 9,616 U.S. residents age 16 and older during the Summer of 2002.

The survey findings show that slightly less than half (46%) of those 16 and older have regular access to a bicycle, with access increasing with increases in household income. About 43 percent ride a bicycle at least once in the summer months, making an estimated 2.484 billion trips during the summer of 2002. Bicycling declines with age, with those under 20 most likely to bicycle and doing so more frequently, while the majority over 45 did not bicycle during the summer months. The majority of bicycling trips were for recreation or for exercise, while just one in 5 trips were made to conduct errands (14%) or for commuting to work or school (5%). About half of all trips (48%) were made on paved roads. An additional 13 percent were on shoulders of paved roads, and 5 percent on bike lanes on roads. One in 7 was made on sidewalks (14%) or bike trails/paths (13%). Only half (50%) of bicyclists say bike paths are available in the area they ride, while 32 percent say bike lanes are available. However, over half of those who do not use available bicycle paths or lanes say they don't use them because they are not convenient, available, or go where they need to go. More than one in 10 bicyclists (13%) felt threatened for their personal safety on the most recent day they rode their bicycle in the past 30 days in the summer of 2002, with 88 percent of these feeling threatened by motorists. One in 5 bicyclists rode in the dark or near-dark for at least part of their trip, with 63 percent of these saying they took actions to make themselves more visible to motorists. About 4 percent of bicyclists or 2.04 million, were injured while riding in the past two years. About .5 million of these were hit by a motorist. Half (50%) of bicyclists wear a helmet for at least some trips, with 35 percent using them for all or most trips. Nine of 10 support helmet laws for children, while 62 percent support such laws for adults. Nearly half (48%) of those 16 and older are satisfied with how their local community is designed for making bicycle riding safer. About as many (47%) would like to see changes including more bike lanes (38%) and bike paths (30%).

About 86 percent of people 16 or older walked, jogged or ran outdoors for 5 minutes or more during the summer months, with 78 percent doing so within the past 30 days. Walking in the past 30 days decreases to just 66 percent for those over 64. An estimated 13.33 billion walking trips were made in the summer months of 2002, with 74 percent of all trips being made by frequent walkers. Personal errands (38%), exercise (28%) and recreation (21%) are the most common reasons for trips. Nearly half (45%) of the trips were mostly made on sidewalks, and 25 percent were mostly on paved roads. Just 6 percent were made mostly on bike or walk paths or trails. About 6 percent of pedestrians felt their personal safety threatened on their most recent trip, with 62 percent saying they felt threatened by motorists. Almost three-quarters of people 16 and older (73%) are satisfied with how their local community is designed for walking, though one-third would like to see changes including more sidewalks (42%) and more lights (17%).

17. Key Words	18. Distribution Statement
Attitudes, Survey, Pedestrians, Walking, Bicycling, Bicyclists, Bicycling Safety	This document is available to the public through the National Technical Information Service, Springfield, VA 22160 and free of charge on the NHTSA website at www.nhtsa.dot.gov.

19. Security Classif. (of this report)	20. Security Classif. (of this page)	21. No. of Pages 29	22. Price

Form DOT F 1700.7 (8-72) **Reproduction of completed page authorized**

Contents

List of Figures

Introduction

Background and Objectives

This report presents findings from the National Survey of Pedestrian and Bicyclist Attitudes and Behaviors, jointly sponsored by the U.S. Department of Transportation's National Highway Traffic Safety Administration and the Bureau of Transportation Statistics (BTS), and administered by The Gallup Organization. The goals of the survey were to ascertain the scope and magnitude of bicycle and pedestrian activity and the public's behavior and attitudes regarding bicycling and walking. This national survey is the first of its kind designed specifically to benchmark bicycle and pedestrian trips, behaviors, and attitudes.

Telephone interviews were conducted with a nationally representative sample of 9,616 respondents 16 or older in the United States between June 11 and August 20, 2002. These results were then weighted to reflect the national population of 208 million non-institutionalized people 16 or older residing in the United States.

Survey respondents were asked to provide information about their overall bicycling and walking behaviors during the previous 30 days to provide for the best recall of actual behavior. While each respondent was asked to respond for the 30-day period prior to the interview date, the cumulative responses in this report represent an average 30-day period from May 11 through August 20, 2002. The survey focused on individual trips taken on the most recent day they bicycled or walked within that past 30 day period. Specific trip data (including trip origin and destination, purpose, time, distance, etc.) were collected for up to six walking and six bicycling trips on the most recent day traveled. These data cannot be used to project year-round bicycling and walking behaviors, but offer a solid reflection of biking and walking activity in the summer months.

The findings of this study are presented in two parts. The first section examines the results regarding bicycling attitudes and behaviors. The second section examines results regarding pedestrian attitudes and behaviors. The report is not intended to provide in-depth analyses of any one topic, but rather to give the reader a general overview of the data.

For purposes of this study, the following definitions are used throughout the report.

Bicyclists: People who reported riding bicycles at least once in the past 30 days in the summer months of 2002.

Pedestrians: People who reported walking, running, or jogging outdoors for at least five minutes at least once in the past 30 days in the summer months of 2002.

Trip: A trip is defined as going from a starting point to a destination for a specific purpose without any stops along the way.

Summer: Summer months are May through August.

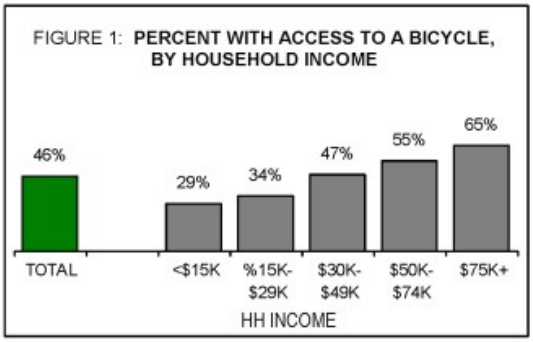
Geographical Areas: The respondents' geographical area of residence and travel was categorized into 1 of 3 urbanicity areas based on U.S. Census Bureau classifications: suburban, urban, and rural.

Key Findings: Bicyclist Attitudes and Behaviors

Access to and Use of Bicycle in Summer Months

Nearly half of people 16 or older (46%) had bicycles available for their use on a regular basis. Those under 21 were the most likely to have access (62%), while less than one-quarter (23%) of those 65 or older reported access.

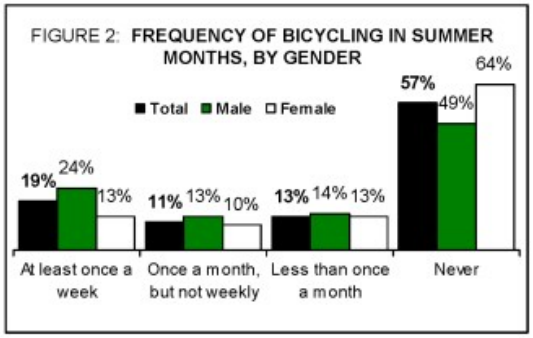
Access to a bicycle rises along with household income. Just 29 percent of those with household incomes under $15,000 reported regular access, increasing to nearly half (47%) of those with incomes of $30,000 to $49,000, and two-thirds (65%) of those with household incomes of $75,000 or more.



Q1: Do you have a bicycle available for your use on a regular basis? [Base: Total Population; n=9,616]

Nearly 6 in 10 (57%) people 16 or older reported that they never use bicycles during the summer months (18% of these nonusers have access to a bicycle, and 82% do not). About one in seven (13%) said they use a bicycle less than once a month, while 1 in 10 (11%) rode at least once a month, but not weekly, and 19 percent rode a bicycle at least weekly during the summer months.

While males are only somewhat more likely to have access to a bicycle than females (51% versus 42%), they are nearly twice as likely as females (24% versus 13%) to say they ride their bicycle at least once a week in the summer months.

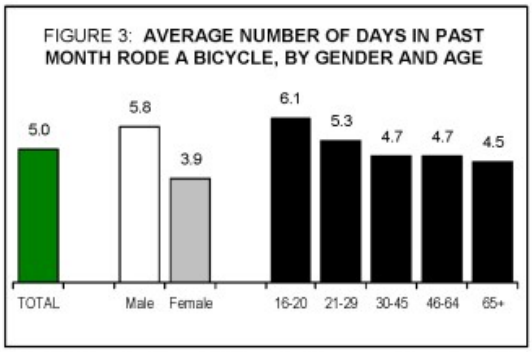


Q2: On average, during the summer months, how often do you use a bicycle? [Base: Total population; n=9,616; Male=3,936; Female=5,680]

2

People 16 and older who bicycled at all in the summer months rode bicycles on an average of 5.0 days during the past 30 days in the summer months. Males rode an average of 5.8 days, compared to 3.9 days for females. People 16 to 20 rode bicycles more often (6.1 days) in the past 30 days than did those of older age groups.

FIGURE 3: **AVERAGE NUMBER OF DAYS IN PAST MONTH RODE A BICYCLE, BY GENDER AND AGE**

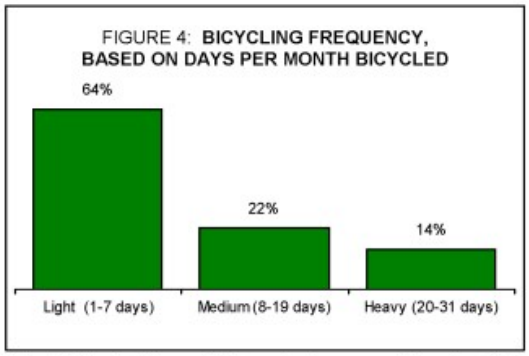


Q2c: Thinking about the past 30 days, about how many of those days did you ride a bicycle? [Base: Total who bicycle in the summer]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Total who bicycle in the summer	4028	1979	2049	435	628	1684	1053	214

Bicycle riders were categorized into heavy (riding 20 or more days per month), medium (riding 8 to 19 days per month) and light (riding 1 to 7 days per month) riders. Using this classification, the majority were light-frequency bicyclists (64%), 22 percent were medium-frequency bicyclists, and 14 percent were heavy-frequency bicyclists during the preceding 30 days.

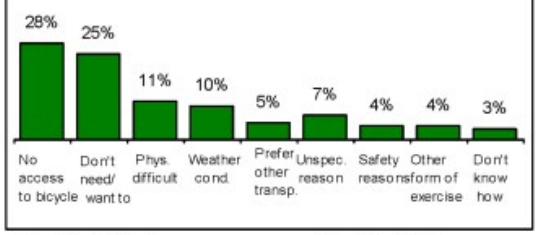
FIGURE 4: **BICYCLING FREQUENCY, BASED ON DAYS PER MONTH BICYCLED**



Q2c: Thinking about the past 30 days, about how many of those days did you ride a bicycle? [Base: Total who bicycle in the summer; n=4,028]

Nearly three-fourths of those 16 or older (72%) never rode a bicycle or had not done so during the past 30 days in the summer of 2002. This represents approximately 151 million people who did not bicycle. Reasons for not bicycling include lack of access to a bicycle (28%) and lack of need or desire to ride a bicycle (25%). Physical difficulty (11%) or weather conditions (10%) were each mentioned by 1 in 10. Bicyclists 65 and older were most likely to cite physical difficulty (21%) as their primary reason for not bicycling recently.

FIGURE 5: **REASONS FOR NOT BICYCLING IN THE SUMMER OR FOR NOT RIDING A BICYCLE MORE RECENTLY**

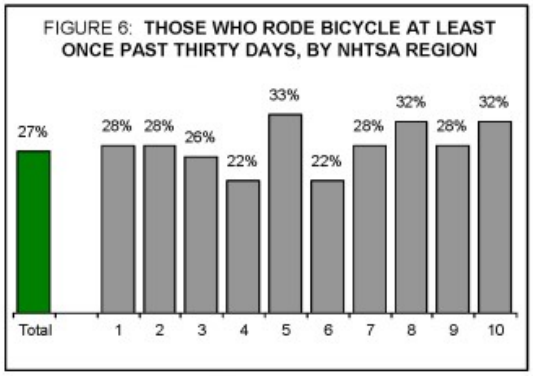


Q2e: What is the primary reason you never ride a bicycle in the summer/have not ridden a bicycle more recently? [Base: Never bicycle in summer months or have not bicycled in past 30 days; n=7,015]

Considering riding activity in the previous 30 days, about one quarter of people 16 and older (27%) reported bicycling at least once.

Males were more likely to be bicyclists than females (34% versus 21%), and those under 20 were much more likely than older adults to bicycle (42% of 16 to 20 versus 8% of 64+). The proportion of those 16 and older who rode at least once in the past 30 days ranged from highs of about one-third in the Midwest (NHTSA Region 5), Mountain States (NHTSA Region 8) and Pacific Northwest (NHTSA Region 10), to lows of 22 percent in the Southeast (NHTSA Region 4) and Mid Southwest (NHTSA Region 6).

FIGURE 6: **THOSE WHO RODE BICYCLE AT LEAST ONCE PAST THIRTY DAYS, BY NHTSA REGION**



Q2c: Thinking about the past 30 days, about how many of those days did you ride a bicycle? [Base: Total population; n=9,616]

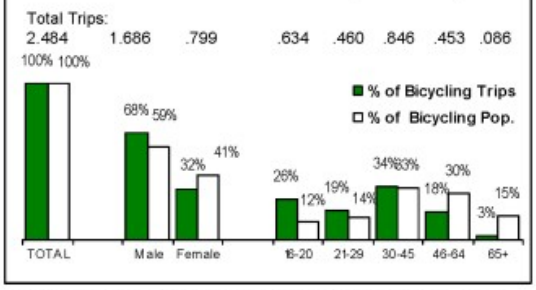
	NHTSA Region									
	1	2	3	4	5	6	7	8	9	10
Total Population	507	843	1027	1754	1681	1149	498	358	1316	483

4

During the summer months of 2002, a projected 2.484 billion bicycling trips were made by people 16 and older. Male bicyclists make a disproportionately high percentage of bicycle trips (given their size in the population) as compared to females. Bicyclists under 21 also make up more than their fair share of bicycle trips (making 26% of trips while they account for just 12% of the total bicycling population).

Light-frequency bicyclists (fewer than 7 days/month) account for the majority (59%) of all bicycling trips, while heavy cyclists (20+ days/month) account for just 19 percent of all trips.

FIGURE 7: **TOTAL NUMBER OF BICYCLING TRIPS, BY TOTAL, GENDER AND AGE (IN BILLIONS)**



Q5: How many trips did you make on this most recent day you rode your bicycle? [Base: Rode bicycle past 30 days]

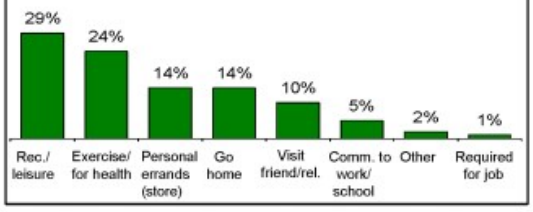
	Total	Male	Female	16-20	21-29	30-45	46-64	65+	Heavy	Medium	Light
Rode bicycle in past 30 days	2525	1325	1200	290	398	1079	626	121	324	549	1642

Origin-Destination Information for Bicycling

Nearly 9 in 10 (89%) trips began at a residence either belonging to the bicyclist or someone else. An additional 7 percent of trips began at a leisure or recreational site such as a park. Just 1 percent began at work, and 3 percent began in some other location.

The most common purposes of trips were for recreation or leisure (29%) and for exercise or health reasons (24%). Fewer trips were made to run personal errands (14%), to go home (14%), and to visit a friend or relative (10%). Just 5 percent said they used their bicycles for commuting to work or school.

FIGURE 8:
PURPOSE OF BICYCLING TRIPS



Q9,a 25a: What was the main purpose for this trip? [Base: Data for all trips; n=3,903]

Characteristics of Bicycling Trips

Nearly 2 of 5 trips (39%) on the most recent day of bicycling were reported to be 1 mile or less. Just 1 in 5 trips (19%) was reported as more than 5 miles (7% were deemed 10 or more miles).

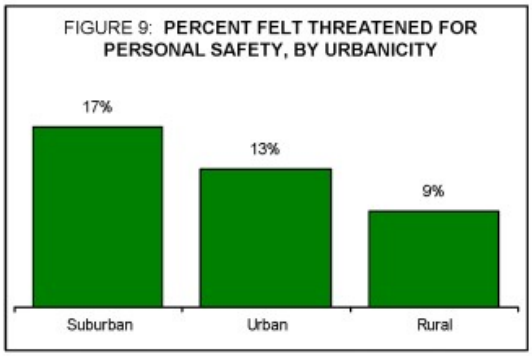
Nearly half (48%) of bicyclists' trips were ridden mainly on paved roads, not on shoulders (48%). Other facilities used for bicycling trips included sidewalks (14%), bicycle paths, walking paths or trails (13%), shoulders of paved roads (13%), unpaved roads (5%), and bicycle lanes on roads (5%).

The bicycle was a preferred mode of transportation even when other modes of transportation were available. Among those who reported bicycling trips that were not just for recreational purposes, nearly 9 in 10 (86%) reported that other types of transportation were available to them that day that they could have used instead of their bicycles. Younger bicyclists (79%, 16 to 20), non-Hispanic Blacks (75%), and those with household incomes less than $15,000 (73%) were least likely to have alternate modes of transportation available. When alternative modes of transportation were available, the bicycle was chosen primarily for the exercise (41%), though others said they chose it because they enjoy biking or good weather (21%), bicycling is convenient (12%) or for recreation (10%).

Bicycling Safety

More than 1 in 10 bicyclists (13%) felt threatened for their personal safety on the most recent day they rode their bicycles in the previous 30 days in the summer of 2002. There were no statistically significant differences by age or gender. Bicyclists in suburban areas were more likely to feel threatened (17%) than those living in urban (13%) or rural (9%) areas. Non-Hispanic White bicyclists (12%) were less likely than those of other races to feel threatened while bicycling.

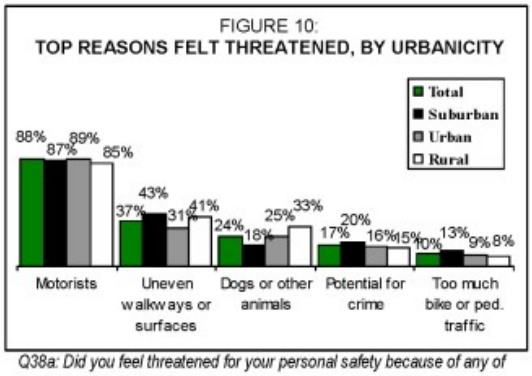
FIGURE 9: **PERCENT FELT THREATENED FOR PERSONAL SAFETY, BY URBANICITY**



Q38: Did you feel threatened for your personal safety at any time when you rode your bicycle that day? [Base: Rode bicycle past 30 days]

6

Overwhelmingly, bicyclists felt threatened while bicycling primarily due to motorists (88%). More than one-third of bicyclists (37%) also reported feeling threatened for their personal safety because of uneven walkways or roadways. One in 4 (24%) felt threatened by dogs or other animals, while 17 percent felt threatened by the potential for crime. Rural bicyclists were more likely to feel threatened by dogs or other animals (33%) than were other cyclists.

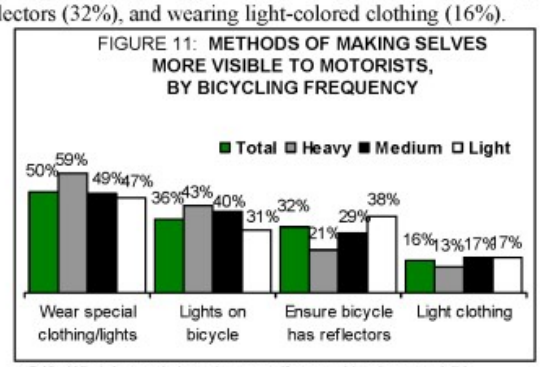


Q38a: Did you feel threatened for your personal safety because of any of the following...? [Base: Felt threatened for personal safety last time rode bicycle; n=351: Suburban=125; Urban=172; Rural=54]

Among those who reported they felt threatened by a motorist (11% of bicyclists), the top two actions seen as threatening were motorists driving too close to the bicyclist (40%), and motorists driving too fast (32%). Other reasons included the driver not seeing the bicyclist (16%), the presence of the motorist was threatening (11%), the motorist was rude (8%) and the motorist did not obey traffic laws (7%).

One in 5 (20%) bicyclists who rode in the past 30 days reported riding in the dark or near-dark for part of their rides on the last day they rode their bicycles. The proportion riding in the dark decreased with age.

Among those who spent at least some time riding in the dark or near-dark in the past year, more than 6 in 10 (63%) made efforts to make themselves more visible to motorists. The most frequently reported methods for making themselves more visible were wearing special clothing with reflectors or lights (50%), using a bicycle headlight or taillight (36%), making sure the bicycle has reflectors (32%), and wearing light-colored clothing (16%).



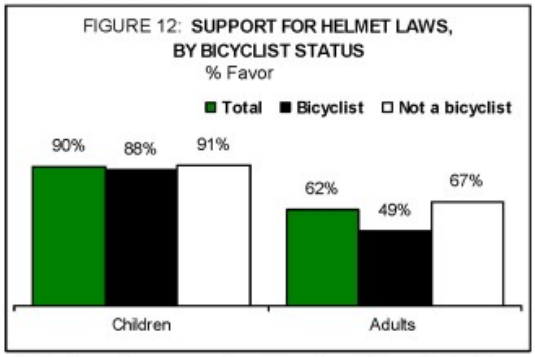
Q40: What do you do to make yourself or your bicycle more visible after dark? [Base: Do something when riding after dark to make self more visible; n=437; Heavy=110; Medium=113; Light=211]

Helmet Laws and Use

Overall, 1 in 4 people 16 and older (24%) expressed uncertainty over whether their State has a bicycle helmet law or not, while 18 percent did say their State does not have any such law. One in 3 (32%) say their State has a law that applies to both adults and children, while 25 percent say their law applies only to children.

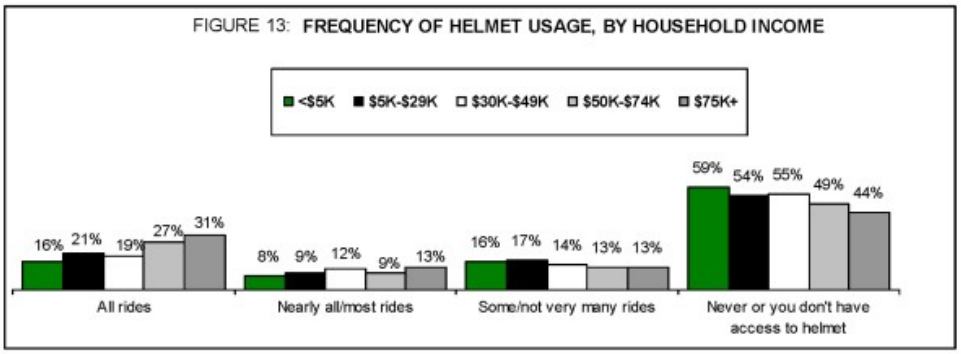
Those with children 5 to 15 living in the household were slightly more likely to say their State has a bicycle helmet law for children (28%) than were those without children 5 to 15 (24%).

Nine in 10 people 16 and older (90%) supported laws that require children to wear helmets whenever they are riding bicycles, but just 6 in 10 (62%) supported such a law for adults to always wear bicycle helmets. Bicyclists were similar to nonbicyclists in level of support for bicycle helmet laws for children (88% versus 91%) but less supportive of bicycle helmet laws than nonbicyclists (49% versus 67%).



Q50: Do you favor or oppose laws that require ...? [Base: Total Adults; Bicyclist n=2,510; Nonbicyclist=7,106]

Half (50%) of all bicyclists said they never wear helmets or did not have access to helmets. About one-third (35%) reported that they wear a helmet for all (24%) or nearly all/most (11%) of their rides. Riders under 30 are less likely than older riders to wear a helmet for all rides. Usage of helmets for all bicycle rides tended to increase as household income increased, as does access to helmets.



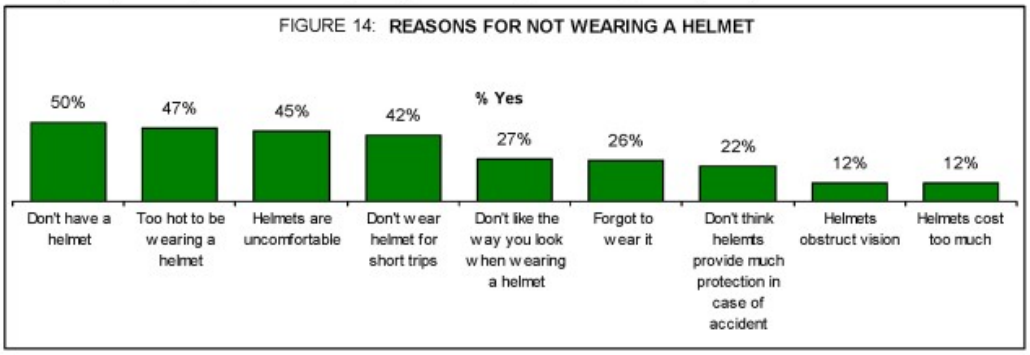
Q47: When riding a bicycle, do you wear a helmet for...? [Base: Rode bicycle past 30 days]

	<$15K	$15K-$29K	$30K-$49K	$50K-$74K	$75K+
Rode bicycle past 30 days	194	319	553	494	720

8

Bicyclists who do not wear a helmet were asked which of a list of potential reasons for not wearing a helmet applied to them. The top reasons for not wearing a helmet were that the bicyclist does not have one (50%), that it is too hot in the summer months to wear a helmet (47%), that helmets are uncomfortable (45%), and that they do not wear helmets for short bicycling trips (42%). Fewer agreed that their reason for not wearing a helmet was because they do not like the way they look in a helmet (27%), that they forgot to wear it (26%), that the helmet does not provide much protection (22%), that they obstruct vision (12%), and that they are too expensive (12%).

FIGURE 14: **REASONS FOR NOT WEARING A HELMET**



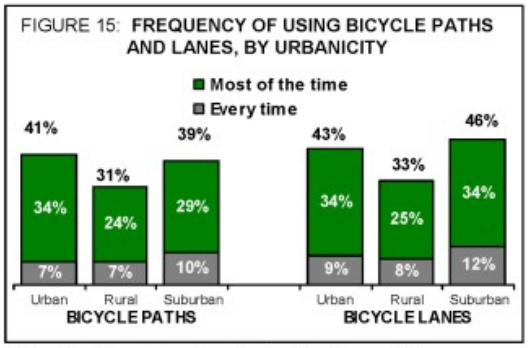
Q48: What are the reasons you don't always wear a bicycle helmet? Is it because…? [Base: Bicyclists who do not wear a helmet for all of their rides n=1,848]

Availability and Use of Bicycle Paths/Bicycle Lanes

Half of bicyclists reported that bicycle paths (paths away from the road on which bikes can travel) are available in the areas they rode (50%), while one-third reported that bicycle lanes (marked lanes on a public road reserved for bikes to travel) are available (32%). The frequency of using bicycle paths and bicycle lanes was very similar, with 73 percent using bicycle paths at least some of the time they rode (39% most or all of the time), and 75 percent reporting using bicycle lanes at least some of the time they rode (43% most or all of the time).

Urban bicyclists were more likely to use bicycle paths and bicycle lanes all or most of the time (41% and 43%) than were bicyclists living in rural areas (31% and 33%).

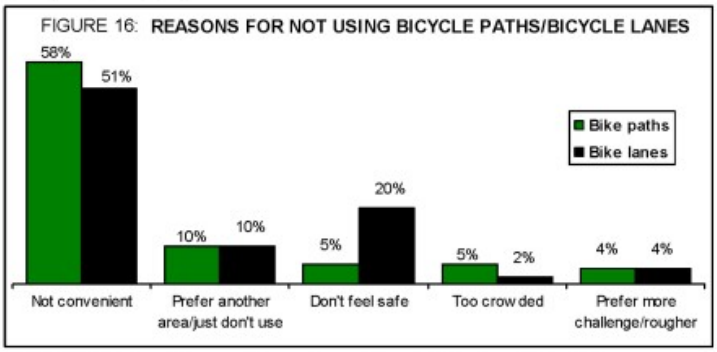
FIGURE 15: **FREQUENCY OF USING BICYCLE PATHS AND LANES, BY URBANICITY**



Q42a, 44a: Do you ride on bicycle paths/bicycle lanes…? [Base: Bicyclists who have bicycle paths available where ride. n=1,292; Urban=667; Rural=199;Suburban=426/ have bicycle lanes available n=833; Urban=402; Rural=109; Suburban=322]

The majority of nonusers said they do not use bicycle paths (58%) or bicycle lanes (51%) because of the lack of convenience, meaning they were either not available or did not go where the bicyclist wanted to go. Another frequent reason for not using bicycle lanes was that bicyclists did not feel safe using them (20%), but this is cited much less often as a reason for not using bicycle paths (5%).

FIGURE 16: **REASONS FOR NOT USING BICYCLE PATHS/BICYCLE LANES**

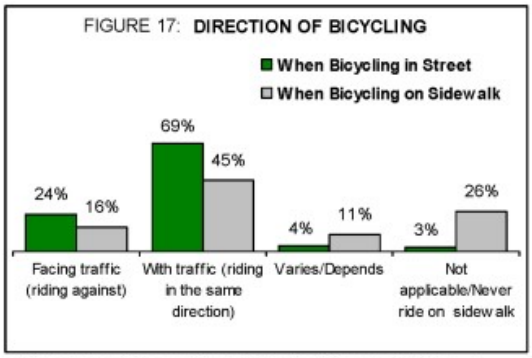


Q43, 45: What is the main reason that you choose not to use the bicycle paths/lanes? [Base: Never/hardly ever use bicycle paths/lanes – but are available; n=337; n=833]

Seven in 10 bicyclists (69%) reported that they typically ride *with* traffic when riding their bicycles in the street, that is, riding in the same direction as the cars. One in four (24%) said they typically ride *against* traffic.

Even when riding on the sidewalk, nearly half (45%) of bicyclists said they ride in the same direction as the cars on the adjacent street. Just 16 percent said they ride facing traffic while on a sidewalk.

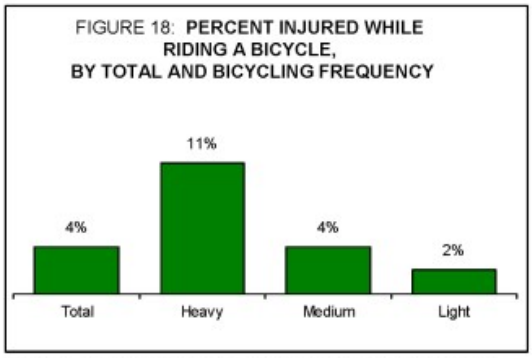
FIGURE 17: **DIRECTION OF BICYCLING**



Q46a: When riding your bicycle in the street do you typically ride…? [Base: Rode bicycle past 30 days; n=2,525]

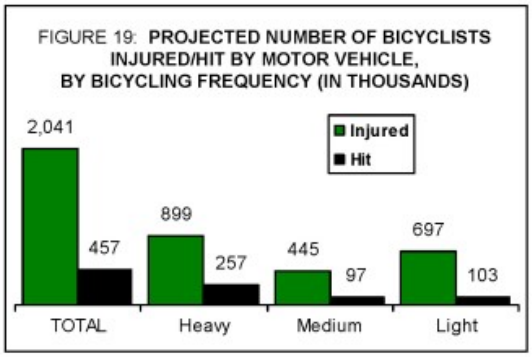
Bicycle-Related Injuries

Just 4 percent of bicyclists 16 and older have been injured in the past two years while riding a bicycle (10% of those 16 to 20). Heavy-frequency bicyclists (20+ days/month) were more likely to experience an injury while bicycling (11%) than were medium- (4%) or light-frequency (2%) bicyclists.



Q46c: In the past two years, were you ever injured while you were riding a bicycle? [Base: Rode bicycle past 30 days; n=2,525; Heavy=324; Medium=549; Light=1,642]

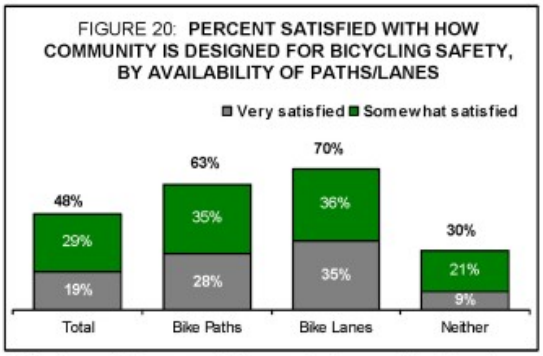
A projected 2 million bicyclists reported being injured while riding a bicycle in the past two years. An estimated 457,000 reported the injury was a result of being hit by motor vehicles. Heavy-frequency bicyclists accounted for nearly 900,000 injuries and 257,000 reported motor-vehicle-related injuries. Light-frequency bicyclists experienced nearly 700,000 injuries in the past two years, with just over 100,000 being hit by motor vehicles.



Q46c: In the past two years, were you ever injured while you were riding a bicycle? Only count injuries that required attention from a medical professional. Q46d: Was the injury a result of being hit by a motor vehicle?
[Base: Rode bicycle past 30 days; N=2,525; Heavy=324; Medium=549; Light=1,642]

Satisfaction with How Community is Designed for Bicycling

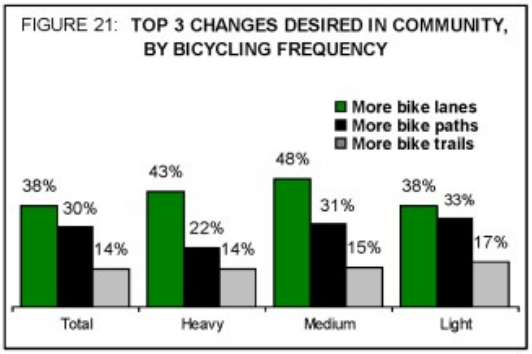
Almost half (48%) of those 16 and older were satisfied with how their communities are designed for bicycle safety. One in 5 (19%) was very satisfied. Bicyclists were more likely to be satisfied with their communities (57% very or somewhat satisfied) than were nonbicyclists (45%). Those who had access to bike lanes (70%) and bike paths (63%) were significantly more likely to be satisfied with their community than those who had neither available (30%).



Q48a: How satisfied are you with how your local community is designed for making bike riding safe? [Base total population n=9,575; Bike Paths=4,721; Bike Lanes=3,046; Neither=3,966]

Regardless of how satisfied they were with the way their communities are designed for bicycling safety, almost half of people 16 or older (47%) would like to see some changes made in their community for bicyclists. Those living in suburban areas were more likely (51%) than those in urban (47%) or rural (42%) areas to desire change.

The change most desired in the community among all cycling frequencies was to increase bicycling facilities such as more bicycle lanes (38%), more bicycle paths (30%), and more bicycle trails (14%).



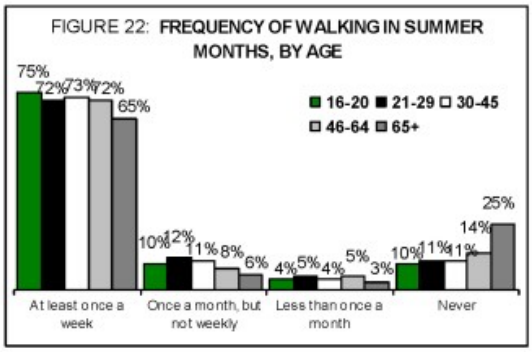
Q48c: What changes would you like to see made in your community? [Base: Desire changes in community for bicyclists]

Key Findings: Pedestrian Attitudes and Behaviors

Walking Behavior in Summer Months

Nearly 3 in 4 (72%) people 16 or older reported that they walked on average at least once a week during the summer months. Walking was defined as any outdoor walking, jogging, or running that lasts at least five minutes or more. About 1 in 10 (9%) said they walk less – at least once a month, but not weekly. Just 4 percent reported walking less than once a month, and 14 percent reported never walking in the summer months. Those 65 or older were more apt to report they never walk (25%) than were those of younger age groups.

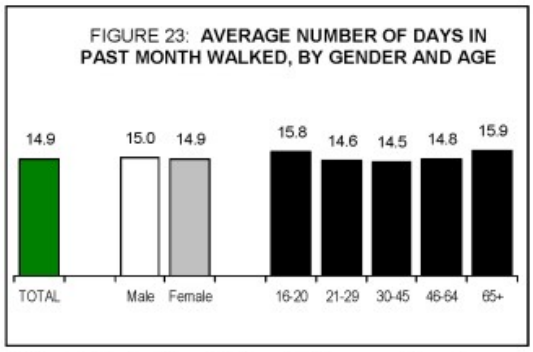
FIGURE 22: **FREQUENCY OF WALKING IN SUMMER MONTHS, BY AGE**



Q52: On average, during the summer months, how often do you walk?

People 16 and older who walked in the summer months walked on average 14.9 days during the previous 30-day period in the summer months. Those 16 to 20 (15.8) and 65 and older (15.9) walked more often in the past 30 days than did those in other age groups.

FIGURE 23: **AVERAGE NUMBER OF DAYS IN PAST MONTH WALKED, BY GENDER AND AGE**

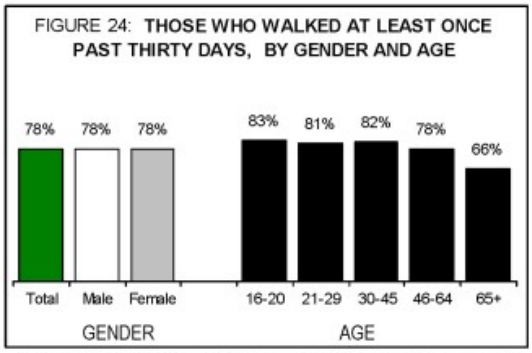


Q52c: Thinking about the past 30 days, about how many of those days did you walk? [Base: Total who walk in the summer]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Total who walk in the summer	8147	3309	4838	641	1152	2751	2472	1086

More than 3 in 4 people 16 and older (78%) reported walking at least once in the past 30 days in the summer months. There was no difference between males and females, nor between most age groups. The exception was the oldest age group, who were less likely to report walking in the 30 days preceding the interview (66%).

FIGURE 24: **THOSE WHO WALKED AT LEAST ONCE PAST THIRTY DAYS, BY GENDER AND AGE**

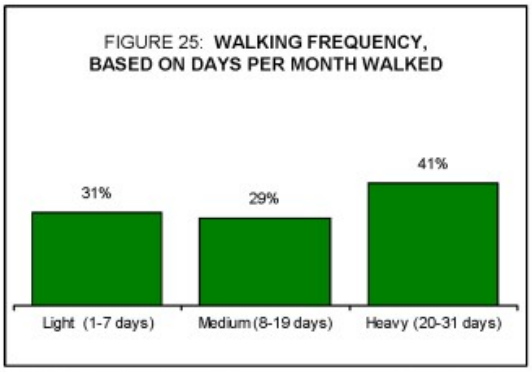


Q52c: Thinking about the past 30 days, about how many of those days did you walk? [Base: Total population]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Total Population	9616	3936	5680	724	1309	3132	2914	1479

Pedestrians were categorized into heavy (walking 20 or more days per month), medium (walking 8 to 19 days per month) and light (walking 1 to 7 days per month) walkers. About 3 in 10 pedestrians are light-frequency (31%), almost as many are medium-frequency pedestrians (29%), while 41 percent are heavy- frequency pedestrians.

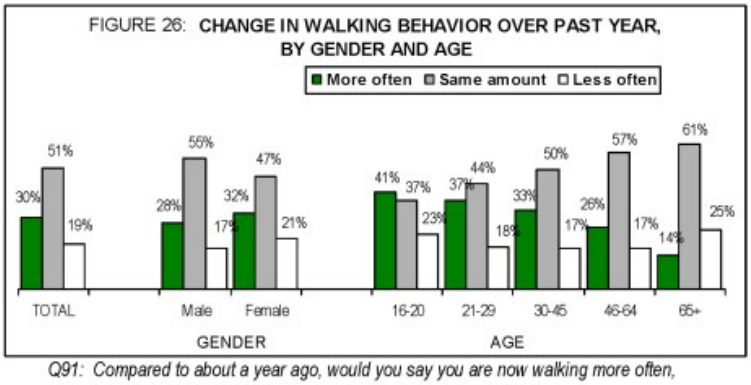
FIGURE 25: **WALKING FREQUENCY, BASED ON DAYS PER MONTH WALKED**



Q52c: Thinking about the past 30 days, about how many of those days did you walk? [Base: Total population; n=9,616]

Overall, the reported walking habits of pedestrians has increased slightly since a year ago. While about one half (51%) of all pedestrians reported no change in their walking behavior compared to a year ago, 3 in 10 (30%) reported walking more often, while 19 percent reported walking less often. Females (32%) were slightly more likely to report an increase in walking behavior from a year ago than were males (28%). The percentage of people reporting an increase in walking declined with age.

FIGURE 26: **CHANGE IN WALKING BEHAVIOR OVER PAST YEAR, BY GENDER AND AGE**



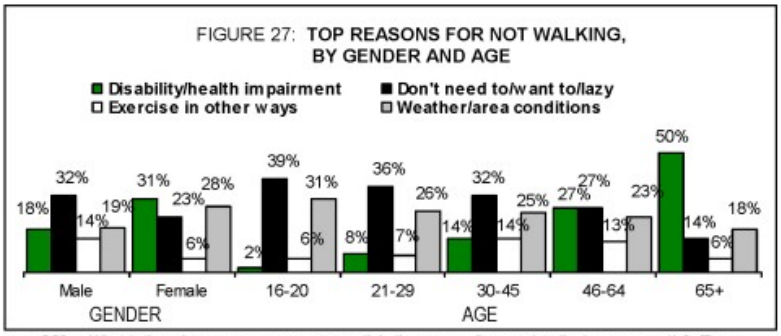
Q91: Compared to about a year ago, would you say you are now walking more often, less often or about the same amount? [Base: Walked past 30 days]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Walked past 30 days	7562	3072	4490	600	1075	2575	2290	982

One in 5 (20%) people 16 or older reported they never walk or had not done so during the past 30 days over the summer of 2002. This represents approximately 41 million people who did not walk. The top reasons given for not walking included lack of desire or need (27%), disabilities and other health impairments (25%), and weather conditions (23%).

Females were more likely to cite disability (31%) and weather conditions (28%) as a reason for not walking than were males (18% and 19% respectively). Males were more likely to report a lack of desire or need (32%) than females (23%). One-half (50%) of those 65 and older who did not walk reported the main reason was because of a disability.

FIGURE 27: **TOP REASONS FOR NOT WALKING, BY GENDER AND AGE**

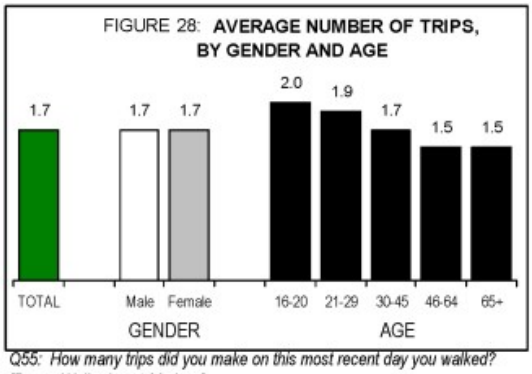


Q52e: What is the primary reason you never walk in the summer/have not walked more recently? [Base: Never walk in summer months or have not walked in past 30 days]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Never walk in summer months or have not walked in past 30 days	1875	792	1083	114	215	501	584	446

During the summer months of 2002, over half (57%) of those 16 and older who made walking trips took one trip on the last day they walked, while 29 percent took two trips, and the remainder took three or more trips (13%). This translates to an average of 1.7 trips per pedestrian on the last day they walked.

FIGURE 28: **AVERAGE NUMBER OF TRIPS, BY GENDER AND AGE**

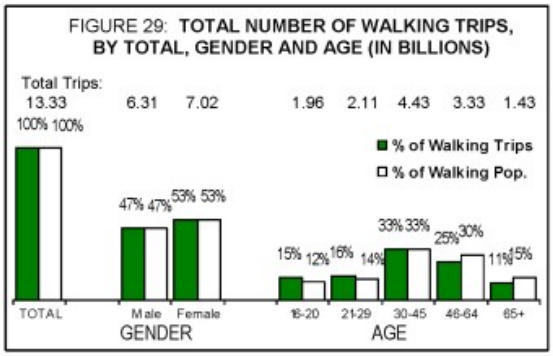


Q55: How many trips did you make on this most recent day you walked?
[Base: Walked past 30 days]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Walked past 30 days	7562	3072	4490	600	1075	2575	2290	982

In all, a projected 13.33 billion walking trips were made by people 16 and older in the summer of 2002. This reflects an estimated 6.31 billion trips made by male pedestrians and 7.02 billion trips made by female pedestrians. Younger walkers (those under 46) made a slightly larger proportion of trips than might be expected, though pedestrians over 45 account for 36 percent of all walking trips (and 45% of all pedestrians).

FIGURE 29: **TOTAL NUMBER OF WALKING TRIPS, BY TOTAL, GENDER AND AGE (IN BILLIONS)**

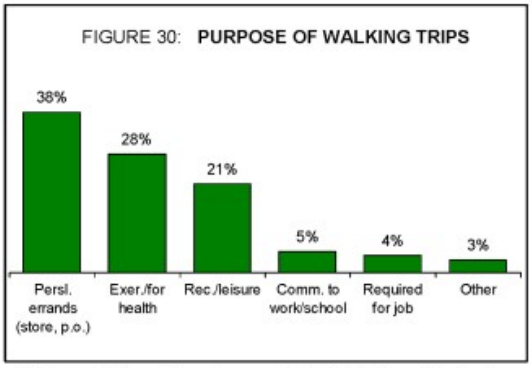


Q55: How many trips did you make on this most recent day you walked?
[Base: Walked past 30 days; n=7,562- see above for detail]

Origin-Destination Information for Walking Trips

Eight in 10 (80%) walking trips began at a residence either belonging to the pedestrian or someone else. An additional 8 percent of trips began at a leisure or recreational site such as a park. Just 5 percent began at work, 3 percent began at a transportation site, and 4 percent began in some other location.

The most common purpose of trips was for personal errands (38%). Additional trip purposes included exercise/for health reasons (28%) and for recreation or leisure (21%). Just 5 percent said they walked to commute to work or school, and 4 percent said that walking is required for their job.



Q59a 75a: What was the main purpose for this trip? [Base: Data for all trips; n=12,283]

Characteristics of Walking Trips

The average reported walking trip most recently taken during the summer was reported to be 1.3 miles in length. Half of trips (50%) were less than one mile, and an additional 13 percent were one mile in length. Just 7 percent of trips were more than five miles.

During the most recent day of walking, 45% of pedestrians walked mostly on sidewalks. Other facilities used for walking trips included paved roads, not on shoulders (25%), shoulders of paved roads (8%), unpaved roads (8%), and bicycle paths, walking paths, or trails (6%).

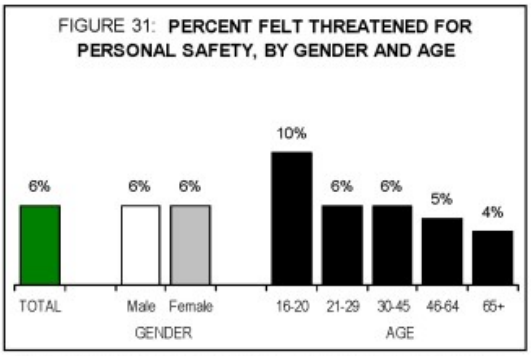
Walking was a preferred mode of transportation even when other modes of transportation were available. Among those who reported walking trips for non-recreational purposes, 3 in 4 (75%) reported that other types of transportation were available to them that day that they could have used instead of walking.

Younger (73%, 16-20) and older (69% 65+) walkers, heavy frequency walkers (72%), and those with household incomes less than $15,000 (70%) were least likely to have alternate modes of transportation available. In cases where alternate modes were available, walking was chosen primarily for the exercise (39%). Other reasons provided were because they enjoy walking or good weather (26%), walking is convenient (12%), or for recreation (6%).

Pedestrian Safety

About 6 percent of pedestrians felt threatened for their personal safety on the most recent day they walked in the summer of 2002. Males and females were equally likely to have felt threatened. Pedestrians 16 to 20 were more likely to have felt threatened (10%) than were those of other age groups.

FIGURE 31: **PERCENT FELT THREATENED FOR PERSONAL SAFETY, BY GENDER AND AGE**



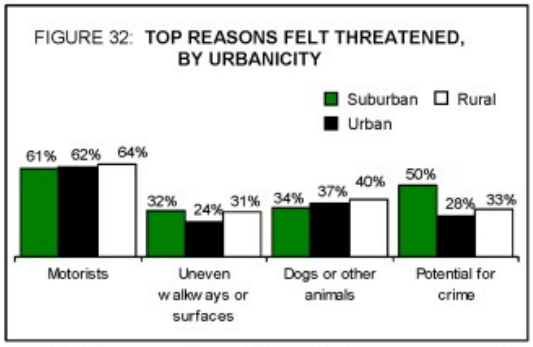
Q88: Did you feel threatened for your personal safety at any time when you walked that day? [Base: Walked past 30 days]

	Total	Male	Female	16-20	21-29	30-45	46-64	65+
Walked past 30 days	7562	3072	4490	600	1075	2575	2290	982

Overwhelmingly, the top reason pedestrians felt threatened while walking was due to motorists (62%). More than one-third of pedestrians also reported feeling threatened for their personal safety because of dogs or other animals (36%) or because of the potential for crime (36%). More than one-quarter (28%) felt threatened by uneven walkways or roadways.

Females were more likely to have felt threatened by the potential for crime (42%) than were males (30%). Suburban pedestrians who felt threatened for their personal safety while walking were more likely to say it was because of the potential for crime (50%) than were those from urban (28%) or rural (33%) areas.

FIGURE 32: **TOP REASONS FELT THREATENED, BY URBANICITY**

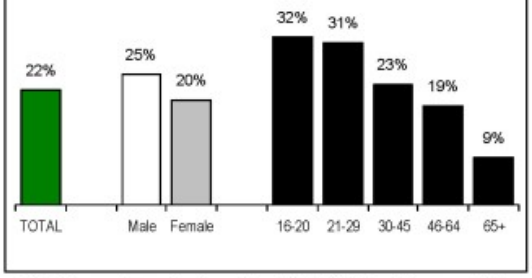


Q88a: Did you feel threatened for your personal safety because of any of the following...? [Base: Felt threatened for personal safety last time walked; Suburban n=138; Urban=207; Rural=88]

Among those who reported that they felt threatened by a motorist (4% of pedestrians), the two actions that were seen as most threatening were driving too fast (41%) and driving too close to the pedestrian (35%).

Overall, 22 percent of pedestrians reported walking in the dark or near-dark for part of their most recent walk. Males (25%) were more likely than females (20%) to have walked in the dark. The proportion walking in the dark decreased with age from about 1 in 3 pedestrians under 30 to just 9 percent of those 65 and older.

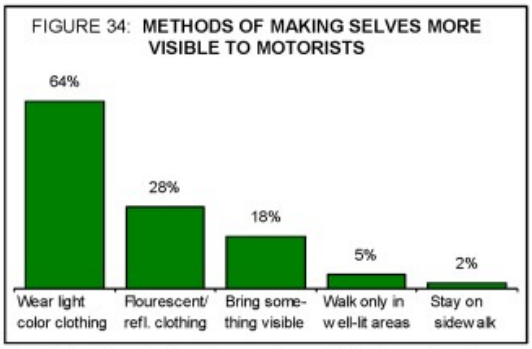
FIGURE 33: **PERCENT WALKING IN DARK OR NEAR-DARK, BY GENDER AND AGE**



Q89: You may have already mentioned this but, the last time you walked, was it dark or near-dark outside for any part of your walk? [Base: Walked past 30 days]

Four in 10 (39%) of those who reported walking in the dark/near dark made efforts to make themselves more visible to motorists. Methods used by pedestrians to make themselves more visible after dark included wearing light-colored clothing (64%), wearing fluorescent or reflective clothing (28%), or bringing something visible with them on the walk such as a flashlight or a dog with a reflective collar (18%).

FIGURE 34: **METHODS OF MAKING SELVES MORE VISIBLE TO MOTORISTS**

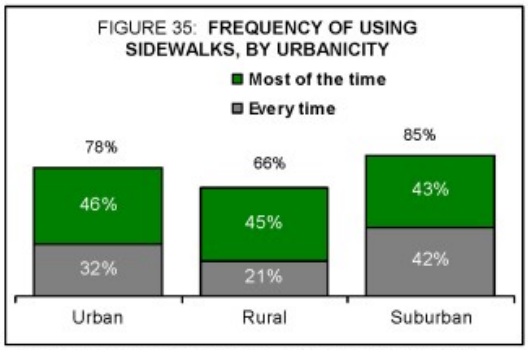


Q90: What do you do to make yourself more visible when walking after dark? [Base: Do something when walking after dark to make self more visible; n=1,246]

Availability and Use of Sidewalks and Paths

Nearly 7 out of 10 (68%) pedestrians reported that sidewalks or paths are available in the areas where they walk.

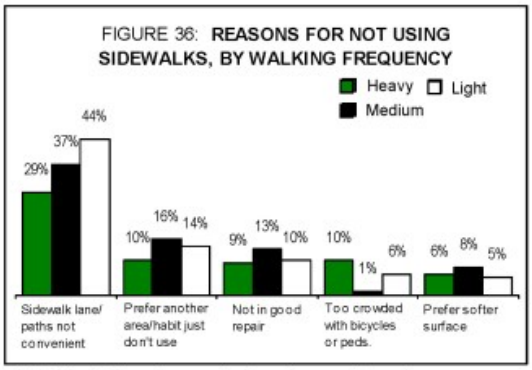
Among pedestrians who reported the availability of those facilities, one-third (34%) reported using sidewalks or paths every time they walk. An additional 45 percent reported using them most of the time. The remainder (21%) used sidewalks or paths only some of the time or less. Suburban pedestrians (85%) were most likely to be frequent users of sidewalks.



Q92a: Do you use sidewalks or paths...? [Base: Walkers who have sidewalks or paths available where walk]

	Total	Urban	Rural	Suburban
Walkers who have sidewalks or paths available where walk	5241	2573	831	1837

The most commonly cited reason for not using sidewalks or paths was the lack of convenience (36%), meaning they were either not available or did not go where the pedestrian wanted to go. This is less of an issue for heavy frequency walkers than less frequent walkers.

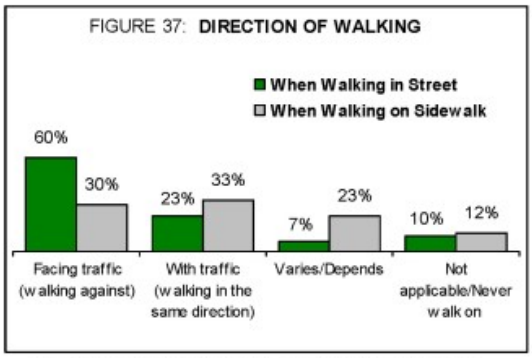


Q93: What is the main reason that you choose not to use these sidewalks or paths? [Base: Never/hardly ever use sidewalks – but are available]

	Total	Heavy	Medium	Light
Never/hardly ever use sidewalks, but are available	302	125	77	97

Six in 10 (60%) pedestrians reported that they typically walk *facing* traffic when walking in the street (i.e., walking against the direction of the traffic) as compared to nearly 1 in 4 (23%) who said they walk *with* traffic. Male and female pedestrians were equally likely to walk against traffic. Pedestrians 45 to 64 (67%) were more apt to walk against traffic than were younger or older pedestrians.

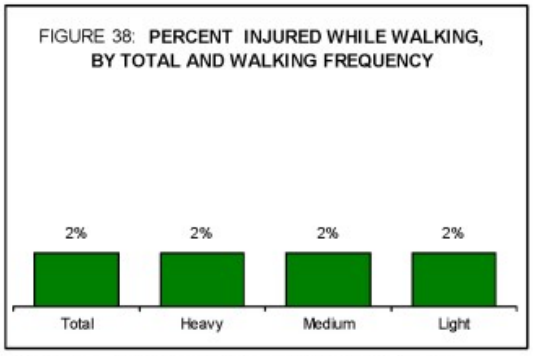
When walking on the sidewalk, pedestrians were about equally likely to walk against (30%) or with (33%) traffic. Nearly 1 in 4 (23%) said it varies, and an additional 12 percent said they never walk on sidewalks.



Q46a: When walking in the street/on the sidewalk do you typically walk…? [Base: Walked past 30 days]

Walking-Related Injuries

Just 2 percent of pedestrians 16 and older reported being injured in the past two years while walking. Heavy-frequency pedestrians (those walking more than 20 out of the past 30 days) were equally likely to experience an injury while walking (2%) as were medium- (2%) and light-frequency (2%) pedestrians.

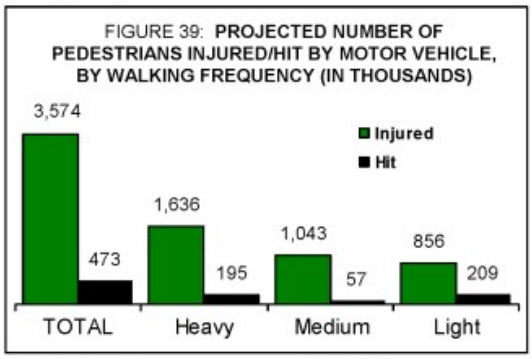


Q96: In the past two years, were you ever injured while you were walking? Only count injuries that required attention by a medical professional. [Base: Walked past 30 days]

	Total	Heavy	Medium	Light
Walked past 30 days	7585	3098	2213	2206

Nearly 3.6 million pedestrians were injured while walking in the past two years. An estimated 473,000 were injured as the result of being hit by motor vehicles. Heavy-frequency pedestrians accounted for more than 1.6 million injuries and 195,000 motor-vehicle-related injuries. Light-frequency pedestrians experienced 856,000 injuries in the past two years, with just over 200,000 being hit by motor vehicles.

FIGURE 39: **PROJECTED NUMBER OF PEDESTRIANS INJURED/HIT BY MOTOR VEHICLE, BY WALKING FREQUENCY (IN THOUSANDS)**



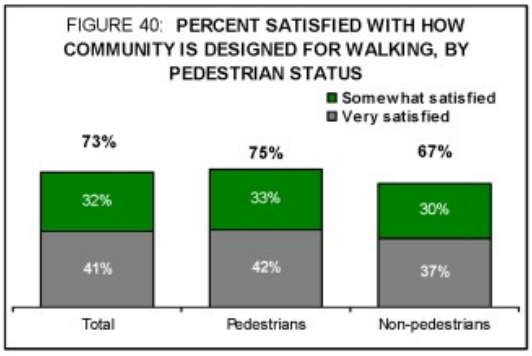
Q96: In the past two years, were you ever injured while you were walking? Q97: Was this injury a result of being hit by a motor vehicle? [Base: Walked past 30 days]

	Total	Heavy	Medium	Light
Walked past 30 days	7585	3098	2213	2206

Satisfaction With How Community Is Designed for Walking

Nearly 3 in 4 (73%) people 16 and older expressed satisfaction with how their communities are designed for making walking safe. About 4 in 10 (41%) were very satisfied. Pedestrians were more satisfied with their communities (75% very or somewhat satisfied) than were nonpedestrians (67%).

FIGURE 40: **PERCENT SATISFIED WITH HOW COMMUNITY IS DESIGNED FOR WALKING, BY PEDESTRIAN STATUS**



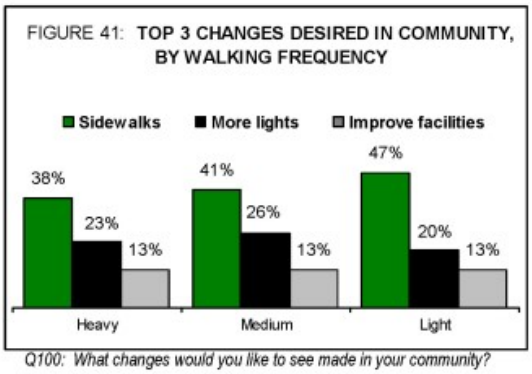
Q98: How satisfied are you with how your local community is designed for making walking safe? [Base total population; Pedestrians n=7,548; Non-pedestrians=201]

22

Regardless of how satisfied they were with the way their communities were designed for walking safety, about one-third of people 16 or older (34%) would like to see some changes made in their community for pedestrians. Those living in urban (35%) and suburban (35%) areas were more likely to desire change than were those in rural (30%) areas.

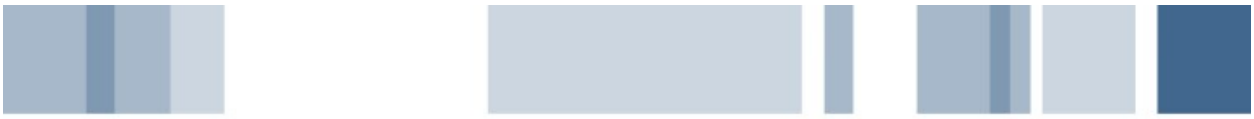
The change most desired in the community is to increase the number of sidewalks (42%). Smaller numbers would like to see more lights (17%), improved facilities (12%), more paths and trails (10%), or more crosswalks (8%). Light-frequency walkers were most interested in adding more sidewalks.

FIGURE 41: **TOP 3 CHANGES DESIRED IN COMMUNITY, BY WALKING FREQUENCY**



Q100: What changes would you like to see made in your community?
[Base: Desire changes in community for pedestrians]

Desire changes in community for pedestrians	Total	Heavy	Medium	Light
	3352	1129	776	780



DOT HS 810 971
August 2008

U.S. Department of Transportation
National Highway Traffic Safety Administration

Attachment 11

How Far Should Parkers Have to Walk?

By Mary S. Smith, P.E. and Thomas A. Butcher, P.E.

One of the most frequently asked questions in any parking planning process is: How far can we expect people to walk from a parking facility to their ultimate destinations? Yet while most parking consultants will tell you there are generally accepted rules of thumb, no two consultants answer that question in quite the same way.

The primary cause for lack of consensus is that there are different factors that affect different situations. For instance, parking designers usually call for maximum walking distances between 300 and 600 feet for retail customers, but between 1,200 and 1,500 feet for employee parking. Distances increase even more when you look at special event standards: maximum walking distances accepted for theme parks, stadiums and arenas reach as high as 2,000 feet.

One reason we talk in terms of "rules of thumb" is that there are no definitive standards or guidelines for the industry. The most widely quoted reference on pedestrian design in the architectural and transportation press is an older book, *Pedestrian Planning and Design*, by John J. Fruin, PhD, upon which we have relied heavily for this article.

In his book, Fruin asserts that "there are indications that the tolerable limit of human walking distance is more situation-related than energy-related." The tolerable walking distance for "a given design situation is related to such factors as the trip purpose of the individual, the available time and the walking environment," Fruin writes.

We would expand Fruin's list of variables affecting acceptable walking distance to include the types of users, frequency of occurrence or use, the familiarity of the user with the facility, the perception of security, the expectations and concerns of the user, the degree of weather protection provided along the path of travel, the perception or absence of barriers or conflicts along the past of travel, and the cost of alternatives to walking, if any.

Another reason we can rely only on rules of thumb is because until recently, parking facilities were considered to be little more than a necessary evil to any land-use development. As a result, many elements of functional design have been addressed with these rules of thumb, which are applied across the board to every type of parking project.

In recent years, however, property owners and developers have come to recognize that parking is the first and last impression afforded to both visitors and employees. As such, they are becoming increasingly determined to make the parking facility reflect and be compatible with the image of the complex as a whole.

Because each owner has a different vision or mission for the property, the appropriate walking distance and other design parameters will not be the same even for complexes with the same land uses. For example, the neighborhood shopping center will have different parking convenience needs than either a high fashion center or regional mall.

With this change in philosophy, rules of thumb no longer provide adequate guides for parking design.

The LOS Approach

To evaluate the qualitative variables in parking design in a systematic and logical way, Walker Parking Consultants/ Engineers has developed the level of service (LOS) approach to parking design. Borrowed from the traffic engineering profession, it allows us to consider a variety of variables affecting acceptability of such design decisions as parking stall and aisle widths, turning radii, entry and exit queuing standards, and sloping of parking floors and express ramps.

The level of service classification system is similar to the grading system used in schools: LOS A is the best or ideal performance; LOS B is good; C is average; and D is below average but minimally acceptable. LOS E is the approximate point of failure, and LOS F describes gridlock conditions.

The LOS system is used to reflect the acceptability by the users of a community of certain parameters. Most roadways that are new or are being improved are designed to attain a LOS of C or better. LOS D is tolerated by commuters in our major urban centers like New York, Los Angeles and Chicago; and efforts to mitigate the conditions would not be initiated until the LOS drops to E or even F. In a small town, a street condition of LOS B may generate an outcry for traffic improvements.

Similarly, issues related specifically to the parking patron can be reflected by the level of service approach. In many cases the specific type of user plays a major role, even within the same land use type. Is the typical user a family going to a theme park (perhaps loaded down with strollers and diaper bags) or a group of adult friends going to a football game? Is it an elderly couple meeting the family at the airport or a business traveler? Are there transportation alternatives for the user? Is the user a shopper who has a number of location choices or a visitor who comes to the site for a specific reason that will not be heavily influenced by parking convenience, such as a visit to a specific doctor? How long is the person going to stay – a few minutes or all day? Are there a variety of parking options at various prices and walking distances such as in a central business district? How often does the user park in the same facility: every day or once a year? Is it a stressful situation, such as hurrying to the airport or going to the hospital, or a more routine commute or shopping trip?

The individual parker's expectations are also important. Is the location suburban or urban? Is the lot an overflow location at the regional shopping center used only at Christmas season or a lot in front of a strip/convenience center? Is it a special event where congestion and long walking distances, are anticipated or a suburban office park where convenience is part of the marketing of the building to tenants? Is it a corporate headquarters where the image of the corporation is an issues or a speculative office building.

Security also is an element perceived by the user; will he/ she be hurrying to traverse the area as quickly as possible, or will the person feel comfortable enough to walk a fairly long distance? Major factors that affect the perception of security include time of day, the neighborhood, the general activity levels and lighting.

With all these different variables, it is easy to see why it has been difficult to set precise standards. We do feel, however, that it is possible to develop such standards.

In each of the above questions and situations, a somewhat better level of service is needed to satisfy the former than the latter types of user. We also might design to different levels of service at different points within the system. For example, we consider that the parking used on average or typical days at shopping centers should be designed for LOS A; for busy Saturdays LOS B should be maintained; and the parking that only gets used for a few hours on the busiest days of the year might be designed for LOS C. We usually design airport parking for LOS A, although, occasionally, we drop to B for long-term, frequent flyer parking.

Other Issues

Other issues affecting walking distance are related to the path of travel itself. Based on our experience and available literature, we have determined there are at least four variables related to path of travel: degree of weather protection, climate, line of sight (can the parker see the destination from the parking space?) and "friction" (interruptions and constraints on the path of travel such as crossing streets with or without traffic signals, and natural and psychological barriers such as railroad tracks or a change in neighborhood).

To fully reflect all path-of-travel variables in a classification of walking distance by level of service would require an overly complex matrix. After some study, however, we found that the degree of weather protection is the most critical variable. We further decided that acceptable walking distances entirely within a parking facility are shorter than those for urban sidewalks, pedestrian bridges or inside buildings such as airports. Because the user of a facility walks down a parking aisle or follows a path between cars to reach the elevator, a high degree of "friction" exists for this system. Also, since parking structures are generally perceived as being less safe than open surface lots, the distinctions between walking within parking lots and structures should be recognized.

Therefore, we have determined the level of service of walking distances for five different types of circumstances. The first three reflect degrees of protection along a dedicated path of travel (i.e., not within a parking facility):

1. **totally unprotected**
2. **covered to reduce the effects of rain or snow**
3. **climate controlled such as in a pedestrian bridge**

The final two categories are:

4. **walking within a surface parking lot**
5. **walking within a parking structure or garage**

The table below presents our recommended gradation of maximum acceptable walking distance for levels of service A through D, which is the lowest level that would be used under design circumstances. We have not tried to determine a distinction between E (the point of failure) and F (gridlock).

Level of Service Conditions	A	B	C	D
Climate Controlled	1,000 ft.	2,400 ft.	3,800 ft.	5,200 ft.
Outdoor/Covered	500	1,000	1,500	2,000
Outdoor/Uncovered	400	800	1,200	1,600
Through Surface Lot	350	700	1,050	1,400
Inside Parking Facility	300	600	900	1,200

Experience has shown that climate in the locality is not a primary factor. There are few, if any, places in the United States that have a truly ideal walking climate year round. Heat can be just as discouraging to walking as cold – rain just as discouraging as snow. Certainly a perfect day increases the acceptable walking distances and would probably increase to the maximum walking distances in climate controlled settings. In the few localities where perfect weather is the year-round norm, we recommend that the climate controlled figures on the table be used.

The maximum walking distance for an unprotected path of travel in a non-parking environment was determined first, using several different types of information.

Fruin's Data

The most important determinant was Fruin's data on the relationship between the walking distance and the proportion of people who choose to walk versus those who choose other modes of travel. This data came from an origin/destination survey at the Port Authority Bush Terminal in midtown-Manhattan. This mid-town terminal situation is probably as close to ideal for studying the point at which an unprotected walking distance goes from being minimally acceptable to unacceptable. With a walking distance of less than 1,000 feet, virtually everyone chose to walk, rather than catch a bus, take a taxi or other available alternatives.

A common criteria for design in the transportation and parking industry is the 85th percentile, i.e., one selects a parameter that is acceptable to 85 percent of the population. Designing for the 100th percentile is excessively expensive; designing for the mean results in problems for 50 percent of the population. In the mid-town bus terminal study, at a distance of about 2,500 feet, 85 percent chose to walk. If the walk was a mile, about half the people chose to walk. Fruin was careful to note that the data was collected on a "fair spring day, resulting in longer walking distances than would otherwise have occurred in New York City."

Fruin compared the above distances to the "severely criticized" maximum walking distances from curbside to gates at such airports as O'Hare (1735 feet), Atlanta (1730 feet), Dallas/Fort Worth (DFW) (1,650 feet) and San Francisco (1,300 feet). Los Angeles, Kennedy, Miami and Detroit each had maximum distances of about 1,100 feet.

The airport walking paths would be primarily in protected, climate controlled spaces. However, people may be hurrying to catch a plan; tired after a long business day; or toting children, strollers and carry-on luggage. Also, the total walking distances from parking space to gate would be substantially longer.

Fruin noted that inter-terminal distances at those airports range from 2,000 to more than 8,000 feet. Some of the inter-terminal pedestrian connections are indoors, while others are unprotected. Most people use the inter-terminal bus service at the longer distances. (It is interesting to note that since publication of Fruin's book, moving sidewalks have been added to O'Hare, both in the terminal and between elevator cores in the garages; and a people-mover has been added to the pedestrian terminal at the American concourse at DFW.)

For special events, several references have cited 1,500 to 2,000 feet as a reasonable walking distance.

For university campuses (usually a LOS C or D condition), our extensive experience with parking studies has found that a significant number of students will walk as far as a mile in good weather, rather than wait for the university shuttle bus. However, the usage of the shuttle system increases sharply in poor weather. The students will not park in distant lots (more than 1,500 to 2,000 feet) at all if shuttle service is not available to provide protection on poor weather days.

City Walking

In cities such as Chicago, anecdotal analysis of commuter walking distances indicates that 1,600 feet is a realistic maximum for LOS D for typical weather conditions.

The LOS A unprotected walking distances in our chart also were derived from sources that cited similar figures.

Several cited an ideal walking distance inside the ring road at major shopping centers as 400 feet; this distance also has been found to be a reasonable walking distance for shoppers in central business districts. One source cited 350 feet as the ideal walking distance for hospital parking.

Therefore, the acceptable maximum unprotected walking distances have been scaled from LOS A of 400 feet to LOS D of 1,600 feet. The protected walking distances were scaled from 500 feet for LOS A to 2,000 feet for LOS D, an increase of 25 percent over the unprotected distances. The fair weather bus terminal study, our experiences with university student parking and the airport data cited by Fruin led us to scale the climate controlled walking distances from 1,000 feet for LOS A to 5,200 feet (just under a mile) for LOS D. We understand that it is considered "ideal" (i.e., LOS A) in the airport industry to provide a moving sidewalk or other people-mover if the walking distance inside the terminal, and thus under climate controlled circumstances, exceeds 1,000 feet.

Where there is friction along the pedestrian path of travel, such as streets to cross and traffic signals, the acceptable walking distance may be reduced by 25 percent or more.

For surface lot walking distances, we have relied on a number of experiences and anecdotes in the design of parking for shopping centers and other uses such as theme parks. We then further discounted the walking distances within parking structures. It should be noted that the acceptable walking distances we have given are substantially longer than those published by one of the authors because of additional experience gains with mega-structures (more than 3,000 parking spaces) since the book *Parking Structures* was published in 1989.

A path of travel often includes components from several of the above categories and conditions. In these cases acceptable total path is less than the total path in climate controlled circumstances for a LOS one notch below the LOS used for the individual components. For example, an airport to be designed for LOS A would want to have a maximum path of travel of 300 feet from the parking space to the elevator within a parking facility, and a weather-protected path of no more than 500 feet from the elevator lobby to the terminal. There may then be a climate controlled path of no more than 1,000 feet from the entrance to the terminal to the gate. The overall path of travel should not exceed 2,400 feet (LOS B).

This story was originally published in *Parking* magazine in 1994.
Mary S. Smith is senior vice president at Walker Parking Consultants. She can be reached at **mary.smith@walkerparking.com**. **Thomas A. Butcher** is executive vice president of Walker Parking Consultants. He can be reached at **tom.butcher@walkerparking.com**.

Attachment 12

Shared Parking

Sharing Parking Facilities Among Multiple Users

TDM Encyclopedia
Victoria Transport Policy Institute
Updated 12 March 2013

This chapter provides information on techniques for sharing parking facilities among various users to increase efficiency.

Description

Shared Parking means that parking spaces are shared by more than one user, which allows parking facilities to be used more efficiently. It is a type of Parking Management. Shared Parking takes advantage of the fact that most parking spaces are only used part time by a particular motorist or group, and many parking facilities have a significant portion of unused spaces, with utilization patterns that follow predictable daily, weekly and annual cycles.

There are various degrees of shared parking. A parking space assigned to a specific user is not shared at all. On-street parking spaces located in a busy, mixed use urban area tends to be the most shared. In between are parking spaces that are shared among various employees at a particular worksite, parking that is shared by customers at a variety of businesses located in a mall, or arrangements by one facility to use another facilities parking at certain times, such as a tavern that allows its parking spaces to be used on Sunday mornings by attendees at a nearby church. An assigned employee parking space is typically used about 2,000 hours per year, while an on-street parking space in a busy area often gets three times as much use. Efficient sharing of spaces can allow parking requirements to be reduced significantly.

Specific ways of sharing parking are described below.

Zoned Rather Than Assigned Spaces

Parking can be shared among a group of employees or residents, rather than assigning to individuals. For example, 100 employees or residents can usually share 60-80 parking spaces without problem, since not all employees will drive to work at one time.

This strategy complements other TDM strategies that encourage people to reduce their vehicle ownership and use, such as Commute Trip Reduction and Location Efficient Development. This type of sharing can be a consumer option. For example, motorists could be offered an assigned space for $100 per month, or a shared space for $60 per month. This allows individuals to decide whether they are willing to pay extra for an assigned space, or capture the savings that result from shared parking.

Share Parking Between Sites

Parking can be shared among different buildings and facilities in an area to take advantage of different peak periods (see Table 1). For example, an office complex can efficiently share parking facilities with a restaurant or theaters, since offices require maximum parking during weekdays, while restaurants and theaters require maximum parking during evenings and weekends. As a result, the total amount of parking can be reduced 40-60% compared with standard off-street parking requirements for each destination (Smith, 1983). ITE (1995) provides specific recommendations for shared parking implementation.

Table 1 **Peak Parking Demand**

Weekday Peaks	Evening Peaks	Weekend Peaks
Banks	Auditoriums	Religious institutions
Schools	Bars and dance halls	Parks
Distribution facilities	Meeting halls	Shops and malls
Factories	Restaurants	
Medical clinics	Theaters	
Offices		
Professional services		

This table indicates peak parking demand for different land use types. Parking can be shared efficiently by land uses with different peaks.

Public Parking/In Lieu Fees

Parking can be shared by relying on public parking facilities rather than having each building provide private off-street parking, since each public space can serve many users and destinations. As a result, 100 public parking spaces can be equivalent to 150 to 250 private parking spaces. Developers or building owners can be allowed or required to pay in-lieu fees that fund public parking facilities as an alternative to minimum requirements for private off-street parking (Shoup, 1999b). On-street parking tends to be the best type of public parking facility for sharing, since it is visible and convenient. It is therefore helpful to manage on-street parking for maximum use, particularly in busy Commercial Centers.

Geographic Considerations

Shared Parking is limited by the proximity of destinations that share a parking facility. Exactly how close they must be depends on the type of land use and the type of user. Table 2 summarizes acceptable walking distances for various types of activities. Acceptable walking distance is also affected by the quality of the pedestrian environment, climate, line of site (longer distances are acceptable if people can see their destination), and "friction" (barriers along the way, such as crossing busy traffic).

Table 2 **Acceptable Walking Distances** (Parking Evaluation)

Adjacent (Less than 100 ft)	Short (less than 800 ft)	Medium (less than 1,200 ft)	Long (less than 1,600 ft)
People with disabilities	Grocery stores	General retail	Airport parking
Deliveries and loading	Professional services	Restaurant	Major sport or cultural event
Emergency services	Medical clinics	Employees	
Convenience store	Residents	Entertainment center	Overflow parking
		Religious institution	

This table indicates maximum acceptable walking distance from parking to destinations for various activities and users. It assumes good pedestrian conditions (sidewalks, crosswalks, level terrain) that are outdoors and uncovered, with a mild climate.

In general, the potential for sharing parking is greatest in areas where land use activities are Clustered, and the benefits from sharing parking are greatest due to high parking costs. Priorities for sharing parking are listed below.

1. *On-street parking on commercial streets.* These are the most convenient parking spaces and so should be managed for maximum turnover to serve short stops (shopping and other errands), by limiting time or applying short-term pricing. This usually means limits of less than 2 hours.

2. *Off-street public parking facilities and on-street parking outside the commercial streets.* These are less

convenient parking spaces and so should be managed for longer stops, including parking by employees, long-term visitors and residents.

3. *Off-street private parking facilities.* These are often the most convenient parking spaces for a particular site, but may also be convenient for other nearby users. They tend to be used to serve other nearby facilities with different peaks. For example, since a bar has peak demand during Saturday night and a church has peak demand during Sunday morning, they can efficiently share parking if located near to each other (usually within a block or so).

The concept of Shared Parking is well known, but it is often discouraged by current planning practices. Conventional planning often reflects an assumption that communities want the greatest possible supply of parking provided at the lowest possible price. Standards used in most communities require each building or facility include a minimum amount of off-street parking supply, based on studies of peak-period demand. Transportation professionals and public officials often prefer generous, simple and consistent minimum parking standards because they are easy to administrate and minimize spillover problems. All of these factors contribute to inefficient use of parking resources: many parking lots are seldom or never full, even during peak periods, and most parking spaces are unused most of the time.

These practices are well established, but are beginning to change, particularly in growing urban communities. Increasingly, communities have objectives to encourage infill development, use of alternative modes and reduce the portion of land that is paved.

How it is Implemented

Shared Parking is usually implemented by municipal government policy to allow and encourage it, with sharing arrangements actually made between individual facility developers and managers. It may require changes to zoning codes (see below), and development of appropriate standards and practices that local transportation planners can use to evaluate, manage and enforce shared parking arrangements. It can be encouraged by establishing parking sharing brokerage services to match potential sharing partners, which can be provided by a Transportation Management Association or local government agency.

Shared parking can also be implemented by providing public parking as a substitute for private parking. This can be done by:

- Providing a maximum amount of on-street parking in an area.
- Providing public off-street parking.
- Managing public parking faculties so the most convenient spaces are available to priority uses (such as customers).
- Addressing barriers, such as inadequate walkways that limit use of public parking.
- Encouraging more Clustered development.
- Allowing or requiring in lieu fees instead of private off-street parking.

Model Shared Parking Code

Below is an example of wording to allow shared parking in municipal parking ordinances.

Introduction

Cumulative parking requirements for mixed-use occupancies or shared facilities may be reduced where it can be determined that the peak requirements of the several occupancies occur at different times (either daily or seasonally). The submittal requirements for a parking reduction request vary according to the method used to determine the parking reduction. The reduction methods and accompanying submittal requirements are outlined in this section. In all cases, a shared parking operations plan must be prepared to the satisfaction of

the Department of Planning showing that parking spaces most conveniently serve the land uses intended, directional signage is provided if appropriate, and pedestrian links are direct and clear. On-street parking spaces wholly adjacent to the property may be included in the required minimum.

Three methods for determining a parking reduction are as follows:

A. Intermittent or Seasonal Nonconflicting Uses

(1.) When required parking reductions are predicted as a result of sharing between intermittent or seasonal uses with nonconflicting parking demands (e.g. a church and a bank), then the reduction can be considered for approval by the Planning Commission without demand calculations or a parking study. Individual spaces identified on a site plan for shared users shall not be shared by more than one user at the same time.

(2.) If a privately owned parking facility is to serve two or more separate properties, then a "Shared Parking Agreement" shall be filed with the City of Fayetteville for consideration by the Planning Commission. Unless explicitly stated to the contrary, the property owner of the parking facility accepts responsibility for operating, maintaining and accepting liability for personal injury and property damage.

B. Parking Occupancy Rate Table

When the parking reduction has been shown to be feasible by using the demand calculations as determined by Table 3, Parking Occupancy Rates, the applicant shall submit a parking demand summary sheet showing the process for calculating the reduction as outlined in this section. (Note: The default rates from the Table 3, Parking Occupancy Rates are set to include a small "safety margin" of parking beyond that minimally needed to serve an average peak demand. Therefore a local study of parking demand may yield a greater reduction in parking required.)

(1.) The minimum number of parking spaces that are to be provided and maintained for each use shall be determined based on standard methods for determining minimum parking supply at a particular site.

(2.) The gross minimum number of parking spaces shall be multiplied by the "occupancy rate" as determined by a study of local conditions (or as found in Table 3), for each use for the weekday night, daytime and evening periods, and weekend night, daytime and evening periods respectively.

(3.) The gross minimum numbers of parking spaces for each of the purposes referred to for each time period shall be added to produce the aggregate gross minimum numbers of parking spaces for each time period.

(4.) The greatest of the aggregative gross minimum numbers of parking spaces for each period shall be determined.

Table 3 Parking Occupancy Rates

Uses	M-F 8am-5pm	M-F 6pm-12am	M-F 12am-6am	Sat. & Sun. 8am-5pm	Sat. & Sun. 6pm-12am	Sat. & Sun. 12am-6am
Residential	60%	100%	100%	80%	100%	100%
Office/ Warehouse /Industrial	100%	20%	5%	5%	5%	5%
Commercial	90%	80%	5%	100%	70%	5%
Hotel	70%	100%	100%	70%	100%	100%
Restaurant	70%	100%	10%	70%	100%	20%
Movie Theater	40%	80%	10%	80%	100%	10%
Entertainment	40%	100%	10%	80%	100%	50%
Conference/Convention	100%	100%	5%	100%	100%	5%
Institutional (non-church)	100%	20%	5%	10%	10%	5%
Institutional (church)	10%	5%	5%	100%	50%	5%

This table defines the percent of the basic minimum needed during each time period for shared parking. (M-F =

Monday to Friday)

C. Local Parking Study
When the parking reduction has been shown to be feasible by using a local parking demand analysis, the following three items must be submitted:

(1.) A parking demand analysis prepared by a qualified parking or traffic consultant, a licensed architect, city planner, or urban planner or civil engineer, which substantiates the basis for granting a reduced number of spaces. A local parking study shall be subject to the approval of the Director of Planning and Planning Commission. The study shall take into account the following three factors:

(a.) Existing parking surveys. Parking surveys shall determine parking occupancy rates of morning, afternoon and evening peaks on the seven different days of the week. The seven days of observation may take place over the span of two consecutive, typical weeks. In the case of new construction or addition of new uses, the surveys shall observe another circumstance with similar mixed uses. A combination of similar circumstances may be necessary to cover all the proposed land uses. The approximate square footages of the various land uses of the specimen projects shall be compared to the proposed project to allow the ratios of uses to be rated accordingly. In the case of an enlargement, or substitution of existing uses, the surveys shall document the occupancy rates of the existing parking facility.

(b.) Proximity and convenience factors. The following factors may influence the Planning Commission's approval of the parking reduction figures:
• Distance between sharing uses and the parking facility
• Pedestrian connections among sharing uses and the parking facility
• Vehicular connections
• Whether parking will be paid
• Location--proximity to the CBD and general development density.
• Proximity to major transit corridors or stations.
• Special trip reduction programs, such as subsidized vanpooling, transit, shuttle or telecommuting
• Need for any reserved parking spaces. (Parking spaces to be shared cannot be reserved for specific uses or individuals except during off-peak hours.)

(c.) Captive market parking requirements. Parking requirements for retail, restaurant, hotel, convention and conference uses may be reduced where it can be determined that some portion of the patronage of these businesses comes from other uses (e.g., employees of area offices patronizing restaurants) located within a maximum walking distance of 500 feet. Parking requirements may be reduced up to 90 percent as appropriate. Whenever practical, such a reduction should be supported by surveys at similar establishments.

(2.) A covenant must be executed guaranteeing that the owner will provide the additional spaces directly or by payment of in-lieu fees if the City, upon thorough investigation of the actual use of parking spaces at the building within two years of initial occupancy, recommends to the Planning Commission that the approved reduction be modified or revoked. Said covenant shall meet the same requirements for covenants set forth in other sections of this document. The City must document insufficient parking supply by showing occupancy rates over 98 percent for a least two consecutive hours on at least three separate days within a single month.

(3.) Fee of guarantee. The owner shall pay a fee which will be applied towards the cost of a parking study of actual parking accumulation to be carried out within one to two years of occupancy.

(4.) Exception: The covenant guaranteeing either additional spaces or payment of in-lieu fees (2. above) and the fee for follow-up parking study (3. above) may be waived when the Planning Commission will certify that previous experience of similar shared parking projects indicates it is unlikely a serious deficiency would result.

d. Covenants. When a covenant between parties is required by this Ordinance, the following standards shall apply:

(1.) Be executed by the owner of said lot or parcel of land the parties having beneficial use thereof.

(2.) Be enforceable by either of the parties having beneficial use thereof, or both.

(3.) Be enforceable against the owner, the parties having beneficial use and their heirs, successors and assigns, or both.

(4.) Be first duly recorded in the Office of the Recorder of Deeds.

E. Parking Lot Location Standards. The location of all required and nonrequired parking lots with five or more spaces shall meet the location requirements below. All conditional uses hereunder shall be granted by the Planning Commission in accordance with Chapter regulations governing applications of conditional uses; procedures.

1. Permitted Locations by Right. Parking lots shall be located within the same zoning district as the use they serve. Required parking lots for uses allowed by right within a zoning district are allowed as a use by right in the same zoning district.

2. Permitted Locations as a Conditional Use. Remains the same.

3. Off-Site Locations. If off-street parking cannot be provided on the same lot as the principal use due to existing buildings or the shape of the parcel, parking lots may be located on other property not more than 600 feet distant from the principal use, subject to conditional use approval by the Planning Commission. Parking spaces serving residential units must be located within 300 feet of the dwelling unit entrances they will serve whether they are off or on the site. Clear, safe pedestrian connections must be provided, requiring no crossing of an arterial street except at a signalized intersection along the pedestrian pathway.

When Parking Requirements Must be Met
Parking requirements shall be met at the time any building or structure is erected, enlarged, or increased in capacity, changed in use, or an applicable outdoor use is established or enlarged. In mixed-use developments, or developments affected by co-operative agreements between different uses on neighboring properties, changes in use will require a parking demand analysis using Table 3 or a Local Parking Study to demonstrate the change in parking demand patterns. A forecast deficiency greater than 10% must be met by the construction of additional parking spaces, payment of in-lieu fees, or support of shuttle service or other trip reduction program satisfactory to the city. If a parking study results in a forecast deficiency of less that 10%, no covenant or guarantee payment is required.

Maximum Number Allowed
Parking lots may contain up to 20% more spaces than the required minimum. Any additional spaces above 20% shall be allowed only as a conditional use and shall be granted in accordance with City zoning governing applications of conditional uses; procedures, and upon the finding that additional spaces are needed.

Travel Impacts

Shared Parking does not directly reduce vehicle travel if it substitutes for increased parking supply. To the degree that it increases the available supply of parking and reduces parking prices it can encourage automobile travel. To the degree that Shared Parking allows more Clustered Development it can encourage use of alternative modes.

Table 4 **Travel Impact Summary**

Travel Impact	Rating	Comments
Reduces total traffic.	0	Depends on parking cost and land use impacts.
Reduces peak period traffic.	0	"

Shifts peak to off-peak periods.	0	"
Shifts automobile travel to alternative modes.	0	"
Improves access, reduces the need for travel.	0	"
Increased ridesharing.	0	"
Increased public transit.	0	"
Increased cycling.	0	"
Increased walking.	0	"
Increased Telework.	0	"
Reduced freight traffic.	0	"

Rating from 3 (very beneficial) to –3 (very harmful). A 0 indicates no impact or mixed impacts.

Benefits And Costs

Shared Parking can reduce parking facility costs (including aesthetic and environmental impacts), allows greater flexibility in facility location and site design, and encourage more efficient land use. Marshall, Garrick and Hansen (2008) found that low-speed urban streets with on-street parking tend to have lower traffic speeds, and so conclude that on-street parking is, "a tool to help create places that are safer, more walkable, require less parking, and have more vitality." Costs include reduced motorist convenience and prestige, and increased automobile travel if it increases total parking supply. For more information see Parking Policy Evaluation.

Table 5 **Benefit Summary**

Objective	Rating	Comments
Congestion Reduction	0	Depends on parking cost and land use impacts.
Road & Parking Savings	3	Can provide significant parking facility savings.
Consumer Savings	2	Can provide savings to consumers.
Transport Choice	0	Depends on parking cost and land use impacts.
Road Safety	0	Depends on parking cost and land use impacts.
Environmental Protection	2	Reduces paved area.
Efficient Land Use	2	Allows more clustered land use.
Community Livability	2	Allows more clustered land use.

Rating from 3 (very beneficial) to –3 (very harmful). A 0 indicates no impact or mixed impacts.

Equity Impacts

The Equity impacts of Shared Parking depend on how it is implemented and what is assumed to be the alternative. If Shared Parking reduces total parking costs it can increase horizontal equity by reducing cross subsidies from non-drivers to drivers. If it provides savings that are passed on to lower-income people it can be progressive. If it helps create more Accessible land use it can benefit people who are transportation disadvantaged and improve basic mobility.

On the other hand, zoning codes may be considered most equitable if they are applied consistently. Flexible standards, which are required for Shared Parking, may be considered unfair to competitors, and may create spillover problems if they fail (for example, if employees parking on residential streets rather than using a parking lot several blocks away as arranged by their employer).

Table 6 **Equity Summary**

Criteria	Rating	Comments
Treats everybody equally.	0	Varies depending on circumstances.
Individuals bear the costs they impose.	0	"
Progressive with respect to income.	0	"

Benefits transportation disadvantaged.	0	"
Improves basic mobility.	0	"

Rating from 3 (very beneficial) to –3 (very harmful). A 0 indicates no impact or mixed impacts.

Applications

Shared Parking can be applied in many situations (Evaluating Parking). It is particularly appropriate where:

- A specific parking problem exists.
- Land values and parking facility costs are high.
- Clustered development is desired.
- Traffic congestion or vehicle pollution are significant problems.
- Excessive pavement is undesirable.

Table 7 **Application Summary**

Geographic	Rating	Organization	Rating
Large urban region.	3	Federal government.	0
High-density, urban.	3	State/provincial government.	1
Medium-density, urban/suburban.	3	Regional government.	2
Town.	3	Municipal/local government.	3
Low-density, rural.	2	Business Associations/TMA.	3
Commercial center.	3	Individual business.	3
Residential neighborhood.	3	Developer.	3
Resort/recreation area.	3	Neighborhood association.	3
		Campus	3

Ratings range from 0 (not appropriate) to 3 (very appropriate).

Category

Land Use Management

Relationships With Other TDM Strategies

Shared Parking is a type of Parking Management and a Parking Solution. It is often implemented as part of TDM, Commute Trip Reduction, Transportation Management Associations and Campus Trip Reduction programs. It supports and is supported by Pedestrian and Cycling Improvements, Transit Improvements, Smart Growth, New Urbanism, Clustering and Transportation Pricing Reforms. It is important for Location Efficient Development.

Stakeholders

Shared Parking is primarily implemented by local government policies and agencies, and by individual developers and businesses. Implementation often involves changing current planning, enforcement and design practices, sometimes with the support of professional organizations. Transportation Management Associations can provide parking facility brokerage services (for example, maintaining a system to match businesses that can share parking facilities).

Barriers to Implementation

Shared Parking require overcoming the traditional assumption that society benefits from a maximum supply of free or low-priced parking, and the resistance from land use and transportation planning institutions that are accustomed to inflexible minimum parking standards. Some public officials consider

Shared Parking difficult to administrate (since it requires flexible parking standards, verification and enforcement), unfair (since some developers benefit more than others), and risky (since they could create spillover problems. Users accustomed to assigned spaces may object to this practice. There may be inadequate capacity during unusual peak demand periods.

Best Practices

Best practices for Shared Parking are described in various reports listed below. They include:

- Establish standard procedures for implementing Shared Parking which specify how to calculate minimum parking requirements for different combinations of land uses, acceptable walking distances, requirements for sharing agreements, verification and enforcement.
- Educate planning officials and developers as the potential for Shared Parking and procedures for implementing it.
- Provide a maximum amount of on-street parking, and public off-street parking as a substitute for private off-street parking. Encourage use of in lieu fees to substitute for private off-street parking.
- Use Transportation Management Associations or local planning agencies to provide Shared Parking matching and brokerage services.
- Insure that there is good pedestrian access and appropriate signage for users concerning Shared Parking.
- Perform regular parking studies and feedback from users to identify problems with Shared Parking.
- Anticipate potential spillover problems, and respond with appropriate regulations and enforcement programs.

What Street Parking Can Do For Downtowns
By Norman W. Garrick and Wesley Marshall (www.courant.com/news/opinion/commentary/hc-plcgarrick0511.artmay18,0,2436671.story).

As in other parts of the country, Connecticut towns and cities are struggling to revitalize their downtowns. Some of the planning and design decisions made in the 1950s and 1960s make this goal more difficult. One such decision is the elimination of street parking from many of our town centers.

Although this practice of not accommodating street parking is now routine, there has been little research done to assess its impact on urban centers. However, a growing number of urban planners have pointed out that centers that have retained street parking, along with other compatible features of pre-1950s town centers, are some of the most successful downtowns in the country.

In order to address this dichotomy between conventional practice and emerging urban theory, we at the University of Connecticut designed two studies of on-street parking and its impact on downtowns. One was based upon case studies of six New England town centers (West Hartford; Northampton, Mass.; Brattleboro, Vt.; Avon Center; Glastonbury Center and Somerset Square in Glastonbury). In the second study, we investigated how street design affected vehicle speeds and safety, based on a study of more than 250 Connecticut roads.

What we found through these studies was that on-street parking plays a crucial role in benefiting activity centers on numerous levels. Here are some of the main benefits.

• *Higher efficiency:* Users of the downtowns consistently selected on-street parking spaces over off-street surface lots and garage parking. The on-street spaces experienced the most use and the highest

turnover.

• *Better land use:* Using the curbside for parking saves considerable amounts of land from life as an off-street surface parking lot. Medium-sized town centers can save an average of more than two acres of land by providing street parking. This efficiency can allow for much higher-density commercial development than is possible if the center relies solely on off-street surface lots.

• *Increased safety:* We showed conclusively that drivers tended to travel at significantly slower speeds in the presence of features such as on-street parking and small building setbacks. Slower vehicle speeds provide pedestrians, cyclists and drivers more time to react, and when a crash does occur, the chance of it being life-threatening is greatly reduced. In short, on-street parking can help to create a safer environment.

• *Better pedestrian environment:* Our study results showed that centers with on-street parking and other compatible characteristics such as generous sidewalks, mixed land uses, and higher densities recorded more than five times the number of pedestrians walking in these areas compared with the control sites, which lack these traits.

Nearly every town in the state has the street space available that could be used for on-street parking. Town leaders should consider it. Our results suggest that on-street parking is a tool that can help create a vibrant and safe town center environment.

Norman W. Garrick is an associate professor of civil and environmental engineering and director of the Center for Transportation and Urban Planning at the University of Connecticut. Wesley Marshall is a doctoral candidate in transportation engineering and urban planning at UConn.

Examples and Case Studies

Shared Parking at Portland Transit Stations

The Tri-Met (Portland area) Park & Ride Policy encourages Shared Parking near transit stations as an efficient and cost effective way to provide parking while minimizing the amount of land devoted to parking facilities. Park & Ride lots are shared with apartment complexes, a regional justice center, churches and movie theaters at more than three dozen sites. With some Transit Oriented Development projects, Tri-Met allows the total supply of off-street parking to decline. For example, if a Park & Ride facility is replaced by a new Transit Oriented Development of at least 30 residential units per acre, at least 75 employees per acre, or other comparable high-density development (Tri-Met, 2001).

City of Monrovia Downtown Parking Management

By Dick Singer, City of Monrovia Public Information Officer

It seemed a risk worth taking - locating a 12-screen, 2,400-seat movie theater in the middle of Monrovia's Old Town without providing the usual adjacent parking structure.

It made sense. Monrovia's Old Town business district is compact (six blocks long and two wide) and abutted by residential neighborhoods on three sides. Medium and high-density housing (mainly senior citizen) had been developed immediately adjacent to the commercial properties. Both MTA and Foothill Transit buses provide service to the edges of Old Town and Monrovia has an active dial-a-ride service providing door-to-door public transportation.

Old Town was redeveloped in the 1970s as a pedestrian-friendly "main street" shopping and service district. Free public parking lots and street parking combined to provide more than 1,200 spaces scattered throughout the district that were never more than 80% filled. For several years, a Friday night Family Festival street fair - running weekly from March through to Christmas - drew as many as 8,000 people on a typical summer night with very little overflow parking into residential neighborhoods. Additionally, most of the businesses using public parking for their employees closed at 5 p.m. and few stores stayed open past 7 p.m., meaning that a shared

parking plan seemed feasible - daytime use for office workers and nighttime use for theater goers.

The theater was to go up on one of the public parking lots, so those spaces had to be replaced, and were by the expansion of another City-owned lot and the re-configuration of a sidestreet adjacent to both that lot and the theater site. When the theater opened, there were more spaces than before the project began. In its first six months of operation, the theater has attracted good crowds and the parking has yet to be a problem. Lot and street parking is sufficient to handle the demand and convenient enough so movie-goers will happily walk two-to-three blocks between their cars and the theater to stroll past shops and restaurants.

The shared-parking plan has worked well in the project's early stages. The second phase of our plan is now about to begin. Theater crowds are drawing a new business mix to the district (as planned) and we are aware that more nighttime business use will develop over the next year. An assessment district is now in the works to finance more Old Town parking - either a structure or an additional street-level lot - to handle the expected increase.

Wit and Humor
Bars and churches are an ideal combination to share parking. Bars have their peak demand Saturday nights and churches have peak demand Sunday mornings. Bar patrons who stay late can simply leave their cars in the parking lot and walk to church early the next morning to pray for forgiveness.

References And Resources For More Information

Booz Allen Hamilton (2006), *International Approaches to Tackling Transport Congestion: Paper 2: Parking Restraint Measures*, Victorian Competition and Efficiency Commission (www.vcec.vic.gov.au).

CNU (2008), *Parking Requirements and Affordable Housing*, Congress for the New Urbanism (www.cnu.org); at www.cnu.org/node/2241.

Joshua **Engel-Yan** and Dylan Passmore (2010), "Assessing Alternative Approaches to Setting Parking Requirements," *ITE Journal* (www.ite.org), Vo. 80, No. 12, December, pp. 30-25.

Reid **Ewing** (1996), *Best Development Practices; Doing the Right Thing and Making Money at the Same Time*, Planners Press (www.planning.org); at www.epa.gov/dced/pdf/bestdevprimer.pdf.

Norman W. **Garrick** and Wesley Marshall (2008) "What Street Parking Can Do For Downtowns," *The Hartford Courant*, (www.courant.com/news/opinion/commentary/hc-plcgarrick0511,artmay18,0,2436671.story).

Angus **Hulme-Moir** (2010), *Making Way for the Car: Minimum Parking Requirements and Porirua City Centre*, Thesis, School of Geography, Environment and Earth Sciences, Victoria University of Wellington (http://researcharchive.vuw.ac.nz/handle/10063/1458).

ITE (1995), *Shared Parking Planning Guidelines*, Institute of Transportation Engineers (www.ite.org).

ITE (2004), *Parking Generation*, Institute of Transportation Engineers (www.ite.org).

K.T. Analytics (1995), *Parking Management Strategies: A Handbook For Implementation*, Regional Transportation Authority (Chicago), 1995; available as FTA, *TDM Status Report: Parking Supply Management and TDM Status Report: Parking Pricing*, Federal Transit Administration (www.fta.dot.gov/library/planning/tdmstatus/tdm.htm).

Richard **Lee**, Robert Rees and Mackenzie Watten (2010), "Smart Growth Parking Requirements Review," *ITE Journal* (www.ite.org), Vo. 80, No. 12, December, 34-40.

Todd **Litman** (1999), *Parking Requirement Impacts on Housing Affordability*, VTPI (www.vtpi.org).

Todd **Litman** (2000), "*Transportation Land Valuation; Evaluating Policies and Practices that Affect the Amount of Land Devoted to Transportation Facilities*," VTPI (www.vtpi.org).

Todd **Litman** (2002), "Parking Costs," *Transportation Cost and Benefit Analysis: Techniques, Estimates and Implications*, Victoria Transport Policy Institute (www.vtpi.org); available at www.vtpi.org/tca/tca0504.pdf.

Todd **Litman** (2004), *Pavement Busters Guide*, VTPI (www.vtpi.org); at www.vtpi.org/pavbust.pdf.

Todd **Litman** (2006), *Parking Taxes: Evaluating Options and Impacts*, VTPI (www.vtpi.org); available at www.vtpi.org/parking_tax.pdf.

Todd **Litman** (2006), *Parking Management Best Practices*, Planners Press (www.planning.org); www.vtpi.org/PMBP_Flyer.pdf.

Todd **Litman** (2006), *Parking Management: Strategies, Evaluation and Planning*, Victoria Transport Policy Institute (www.vtpi.org); at www.vtpi.org/park_man.pdf.

Todd **Litman** (2006), *Parking Management: Innovative Solutions To Vehicle Parking Problems*, Planetzen (www.planetizen.com/node/19149).

Kyle **Maetani**, Michael Kodama, Richard Willson, William Francis & Associates (1996), *Using Demand-Based Parking Strategies to Meet Community Goals; Local Government Parking Management Handbook*, Mobile Source Air Pollution Reduction Committee (MSRC), South Coast Air Quality Management District (www.aqmd.gov).

Wesley E. **Marshall** and Norman W. Garrick (2006), *Parking at Mixed-Use Centers in Small Cities*, Transportation Research Board Annual Meeting (www.trb.org); at www.mdt.mt.gov/research/docs/trb_cd/Files/06-2864.pdf.

Wesley E. **Marshall**, Norman W. Garrick and Gilbert Hansen (2008), *Reassessing On-Street Parking*, Transportation Research Board 87th Annual Meeting (www.trb.org).

Karel **Martens** (2005), *Effects of Restrictive Parking Policy on the Development of City Centers*, Environmental Simulation Laboratory, Tel Aviv University, for Israeli Ministry of Transport; available at www.mot.gov.il/wps/pdf/HE_TRAFFIC_PLANNING/RestrictiveParkingPolicy.pdf.

Metro Vancouver (2012), *Metro Vancouver Apartment Parking Study; Revised Technical Report*, Metropolitan Planning, Environment, and Parks (www.metrovancouver.org); included in 7 Sept. 2012 Regional Planning And Agriculture Committee Agenda at www.metrovancouver.org/boards/Regional%20Planning%20and%20Agriculture/Regional_Planning_and_Agriculture_Committee-September_7_2012-Agenda.pdf. Also see, "Apartment parking spots lift development costs in Vancouver," *Georgia Strait*, www.straight.com/article-770756/vancouver/parking-spots-lift-prices.

Adam **Millard-Ball**, Patrick Siegman, and Jeffrey Tumlin (2004), "Solving Campus Parking Shortages: New Solutions for an Old Problem," *Planning for Higher Education*, Society of College and University Planning (www.scup.org), Vol. 33, No. 1, pp. 30-43.

MRSC (2005), *Downtown Parking Solutions*, Municipal Research and Service Center of Washington (www.mrsc.org/Subjects/Transpo/Tpark/transsolut.aspx).

MTC (2007), *Developing Parking Policies to Support Smart Growth in Local Jurisdictions: Best Practices*, Metropolitan Transportation Commission (www.mtc.ca.gov); at www.mtc.ca.gov/planning/smart_growth/parking_seminar/BestPractices.pdf.

MTC (2007), *Reforming Parking Policies To Support Smart Growth Toolbox/Handbook: Parking Best Practices*

& Strategies For Supporting Transit Oriented Development In The San Francisco Bay Area, Metropolitan Transportation Commission (www.mtc.ca.gov); at www.mtc.ca.gov/planning/smart_growth/parking/parking_seminar/Toolbox-Handbook.pdf.

NPH (2003), *Residential Parking Tool Box*, Non-Profit Housing Association of Northern California; at www.nonprofithousing.org/actioncenter/toolbox/parking/content.html. This website provides information on residential parking regulations, costs and management strategies to improve efficiency and increase housing affordability.

Oregon Downtown Development Association (2001), *Parking Management Made Easy: A Guide to Taming the Downtown Parking Beast*, Transportation and Growth Management Program, Oregon DOT and Dept. of Environmental Quality (www.lcd.state.or.us/tgm/publications.htm).

PAS (2009), *Parking Solutions: Essential Info Packet*, Planning Advisory Service, American Planning Association (www.planning.org): at www.planning.org/pas/infopackets. These packets consist of compilation of related documents that provide practical information on various parking management strategies, suitable for use by planners and developers. These include:

- *Parking Solutions* (130 pages) includes six documents that describe modern approaches to parking management.
- *Shared Parking* (133 pages) includes more than thirty documents concerning shared parking, parking in-lieu fees, parking requirement reductions and exemptions, and downtown district special parking requirements.
- *Green Parking Lot Design* (66 pages) includes three documents that describe ways to improve parking lot environmental performance including landscaping, stormwater management and reduced heat island effects.
- *Permeable Pavement and Bicycle Parking* (38 pages) includes five documents concerning the use of permeable parking lot pavement materials and five documents concerning bicycle parking requirements and design.

Donald C. **Shoup** (1999), "In Lieu of Required Parking," *Journal of Planning Education and Research*, Vol. 18, pp. 307-320.

Donald **Shoup** (2005), *The High Cost of Free Parking*, Planners Press (www.planning.org).

Thomas P. **Smith** (1983), *Flexible Parking Requirements*, PAS Report 377, American Planning Association (www.planning.org).

Mott **Smith** (2006), *Onsite Parking: The Scourge of America's Commercial Districts*, Planetizen (www.planetizen.com/node/19246).

Stein Engineering (1997), *Shared Parking Handbook*, Portland Metro (www.metro-region.org); at www.metro-region.org/library_docs/land_use/sharedpark.pdf.

Tri-Met (2001), *Park & Ride Policy*, Tri-County Metropolitan Transportation District of Oregon (www.tri-met.org).

ULI (2000), *The Dimensions of Parking*, Urban Land Institute (www.uli.org) and the National Parking Association.

USEPA (2006), *Parking Spaces / Community Places: Finding the Balance Through Smart Growth Solutions*, Development, Community, and Environment Division (DCED); U.S. Environmental Protection Agency (www.epa.gov/smartgrowth/parking.htm).

USEPA (2009), *Essential Smart Growth Fixes for Urban and Suburban Zoning Codes*, U.S. Environmental Protection Agency (www.epa.gov); at www.epa.gov/smartgrowth/pdf/2009_essential_fixes.pdf.

Rachel **Weinberger**, John Kaehny and Matthew Rufo (2009), *U.S. Parking Policies: An Overview of Management Strategies*, Institute for Transportation and Development Policy (www.itdp.org).

This Encyclopedia is produced by the Victoria Transport Policy Institute to help improve understanding of Transportation Demand Management. It is an ongoing project. Please send us your comments and suggestions for improvement.

VTPI Homepage	Encyclopedia Homepage	Send Comments

Victoria Transport Policy Institute
www.vtpi.org info@vtpi.org
1250 Rudlin Street, Victoria, BC, V8V 3R7, CANADA
Phone & Fax 250-360-1560
"Efficiency - Equity - Clarity"

#89

10.1.3 Response to Letter from City of San Luis Obispo

Comment No.	Response
SLO-1	The University notes the receipt of both the City's technical response letter and the "summary of citizen concerns" from the March 25, 2014, Town Hall meeting. The Town Hall materials are addressed separately (refer to Section 10.1.2).
SLO-2	Comment noted. More detailed comments and responses are provided below.
SLO-3	The commenter states that the RDEIR fails to (1) analyze the range of reasonable and foreseeable impacts; and (2) incorporate mitigation identified by the City. The commenter also states that the University should re-evaluate alternative sites which may be environmentally superior. The commenter refers more specifically to (1) and (2), and addresses alternatives in subsequent comments. Detailed responses are provided below.
SLO-4	The commenter incorporates by reference comments submitted on the previous draft of the EIR. The University has prepared specific responses to previous comments. Agency comments on the previous Draft EIR are compiled as Chapter 9-1 of the Final EIR. Responses to the City's prior comments have been prepared separately and will be forwarded to the City.
SLO-5	The commenter states that an update of the Master Plan needs to include "retirement" of existing housing sites. The RDEIR includes the following specific language in both the Executive Summary and the Project Description to address disposition of existing sites: "Under the current proposal, the bed count identified in the Master Plan for housing sites H-4 through H-7 would be consolidated at the current site and the complexes at sites H-4 through H-7 would ~~not be pursued under~~ be removed from the current Master Plan. The project is intended to meet existing and projected demand for housing. The project does not increase enrollment over current levels. The Poly Canyon Village project, developed in 2008, included an amendment to the total Master Plan bed count, and an EIR was certified for the project. The proposed housing does not increase bed count over projections in the Master Plan, as amended." The above language specifically commits the University to forego development of previously identified housing sites under the current Master Plan.
SLO-6	Additional mitigation has been identified to address certain off-site significant and unavoidable impacts. The commenter refers more specifically to mitigation for off-site impacts under individual topical sections; proposed language is included as a response to specific comments.
SLO-7	The commenter identifies additional applicable policies from the City's General Plan Land Use and Circulation Elements. The University is not subject to land use controls enacted by the City; the RDEIR includes reference to applicable policies for informational purposes. Table 3-2 will be amended as follows: Page 3-8 and 3-9, Section of Table 3-2 referencing the "City of San Luis Obispo Land Use Element"" will be amended to include the following text: "2.1.3: Neighborhoods should be protected from intrusive traffic. Proposed Action: Based on information presented in Section 4-6 of the RDEIR and in the Final EIR, the project improves traffic volumes along Grand and Slack, due predominantly to

Comment No.	Response
	student commute trip capture and closure of the surface parking lot. The project will redirect existing commuter trips to other campus entrances to access other parking facilities, resulting in significant impacts at major intersections. The University has incorporated mitigation TC/mm-1 into the Final EIR to contribute a fair share component of the costs to improve affected intersections. However, impacts are concluded to be significant and unavoidable in the event funding to improve intersections is not attained. The project will redistribute trips to major intersections in the area designed to handle higher traffic volumes. Section 4.6 of the EIR states that the project will generally create an improved environment for pedestrians and cyclists in the immediate area. " 2.2.10: All multi-family development and large group-living facilities should be compatible with any nearby, lower density development. Proposed Action: The University is not subject to local land use control. Existing three-story student housing is located proximate to the site, and is therefore an existing component of the mix of uses in the area. Other compatibility-related impacts identified in the EIR include aesthetics, air quality, and noise. The EIR finds aesthetic compatibility with the neighborhood adverse and unavoidable. Operational air quality is identified as significant and unavoidable. The project is therefore "potentially inconsistent" with this policy. Finding: "Potentially inconsistent." Page 3-9, Section of Table 3-2 referencing the "City of San Luis Obispo Circulation Element" will be amended to include the following text: "5.0.3: New development shall provide sidewalks and pedestrian paths consistent with City policies, plans, programs and standards. Proposed Action: The University is responsible for the determination of adequacy of sidewalks and pedestrian pathways within its property. The EIR addresses impacts related to pedestrian activity in Section 4-6 and finds impacts less than significant with mitigation. Mitigation TC/mm-2 includes coordination with City and SLCUSD planning for pedestrian routing in the vicinity of Grand and Slack Street." It should be noted that the project is consistent with General Plan policies which support increased on-campus student housing.
SLO-8	The University is not subject to local land use control, including provisions related to density. The University utilizes metrics such as students per acre to discuss density of residential complexes; the assumptions of density referenced by the commenter were for use in air quality modeling only. The EIR addresses the issues listed by the commenter, including traffic, noise, light, glare, and visual compatibility.
SLO-9	The Final EIR will be amended to provide more clarity regarding location of, and capacity and distance to dining facilities, as follows: Page 5-1 "The University has considered several alternatives to the proposed site, including those depicted in Figure 5-1. The northern site (8.7 acres) was rejected during the planning process because of lack of proximity to existing communal dining facilities (Building 19 and Vista Grande) and student activity centers at the University Union and Recreation Center." Page 5-9 "The proposed project location was selected in part because of proximity to other existing

Comment No.	Response
	freshman housing and existing communal dining facilities (Building 19 and Vista Grande). Locating the housing to the H-12 and H-16 parking lots under this Location Alternative would require the development of additional dining facilities. Development of dining facilities or development of a shuttle system to access existing dining facilities would add to the cost of the project, and would have secondary congestion and air quality impacts." Capacity at existing dining facilities is considered sufficient based on communications with University staff.
SLO-10	The cumulative impacts analysis is based on the most recently adopted land use documents applicable on both University property and the within the City of San Luis Obispo. The enrollment numbers suggested by President Armstrong were intended to begin the discussion of growth at Cal Poly in the future and have not been adopted as a specific numerical goal or enrollment target. The Campus is currently operating and developing under the 2001 Master Plan which provides specific enrollment numbers and adopted capacities. In order for Cal Poly to grow enrollment significantly beyond the 2001 Master Plan the campus would need to amend the Master Plan and review the potential environmental impacts of the proposed growth. Annual decisions about enrollment capacity are subject to a variety of factors, including funding, teaching capacity, and student performance.
SLO-11	The text on page 4.1-5 of the Final EIR will be amended as follows: "The section of Grand Avenue approaching campus is designated as a Scenic Roadway in the City's Circulation Element. The designation is a function of the ~~"boulevard" aesthetic along the roadway and the prominent campus gateway~~ relatively high quality views accessible from the roadway."
SLO-12	The commenter suggests additional mitigation be applied to address significant and unavoidable impacts related to visual transition. Specific suggestions and responses are included in SLO-15 below.
SLO-13	Comment noted.
SLO-14	The commenter states that the EIR does not specifically address setback or clustering options, except as part of reduced project alternatives. The feasibility of additional setback is addressed in Chapter 5 of the EIR; the EIR states that additional setback would require alterations in the program or project components. This is based on communications with University staff. Additional information regarding the feasibility of alternatives is provided in MR-8 (Chapter 10-2).
SLO-15	The University has evaluated building design and site layout throughout development of the proposed project (Joel Neel, Director, Facilities Planning and Capital Projects, personal communication, ongoing). The following project components limit options related to building design and site layout: ▪ Site Constraints. As noted throughout the EIR, the approximately half of the site is underlain by undocumented fill. As stated in the geotechnical appendices, the transition from shallow bedrock to the area of greatest fill depth is located generally in the area proposed for the "Great Lawn." Excavation and structural modifications required to account for the differential settlement potential to make this portion of the site suitable for buildings, as opposed to open space, are cost prohibitive. In order to

Comment No.	Response

account for the change in geology in this area the portion of the building on bedrock would need to be excavated an additional 10 to 15 feet. This additional excavation could add as much as 25% to the cost of the foundation.

- Type of Residences. The project is a freshman dormitory-style project. Many of the suggested mitigation, including stepping back floors, exaggerating articulation, etc. are problematic for this type of development. Dormitories consist of individual rooms serving 1-2 individuals, oriented along a central hallway, with shared bath and living areas. The project is designed to provide a 51-person family group, with visibility and access from resident advisor rooms. The buildings on each floor have bedrooms to accommodate 50 students and a resident advisor. Building 3 is half the size of the building 2 and 2R floor plan and divides the family unit between two floors.
- Overall, the site is designed to orient internally to campus; the site design reinforces orientation to the campus (rather than the neighborhoods) by:
    - Orienting buildings internal to the site
    - Locating open space in internal portions of the site
    - Locating ingress/egress points internal to the site
- Project Budget. There are particularities about the funding and budget associated with the proposed project, which pose unique issues related to the feasibility of mitigation that would significantly increase cost.
    - Housing and parking are not state-supported and must therefore be self-supporting. The University has a set budget to complete the entire project. The costs to construct and operate project components must be weighed against the income from rents. The project has a required 30-year payback period, in which time debt obligations must be cleared. This informed the development of the site plan. The following are important considerations to achieve budget objectives:
        - Building plates are simplified and repeat from floor to floor
        - In order to provide the maximum program benefit each floor needs to maintain the same number of bedrooms, bathroom, study and gathering space

Building 4 is setback an average of 35 feet from the northern edge of Slack Street. Increasing the setback would require relocation of open space amenities to the southern portion of the site and development of fill to bedrock transition area. The University finds that this is not feasible because of increased costs, and is not desirable, as it would locate the main gathering areas on site proximate to the neighborhoods.

Suggested mitigation is addressed below:

Stepped Buildings. As stated previously, “stepping” the southernmost buildings is infeasible given the type of development proposed. Floor plates include the same layout on each floor to achieve the desired family unit of 50 students and one resident advisor. Building 3 is half the size of the building 2 and 2R floor plan and divides the family unit between two floors.

The following mitigation is being proposed to reduce impacts related to compatibility/scale:

“AES/mm-2 The final site plan shall be amended to specify three stories in Building 4 (the building fronting Slack Street).”

Comment No.	Response
	Wall and Roof Articulation. Buildings include facades which are varied in orientation and expanse. Buildings include "breakpoints" where the building angles back, and the orientation varies, so as to reduce the impression of a continuous wall. Continuous surfaces extend no further than 125 feet in each of the southernmost buildings. Varying the articulation of rooflines sufficient to reduce impacts related to view blockage is considered infeasible; the addition of a slope roof line would increase the overall building height and therefore would not address the concerns. *Color.* The project description will be clarified to state that the building facades that face the exterior of the site will have a more muted color palette blending with the existing university character. *Style*. As stated in the EIR, the style of the buildings is consistent with expectations on and near campus. Architectural style is not considered an important contributing factor to the visual quality of the surrounding neighborhood (EIR Section 4.1). Scale and view obstruction underlie the significant impact conclusions; therefore, alteration of style would not serve to reduce the severity of impacts.
SLO-16	The evaluation of light impacts was based on evaluation of existing lighting levels, and the project's contribution to lighting levels. The mitigation proposed expands upon Master Plan EIR mitigation, by requiring a comprehensive lighting plan. Fenestration and glazing are among the types of measures addressed in lighting plans. The mitigation will be amended in the Final EIR to clarify that the plan shall address glare and reflectivity as follows: "AES/mm-4 Prior to approval of the development plan, the ~~applicant~~ University shall submit a comprehensive lighting plan for review and approval by the ~~State Architect~~ CSU. The Lighting Plan shall be prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA) using guidance and best practices endorsed by the International Dark Sky Association. The lighting plan shall address all aspects of the lighting, including but not limited to all buildings, infrastructure, surface parking lots, parking garage decks, portals and driveways, paths, recreation areas, safety, and signage. The lighting plan shall include the following in conjunction with other measures as determined by the illumination engineer: a. The point source of all exterior lighting shall be shielded from off-site views; b. Light trespass from exterior lights shall be minimized by directing light downward and utilizing cut-off fixtures or shields; c. Lumination from exterior lights shall be the lowest level allowed by public safety standards; d. Exterior lighting shall be designed to minimize illumination onto exterior walls; and, e. Any signage visible from off-site shall not be internally illuminated. f. The use of reflective materials on the exterior of all structures shall be minimized." Alternative site layouts were addressed in Section 5.
SLO-17	The conclusion in the EIR was informed by a comment letter provided by the SLO APCD on the Draft EIR for the project. A detailed response to concerns over trip generation rates used in the analysis is provided in SLO-23. Cumulative impacts related to GHG, discussed on page 4.2-21, have been clarified as follows: "Greenhouse gas (GHG) impacts contribute cumulatively with those produced worldwide to

Comment No.	Response
	affect climate change. However, the project will not exceed the San Luis Obispo Air Pollution Control District per service population threshold. Compliance with identified air quality, energy efficiency, and water conservation mitigation measures would reduce the project's contribution to cumulative GHG emissions, and subsequent climate change to a less than significant level. Therefore, cumulative GHG impacts are considered less than significant. However, because operational air quality impacts would remain significant with mitigation, the contribution of operational emissions to cumulative effects ~~are~~ is considered *significant and unavoidable (Class I)*."
SLO-18	The University utilizes metrics such as students per acre to discuss density; the assumptions of density referenced by the commenter were for use in air quality modeling only and are not considered representative of a potential volume of vacated residences. Furthermore, the student population captured by this project are first-year students; existing residential patterns of this student group are considered more variable than other classes (for example, many freshmen may live at home). The University maintains that, based on information provided in the record, impacts related to backfill are speculative, and that the addition of 30 professional staff positions in the San Luis Obispo County region is not significantly growth-inducing.
SLO-19	Pursuant to Section 15131 (CEQA Guidelines, Economic and Social Effects): "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes….The focus of the analysis shall be on the physical changes". Based on analysis of the project, and incorporation of recommended mitigation measures (N/mm-1), economic or social changes will not occur which would result in an adverse physical effect. Where typical noise levels can be predicted, such as for nighttime recreational activities, an analysis and mitigation are provided. Otherwise, the EIR concludes that noise levels as a physical change in the environment associated with sporadic nuisance noise events are not an identified environmental impact of the project.
SLO-20	The commenter raises a planning issue which does not constitute an environmental impact. The hiring of additional personnel is not an environmental impact unless it results in environmental impacts associated with new or expanded facilities. As stated in the EIR, the University continually gauges staffing needs for campus police and has sufficient existing facilities to accommodate staffing growth. Please refer to SLO-19 regarding nuisance noise. Traffic impacts are addressed in Section 4.6. Criminal activity, likewise a social issue, is addressed in several areas of the EIR, including Section 4.5-5 and the Executive Summary.
SLO-21	The commenter raises a social and planning issue which does not constitute an environmental impact. The potential criminality or nuisance caused by the relocation of students to campus does not cause predictable environmental impacts. The EIR recognizes on page 4.5-5 that shifts in patrols may occur as residency patterns shift; however, this is concluded to be speculative to predict. Regardless, no physical facility impacts have been identified. The Section further references (page 4.5-6) ongoing coordination between the City and University regarding public safety.
SLO-22	The commenter presents combined police and fire calls for service for the Grand and Slack area, and states that nighttime activity increases in this area compared to day time. This

Comment No.	Response
	comment is noted. The commenter further states that pedestrian activity will require safety improvements and traffic engineering design. It can be concluded the commenter is particularly addressing nighttime conditions. The EIR finds that the existing pedestrian and bicycle facilities in the vicinity, as mitigated, are sufficient to serve the project population. The mitigation program includes lighting and other measures to address nighttime conditions. Responses to comments regarding police are provided in SLO-21.
SLO-23	Trip generation for the transportation study for the Student Housing South EIR was calculated using three methodologies: ▪ Trip generation based on April 2013 general parking lot occupancy counts and May 2013 roadway segment counts along Grand Avenue south of McCollum Street (general parking redistributed trips) ▪ Trip generation based on April 2013 freshmen parking lot occupancy counts, 2012-2013 school year freshmen parking permit purchase rates, and October 2013 freshmen parking lot in/out rates (freshmen redistributed trips) ▪ Trip generation based on freshmen trip rates and freshmen commute reductions from the 2000/2001 Master Plan EIR (commute reduction) Trip generation for general parking redistributed trips was calculated by estimating the proportion of morning and afternoon peak parking demand that travels during the peak hour of travel. This process uses data more recent than the Master Plan EIR. April 2013 parking lot occupancy counts were used to determine the morning and afternoon peak parking demand that would be required to shift to other lots because of the reduction of parking capacity at the project site. The May 2013 Grand Avenue counts were used to determine the proportion of morning and afternoon peak parking demand that travels during the peak hour of travel. Multiplying the morning and afternoon peak period shifted demand by the morning and afternoon peak hour travel proportions yielded the number of general parking redistributed trips. Trip generation for residential parking redistributed trips was conducted using the same general methodology as the general parking redistributed trips. For residential parking redistributed trips, the determination of how many freshmen vehicles would be shifted comprised of two parts: ▪ April 2013 freshmen parking lot occupancy counts were used to determine the demand shift of existing vehicles ▪ Freshmen parking permit purchase rates for the 2012-2013 school year were used to determine how many new on-campus freshmen would bring a car to campus Based on the above data, the projected number of shifted residential vehicles was determined. The October 2013 counts at freshmen on-campus parking lot R-1 were used to determine what proportion of freshmen parked cars travel during the morning and afternoon peak hour. Multiplying the morning and afternoon peak period shifted demand by the morning and afternoon peak hour travel proportions yielded the number of residential parking redistributed trips. Data provided by the City for the three gateway intersections into campus (Santa Rosa Street/Highland Drive, California Boulevard/Foothill Boulevard and Grand Avenue/Slack Street) indicates that the overall trip generation for the University is higher than what the 2000/2001 Master Plan EIR predicted. The following table details the estimated number of

Comment No.	Response

peak hour trips per the Master Plan EIR and the actual trip data as collected by the City in May 2013:

Data Source	Trips Counted			
	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
2000/2001 Master Plan EIR (Existing with Project Volumes)	1691	187	963	1752
May 2013 Counts	2648	595	1515	2698

This data suggests that the trip generation rates assumed in the Master Plan EIR may be too low. Increases in the number of trips could be the result of increased faculty/staff, visitor or student commute trips; increases in trips due to faculty or other non-on campus freshmen are not relevant to this project because the Student Housing South project will house freshmen.

project would not redistribute staff trips because staff-only parking is not affected; any staff parking in the general lots would be counted as part of the general parking redistribution. The trip generation calculations for the general parking redistribution trips and freshmen parking redistribution trips are not subject to potential errors in the Master Plan EIR rates – the trip generation for general and residential redistribution is based on travel data collected in and around the time of the City's May 2013 counts. Freshmen trip rates per bed from the Master Plan EIR are used in the study to calculate the freshman commute reduction.

The freshmen vehicle trip rates from the 2000/2001 Cal Poly Master Plan update were based on field collected data at Cal Poly and other California colleges around 2000. The on-campus field collected data consisted of counts at a resident-only parking lot on the Cal Poly campus. These rates may have fluctuated slightly over time, but these same rates have been used for the Cal Poly Master Plan Update EIR (2000/2001) and the Cal Poly Student Housing North EIR (2003). To confirm that Master Plan EIR rates were appropriate for use in this study, an additional comparison between the 2000/2001 Master Plan EIR freshmen trip rates and more recent count data was performed. As part of the transportation study for the Student Housing South EIR, midweek roadway tube counts were also conducted at entries and exits to the R-1 residential parking lot in October 2013. The R-1 lot serves the South Mountain ("Red Brick"), North Mountain and Cerro Vista student housing complexes. Yosemite and Sierra Madre Halls are served by the R-2 lot on the proposed project site. At the time of the counts in October 2013, these complexes were almost exclusively populated with freshmen. Freshmen in these complexes are required to purchase a dining plan, which limits their need for off-campus shopping trips.

At the community open forum on December 2, 2013, the University presented that the pre-2001 Master Plan update capacity of on-campus housing with 2,783 beds. These 2,783 beds included all beds at the North Mountain, Red Brick, Sierra Madre and Yosemite residence halls (this value does not include beds at the newer Cerro Vista or Poly Canyon Village complexes). Many of these residence halls have been changed to triple-bed configurations between 2000 and 2013 (they were double-bed previously), so the actual total number of beds in these older residence halls is likely greater than in the University's December 2013 presentation. The Cerro Vista Apartments house 796 beds as per the University's December 2013 presentation. Using a conservative assumption of 2,500 occupied beds for the R-1 parking lot service area (250 beds for each of the 6 Red Brick

Comment No.	Response

dorms plus 796 beds at Cerro Vista and 250 beds total in the North Mountain halls), the following table details the trip generation rates calculated from the data.

Data Source	Freshmen Beds	Trips Counted				Calculated Trip Rate			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		In	Out	In	Out	In	Out	In	Out
Counts	2,500	13	18	52	62	0.005	0.007	0.021	0.025
2011 Master Plan EIR	--	--	--	--	--	0.038	0.013	0.046	0.086

The R-1 parking lot data suggests that the actual pre-commute reduction freshmen trip rate is about 65%-75% lower than the 2000/2001 Campus Master Plan rate used in the traffic analysis. The commute reduction assumed in the Master Plan EIR assumed that certain Transportation Demand Management (TDM) strategies would be put in place as part of the implementation of the Master Plan. Since the pre-commute reduction trip rate assumed in the Master Plan EIR is based on counted rates from 1999-2000, it appears that some of the TDM measures implemented between 2000 and 2013 have been effective in reducing freshman trips. If it is assumed that the TDM measures assumed for the commute reduction in the Master Plan EIR are actually 65% effective for freshmen (consistent with the count data presented above), then the trip generation rate calculation with the commute reduction is as follows:

	AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out
Counted Trip Rate	0.013	0.005	0.007	0.046	0.021	0.025
65% * Commute Reduction from Master Plan EIR	-0.076	-0.057	-0.019	-0.108	-0.038	-0.070
Adjusted Counted Trip Generation Rate (with 65% TDM reduction)	-0.064	-0.052	-0.012	-0.056	-0.014	-0.042
Rate Used in Transportation Impact Analysis (from 2000/2001 Campus Master Plan)	-0.065	-0.049	-0.016	-0.034	-0.012	-0.022
Difference in Trips at 1475 Beds (2013 Rate – 2000 Rate)	+2	-4	+6	-32	-3	-29

As a result, the trip rates used in the analysis for freshmen commute reduction are generally equivalent to, or more conservative than, the rates calculated from the recent counts, regardless of whether TDM measures are assumed or not. Chapter 3 Of Appendix F has been updated to include this information.

The Student Housing South project as proposed will not increase the enrollment of the University. Moving freshmen on campus will eliminate commute (to/from campus) trips for

Comment No.	Response
	these students, and the net peak hour trip generation rate for moving these students on campus should be negative because these freshmen will not be replaced off-campus. For consistency with previous campus planning efforts the freshmen trip rates and freshmen commute reductions as described in the Cal Poly Master Plan Update EIR (2001) and the Student Housing North EIR (2003) were used. These field collected rates are more suitable for use as they directly represent a college campus environment versus the Apartment trip generation rate presented in the Institute of Transportation Engineers' *Trip Generation*. *Trip Generation* is a compendium of trip generation studies from across the United States. Volume 1 of *Trip Generation* indicates that the data are "primarily collected at suburban location having little or no transit service, nearby pedestrian amenities or travel demand management (TDM) programs." The rates in *Trip Generation* would therefore not accurately reflect the trip generation characteristics of an on-campus housing facility with good pedestrian and bicycle connectivity to on-campus dining and recreation facilities along with substantial transit service provided.
SLO-24	The commenter generally contends that impacts related to fire service are "downplayed." The commenter references the City of San Luis Obispo comment letter submitted on the Draft EIR. Responses to the original comment letter are provided in Chapter 9-1 of the Final EIR. In response to current comments, the text on page 4.5-1 will be amended in the Final EIR as follows: "The City Fire Department has a staff of approximately ~~55~~ 51 employees, including ~~45~~ 42 firefighters and ~~10~~ 9 administrative and fire prevention personnel."
SLO-25	Text on page 4.5-1 will be amended as follows: "Existing fire-related calls to the fire department are low, as noted in the most recent Fire Services Agreement (2013) and the Annual Fire Safety Report for 2012. Approximately seven fire events occurred in 2012, and approximately ten fire or fire system events occurred in 2013, mainly associated with cooking in student residences. The City Fire Department also provides medical emergency response on campus. Medical emergencies on campus currently account for approximately 24% of all incidents managed by the nearest fire station. " Text on pages 4.5-4 and 4.5-5 will be amended as follows: "~~The University regularly negotiates a service contract with the City Fire Department to cover service and associated costs~~. No specific additional improvements to facilities which could have an environmental impact have been identified. The proposed housing is a consolidation of bedcount approved under the existing Master Plan; the project does not increase bedcount, enrollment, or estimates of built space beyond Master Plan projections; therefore, assuming fire department planning accounts for development under the Master Plan, no additional impacts to facilities are anticipated. ~~Ongoing contract negotiation and revision will be sufficient to address the University's contribution to wear and tear on existing facilities~~. The City and the University ~~entered into~~ renewed an agreement for the provision of fire and emergency medical services in July 2013. The agreement extends through 2018. No amendments or modifications to the agreement are contemplated at this time." The EIR was amended to include additional information about physical impacts to facilities.
SLO-26	Text on page 4.5-1 will be amended as shown in SLO-25 above. The EIR states on page 4.5-4 that the project will increase the number of buildings requiring fire protection.

Comment No.	Response
SLO-27	The RDEIR was amended to note that the City will have approval authority over final proposals for access.
SLO-28	Comment noted. The EIR notes on page 4.5-4 that the project would increase nighttime call volumes on campus.
SLO-29	Noted. The EIR, as amended in SLO-25, above, clarifies the role of agreements.
SLO-30	The RDEIR addresses access on page 4.5-5, including clarification that the City has approval authority over final proposals for access.
SLO-31	Trip generation for the transportation study for the Student Housing South EIR was calculated using three methodologies: ▪ Trip generation based on April 2013 general parking lot occupancy counts and May 2013 roadway segment counts along Grand Avenue south of McCollum Street (general parking redistributed trips) ▪ Trip generation based on April 2013 freshmen parking lot occupancy counts, 2012-2013 school year freshmen parking permit purchase rates, and October 2013 freshmen parking lot in/out rates (freshmen redistributed trips) ▪ Trip generation based on freshmen trip rates and freshmen commute reductions from the 2000/2001 Master Plan EIR (commute reduction) Trip generation for general parking redistributed trips was calculated by estimating the proportion of morning and afternoon peak parking demand that travels during the peak hour of travel. This process uses data more recent than the Master Plan EIR. April 2013 parking lot occupancy counts were used to determine the morning and afternoon peak parking demand that would be required to shift to other lots because of the reduction of parking capacity at the project site. The May 2013 Grand Avenue counts were used to determine the proportion of morning and afternoon peak parking demand that travels during the peak hour of travel. Multiplying the morning and afternoon peak period shifted demand by the morning and afternoon peak hour travel proportions yielded the number of general parking redistributed trips. Trip generation for residential parking redistributed trips was conducted using the same general methodology as the general parking redistributed trips. For residential parking redistributed trips, the determination of how many freshmen vehicles would be shifted comprised of two parts: ▪ April 2013 freshmen parking lot occupancy counts were used to determine the demand shift of existing vehicles ▪ Freshmen parking permit purchase rates for the 2012-2013 school year were used to determine how many new on-campus freshmen would bring a car to campus Based on the above data, the projected number of shifted residential vehicles was determined. The October 2013 counts at freshmen on-campus parking lot R-1 were used to determine what proportion of freshmen parked cars travel during the morning and afternoon peak hour. Multiplying the morning and afternoon peak period shifted demand by the morning and afternoon peak hour travel proportions yielded the number of residential parking redistributed trips. Data provided by the City for the three gateway intersections into campus (Santa Rosa

Comment No.	Response

Street/Highland Drive, California Boulevard/Foothill Boulevard and Grand Avenue/Slack Street) indicates that the overall trip generation for the University is higher than what the 2000/2001 Master Plan EIR predicted. The following table details the estimated number of peak hour trips per the Master Plan EIR and the actual trip data as collected by the City in May 2013:

Data Source	Trips Counted			
	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
2000/2001 Master Plan EIR (Existing with Project Volumes)	1691	187	963	1752
May 2013 Counts	2648	595	1515	2698

This data suggests that the trip generation rates assumed in the Master Plan EIR may be too low. Increases in the number of trips could be the result of increased faculty/staff, visitor or student commute trips; increases in trips due to faculty or other non-on campus freshmen are not relevant to this project because the Student Housing South project will house freshmen.

The project would not redistribute staff trips because staff-only parking is not affected; any staff parking in the general lots would be counted as part of the general parking redistribution. The trip generation calculations for the general parking redistribution trips and freshmen parking redistribution trips are not subject to potential errors in the Master Plan EIR rates – the trip generation for general and residential redistribution is based on travel data collected in and around the time of the City's May 2013 counts. Freshmen trip rates per bed from the Master Plan EIR are used in the study to calculate the freshman commute reduction.

The freshmen vehicle trip rates from the 2000/2001 Cal Poly Master Plan update were based on field collected data at Cal Poly and other California colleges around 2000. The on-campus field collected data consisted of counts at a resident-only parking lot on the Cal Poly campus. These rates may have fluctuated slightly over time, but these same rates have been used for the Cal Poly Master Plan Update EIR (2000/2001) and the Cal Poly Student Housing North EIR (2003). To confirm that Master Plan EIR rates were appropriate for use in this study, an additional comparison between the 2000/2001 Master Plan EIR freshmen trip rates and more recent count data was performed. As part of the transportation study for the Student Housing South EIR, midweek roadway tube counts were also conducted at entries and exits to the R-1 residential parking lot in October 2013. The R-1 lot serves the South Mountain ("Red Brick"), North Mountain and Cerro Vista student housing complexes. Yosemite and Sierra Madre Halls are served by the R-2 lot on the proposed project site. At the time of the counts in October 2013, these complexes were almost exclusively populated with freshmen. Freshmen in these complexes are required to purchase a dining plan, which limits their need for off-campus shopping trips.

At the community open forum on December 2, 2013, the University presented that the pre-2001 Master Plan update capacity of on-campus housing with 2,783 beds. These 2,783 beds included all beds at the North Mountain, Red Brick, Sierra Madre and Yosemite residence halls (this value does not include beds at the newer Cerro Vista or Poly Canyon Village complexes). Many of these residence halls have been changed to triple-bed configurations between 2000 and 2013 (they were double-bed previously), so the actual

Comment No.	Response

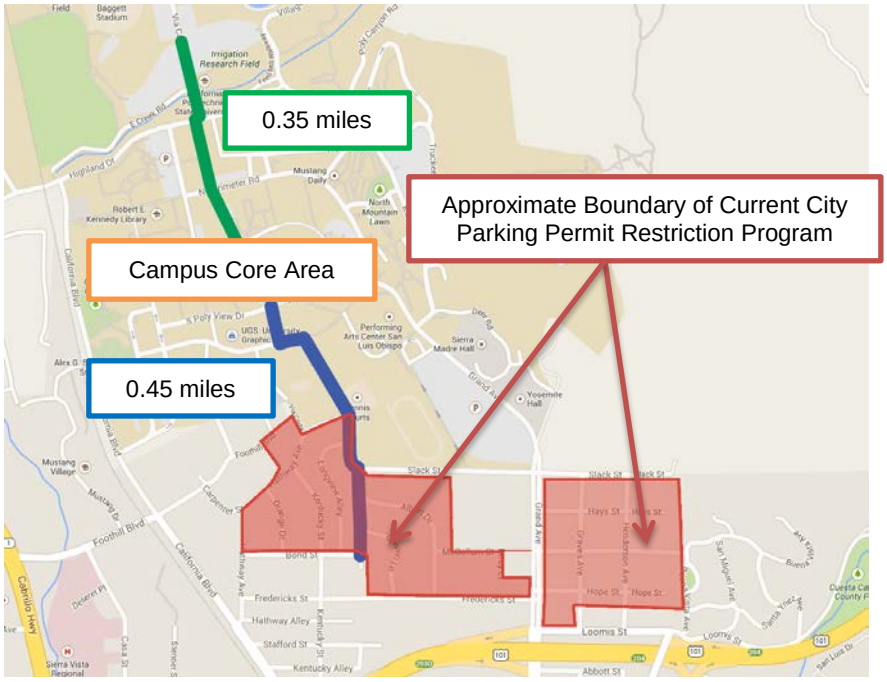
total number of beds in these older residence halls is likely greater than in the University's December 2013 presentation. The Cerro Vista Apartments house 796 beds as per the University's December 2013 presentation. Using a conservative assumption of 2,500 occupied beds for the R-1 parking lot service area (250 beds for each of the 6 Red Brick dorms plus 796 beds at Cerro Vista and 250 beds total in the North Mountain halls), the following table details the trip generation rates calculated from the data.

Data Source	Freshmen Beds	Trips Counted				Calculated Trip Rate			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		In	Out	In	Out	In	Out	In	Out
Counts	2,500	13	18	52	62	0.005	0.007	0.021	0.025
2011 Master Plan EIR	--	--	--	--	--	0.038	0.013	0.046	0.086

The R-1 parking lot data suggests that the actual pre-commute reduction freshmen trip rate is about 65%-75% lower than the 2000/2001 Campus Master Plan rate used in the traffic analysis. The commute reduction assumed in the Master Plan EIR assumed that certain Transportation Demand Management (TDM) strategies would be put in place as part of the implementation of the Master Plan. Based on discussion with City staff, it appears that not all of the TDM strategies assumed in the Master Plan EIR have been implemented. Since the pre-commute reduction trip rate assumed in the Master Plan EIR is based on counted rates from 1999-2000, it appears that some of the TDM measures implemented between 2000 and 2013 have been effective in reducing freshman trips. If it is assumed that the TDM measures assumed for the commute reduction in the Master Plan EIR are actually 65% effective for freshmen (consistent with the count data presented above), then the trip generation rate calculation with the commute reduction is as follows:

	AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out
Counted Trip Rate	0.013	0.005	0.007	0.046	0.021	0.025
65% * Commute Reduction from Master Plan EIR	-0.076	-0.057	-0.019	-0.108	-0.038	-0.070
Adjusted Counted Trip Generation Rate (with 65% TDM reduction)	-0.064	-0.052	-0.012	-0.056	-0.014	-0.042
Rate Used in Transportation Impact Analysis (from 2000/2001 Campus Master Plan)	-0.065	-0.049	-0.016	-0.034	-0.012	-0.022
Difference in Trips at 1475 Beds (2013 Rate – 2000 Rate)	+2	-4	+6	-32	-3	-29

As a result, the trip rates used in the analysis for freshmen commute reduction are generally equivalent to, or more conservative than, the rates calculated from the recent counts, regardless of whether TDM measures are assumed or not. Chapter 3 Of Appendix F has

Comment No.	Response
	been updated to include this information. The Student Housing South project as proposed will not increase the enrollment of the University. Moving freshmen on campus will eliminate commute (to/from campus) trips for these students, and the net peak hour trip generation rate for moving these students on campus should be negative because these freshmen will not be replaced off-campus. For consistency with previous campus planning efforts the freshmen trip rates and freshmen commute reductions as described in the Cal Poly Master Plan Update EIR (2001) and the Student Housing North EIR (2003) were used. These field collected rates are more suitable for use as they directly represent a college campus environment versus the Apartment trip generation rate presented in the Institute of Transportation Engineers' *Trip Generation*. *Trip Generation* is a compendium of trip generation studies from across the United States. Volume 1 of *Trip Generation* indicates that the data are "primarily collected at suburban location having little or no transit service, nearby pedestrian amenities or travel demand management (TDM) programs." The rates in *Trip Generation* would therefore not accurately reflect the trip generation characteristics of an on-campus housing facility with good pedestrian and bicycle connectivity to on-campus dining and recreation facilities along with substantial transit service provided.
SLO-32	Please see response to [Original Letter Comment #28] and [Original Letter Comment #29]. The residential parking on campus is mostly used for long-term storage, so an effective parking capacity factor was not used. For general parking, existing data suggests that the parking garage on the project site would be nearly 100% full; commuters that perceive the lots to be full will have taken current travel routes to campus – these trips would not contribute to projected off-site impacts. The walking distance from the General parking lots on the north side of campus to the campus core area is approximately 0.35 miles (green line on diagram below). The walking distance from the intersection of Bond Street/Longview Avenue to the campus core area is approximately 0.45 miles (blue line on diagram below). 

Comment No.	Response
	Commuters parking on the north side of campus would find that their travel path the campus core would be shorter than if they parked in areas south of the campus boundary in areas without parking permit restrictions. Therefore, if commuters found that all of the spaces at the proposed parking garage were full, they would be more likely to park in the parking lots on the north side of campus because they would be closer to their destination versus parking in an area south of the University boundary without parking permit restrictions. As a result, the change in parking demand on streets south of the University is expected to be negligible and would not cause parking shortages on City streets. There is some non-permit parking available on the south side of the project frontage on Slack Street, however this parking is currently full during the day; there is no additional available capacity at this location. The analysis assumes that a percentage (10%) of redistributed general parking commute trips would remain on Grand Avenue. This percentage includes those who would take Grand Avenue to reach the north side of campus due to trip origin/destination, as well as those who may find that the garages along Grand Avenue are full.
SLO-33	Please see response to [Original Letter Comment #30] and [SLOCOG comment #6]. The majority of trips on SLO Transit routes running through campus during the periods of peak ridership are commute trips to/from the University. Generally speaking, commute trips off campus for freshmen living on campus will be low during periods of peak ridership due to the provision of amenities on campus such a dining, recreation and entertainment. An increase in non-commute trips could occur during the peak ridership periods, but these would be counteracted by the reduction in commute trips, or the non-commute trips will occur during off-peak periods. As a result because peak direction ridership would be reduced, impacts to transit crowding are not expected to occur with the proposed project.
SLO-34	Net trip reductions along Grand Avenue between US 101 and Slack Street are comprised of two components: redistributed general parking lot trips (created when parking is reduced on the project site) and trips removed from the system as a whole as a byproduct of moving freshmen on campus (internalization). General parking is chiefly comprised of student commute trips, campus visitors and staff. As noted in the EIR, the trips related to general parking redistribution are largely moved off of Grand Avenue in favor of California Boulevard and Highland Drive. Based on the gateway volume distribution assumed in Table 12 of Appendix F, 90% of the general parking redistributed trips are moved off of Grand Avenue. Additionally, moving freshmen on-campus internalizes these freshmen commute trips; these trips are removed from Grand Avenue in full. Accordingly, the following table shows that the net project trips would be negative along Grand Avenue.

Comment No.	Response

Item	AM Peak Hour		PM Peak Hour	
	Southbound	Northbound	Southbound	Northbound
Redistributed Residential Trips on Grand Avenue	4	3	13	11
90% * Redistributed General Trips	-12	-35	-4	-2
Freshmen Commute Reduction	-24	-72	-32	-17
Total Net Trips on Grand Avenue Gateway	*-32*	*-104*	*-23*	*-8*
Net Trips at Grand Avenue/Slack Street	*-136*		*-31*	
Net Trips at Grand Avenue/Loomis Street-US 101 Southbound	*-136*		*-31*	
Net Trips at Grand Avenue/US 101 Northbound-Abbott Street	*-121*		*-27*	

Chapter 3 of Appendix F has been updated to include this information. Since the number of net project trips on Grand Avenue is negative, the intersections of Grand Avenue/Slack Street and Grand Avenue/US 101 Northbound off-ramp-Abbott Street were not studied as part of the analysis. Reductions in traffic volumes typically *decrease* intersection delay; per the transportation impact criteria presented in the EIR, intersections operating at unacceptable levels of service are only impacted when a project contributes a net *increase* in the number of trips at the intersection. Because the number of net project trips through the intersection is negative, Grand Avenue intersections would not be significantly impacted by the project.

City staff has also suggested that the increased level of pedestrian and bicycle traffic in the vicinity of the project site may degrade traffic operations at Grand Avenue/Slack Street. A sensitivity test was performed for the intersection of Grand Avenue/Slack Street near the project site, which is all-way stop-controlled. A sensitivity test was performed in Synchro for estimated Cumulative without Projects conditions. In order to estimate Cumulative without Project conditions, turning movement count data provided by the City of San Luis Obispo from May 2013 was factored up consistent with forecasts for other study intersections to represent cumulative year traffic volumes. Additionally, to account for changes due to the project future year traffic, pedestrian and bicycle volumes were included based on expected activity and traffic levels around the intersection. Based on this analysis, the average traffic delay at Grand Avenue/Slack Street is slightly lower under estimated Cumulative with Project conditions than estimated Cumulative without Project conditions, even when accounting for higher levels of pedestrian and bicycle activity. Therefore, because traffic volumes would decrease, and because pedestrian and bicycle activity would not result in significant changes in traffic delay, this intersection would not be impacted due to the project.

Comment No.	Response
SLO-35	Appendix F will be updated to match Table 4.6-1.
SLO-36	The EIR has been updated to include additional mitigation. The mitigation section for off-site traffic impacts will be amended as follows: "Impacts to intersections are a result of redistribution of parking trips. The TIA discusses various potential mitigation options, including the provision of additional general and residential parking on-site to reduce the number of trips redistributed, a Transportation Demand Management (TDM) Program (with monitoring) to reduce the number of trips, and other standard traffic mitigation options to reduce trips or accommodate additional capacity. ~~However, the likely success and feasibility of these measures is difficult to establish at this time due to the nature of the proposed project, as discussed below.~~ The following is an evaluation of the feasibility of TIA recommendations. ***On-Site Parking Replacement*** Providing ~~A~~additional parking ~~replacement~~ at the project site would facilitate ~~encourage~~ trips to campus ~~to be made~~ using existing travel patterns, thus reducing the redistribution of vehicle trips to California Boulevard and Santa Rosa Street and reducing impacts on intersections along those streets. In this regard, ~~Cal Poly staff has indicated that a~~ the proposed Parking ~~area~~ Structure may include ~~of~~ up to 500 spaces at the project site ~~may be possible~~, as referenced in the Project Description. ~~At this time, however, the ultimate financial feasibility of a 500-space parking area has not yet been determined.~~ However, ~~D~~development of a 500-space parking area alone would not be sufficient to mitigate project-related impacts at nearby intersections to a less than significant level, as detailed in the TIA (refer to Appendix F). Incorporating a 500-space garage as part of the project would reduce parking redistribution and lessen the severity of the intersection impacts, but because the project would continue to produce a net addition of trips to impacted study intersections, it would not fully mitigate the intersection impacts to a less than significant level under City and Caltrans thresholds. In order to reduce potential impacts to less than significant, the project-related trips at affected study intersections currently operating at deficient levels would need to be reduced to zero. The financial feasibility of a 500-space parking structure has yet to be determined; therefore, development of such a structure cannot be counted towards mitigation for the project's impacts. ***Transportation Demand Management and Monitoring Program*** Cal Poly already implements TDM measures that could be enhanced and improved upon by expanding the current program. The University could also implement additional TDM measures. ~~Available~~ Examples of TDM measures include: modifications to the number or price of residential parking permits; an expansion of existing carsharing or ridesharing programs; development of bicycle and pedestrian improvements to areas of high trip attraction; and development of increased amenities on campus to reduce the need for off-campus travel by students and faculty. However, as noted above, ~~P~~pursuant to the City and Caltrans thresholds identified above, the addition of even one trip to an intersection that currently operates at an unacceptable LOS would be considered a potentially significant impact. Therefore, implementation of any recommended TDM program would need to result in a zero net trip increase at the impacted study intersections in order to reduce the impacts to less than significant. ~~be monitored to ensure compliance with the strict zero net trip increase threshold at the impacted study intersections.~~

Comment No.	Response

A combination of on-site parking replacement and a monitored TDM program could ~~produce~~ reduce intersection impacts~~ that are less than significant with mitigation~~. However, because the project site plan has not been finalized and the level of parking replacement on-site is still to be determined, development of a TDM and monitoring plan of appropriate detail and scope is not possible at this time. There are additional limits on the feasibility of TDM as mitigation for the effects of this project. These include the following: (1) funding cannot be guaranteed, most TDM programs on campus are grant-funded, (2) the effectiveness of TDM as it relates to the particular impacts of this project cannot be quantified and (3) participation and funding of TDM cannot be guaranteed long-term. ~~Upon finalization of the project site plan and determination of the feasible number of parking spaces that can be provided on site, it may be conclusively established that appropriate mitigation is available to reduce significant impacts to intersections. However, b~~ B~~ecause the effects of the TDM measures cannot be fully developed and quantified at this time~~ For these reasons, ~~significant impacts to intersections in the project vicinity would remain *significant and unavoidable (Class I)*~~.the implementation of TDM does not constitute feasible mitigation for the project.

~~*Other standard mitigation measures were also considered to reduce impacts to intersections, including reducing the project size, physical improvements to roadways, and payment of in lieu fees. These measures are typically considered as an integral component of traffic studies for other development projects; however, their implementation may not be feasible or appropriate due to the unique nature of this project.*~~

Reduced Housing Alternative

Reduced projects are typically addressed as alternatives (refer to Chapter 5, Alternatives Analysis). In this case, a reduced project would lessen the beneficial commute trip reduction associated with moving students onto campus, potentially exacerbating intersection impacts. For this reason, implementation of a reduced size project as mitigation would not be feasible since it would preclude meeting project objectives.

Roadway Improvements

Impacts to area intersections could alternately be addressed by improvements in physical capacity or performance. The City has identified several improvements to impacted intersections in several planning documents. These include:

- Foothill & Santa Rosa: Intersection widening (identified in the Highway 1 Major Investment Study.)
- California & Taft: Signalization or roundabout control upgrade.
- US 101 & California: Modification of painted median / TWLTL to accommodate a two-stage left turn. Cumulative signalization or roundabout control upgrade.

No physical improvements have been identified by the City for the Walnut and Santa Rosa Street intersection or the Highland Drive and Santa Rosa Street intersection.

Intersection improvements, including widening Santa Rosa Street to three lanes in each direction, would improve affected intersection operations, but would not reduce the number of project-related trips traveling through the intersections. Physical improvements may ~~also~~ have secondary impacts associated with the improvement, such as increasing pedestrian crossing distances, and environmental impacts associated with construction, including additional air quality, erosion, and noise impacts. Increasing the crossing distances would necessitate signal timing adjustments along the corridor which may lead to degradation in intersection operations. Widening could also be physically infeasible in constrained areas.

Physical improvements ~~could be funded~~ identified above are ultimately the jurisdiction of the

Comment No.	Response

City and/or Caltrans, and may involve the County of San Luis Obispo or SLOCOG. The impact of project-related trips could be offset by participation in funding through CSU fair-share percentage contribution to the costs to construct identified improvements. ~~However, since an established City capital program for addressing such improvements is not in place, the potential impacts to intersections are identified as significant and unavoidable (Class I).~~

~~Mitigation options are discussed above in an attempt to reduce project impacts. However, because the mitigation will ultimately be formulated by what is determined to be feasible by project design, cost, campus goals, and guidelines in the Master Plan, there is insufficient evidence to assume the mitigation options will reduce potential impacts to intersections. Therefore, potential impacts to intersections are identified as significant and unavoidable (Class I).~~

The following mitigation is proposed to address impacts to off-campus intersections:

TC/mm-1 CSU/Cal Poly shall pay to the City of San Luis Obispo its fair-share of the identified infrastructure improvement costs to construct the following improvements located within the City's jurisdiction, provided that: (a) the state Legislature appropriates the funds for the improvements as requested by CSU in the state budget process, (b) a capital improvement plan or similar plan has been adopted to ensure implementation of the improvements, and (c) the City's (or other agency's) share of the mitigation improvement cost has been allocated and is available for expenditure, thereby triggering CSU's fair-share contribution payment:

- *Foothill & Santa Rosa: Intersection widening as identified in the Highway 1 Major Investment Study (Fair Share Percentage: Existing + project (1.9%) and cumulative (1.6%)).*
- *California & Taft: Signalization or roundabout control upgrade (Fair Share Percentage: Existing + project (2.6%) and cumulative (2.0%)).*
- *US 101 & California: Modification of painted median / two-way left turn lane to accommodate a two stage left turn. (Fair Share Percentage: Existing + project (2.5%)); and signalization or roundabout control upgrade (Fair Share Percentage: Cumulative 1.8%).*
- *Walnut Street and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.4 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.*
- *Highland Drive and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.3 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.*

As to those improvements identified above that are located within the jurisdiction of Caltrans, CSU will support Caltrans in its efforts to obtain the appropriate funding through the state budget process, and will look to the City of San Luis Obispo to join in that support.

With the addition of new TC/mm-1, existing TC/mm-1 et seq. will be renumbered sequentially.

The CSU has negotiated in good faith with the City of San Luis Obispo regarding its fair-share of the costs to construct improvements in the city's jurisdiction related to this project. While agreement with the city was not reached, the campus is seeking trustee approval to request a total of $534,000 in capital funding from the governor and legislature for the

Comment No.	Response

identified off-site mitigation measures below. Payment is contingent upon (a) the state Legislature appropriating the funds for said improvements as requested by the CSU in the state budget process; and (b) the city allocating its share of the mitigation improvement costs and ensuring said amount is available for expenditure, thereby triggering the CSU's fair share contribution payment. The improvements which have been identified by the city and included as mitigation measures in the EIR are as follows:

- Foothill Boulevard and Santa Rosa Street: The existing conditions are already at a Level of Service D and will be at Level of Service F under cumulative conditions (due to planned city and other projects). Therefore, due to cumulative conditions and the addition of the project, the intersection needs widening as identified in the City of San Luis Obispo's State Route 1 Major Investment Study. The university estimates its fair share for the improvements of this intersection to be $342,166 based on the project contributing a 1.9 percent increase to the number of existing intersection trips.
- California Boulevard & Taft Street: The existing conditions are already at a Level of Service F and will be at Level of Service F under cumulative conditions. Therefore, due to cumulative traffic and the addition of the project, the intersection needs signalization or a roundabout control upgrade. The university estimates its fair share for the improvements of this intersection to be $97,547 based on a 2.6 percent net trip increase in existing conditions.
- US Highway 101 & California Boulevard: The existing conditions are already at a Level of Service F and will be at Level of Service F under cumulative conditions. Therefore, due to the project traffic, the intersection needs modification to provide a painted median and two-way left turn lane to accommodate a two-stage left turn, while due to cumulative traffic the intersection needs improved signalization, or roundabout control upgrade. The University estimates its fair share for the improvements of this intersection to be $93,795 based on a 2.5 percent net trip increase to existing conditions.

In addition, the project will have a significant impact on the following intersections:

- Walnut Street and Santa Rosa Street. The existing conditions are already at a Level of Service E in the a.m. peak and Level of Service D in the p.m. peak. The university estimates its fair share for the improvements of this intersection to be 2.4 percent based on the net trips added to existing conditions. Physical improvement plans for this intersection have not been identified to the university at this time.
- Highland Drive and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.3 percent cost of the improvements using the existing plus project condition. Physical improvement plans for this intersection have not been identified to the university at this time.

The net trips added by the project to the above intersections range from -5 (meaning trips were reduced) during the morning peak period and up to 79 trips added at intersections during the afternoon peak period.

If all of the improvements identified in mitigation measure TC/mm-1 were constructed, including as yet identified improvements to the intersections of Walnut Street and Santa Rosa Street and Highland Drive and Santa Rosa Street, the project's impacts would be reduced to less than significant since overall system performance would improve to acceptable levels. However, because the Legislature may not provide funding to CSU in the amount requested, or because funding may be delayed, or because even if the requested

Comment No.	Response
	funding is appropriated, the City and/or applicable transportation agencies may not obtain the remaining funds necessary to implement the improvements, the above mitigation cannot be relied upon to reduce impact findings to a less than significant level. There are no other feasible mitigation measures that would reduce the identified impacts to less than significant applying the City and Caltrans thresholds. Therefore, there are no feasible mitigation measures that will reduce the identified significant impacts to a level below significant and these impacts are considered significant and unavoidable even after implementation of all feasible transportation/circulation mitigation measures. Likewise, there are limits on the feasibility of Transportation Demand Management (TDM) as mitigation for the effects of this project. These include the following: (1) funding cannot be guaranteed, most TDM programs on campus are grant-funded, (2) the effectiveness of TDM as it relates to the particular impacts of this project cannot be quantified and (3) participation and funding of TDM cannot be guaranteed long-term, and are not sufficient to reduce the impact severity to a less than significant level. Therefore, there are no feasible mitigation measures that will reduce the identified significant impacts to a level below significant and these impacts are considered significant and unavoidable even after implementation of all feasible transportation/circulation mitigation measures. Therefore, impacts to intersections are identified as *significant and unavoidable (Class I)*."
SLO-37	Language regarding percent contribution towards physical improvements has been added to the mitigations section of the EIR and Appendix F. However, because the City has not formally designed or approved these physical improvements, and because of uncertainty surrounding approval of funding, the impacts are considered significant and unavoidable (Class I).
SLO-38	The EIR has been updated to include additional mitigation. Refer to SLO-36. However, it remains that funding contingencies, and unpredictability in success of TDM measures remain concerns as to whether impacts can be reduced to a less than significant level.
SLO-39	The EIR has been updated to include a fair-share contribution percentage for specified improvements. Payment of fair-share contribution is contingent on City contributing the remaining funds for a given improvement.
SLO-40	The comment summarizes with the statement that the EIR fails to address or mitigate impacts, and that revisions are necessary. Responses to specific comments are provided in the preceding paragraphs.

From: lgardner_apcd@co.slo.ca.us
To: Nicole Carter
Cc: mguise@co.slo.ca.us; aroslan@co.slo.ca.us; jneel@calpoly.edu
Subject: APCD Comments on Cal Poly Student Housing South Recirculated Environmental Impact Report
Date: Monday, March 31, 2014 4:19:03 PM
Attachments: 3783-3.pdf

Attached are APCD Comments on the Cal Poly Student Housing South Recirculated Environmental Impact Report.

If you have any questions, contact Melissa Guise at 805-781-5912.

(See attached file: 3783-3.pdf)

Linda Gardner
Administrative Assistant
Air Pollution Control District
Phone: 805-781-4653
Email: lgardner@co.slo.ca.us

[Scanned @co.slo.ca.us]

SLO COUNTY apcd | Air Pollution Control District
San Luis Obispo County

March 31, 2014

CSU Board of Trustees
c/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding the Cal Poly Student Housing South Recirculated Environmental Impact Report

Dear Ms. Carter,

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 Recirculated Environmental Impact Report for the above referenced project.

The project as proposed would include construction of a new dormitory complex of up to five-story towers on 12 acres and would include a total of 1,475 beds and 20,000 square feet of space (could be utilized for a central plant, custodial room, mailroom, workshop, electrical room, and/or coffee shop). The project will also include removal of approximately 1,300-space surface parking lot, and construction of a 300 to 500-space parking structure. *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**.

Page 4.2-13 Construction Phase Emissions
As indicated in APCD's last comment letter on this project dated January 21, 2014, Mitigation Measures AQ/mm-1 Section c, which deals with architectural coatings is too vague and needs to be clarified. The draft EIR demonstrates that if the architectural coating phase of the project is extended, the emissions would be below the CEQA threshold. APCD staff recommends that the measure be written to be consistent with the assumptions used in the calculations or some other methods to demonstrate emissions would be reduced below the threshold. The measure as currently written states "*Prior to the start of construction, verify through written documentation submitted to the SLOAPCD that the following standards are met....*" **APCD staff recommend the details of how this standard will be met be included in the final EIR and thereby part of the public review process**.

APCD-1

T 805.781.5912 F 805.781.1002 W slocleanair.org 3433 Roberto Court, San Luis Obispo, CA 93401

Page 4.2-14 and 15 Operational Phase Emissions **APCD-2**

As indicated in APCD's last comment letter on this project dated January 21, 2014, APCD staff recommended and still recommends including additional mitigation measures to reduce the operational impacts to get the project below the CEQA threshold. As shown in the draft EIR, the annual emissions will not exceed the APCD annual CEQA threshold for ROG +NOx of 25 ton/year, but it will exceed the daily threshold of 25 lbs/day ROG+NOx. The draft EIR shows that with mitigation the daily operational emissions could be reduced to 26.72 lb/day of ROG + NOx. **APCD staff recommends additional measures to reduce the operational phase emission to below the daily CEQA threshold**

Additional mitigation measures could include:

- Installing EV Charging stations in the parking lot for public access.
- Reducing the number of parking spaces as indicated in the draft EIR.
- Incorporating solar panels into the project. On Page ES 11 - Under the section on utilities the DEIR indicates "climate control and water would be provided by one of three options: additional capacity at the central plant, installation of a cogeneration or fuel cell system on-site, or installation of approximately 10 boilers within the buildings. The project may also include rooftop solar energy systems to supplement climate control and power demand."

  To reduce potential air quality impacts and keeping with Cal Poly's commitment to sustainability, the ACPD recommends that solar panels be incorporated into the project.

- If the additional mitigation measures do not get the project below the daily threshold of 25lbs/day ROG + NOx, off-site mitigation is recommended to bring the project to a Class II impact, significant but mitigated.

Page 4.2-17 Naturally Occurring Asbestos **APCD-3**

A statement was added to the EIR that addresses Naturally Occurring Asbestos (NOA) and the requirement for an exemption request if NOA is not present at the site. This section was added in the text of the EIR but was not incorporated as a mitigation measure. **APCD staff recommends this text be included as a mitigation measure to ensure compliance with the requirement.**

Page 4.2-17 Construction Emissions from Diesel Particulate Matter **APCD-4**

As indicated in our last comment letter on this project dated January 21, 2014, the following mitigation measures were recommended and not included in the recirculated EIR. **In addition to the measures proposed in the recirculated DEIR the APCD recommends inclusion of the following measure to reduce impacts to sensitive receptors (e.g. residential units or schools) during construction:**

A. **Equipment Selection**
   The equipment that shall be used most often near sensitive receptors shall be either 1) equipped with either Tier 4 engines, or 2) Tier 3 engines with ARB verified Level 3 exhaust retrofits, or shall be 3) alternatively fueled engines (compressed natural gas, electric etc.).

APCD-4 (continued)

B. Idling Limitations
Idling Restrictions Near Sensitive Receptors for Diesel Equipment:
1. Idling areas shall not be located within 1,000 feet of sensitive receptors;
2. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
3. Signs that specify the no idling requirements must be posted and enforced at the site.

C. Equipment staging areas
Equipment staging areas should be located at least 1,000 feet from sensitive receptors.

D. Work Scheduling
Work that will involve the use of the most diesel equipment should be scheduled to occur when school is out of session to the extent feasible.

APCD-5

Operational Permit Requirements
Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. 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 Appendix, page 4-4, in the APCD's 2009 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Food and beverage preparation (primarily coffee roasters);
- Dry cleaning;
- Boilers;
- Internal combustion engines;
- Cogeneration facilities;

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,

Melissa Guise
Air Quality Specialist

MAG/lmg

cc: Nicole Carter, CSU Board of Trustees

H:\PLAN\CEQA\Project_Review\3000\3700\3783-3\3783-3.docx

10.1.4 Response to Letter from San Luis Obispo County Air Pollution Control District

Comment No.	Response
APCD-1	The EIR, page 4.2-12, includes a discussion of why extension of application periods is infeasible. The University, prior to commencement of construction, will provide reporting to the APCD regarding measure compliance. The following clarifications will be incorporated in the EIR: "Prior to start of construction, the University and its contractors shall submit a complete schedule to the APCD, including projected timing and duration of architectural coating application. The University and its contractors shall also update information regarding size of buildings, including the parking structure. Prior to the start of the application period, the University and its contractors shall provide a refined schedule to the APCD which specifically addresses application of architectural coating; the University and its contractors will extend or vary application schedules to the extent feasible." The schedule for application will be reevaluated, and extended as feasible, however, since extension of the application period to the extent required to fully mitigate impacts is infeasible (page 4.2-12), impacts are concluded to be significant and unavoidable. The actual application rate will vary based on completion rates of individual buildings, and the ultimate construction schedule.
APCD-2	It should be noted that the daily operational emissions threshold may not be the most representative metric for the project based on guidance provided in the APCD's CEQA Air Quality Handbook. However, the EIR discloses both the annual and daily thresholds and levels in order to provide more information. As stated in the EIR, a major component of the operational emissions is architectural coating re-application throughout the lifetime of the project. Actual re-application rates, as noted in the EIR, will depend on a variety of real-world factors. Specific responses to suggested mitigation are provided below: EV Charging: The University is pursuing funding for EV charging stations as part of a grant application (Julie Maloney, Campus Planner, personal communication 3/11/2014). The mitigation for AQ Impact 2 in the EIR will be amended as follows: ▪ "Provide EV charging stations in the parking lot or structure" Reduced Parking Spaces: In order to provide a reasonable worst-case scenario for modeling of emissions, the air quality analyses assumed a 500-space parking garage. A final number of parking spaces has not yet been determined. As noted in the Alternatives Analysis, reducing parking exacerbates traffic impacts at area intersections due to increased redistribution. However, a reduced parking scenario is a component of the existing proposed project. Solar Panels: The financial feasibility of solar panels has not yet been determined; the demands of the project will require some combination of technologies. Solar panels are an option within the existing project description. Off-site Mitigation. The EIR provides a reasonable, worst-case scenario for modeling of operational emissions. As stated previously, several factors, including the type of mechanical systems employed, the ultimate size of the parking structure, and the actual application and re-application rates of architectural coatings will inform more accurate operational emissions. Specific to vehicle emissions, the proposed project is an infill project, utilizing significant existing transit infrastructure, and resulting in significant reductions in commute trips. Additional off-site mitigation is not considered suitable for this type of project. The University has an active program of transit and other

Comment No.	Response
	transportation demand management programs which will continue campus wide. The project also includes mitigation to address intersection performance locally: The following mitigation is proposed to address impacts to off-campus intersections: *TC/mm-1 CSU/Cal Poly shall request its fair-share of the identified infrastructure improvement costs to construct the following improvements located within the City's jurisdiction, provided that: (a) a capital improvement plan has been adopted for the improvements, and (b) the City's (or other agency's) share of the mitigation improvement cost has been allocated and is available for expenditure for the following projects:* • *Foothill & Santa Rosa: Existing + project (1.9%) and cumulative (1.6%) intersection widening as identified in the Highway 1 Major Investment Study* • *California & Taft: Existing + project (2.6%) and cumulative (2.0%) signalization or roundabout control upgrade* • *US 101 & California: Existing + project (2.5%) modification of painted median / two-way left turn lane to accommodate a two stage left turn. Cumulative signalization or roundabout control upgrade (1.8%).* • *Walnut Street and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.4 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.* • *Highland Drive and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.3 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.* *As to those improvements identified above that are located within the jurisdiction of Caltrans, CSU/Cal Poly will support Caltrans in its efforts to obtain the appropriate funding through the state budget process, and will look to the City of San Luis Obispo to join in that support.* Improving intersection performance may improve air quality parameters by reducing idling and queuing of vehicles. The revised text notes limitations regarding the feasibility of the above mitigation associated with potential funding constraints or delays and, therefore, implementation of the mitigation cannot be assured.
APCD-3	The text on page 4.2-18 will be amended as follows: "AQ/mm-5a Prior to commencement of construction, the University shall file an exemption request for absence of Naturally Occurring Asbestos."
APCD-4	Tier 3 or better engines are specified in AQ/mm-1. Mitigation AQ/mm-2 shall be amended as follows: "AQ/mm-2 In order to minimize DPM impacts to sensitive receptors proximate to the project site, the following mitigation is proposed in conjunction with measures included in the project, and AQ/mm-1. a. Staging and queuing areas shall be located as distant as possible from sensitive receptors.

Comment No.	Response
	b. ~~Diesel idling greater than 5 minutes is not~~ No idling is permitted. c. Signs specifying the no idling limitations shall be installed on-site for the duration of construction." Compliance with items C and D is infeasible for the project. There are no locations on campus which are more than 1,000 feet from sensitive receptors. Therefore the mitigation program specifies "distant as possible." Limits on work scheduling to outside of school sessions would extend the construction schedule significantly, and is therefore considered infeasible.
APCD-5	In compliance with existing regulations, the University will obtain necessary permits.

10.2 GENERAL PUBLIC COMMENT LETTERS AND RESPONSES

10.2.1 Master Responses

Certain comments submitted by members of the public related to substantially similar issues. The following responses are master responses intended to address all of the comments submitted in relation to these issue areas. All individual responses set out in Section 10.3.2, Public Comments, below, related to comments regarding one of these issue areas are referred back to the appropriate master response to avoid unnecessary length and duplication in this document.

Response No. | **Master Response**

MR-1 ***GRAND AVENUE TRAFFIC***

Net trip reductions along Grand Avenue between US 101 and Slack Street are comprised of two components: redistributed general parking lot trips (created when parking is reduced on the project site) and trips removed from the system as a whole as a byproduct of moving freshmen on campus (internalization). General parking is chiefly comprised of student commute trips, campus visitors and staff.

As noted in the EIR, the trips related to general parking redistribution are largely moved off of Grand Avenue in favor of California Boulevard and Highland Drive. Based on the gateway volume distribution assumed in Table 12 of Appendix F, 90% of the general parking redistributed trips are moved off of Grand Avenue. Additionally, moving freshmen on-campus internalizes these freshmen commute trips; these trips are removed from Grand Avenue in full. Accordingly, the following table shows that the net project trips would be negative along Grand Avenue.

Item	AM Peak Hour		PM Peak Hour	
	Southbound	Northbound	Southbound	Northbound
Redistributed Residential Trips on Grand Avenue	4	3	13	11
90% * Redistributed General Trips	-12	-35	-4	-2
Freshmen Commute Reduction	-24	-72	-32	-17
Total Net Trips on Grand Avenue Gateway	*-32*	*-104*	*-23*	*-8*
Net Trips at Grand Avenue/Slack Street	*-136*		*-31*	
Net Trips at Grand Avenue/Loomis Street-US 101 Southbound	*-136*		*-31*	
Net Trips at Grand Avenue/US 101 Northbound-Abbott Street	*-121*		*-27*	

Chapter 3 of Appendix F has been updated to include this information. Since the number of net project trips on Grand Avenue is negative, the intersections of Grand Avenue/Slack Street and Grand Avenue/US 101 Northbound off-ramp-Abbott Street

Response No.	Master Response

were not studied as part of the analysis. Reductions in traffic volumes typically *decrease* intersection delay; per the transportation impact criteria presented in the EIR, intersections operating at unacceptable levels of service are only impacted when a project contributes a net *increase* in the number of trips at the intersection. Because the number of net project trips through the intersection is negative, Grand Avenue intersections would not be significantly impacted by the project.

City staff has also suggested that the increased level of pedestrian and bicycle traffic in the vicinity of the project site may degrade traffic operations at Grand Avenue/Slack Street. A sensitivity test was performed for the intersection of Grand Avenue/Slack Street near the project site, which is all-way stop-controlled. A sensitivity test was performed in Synchro for estimated Cumulative without Projects conditions. In order to estimate Cumulative without Project conditions, turning movement count data provided by the City of San Luis Obispo from May 2013 was factored up consistent with forecasts for other study intersections to represent cumulative year traffic volumes. Additionally, to account for changes due to the project future year traffic, pedestrian and bicycle volumes were included based on expected activity and traffic levels around the intersection. Based on this analysis, the average traffic delay at Grand Avenue/Slack Street is slightly lower under estimated Cumulative with Project conditions than estimated Cumulative without Project conditions, even when accounting for higher levels of pedestrian and bicycle activity. Therefore, because traffic volumes would decrease, and because pedestrian and bicycle activity would not result in significant changes in traffic delay, this intersection would not be impacted due to the project.

MR-2 ***NUISANCES ASSOCIATED WITH STUDENTS***

Comments raised regarding student nuisances are related mainly to noise, pedestrian activity, and public safety concerns related to student-age parties and other gatherings in or near the residential neighborhood to the south. Commenters continue to assert that these concerns constitute environmental effects which warrant analysis and mitigation in the EIR.

The EIR addresses these issues in several locations. First, the EIR identifies “Areas of Controversy Known to the Lead Agency” in Section H of the Executive Summary. Nuisances and the treatment of nuisances throughout the EIR are summarized in this Section. Section H describes where topics are addressed and notes that behaviors do not necessarily cause quantifiable effects.

Pursuant to Section 15131 (CEQA Guidelines, Economic and Social Effects): “Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes….The focus of the analysis shall be on the physical changes”.

The EIR analysis is organized in compliance with Section 15131 quoted above. Nuisance noise is addressed in Section 4.4. The EIR discloses the type and potential sources of noise, including sporadic noise associated with student-age populations which are present in the neighborhood. The thresholds in Section 4.4 define significant impacts, including exceedances of noise level standards, and permanent or temporary increases in ambient noise levels. Ambient noise levels are described as those typical noise levels in the environment at a particular location. The EIR analysis finds that sporadic noise associated with residents of the project who may access the neighborhood for gatherings, is speculative and not quantifiable under the defined thresholds. Therefore, while student behavior may have certain

Response No.	Master Response
	social effects, physical changes are not quantifiable in this instance. Similarly, Section 4.5 discloses concerns related to nuisance behavior and public safety concerns. However, the analysis focuses on whether the behavior would result in physical environmental effects associated with increased facilities needed to address the issue. The EIR analysis finds insufficient nexus between the concerns over behavior and quantifiable environmental impacts. The EIR discloses, in both instances, substantive information regarding how response to nuisances are planned for and addressed both on campus and in the surrounding community. The following clarifications to the project description have bearing on these issues: ▪ The project locates two 24-hour professional staff residences in the southernmost buildings (Buildings 4 and 5) ▪ The southernmost building (Building 4) will be designated programmatically a "Quiet Dorm". The "Quiet Dorm" will have strict rules regarding the amount of noise.
MR-3	***BUFFERS*** The southernmost building (4) is currently designed to be setback from Slack Street by an average of 35 feet. Structures are located more than 200 feet from the nearest private residences. The Slack Street frontage and the southern corners of the project are programmed to be landscaped, predominantly with large trees. The proposed site layout provides opportunities to locate major outdoor gathering spaces more distant from the City limits and neighborhoods.
MR-4	***SOCIAL AND ECONOMIC ISSUES*** Pursuant to Section 15131 (CEQA Guidelines, Economic and Social Effects): "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes….The focus of the analysis shall be on the physical changes". Based on analysis of the project, and incorporation of recommended mitigation measures, economic or social changes will not occur which would result in an adverse physical effect.
MR-5	***STATEMENTS REGARDING ENROLLMENT FROM THE PRESIDENT'S OFFICE*** The enrollment numbers suggested by President Armstrong were intended to begin the discussion of growth at Cal Poly in the future and have not been adopted as a specific numerical goal or enrollment target. The Campus is currently operating and developing under the 2001 Master Plan which provides specific enrollment numbers and adopted capacities. In order for Cal Poly to grow enrollment significantly beyond the 2001 Master Plan the campus would need to amend the Master Plan and review the potential environmental impacts of the proposed growth. Annual decisions about enrollment capacity are subject to a variety of factors, including funding, teaching capacity, and student performance.
MR-6	***OFF-CAMPUS PARKING*** There is substantial available parking on campus to serve the campus population; as

Response No.	Master Response

stated in the EIR, much of the available capacity is underutilized. The decision to park off-campus, particularly in areas where such parking is illegal, such as in retail lots where signage specifically states use is for businesses only, or in neighborhoods with parking restrictions, is an individual decision of risk on the part of the driver. In areas where longer-term public street parking is legal, existing capacities limit use. In all cases, much of this off-campus parking may be associated with student commuters, as opposed to campus residents, who need longer-term storage for vehicles, or staff and faculty. The project has the effect of significantly reducing student commuters by providing on-campus housing. The EIR finds that sufficient capacity exists for vehicles displaced from the on-site lot closure; therefore, no increases in off-campus parking are expected as a result of the project.

Physical environmental effects associated with parking are associated mainly with impacts related to construction of new parking facilities. Secondary air quality and traffic impacts may occur in densely population urban areas with highly constrained parking, where the act of searching for parking results in contributions to deficient circulation or leads to buildup of air pollutants. The EIR has identified sufficient parking within the project and on campus to accommodate projected demand associated with the project. The project would not require the construction of new off-campus parking facilities, which would have environmental effects, and would not result in a reasonably foreseeable condition in which searching for parking would result in measurable traffic or air quality impacts.

MR-7 ***USE OF THE ADMINISTRATION BUILDING SITE***

Pursuant to CEQA Guidelines §15126.6, "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives…" The alternative suggested - relocation of the existing administrative functions and repurposing/reconstruction of the existing administrative building - does not meet the standard of feasibility.

The existing site occupied by the Administration building is approximately 2.5 acres in size. To provide sufficient beds, a housing complex would need to be developed as approximately three, 20-story towers in this location. Costs associated with type of construction, the scale of this type of development, as well as issues related to access, ingress and egress, pose significant constraints to implementation of this suggested alternative. Site development constraints are compounded by the need to provide continuity in the administrative functions during development. Administrative space and functions would need to be continued during construction, significantly extending the construction timeframe (adding approximately four years to the schedule) and substantially increasing costs (the project budget would need to be expanded to include the new administration building, as well as temporary facilities), and increased construction costs. For these reasons, this alternative is not considered either reasonable or feasible.

MR-8 ***FEASIBILITY OF ALTERNATIVE SITES***

Commenters state the Final EIR needs to provide more information regarding the feasibility of project alternatives. The University has continually evaluated site selection, design and site layout throughout development of the proposed project, as noted in Section 5.0. The following information will be appended to the alternatives analysis to clarify feasibility of various alternatives, in particular, those alternatives determined to be environmentally superior to the proposed project:

- Site Constraints. The EIR provides general and preliminary information

Response No.	Master Response

regarding constraints at each identified alternative; however, additional work would be required in the event of a specific project proposal. Commenters, in general, placed more importance on impacts to the neighborhood, than to other residential areas and populations on campus. However, under the CEQA thresholds defined in the EIR, sensitive populations include student residents on campus, and visual, biological, and other resources are not lessened in importance because of the campus location. The evaluation in the EIR holds all identified resources equal, based on the inherent value independent of location.

- Project Budget. The funding and budget process associated with the proposed project create unique issues related to the feasibility of alternatives:
    - Housing, parking and dining are not state-supported and must therefore be self-supporting. The University has a set budget to complete the entire project. The costs to construct and operate project components must be weighed against the income from rents. The project has a required 30-year payback period, in which time debt obligations must be cleared. This informed the development of the site plan. The following are important considerations to achieve budget objectives:
        - Utilizing existing adjunct facilities, such as dining, wherever feasible. The addition of a separate dining hall to serve a single residential development, including additional staff, distribution infrastructure, etc. would add approximately $25,000,000 to the project budget, and would make development infeasible given current budget limitations.
        - Combining program components, including staffing, gathering spaces, as supportive services, wherever feasible. Several commenters have disagreed with statements in the EIR that the co-location of new freshman housing with existing freshman, as opposed to upper-classmen, housing, is an important consideration in the location of the project. The University has stated in the EIR, at community forums, and in email correspondence (4.17.2014) that co-location is critical to the success of the freshman housing program. In particular, University staff note that;
            - First year students are commonly at a similar stage of personal and cognitive development, as they begin their college education. Housing first year students in residence hall communities in close proximity allows for more intentional and focused educational and student development based programming that supports the personal and cognitive development, a strong factor in first year student retention.
            - Having first year students living in residence halls in close communities with each other allows for a greater connection to the campus resources that

Response No.	Master Response

are critical to the transition and success of first year students - dining, University Union, recreation center, etc.

- Poly Canyon Village and Cerro Vista were specifically designed to provide a type of housing and living style more reflective of private residential options to retain older students in on-campus housing. The Village and Cerro Vista were designed to allow students to cook in their units.

- Specific Alternatives: Alternatives identified as environmentally superior in Chapter 5 included:
  - No Project – No Development Alternative
  - H12/H16 Alternative
  - No Parking Garage Alternative

  The feasibility of each alternative is addressed below:
  - The No Project alternative is not feasible, in that no residences would be built, and therefore the various project objectives, and Master Plan objectives, would not be met.
  - The H12/H16 Alternative is infeasible in that it would:
    - Require the development of dining and additional activity/gathering space, exceeding the available budget and increasing impacts related to construction.
    - Require taller buildings - the program requirements and the addition of a dining facility with a site area of 8.7 acres would most likely require some if not all of the buildings be increased to 6 stories. Costs to construct six stories are exponentially higher due to code requirements.
    - Not achieve objectives of the Housing Program to expand and co-locate the freshman housing program
    - Require the replacement of the bridge at Via Carta.
    - Require the conversion of Prime agricultural land. (note: see page 55 of the Master Plan)
    - Increase the project budget by approximately $25,000,000 with the addition of a project specific dining hall, with additional costs related to code requirements and bridge replacement.
  - The No Parking Garage Alternative would remove replacement parking, but would significantly increase redistributed trips at area intersections. This alternative would not meet the objectives of the project due to the lower bed count resulting from the reduction of scale of residential structures. This alternative is infeasible because of the many concurrent events on campus that require parking in the general proximity. Should the campus have an event at the Performing Arts Center and the Robert A. Mott Gymnasium,

Response No.	Master Response
	the closest large parking lot would be north of Brizzolara Creek.

MR-9 ***ADDITIONAL INFORMATION, AESTHETICS MITIGATION***

The University has evaluated building design and site layout throughout development of the proposed project (Joel Neel, Director, Facilities Planning and Capital Projects, personal communication, ongoing). The following project components limit options related to building design and site layout:

- Site Constraints. As noted throughout the EIR, approximately half of the site is underlain by undocumented fill. As stated in the geotechnical appendices, the transition from shallow bedrock to the area of greatest fill depth is located generally in the area proposed for the "Great Lawn" (central open space). Excavation and structural modifications required to account for the differential settlement potential to make this portion of the site suitable for buildings, as opposed to open space, are cost prohibitive. In order to account for the change in geology in this area the portion of the building on bedrock would need to be excavated an additional 10 to 15 feet. This additional excavation could add as much as 25% to the cost of the foundation.
- Type of Residences. The project is a freshman dormitory-style project. Many of the suggested mitigation, including stepping back floors, exaggerating articulation, etc. are problematic for this type of development. Dormitories consist of individual rooms serving 1-2 individuals, oriented along a central hallway, with shared bath and living areas. The project is designed to provide a 51-person family group, with visibility and access from resident advisor rooms. The buildings on each floor have bedrooms to accommodate 50 students and a resident advisor. Building 3 is half the size of the building 2 and 2R floor plan and divides the family unit between two floors.
- Overall, the site is designed to orient internally to campus; the site design reinforces orientation to the campus (rather than the neighborhoods) by:
    - Orienting buildings internal to the site
    - Locating open space in internal portions of the site
    - Locating ingress/egress internal to the site
- Project Budget. There are particularities about the funding and budget associated with the proposed project that pose unique issues related to the feasibility of mitigation that would significantly increase cost.
    - Housing and parking are not state-supported and must therefore be self-supporting. The University has a set budget to complete the entire project. The costs to construct and operate project components must be weighed against the income from rents. The project has a required 30-year payback period, in which time debt obligations must be cleared. This informed the development of the site plan. The following are important considerations to achieve budget objectives:
        - Building plates are simplified and repeat from floor to floor
        - In order to provide the maximum program benefit each floor needs to maintain the same number of bedrooms, bathroom, study and gathering space

Building 4 is setback an average of 35 feet from the northern edge of Slack Street. Increasing the setback would require relocation of open space amenities to the

Response No.	Master Response

southern portion of the site and development of fill to bedrock transition area. The University finds that this is not feasible because of increased costs, and is not desirable, as it would locate the main gathering areas on site proximate to the neighborhoods.

Suggested mitigation is addressed below:

Stepped Buildings. As stated previously, "stepping" the southernmost buildings is infeasible given the type of development proposed. Floor plates include the same layout on each floor to achieve the desired family unit of 50 students and one resident advisor. Building 3 is half the size of the building 2 and 2R floor plan and divides the family unit between two floors.

The following mitigation is being proposed to reduce impacts related to compatibility/scale:

"AES/mm-2 The final site plan shall be amended to specify three stories in Building 4 (the building fronting Slack Street)."

Wall and Roof Articulation. Buildings include facades which are varied in orientation and expanse. Buildings include "breakpoints" where the building angles back, and the orientation varies, so as to reduce the impression of a continuous wall. Continuous surfaces extend no further than 125 feet in each of the southernmost buildings.

Varying the articulation of rooflines sufficient to reduce impacts related to view blockage is considered infeasible; the addition of a slope roof line would increase the overall building height and therefore would not address the concerns.

Color. The project description will be clarified to state that the building facades that face the exterior of the site will have a more muted color palette blending with the existing university character.

Style. As stated in the EIR, the style of the buildings is consistent with expectations on and near campus. Architectural style is not considered an important contributing factor to the visual quality of the surrounding neighborhood (EIR Section 4-1). Scale and view obstruction underlie the significant impact conclusions; therefore, alteration of style would not serve to reduce the severity of impacts.

MR-10 ***OFF SITE TRANSPORTATION IMPACTS***

The mitigation section for off-site traffic impacts will be amended as follows:

"Impacts to intersections are a result of redistribution of parking trips. The TIA discusses various potential mitigation options, including the provision of additional general and residential parking on-site to reduce the number of trips redistributed, a Transportation Demand Management (TDM) Program (with monitoring) to reduce the number of trips, and other standard traffic mitigation options to reduce trips or accommodate additional capacity. ~~However, the likely success and feasibility of these measures is difficult to establish at this time due to the nature of the proposed project, as discussed below.~~ The following is an evaluation of the feasibility of TIA recommendations.

On-Site Parking Replacement

Providing ~~A~~additional parking ~~replacement~~ at the project site would facilitate ~~encourage~~ trips to campus ~~to be made~~ using existing travel patterns, thus reducing the redistribution of vehicle trips to California Boulevard and Santa Rosa Street and reducing impacts on intersections along those streets. In this regard, ~~Cal Poly staff~~

Response No.	Master Response

~~has indicated that a~~ the proposed Parking ~~area~~ Structure may include ~~of~~ up to 500 spaces at the project site ~~may be possible~~, as referenced in the Project Description. ~~At this time, however, the ultimate financial feasibility of a 500-space parking area has not yet been determined.~~

However, ~~D~~development of a 500-space parking area alone would not be sufficient to mitigate project-related impacts at nearby intersections to a less than significant level, as detailed in the TIA (refer to Appendix F). Incorporating a 500-space garage as part of the project would reduce parking redistribution and lessen the severity of the intersection impacts, but because the project would continue to produce a net addition of trips to impacted study intersections, it would not fully mitigate the intersection impacts to a less than significant level under City and Caltrans thresholds. In order to reduce potential impacts to less than significant, the project-related trips at affected study intersections currently operating at deficient levels would need to be reduced to zero. The financial feasibility of a 500-space parking structure has yet to be determined; therefore, development of such a structure cannot be counted towards mitigation for the project's impacts.

Transportation Demand Management and Monitoring Program

Cal Poly already implements TDM measures that could be enhanced and improved upon by expanding the current program. The University could also implement additional TDM measures. ~~Available~~ Examples of TDM measures include: modifications to the number or price of residential parking permits; an expansion of existing carsharing or ridesharing programs; development of bicycle and pedestrian improvements to areas of high trip attraction; and development of increased amenities on campus to reduce the need for off-campus travel by students and faculty.

However, as noted above, ~~P~~pursuant to the City and Caltrans thresholds identified above, the addition of even one trip to an intersection that currently operates at an unacceptable LOS would be considered a potentially significant impact. Therefore, implementation of any recommended TDM program would need to result in a zero net trip increase at the impacted study intersections in order to reduce the impacts to less than significant. ~~be monitored to ensure compliance with the strict zero net trip increase threshold at the impacted study intersections.~~

A combination of on-site parking replacement and a monitored TDM program could ~~produce~~ reduce intersection impacts ~~that are less than significant with mitigation~~. However, because the project site plan has not been finalized and the level of parking replacement on-site is still to be determined, development of a TDM and monitoring plan of appropriate detail and scope is not possible at this time. There are additional limits on the feasibility of TDM as mitigation for the effects of this project. These include the following: (1) funding cannot be guaranteed, most TDM programs on campus are grant-funded, (2) the effectiveness of TDM as it relates to the particular impacts of this project cannot be quantified and (3) participation and funding of TDM cannot be guaranteed long-term. ~~Upon finalization of the project site plan and determination of the feasible number of parking spaces that can be provided on site, it may be conclusively established that appropriate mitigation is available to reduce significant impacts to intersections. However, b Because the effects of the TDM measures cannot be fully developed and quantified at this time~~ For these reasons, ~~significant impacts to intersections in the project vicinity would remain *significant and unavoidable (Class I)*.~~ the implementation of TDM does not constitute feasible mitigation for the project.

~~*Other standard mitigation measures were also considered to reduce impacts to*~~

Response No.	Master Response

~~*intersections, including reducing the project size, physical improvements to roadways, and payment of in lieu fees. These measures are typically considered as an integral component of traffic studies for other development projects; however, their implementation may not be feasible or appropriate due to the unique nature of this project.*~~

Reduced Housing Alternative

Reduced projects are typically addressed as alternatives (refer to Chapter 5, Alternatives Analysis). In this case, a reduced project would lessen the beneficial commute trip reduction associated with moving students onto campus, potentially exacerbating intersection impacts. For this reason, implementation of a reduced size project as mitigation would not be feasible since it would preclude meeting project objectives.

Roadway Improvements

Impacts to area intersections could alternately be addressed by improvements in physical capacity or performance. The City has identified several improvements to impacted intersections in several planning documents. These include:

- Foothill & Santa Rosa: Intersection widening (identified in the Highway 1 Major Investment Study.)
- California & Taft: Signalization or roundabout control upgrade.
- US 101 & California: Modification of painted median / TWLTL to accommodate a two-stage left turn. Cumulative signalization or roundabout control upgrade.

No physical improvements have been identified by the City for the Walnut and Santa Rosa Street intersection or the Highland Drive and Santa Rosa Street intersection.

Intersection improvements, including widening Santa Rosa Street to three lanes in each direction, would improve affected intersection operations, but would not reduce the number of project-related trips traveling through the intersections. Physical improvements may ~~also~~ have secondary impacts associated with the improvement, such as increasing pedestrian crossing distances, and environmental impacts associated with construction, including additional air quality, erosion, and noise impacts. Increasing the crossing distances would necessitate signal timing adjustments along the corridor which may lead to degradation in intersection operations. Widening could also be physically infeasible in constrained areas.

Physical improvements ~~could be funded~~ identified above are ultimately the jurisdiction of the City and/or Caltrans, and may involve the County of San Luis Obispo or SLOCOG. The impact of project-related trips could be offset by participation in funding through CSU fair-share percentage contribution to the costs to construct identified improvements. ~~However, since an established City capital program for addressing such improvements is not in place, the potential impacts to intersections are identified as significant and unavoidable (Class I).~~

~~Mitigation options are discussed above in an attempt to reduce project impacts. However, because the mitigation will ultimately be formulated by what is determined to be feasible by project design, cost, campus goals, and guidelines in the Master Plan, there is insufficient evidence to assume the mitigation options will reduce potential impacts to intersections. Therefore, potential impacts to intersections are identified as significant and unavoidable (Class I).~~

The following mitigation is proposed to address impacts to off-campus intersections:

Response No.	Master Response

TC/mm-1 CSU/Cal Poly shall pay to the City of San Luis Obispo its fair-share of the identified infrastructure improvement costs to construct the following improvements located within the City's jurisdiction, provided that: (a) the state Legislature appropriates the funds for the improvements as requested by CSU in the state budget process, (b) a capital improvement plan or similar plan has been adopted to ensure implementation of the improvements, and (c) the City's (or other agency's) share of the mitigation improvement cost has been allocated and is available for expenditure, thereby triggering CSU's fair-share contribution payment:

- *Foothill & Santa Rosa: Intersection widening as identified in the Highway 1 Major Investment Study (Fair Share Percentage: Existing + project (1.9%) and cumulative (1.6%)).*
- *California & Taft: Signalization or roundabout control upgrade (Fair Share Percentage: Existing + project (2.6%) and cumulative (2.0%)).*
- *US 101 & California: Modification of painted median / two-way left turn lane to accommodate a two stage left turn. (Fair Share Percentage: Existing + project (2.5%)); and signalization or roundabout control upgrade (Fair Share Percentage: Cumulative 1.8%).*
- *Walnut Street and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.4 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.*
- *Highland Drive and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.3 percent cost of the improvements using the existing plus project condition. Physical improvements for this intersection have not been identified to the university at this time.*

As to those improvements identified above that are located within the jurisdiction of Caltrans, CSU will support Caltrans in its efforts to obtain the appropriate funding through the state budget process, and will look to the City of San Luis Obispo to join in that support.

With the addition of new TC/mm-1, existing TC/mm-1 et seq. will be renumbered sequentially.

The CSU has negotiated in good faith with the City of San Luis Obispo regarding its fair-share of the costs to construct improvements in the city's jurisdiction related to this project. While agreement with the city was not reached, the campus is seeking trustee approval to request a total of $534,000 in capital funding from the governor and legislature for the identified off-site mitigation measures below. Payment is contingent upon (a) the state Legislature appropriating the funds for said improvements as requested by the CSU in the state budget process; and (b) the city allocating its share of the mitigation improvement costs and ensuring said amount is available for expenditure, thereby triggering the CSU's fair share contribution payment. The improvements which have been identified by the city and included as mitigation measures in the EIR are as follows:

- Foothill Boulevard and Santa Rosa Street: The existing conditions are already at a Level of Service D and will be at Level of Service F under cumulative conditions (due to planned city and other projects). Therefore, due to cumulative conditions and the addition of the project, the intersection

Response No.	Master Response

needs widening as identified in the City of San Luis Obispo's State Route 1 Major Investment Study. The university estimates its fair share for the improvements of this intersection to be $342,166 based on the project contributing a 1.9 percent increase to the number of existing intersection trips.

- California Boulevard & Taft Street: The existing conditions are already at a Level of Service F and will be at Level of Service F under cumulative conditions. Therefore, due to cumulative traffic and the addition of the project, the intersection needs signalization or a roundabout control upgrade. The university estimates its fair share for the improvements of this intersection to be $97,547 based on a 2.6 percent net trip increase in existing conditions.

- US Highway 101 & California Boulevard: The existing conditions are already at a Level of Service F and will be at Level of Service F under cumulative conditions. Therefore, due to the project traffic, the intersection needs modification to provide a painted median and two-way left turn lane to accommodate a two-stage left turn, while due to cumulative traffic the intersection needs improved signalization, or roundabout control upgrade. The University estimates its fair share for the improvements of this intersection to be $93,795 based on a 2.5 percent net trip increase to existing conditions.

In addition, the project will have a significant impact on the following intersections:

- Walnut Street and Santa Rosa Street. The existing conditions are already at a Level of Service E in the a.m. peak and Level of Service D in the p.m. peak. The university estimates its fair share for the improvements of this intersection to be 2.4 percent based on the net trips added to existing conditions. Physical improvement plans for this intersection have not been identified to the university at this time.

- Highland Drive and Santa Rosa Street. The university estimates its fair share for the improvements of this intersection to be 2.3 percent cost of the improvements using the existing plus project condition. Physical improvement plans for this intersection have not been identified to the university at this time.

The net trips added by the project to the above intersections range from -5 (meaning trips were reduced) during the morning peak period and up to 79 trips added at intersections during the afternoon peak period.

If all of the improvements identified in mitigation measure TC/mm-1 were constructed, including as yet identified improvements to the intersections of Walnut Street and Santa Rosa Street and Highland Drive and Santa Rosa Street, the project's impacts would be reduced to less than significant since overall system performance would improve to acceptable levels. However, because the Legislature may not provide funding to CSU in the amount requested, or because funding may be delayed, or because even if the requested funding is appropriated, the City and/or applicable transportation agencies may not obtain the remaining funds necessary to implement the improvements, the above mitigation cannot be relied upon to reduce impact findings to a less than significant level. There are no other feasible mitigation measures that would reduce the identified impacts to less than significant applying the City and Caltrans thresholds. Therefore, there are no feasible mitigation measures that will reduce the identified significant impacts to a level below significant and these impacts are considered significant and unavoidable even after

Response No.	Master Response
	implementation of all feasible transportation/circulation mitigation measures. Likewise, there are limits on the feasibility of Transportation Demand Management (TDM) as mitigation for the effects of this project. These include the following: (1) funding cannot be guaranteed, most TDM programs on campus are grant-funded, (2) the effectiveness of TDM as it relates to the particular impacts of this project cannot be quantified and (3) participation and funding of TDM cannot be guaranteed long-term, and are not sufficient to reduce the impact severity to a less than significant level. Therefore, there are no feasible mitigation measures that will reduce the identified significant impacts to a level below significant and these impacts are considered significant and unavoidable even after implementation of all feasible transportation/circulation mitigation measures. Therefore, impacts to intersections are identified as *significant and unavoidable (Class I)*."

10.2.2 General Public Comment Letters and Responses

The following members of the general public have submitted comments on the 2014 Recirculated Draft EIR.

Respondent	Code	Contact Information	Page
Concerned Citizen Letter dated: February 3, 2014	CC	*[contact information not provided]*	10.2-14
Laurel and Saeed Davar Email dated: February 16, 2014	LSD	2076 Hays Street San Luis Obispo, CA 93405	10.2-16
Henry Herzog Email dated: February 16, 2014	HH	hankherzog@sbcglobal.net *[physical address not provided]*	10.2-19
Randy Brindley Email dated: February 17, 2014	RB	Brindley Construction & Painting P.O. Box 466 Cayucos, CA 93430	10.2-21
Glen Estabrook, CIC Email dated: February 18, 2014	GE	Brown & Brown Insurance P.O. Box 30098 Santa Barbara, CA 93130	10.2-23
Bob Yeager Email dated: February 19, 2014	BY	slomanbob@gmail.com *[physical address not provided]*	10.2-25
Juventino Ortiz Letter dated: March 22, 2014	JO	2267 Santa Ynez Avenue San Luis Obispo, CA 93405	10.2-27
Gracie Tedone Manderscheid Email dated: March 24, 2014	GTM	sloshopper@aol.com *[physical address not provided]*	10.2-30
Michele Hall Letter dated: March 25, 2014	MH	njmslo19@aol.com *[physical address not provided]*	10.2-32
Claudia Andersen Emails dated: March 26, 2014	CA(a)	1405 Slack Street San Luis Obispo, CA 93405	10.2-36
Tina Crozier Email dated: March 26, 2014	TC	tinamc@charter.net *[physical address not provided]*	10.2-41
Susan Hay Email dated: March 26, 2014	SH	sthay21@aol.com *[physical address not provided]*	10.2-43
James Lopes Letter dated: March 26, 2014	JL	1336 Sweetbay Lane San Luis Obispo, California 93401	10.2-46
Sharon Whitney Letter received: March 26, 2014 (Letter dated: March 31, 2014)	SW(a)	216 Albert Drive San Luis Obispo, CA 93401	10.2-56
Michael Boudreau Email dated: March 27, 2014	MB	854 Murray Avenue San Luis Obispo, CA	10.2-72
Sharon Whitney Email dated: March 27, 2014	SW(b)	216 Albert Drive San Luis Obispo, CA 93401	10.2-74

Respondent	Code	Contact Information	Page
Joanne and Philip Ruggles Email and letter dated: March 28, 2014	JPR	P.O. Box 46 San Luis Obispo, CA 93406	10.2-76
Linda White Letter dated: March 28, 2014	LW(a)	2077 Slack Street San Luis Obispo, CA 93405	10.2-80
Sharon Whitney Email dated: March 28, 2014	SW(c)	216 Albert Drive San Luis Obispo, CA 93401	10.2-169
M. Zafar Iqbal PhD, CPA, CMA, CIA **Professor Emeritus of Accounting** Email dated: March 29, 2014	ZI	Orfalea College of Business San Luis Obispo, CA 93407	10.2-171
Terry Elfrink Email and letter dated: March 30, 2014	TE	1983 Slack Street San Luis Obispo, CA 93405	10.2-173
Virginia Jensen Email dated: March 30, 2014	VJ	virjensen@gmail.com *[physical address not provided]*	10.2-182
Martha Lindholm Email dated: March 30, 2014	ML	mlindholm528@gmail.com *[physical address not provided]*	10.2-184
Mila Vujovich-La Barre Letter dated: March 30, 2014	MVLB	650 Skyline Drive San Luis Obispo, California 93405	10.2-186
Judy West Email dated: March 30, 2014	JWe	charliejude@live.com *[physical address not provided]*	10.2-189
Claudia Andersen Email dated: March 31, 2014	CA(b)	1405 Slack Street San Luis Obispo, CA 93405	10.2-191
Russell Hall Email dated: March31, 2014	RH	179 Longview Lane San Luis Obispo, CA 93405	10.2-195
John Keisler Letter dated: March 31, 2014	JK	144 Henderson Avenue San Luis Obispo, CA 93405	10.2-199
Rebecca Keisler Letter dated: March 31, 2014	RKe	144 Henderson Avenue San Luis Obispo, CA 93405	10.2-203
Rachel Kovesdi Email dated: March 31, 2014	RKo	Kovesdi Consulting 3940-7 Broad Street, #139 San Luis Obispo, CA 93401	10.2-207
Neighborhood Email dated: March 31, 2014	N	[multiple commenters – refer to letter]	10.2-211
Jeniene White Email dated: April 1, 2014	JWh	jenienew@gmail.com *[physical address not provided]*	10.2-217
Scott Nichols Undated letter	SN	*[contact information not provided]*	10.2-217

2-3-14

RECEIVED
FEB 06 2014
CITY CLERK

Mayor Jan Mark,

I have been concerned about the 1400 bed resident hall and condos proposed for Grand Ave and Slack Street. I don't think anyone realizes how much traffic is already on Grand Ave. I am retired and live on Grand Ave. So one day last week I sat on my deck and counted cars, suv, buses, truck, etc. that traveled up and down Grand in just 1 hour. Here are my findings.

Cars, pickups, suvs etc	620
City buses	10
Ne'ery delivery truck	3

And also we get Amtrak buses but none came this hour.

I was also curious about Poly. Kids

Walkers 46 - with an I-pod or cellphone 13
Bikers 33 - no helmets 28 1 no hands!
Runners 6
Motorcycles 4
Skateboarders 2

This all within 1 hour. Also when Pac has a good show the cars are bumper to bumper.

Heaven knows what will happen if the proposed buildings are allowed. I hope you're show this to people who will make the decisions.

Thank you,
A concerned citizen • SLO Native

CC-1

10.2.2.1 Response to Anonymous Letter

Comment No.	Response
CC-1	Please refer to MR-1.

Nicole Carter

From: Laurel Davar <ljdavar@aol.com>
Sent: Sunday, February 16, 2014 11:28 AM
To: Nicole Carter
Subject: Cal Poly Dorm Expansion

To Whom it May Concern:

My husband and I live at 2076 Hays Street in the neighborhood adjacent to proposed dorm expansion plans at Slack St. and Grand Avenue. We are **opposed to this project's location**. Our reasons are below.

1) The increased traffic on Grand Avenue will cause further gridlock and bring even more unskilled drivers into our neighborhood trying to find alternative routes. **LSD-1**

2) It is wishful thinking that traffic would be confined to 1430 students. These students have parents and friends and will require police, fire, emergency services as well as frequent trips by moving companies, US Postal Service, UPS, FED EX, transit buses and trash collection. **LSD-2**

3) The student population currently occupying residences in this neighborhood have all but destroyed the quality of life. This neighborhood was once very desirable and upscale. **LSD-3**

4) Students **DO NOT MAKE GOOD NEIGHBORS.** Since living here our sleep has been disturbed every single Friday night and often other nights while students have their drunken pong parties.
Speaking to them personally has had no effect.

I do not think it is unreasonable to expect undisturbed sleep for myself and my guests. I do not think it is unreasonable to expect that I can play my own music in my own home or listen to my TV without the sound being blocked by a party 4 doors down. Calling the cops places the burden on the city and works only for the short term.

We object to:

a. beer cans strewn about lawns.
b. trash cans left street side
c. parking encroachment
d. puke in the gutters
e. urinating on lawns
f. indecent exposure
g. screaming and yelling at all hours
h. trashing the rental homes so that landlords never make improvements
i. vehicles on front lawns
j. intimidating elderly residents some of whom are retired Cal Poly Professors!

1

k. loud music

LSD-3 (continued)

5) The disgusting and irresponsible social habits of some Cal Poly students requires that their dorms be further away from city neighborhoods. Buffer zones should be considered, and honestly we don't care about the inconvenience of their having to walk a little farther.

LSD-4

Sincerely,
Laurel & Saeed Davar

2

10.2.2.2 Response to Email from Laurel and Saeed Davar

Comment No.	Response
LSD-1	Please refer to MR-1.
LSD-2	As stated in MR-1, vehicle traffic in the vicinity of the Grand Avenue and Slack Street intersection is projected to decrease with implementation of the project. Incidental trips, associated with populations such as visitors and service providers are factored into modeling. Service and visitor trips are: typically off-peak, a component of existing traffic within the campus, and are accommodated on site as part of the general parking population.
LSD-3	Please refer to MR-2.
LSD-4	Please refer to MR-3.

Nicole Carter

From: hank herzog <hankherzog@sbcglobal.net>
Sent: Sunday, February 16, 2014 10:09 AM
To: Nicole Carter
Subject: poly dorm

A recent letter to the editor in the Tribune seemed to make sense. I support the suggestion to move the Administration Building to the Grand Ave. parking lot area, create additional parking with a new parking structure and build the new dorm in the area vacated by the administration building. Placing the dorm in the center of campus allows students easy access to food services, the University Union, as well as to classrooms, the library and recreational facilities. Placing the Admin. building on the edge of campus, with ample parking fosters ease of access to the college administration by the general public, allowing them to conduct needed business with the University.
This plan makes so much more sense. It would alleviate neighborhood concerns regarding student encroachment on the neighborhoods around campus and supply needed parking.
Henry Herzog

HH-1

1

10.2.2.3 Response to Email from Henry Herzog

Comment No.	Response
HH-1	Pursuant to CEQA Guidelines §15126.6, "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives…" The alternative suggested - relocation of the existing administrative functions and repurposing/reconstruction of the existing administrative building - does not meet the standard of feasibility. The existing site occupied by the Administration building is approximately 2.5 acres in size. To provide sufficient beds, a housing complex would need to be developed as approximately three, 20-story towers in this location. Costs associated with type of construction, the scale of this type of development, as well as issues related to access, ingress and egress, pose significant constraints to implementation of this suggested alternative. Site development constraints are compounded by the need to provide continuity in the administrative functions during development. Administrative space and functions would need to be continued during construction, significantly extending the construction timeframe (adding approximately four years to the schedule) and substantially increasing costs (the project budget would need to be expanded to include the new administration building, as well as temporary facilities, and increased construction costs. For these reasons, this alternative is not considered either reasonable or feasible.

Nicole Carter

From: Randy Brindley <randybrindley@gmail.com>
Sent: Monday, February 17, 2014 10:04 AM
To: Nicole Carter
Subject: Cal Poly Dorms

Hi Nicole, my name is Randy Brindley, I'm a contractor in Cayucos and have been working on some sustainable projects for customers. I do a lot of synthetic turf for landscaping and drought tolerant plants. I'm now going into water catchment ideas and recycling grey water for landscaping. It would be nice to see the biggest Engineering school to be the first to incorporate some of these ideas. I'm sure the community would be a lot more user friendly. **RB-1**

--
Randy Brindley
Brindley Construction & Painting
P.O. Box 466
Cayucos, CA 93430
805-440-3779

***** PLEASE NOTE NEW MAILING ADDRESS *****

1

10.2.2.4 Response to Email from Randy Brindley

Comment No.	Response
RB-1	The project employs several Low Impact Development techniques to address infiltration and drainage.

Nicole Carter

From: Glen Estabrook <Gestabrook@bbofcal.com>
Sent: Tuesday, February 18, 2014 10:14 AM
To: Nicole Carter
Subject: Cal-Poly Proposed Student Housing Project / 1450+-

Nicole:

I have been monitoring the latest of several Student Housing Projects at Cal Poly and unlike previous concerns I wanted to represent my opposition to this next project in review. **GE-1**

This is not to say University is extremely important to the town and its financial stability, however, the continual rapid growth of housing and students does have an impact our dedication to our local environment, and the wellbeing of our permanent resident's quality of life and those dependent on providing housing for their ongoing existence. Please be assured I appreciate "balance" growth, however, at this point for the community's overall wellbeing I am hopeful the University will take a well-deserved breath by having this latest project postponed to allow for a long term introspective review by the town "fathers".

Thank you,

Glen Estabrook, CIC
Brown & Brown Insurance
P.O. Box 30098
Santa Barbara, CA 93130
gestabrook@bbofcal.com
(805) 690-2648
(800) 350-6328
(805) 690-2748 Fax

Good or bad, we want to know your thoughts; that's how we get better!
Thanks for taking the time

please consider the environment before printing this email

1

10.2.2.5 Response to Email from Glen Estabrook, CIC

Comment No.	Response
GE-1	Comments and responses are being forwarded to the CSU Board of Trustees for consideration during the decision-making process.

Nicole Carter

From: Bob Yeager <slomanbob@gmail.com>
Sent: Wednesday, February 19, 2014 10:48 AM
To: Nicole Carter
Subject: Dorms

Dear Nicole Carter: We know the college (cal poly) can find a better place to locate the new buildings and parking lot. The residence who live close to the proposed building site have our vote of NO! We live off of foothill blvd. And know very well the headaches associated with the college students. There are many homes in our area that are rented which is easy to see why there are very few parking spots left on the street due to three and four or more students parking on the streets. Between the sitting in chairs on the roof's drinking beer to loud parties at night there is no wonder most home owners are fed up. Yes! Keep them up on campus but as far away from the homeowners who are trying to keep their properties up. Thank You from a concerned Home Owner.

BY-1

1

10.2.2.6 Response to Email from Bob Yeager

Comment No.	Response
	Please refer to MR-2.
BY-1	Alternative sites were evaluated in the EIR, including sites located more distant from existing neighborhoods. This information will be considered by the decision-makers during the project review process.

RECEIVED MAR 25 2014

Juventino Ortiz

2267 Santa Ynez Avenue • San Luis Obispo, CA 93405
• E-Mail: javajuv@charter.net

March 22, 2014

CSU Board of Trustees
c/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

Subject: California Polytechnic State University Student Housing South Project SCH#2013091085

The Cal Poly Student Housing South Project E.I.R. deserves more attention and analysis of several checklist items including:

Aesthetics: The only two Class 1 (significant and unavoidable) impacts identified with air quality and traffic. Given the height and massing of the proposed structures (shown in all simulations as four stories, but described in the narrative as five stories), the night lighting to protect hundreds of co-eds, as well as the sensitivity of the surrounding hill and peak vistas, this project will also include Class 1 aesthetic/visual resource impacts. **JO-1**

Emergency Services: City Fire and Emergency Medical Services currently serve Cal Poly, under a contract executed in the summer of 2013 prior to the disclosure of this project E.I.R. notice. This massive project adjacent to the City of San Luis Obispo neighborhoods and educational facilities will require additional police, fire and emergency medical staffing to service the additional residents within this proposed housing facility. The costs for these additional services or delayed response times if funding is not available, will default to City of San Luis Obispo residents. This should be regarded as a Class 1 Public Services impact as well as anticipated increases in disturbances in adjacent residential neighborhoods because of the close proximity of residential college-aged students. **JO-2**

Land Use: This project will cause Class 1 land use compatibility impacts with the surrounding established, single-story residential neighborhoods and elementary school across the street. The elementary school has a current enrollment of approximately 450 students, and the San Luis Coastal Unified School District is currently evaluating an additional 150 students for next fall for a total of 600 students adjacent to the proposed project. Will this E.I.R. evaluate noise, increased traffic and safety impacts to these students actively engaged in academic and outside activities during the continuous 31-month construction period? **JO-3** **JO-4**

Traffic: The E.I.R. analysis of Class 1 impacts is incomplete. There is no analysis for the impacts associated with this project for the Slack Street/ Grand Avenue intersection or the Grand Avenue/ Highway 101 interchange. All of the intersections crossing Grand Avenue such as Loomis Street and other residential streets must be analyzed for circulation and traffic safety. The one traffic light at the west side of the Highway 101/Grand Avenue overpass is inadequate for traffic attempting to cross Grand Avenue from Loomis to the southbound Highway 101 on-ramp. This coupled with left turn **JO-5**

pockets along Grand Avenue will simply be made worse with more vehicle trips associated with additional residents and a Welcome Center at the proposed project site. This will be especially true during peak times of traffic along Grand Avenue during special events and campus activities (Open House, Student Move-in Day and student move out dates). CALTRANS should also be considered a Responsible Agency for comment if they have not already submitted comments regarding this project.

JO-5 (continued)

The preferred alternative identified in the Draft E.I.R. is in keeping with the Cal Poly Master Plan where as this project is not. It is disheartening that public comments from Cal Poly leadership have already committed to the proposed project site prior to the completion of this CEQA required process.

JO-6

I appreciate the opportunity to comment on this proposed project and ask that the CEQA process for this project be more comprehensive and detailed regarding the impacts associated with it.

Sincerely,

Juventino Ortiz

Cc: City Clerk of City of San Luis Obispo, City Council for City of San Luis Obispo

10.2.2.7 Response to Letter from Juventino Ortiz

Comment No.	Response
JO-1	The Recirculated Draft EIR includes aesthetics among the Class I, significant and unavoidable impacts identified for the project.
JO-2	As noted Section 4.5, the University is required to regularly renegotiate existing public services agreements to account for current conditions. Text on page 4.5-5 will be amended as follows to clarify the process for agreements: "~~The University regularly negotiates a service contract with the City Fire Department to cover service and associated costs~~. No specific additional improvements to facilities which could have an environmental impact have been identified. The proposed housing is a consolidation of bedcount approved under the existing Master Plan; the project does not increase bedcount, enrollment, or estimates of built space beyond Master Plan projections; therefore, assuming fire department planning accounts for development under the Master Plan, no additional impacts to facilities are anticipated. ~~Ongoing contract negotiation and revision will be sufficient to address the University's contribution to wear and tear on existing facilities~~. The City and the University entered into an agreement for the provision of fire and emergency medical services in July 2013. The agreement extends through 2018. No amendments or modifications to the agreement are contemplated at this time."
JO-3	CEQA requires identification of the physical environmental impacts of a project. Land use compatibility is evaluated in the EIR in the context of physical environmental impacts (for example, aesthetics, air quality and traffic). The University is not subject to local land use planning laws; existing development on campus differs significantly in terms of use and scale when compared to the City at large.
JO-4	The EIR analyzes impacts of the project against existing conditions, which, as noted in Section 4.6, include occupation of the former Pacheco Elementary School site with the Teach Program.
JO-5	Please refer to MR-1. Discussion of event traffic is provided on page 4.6-24 of the Recirculated Draft EIR. Caltrans has been notified throughout the CEQA process.
JO-6	This information is being forwarded to planners and decision makers for inclusion in the project review process.

Nicole Carter

From: sloshopper@aol.com
Sent: Monday, March 24, 2014 8:12 PM
To: Jwellner@calpoly.edu; Nicole Carter
Subject: First Year Student Project

GTM-1

San Luis Coastal Unified School District listened to the community it serves. They are scaling back their project after hearing the concerns of San Luis Obispo citizens. Cal Poly has the opportunity to follow the good example of SLCUSD by locating the freshman dorm project elsewhere on the vast Poly campus. Poly has the chance to show that they truly do want to work with the city, not just give lip service.

My family has lived on Albert Drive since 1953. It was one of the first houses on the block. My 90-year-old father still lives there. Five of his nine children graduated from Poly. My two sons and two nephews did as well. I have a niece and nephew who are currently students there. We appreciate having the college in our city.

If the project goes through in the planned location, perhaps Jeffery Armstrong's motto "The Poly Way" should be changed to "Our Poly Way or the Highway."

Please listen to the community you serve.

Thank you!

Gracie Tedone Manderscheid

1

10.2.2.8 Response to Email from Gracie Tedone Manderscheid

Comment No.	Response
GTM-1	This information is being forwarded to planners and decision makers for inclusion in the project review process.

From: Nimslo19@aol.com
To: Nicole Carter
Subject: dorm construction concerns
Date: Monday, March 31, 2014 9:15:39 AM
Attachments: TownHallMeetingMarch25.docx

Please open and read. Thank you.

Town Hall Meeting March 25, 2014

Hello. My name is Michele Hall. I've lived in the Alta Vista neighborhood for almost 33 years. I'm a retired teacher. I've taught elementary and secondary levels as well as preschoolers and adults. It is from the perspective of an educator that I would like to address the council. The concern I have is about the dorm construction site and it's proximity to the Old Pacheco campus on Slack Street.

Here are my concerns:

1. There will be noise, noxious fumes from idling machinery, and toxic dust during the proposed 31 months of construction. The Environmental Impact Report has identified this building project as exceeding daily emission thresholds , a significant and unavoidable Class 1 impact. A fourth grader will spend all three grades at Teach School hearing and being distracted by the activity across the street besides experiencing poor air quality. **MH-1**

2. Currently, students at the Old Pacheco (soon to be New Teach School) campus have a lovely garden and views of the foothills across from their spacious playground. The EIR has said itself that the proposed dorm towers would not be harmonious with the surrounding area. I believe that besides blocking the view , they will create a wind tunnel and adversely affect sunlight and glare for the elementary school. **MH-2**

3. In the fall of 2014, enrollment at Teach School and the Classical Academy will increase to 500 students, all of whom commute from neighborhoods in the area. No bus service will be provided. That means parents will be dropping off and picking up their children twice a day from the intersection of Grand and Slack Streets where traffic is already **MH-3**

unsupported by a signal and is a hectic combination of skateboarders, cyclists, and often distracted drivers trying to wedge into free parking spaces along Slack St. Then there are the vehicles entering or exiting the main campus. Add the confusion of construction activity and I believe a dangerous situation is made even worse. Plus, it's conceivable that San Luis Coastal Unified School District will add to the current enrollment in the coming years, when its lease with The Classical Academy expires.

MH-3 (continued)

4. If we look to the future and the project goes ahead, imagine the effect of almost 1500 18 year olds living across the street from our prized magnet school. Windows will be open, music will blare, basketballs will bounce, and the cumulative energy and sheer mass of the towers will dominate the area.

MH-4

Since Cal Poly's master plan indicates that one of its goals is to create residential environments which support learning and contribute to the health and well being of the students and community shouldn't we ask our own city to likewise protect our school and neighborhood? Our city's mission statement indicates that it puts high value on each citizen it serves. It states that we have respect for each other and those we serve. That means our teachers, parents, and most importantly our kids at the New Teach School campus.

MH-5

There is an alternative site for this construction. In fact it has been identified by the EIR as environmentally superior. It is a mutually agreeable solution. It's a win win for everyone if we work together. Thank you.

MH-6

10.2.2.9 Response to Letter from Michele Hall

Comment No.	Response
MH-1	The proximity of sensitive receptors is identified and addressed in Section 4.2, Air Quality.
MH-2	The commenter does not provide evidence to support the assertion that the project would create a wind tunnel or affect solar access. The project includes several buildings with varying orientation and footprint and the landscape plan includes substantial numbers of trees; all of these project components would reduce the potential for creation of a "wind tunnel." There is no evidence provided to suggest solar access would be limited by the project; the southernmost building is set back an average of 35 feet north of the northern edge of Slack Street, and 200 feet north of occupied structures off campus. Glare is addressed in Section 4.1, Aesthetic Resources, of the EIR.
MH-3	The current and planned use of the former Pacheco Elementary School by the Teach program, as well as potential future use of the facility is addressed in the Recirculated Draft EIR (for example, impacts related to traffic are addressed in Section 4.6, Traffic and Circulation).
MH-4	These comments are being included in the record for consideration by the Trustees and other project decision-makers.
MH-5	The commenter addresses City of San Luis Obispo planning and jurisdiction.
MH-6	These comments are being included in the record for consideration by the Trustees and other project decision-makers.

Nicole Carter

From: Claudia Andersen <andersen.claudia49@gmail.com>
Sent: Wednesday, March 26, 2014 9:16 PM
To: Nicole Carter
Subject: Letter to CSU Trustees

Nicole, will you please send this to the Chancellor & CSU trustees: (thanks)

Dear Chancellor,
>
> In response to the SLO Cal Poly proposal to build a Freshman dorm complex the size of SIX WALMARTS on the street that my family has lived on for 50 years, I submit the following.
>
> Our home & neighborhood is not a safe place now. We question if we can enjoy a quality of life that includes a safe & quiet neighborhood. What was once sporadic has become predictable & constant. Where we once had the kind of neighbors who would get together to replace a fence, we now have out of town landlords who have no interest in maintaining property or relationships. We've always had a trickle of student noise, but now there is a roar from parties on Albert & Hathway, and large groups of students who seem to adopt a mob mentality..I believe if they were brown, we would call them gangs. They shout to each other across the street as they look for party houses. They gather in front of our homes waiting for the drunk buses to arrive. Large commercials buses idle while loading up intoxicated, partying students. I was told by Keith Humphrey that I should just be glad they are leaving & not driving drunk! **CA(a)-1**
>
> Poly is rated 8th out off 64 state colleges for alcohol abuse. Poly
> promotes the alcohol culture, I assume to attract more students. The Mustang Daily newspaper has a weekly beer column as well as frequent articles to promote alcohol use : such as Neknomination, a trend of tilting your neck, chugging back, nominating 3 others to do the same: other articles are "Pass the Bottle ", "Inside the Heat of the Bar ", Maker movement finds SLO home...you get the idea. The result of this culture is what we deal with now. We are encouraged to call the police. Young SNAP officers respond but are afraid to get out of their cars. If a police officer does respond, the dispatcher checks to see if there has been a previous warning. If there has been one, they will send a police officer who is supposed to issue a citation. HOWEVER it's up to police discretion, which has resulted in officers issuing an average of only 14% citations. Thus 86% of the complaints receives a warning which means NOTHING TO THE PARTIERS. They get away with disturbing the peace. **CA(a)-2**
>
> In September of 2013, out of 238 calls to police, only 33 citations were issued. In October of 2013: 237 calls, 32 citations. The result has been an EXPLOSION of drunken behaviors of students, crime, alcohol abuse and "unruly gatherings" (read riots). The revised CITY ORDINANCE of 2010 did initially reduce the number of calls (by 50%)! but the offenses are on the rise again. We now contend with FIGHTS even in the middle of the day. Four days ago there was a FIGHT directly in front of our mayor's home. Our beloved Dr French had a crowd of students in front of his home waiting for the drunk buses. The disrespect is BEYOND COMPREHENSION.
>
> In my attempt to QUANTIFY the disturbance I requested records from the City Police & received, over only 2 weekends:
> 68 ARRESTS FOR MINOR CONSUMPTION OF ALCOHOL, 18 ARRESTS FOR PUBLIC INTOXICATION, 6 DUI'S.
>
> In 2012 there were ONE THOUSAND SIX HUNDRED FORTY FOUR CALLS TO POLICE from our neighbors
> In 2013 there were ONE THOUSAND SEVEN HUNDRED TWENTY SEVEN calls.

1

CA(a)-2 (continued)

These are all in our neighborhood. This is what we are surrounded by. This is violence & red flashing police lights in my living room.
>
> State law requires that projects not be approved unless there are feasible mitigation measures to lessen the impacts. The recent spate of Greek parties & violations, such as the chair races at 2 am on Fredericks, was during a month os "social probation". This is an example of failed mitigation. No matter that extra campus police are added or a new community relations position...nothing has caused any meaningful improvement. ADDING 1500 FRESHMEN into this quagmire is insanity. We all know the definition of insanity: making the same mistake over & over & expecting different results.

Thank you for reading this.

Respectfully,
Claudia Andersen
>
>
>
>
>
>
>
>
>
>
>
>
>
>
>

From: Joel Neel
To: Nicole Carter
Cc: Julie H. Moloney
Subject: FW: STUDENT HOUSING SOUTH. 3/25/14
Date: Thursday, March 27, 2014 7:11:26 AM

On 3/26/14, 9:50 PM, "Claudia Andersen" <andersen.claudia49@gmail.com> wrote:

> Hello,
>
> I'm sure you are aware of the Town Hall meeting that was held by the
>City Council last night.
> It was suggested that we pass our comments to you, as well as to the
>Chancellor.
> Thanks for reading :
>>> My family moved to Slack St in 1964 to be near my brother who was
>>>enrolled at Cal poly. I'm a Tiger, class of '67 SLOHS. After our
>>>college years, my husband & I moved to Alaska where we pursued our
>>>careers and raised a family. We've always returned to San Luis, but
>>>when my mother's husband died in '03 we needed to spend more & more
>>>time here until her death in 2012. During that time, we fell back in
>>>love with SLO, our home with the view of the hills, and the access to
>>>the many trails that the City has always made a priority (thank you
>>>again).
>>>
>>> Our home & neighborhood does not feel safe anymore. We question if
>>>we can enjoy a quality of life. What was once sporadic has become
>>>predictable & constant. Where we once had the kind of neighbors who
>>>would get together to replace a fence, we now have out of town
>>>landlords who have no interest in maintaining property or
>>>relationships. We've always had a trickle of student noise, but now
>>>there is a roar from parties on Albert & Hathway, and large groups of
>>>students who seem to adopt a mob mentality..I believe if they were
>>>brown, we would call them gangs. They shout to each other across the
>>>street as they look for party houses. They gather in front of our
>>>homes waiting for the drunk buses to arrive. Large commercial buses
>>>idle while loading up intoxicated, partying students. I was told by
>>>Keith Humphrey that I should just be glad they are leaving & not
>>>driving drunk!
>>>
>>> Poly is rated 8th out off 64 state colleges for alcohol abuse. Poly
>>>promotes the alcohol culture, I assume to attract more students. The
>>>Mustang Daily newspaper has a weekly beer column as well as frequent
>>>articles to promote alcohol use : such as Neknomination, a trend of
>>>tilting your neck, chugging back, nominating 3 others to do the same:
>>>other articles are "Pass the Bottle ", "Inside the Heat of the Bar ",
>>>Maker movement finds SLO homeŠyou get the idea. The result of this
>>>culture is what we deal with now. We are encouraged to call the police.
>>>Young SNAP officers respond but are afraid to get out of their cars.
>>>If a police officer does respond, the dispatcher checks to see if
>>>there has been a previous warning. If there has been one, they will
>>>send a police officer who is supposed to issue a citation. HOWEVER
>>>it's up to police discretion, which has resulted in officers issuing
>>>an average of only 14% citations. Thus 86% of the complaints receives
>>>a warning which means NOTHING TO THE PARTIERS. They get away with
>>>disturbing the peace.
>>>
>>> In September of 2013, out of 238 calls to police, only 33 citations
>>>were issued. In October of 2013: 237 calls, 32 citations. The result
>>>has been an EXPLOSION of drunken behaviors of students, crime,
>>>alcohol abuse and "unruly gatherings" (read riots). The revised CITY
>>>ORDINANCE of 2010 did initially reduce the number of calls (by 50%)!
>>>but the offenses are on the rise again. We now contend with FIGHTS
>>>even in the middle of the day. Four days ago there was a FIGHT
>>>directly in front of our mayor's home. Our beloved Dr French had a
>>>crowd of students in front of his home waiting for the drunk buses.
>>>The disrespect is BEYOND COMPREHENSION.
>>>
>>> In my attempt to QUANTIFY the disturbance I requested records from

>>>the City Police & received, over only 2 weekends:
>>> 68 ARRESTS FOR MINOR CONSUMPTION OF ALCOHOL, 18 ARRESTS FOR PUBLIC
>>>INTOXICATION, 6 DUI'S.
>>>
>>> In 2012 there were ONE THOUSAND SIX HUNDRED FORTY FOUR CALLS TO
>>> POLICE from our neighbors In 2013 there were ONE THOUSAND SEVEN
>>> HUNDRED TWENTY SEVEN calls.
>>>
>>> State law requires that projects not be approved unless there are
>>>feasible mitigation measures to lessen the impacts. The recent spate
>>>of Greek parties & violations, such as the chair races at 2 am on
>>>Fredericks, was during a month os "social probation". This is an
>>>example of failed mitigation. No matter that extra campus police are
>>>added or a new community relations positionŠnothing has caused any
>>>meaningful improvement. ADDING 1500 FRESHMEN into this quagmire is
>>>insanity. We all know the definition of insanity: making the same
>>>mistake over & over & expecting different results.
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>
>>>

10.2.2.10 Response to Emails from Claudia Andersen

Comment No.	Response
CA(a)-1	Please refer to MR-2.
CA(a)-2	Please refer to MR-2.

Nicole Carter

From: Kristine Crozier <tinamc@charter.net>
Sent: Wednesday, March 26, 2014 1:57 PM
To: Nicole Carter

Hello. I am a resident in the Monterey Heights neighborhood right up by Poly. My family and I have lived here for 13 years. We are supporters of the college and attend many of the events on campus. I love the access to sitters.from the child development program. In fact, my husband is alumni. I am opposed to the placing the new dormitories on the corner of Grand and Slack. **TC-1**

We already live in a neighborhood where the students outnumber the locals. So far we have been fortunate to have respectful students.living near us and are understanding that there will be some parties in our neighborhood. We knew.this.when we chose to reside in this neighborhood. However, I never imagined that I would have 1500 new college aged neighbors moving in only 5 houses away.

I have 2 young children and this concerns me on several levels. The increased traffic would congress an already problematic intersection. I would also be concerned about placing that many college students right across the street from the Pacheco Elementary school. This location will deter families from moving into the neighborhood which will change the climate around these neighborhoods. I am sure this will also affect home values when homeowners and their college renters neglect.their properties. **TC-2**

My two cents.
Sincerely,
Tina Crozier

1

10.2.2.11 Response to Email from Tina Crozier

Comment No.	Response
TC-1	Comments and responses are being included in project review for consideration by planners and decision makers.
TC-2	Please refer to MR-2. Impacts related to current and planned operations at the former Pacheco Elementary School have been addressed in several sections of the EIR, including Section 4.6, Traffic and Circulation

Nicole Carter

From: Susan Hay <sthay21@aol.com>
Sent: Wednesday, March 26, 2014 11:33 AM
To: Nicole Carter
Subject: Cal Poly New Housing Project

Dear Nicole,
Your contact information was given to us last night at the SLO Town Meeting on the proposed site for new freshmen housing at Cal Poly. I have been a full time and part time resident at the corner of Grand Ave. and Fredericks over the last 8 years. We were told final comments are due by Monday, March 31.
I have the following additional comments:

1. Since the neighborhood south of Cal Poly has turned into college rental houses...including increased population with landlords turning garages into additional bedrooms to line their own pockets...The UC Regents and Cal Poly should publish a disclaimer to the parents if the new dorm and parking are built next to the college rental neighborhood: **SH-1**

"Your freshmen student will be living in a dormitory directly across the street from a compacted neighborhood of college rental houses with overage adults who hold drinking binge parties weekly. This neighborhood across from your freshmen student dorm has a police call record you can access through sanluisobispo.com ... police reports that reflects thefts, sexual assaults, drunks, DUI's are on record. If you as a parent prefer your freshmen student not live directly across from this lifestyle, then do not "buy into" this new dorm facility. This dorm is the equivalent to your student living across the street from an array of drinking bars, and the houses advertise by a light turned on, or a flag in their front window, and if one house gets busted, your student can go on social networks to find the next house to drink again."

These comments above are true, as I go out on the streets to observe what goes on...so the above "disclaimer" to parents would be the "honest" approach by the Univeristy.
As a parent, we like to think our young adult student would be safe in the university setting within the paradise of San Luis Obispo County. We also "think" our freshmen student will be safe in a "dorm."
I read an article in a Neurological publication that stated the front lobe of the brain does not fully develop until age 25. It is that part of the brain that houses "judgement." No wonder teens and those under 25 make bad choices. Our job as parents and educators is to help our young people...not throw them to the wolves!

2. **Traffic**...We do not NEED a car to get an education! UC Regents and Cal Poly should strongly consider the more environmentally conscious route and discourage automobiles for students. The approximate cost to own and operate a vehicle is probably close to $7,000. a year. Help today's families by reducing expense to educate their child by showing the savings of not having a car at school, and consider a "Student Environmental Incentive Program." Perhaps a nice graduation bonus can be paid out for those graduating in 4-5 years, by not bringing an automobile to San Luis Obispo! **SH-2**
Follow the campus and town at UC Davis...for their bike friendly campus and town...and don't increase our neighborhood and downtown problems with more vehicles!

3. **UC Regents Long Term Plans**...It has been brought to my attention that UC Regents did a study of all the UC and Polytech campuses to decide on classroom expansions for the growing population in the State of California. I was told Cal Poly in SLO is the campus chosen to allow expansion for a total of 12,000 additional students within some period of time. **SH-3**
We want to see the UC Regents master plan for the long-term. I am not convinced that this dormitory for 1,400 students, plus the press only being told a growth of 5,000 students, is the complete information.
If UC Regents intends to double the student population at Cal Poly, the townspeople and taxpayers have a right

1

to know about this so we can amicably find solutions. **SSH-3 (continued)**

4. **Future Threat**...I am afraid the type of growth in #3 above would eventually bring upon homeowners on Grand Avenue and other streets a future threat of Eminent Domain. If the growth of the college campus is not planned properly for the long term, it could cause the State of California to level the houses on Grand Ave. to add 2 more lanes to handle the influx of all the traffic to the campus. Would any of you want to have your home taken by Eminent Domain? **SH-4**

5. **Neighborhood Demographic Change** ... Through the years, owner occupied homes have dwindled in the neighborhood south of Cal Poly and turned into a high percentage of college rentals as we know. This has also impacted the churches in this neighborhood, which organize community help. These churches have programs to feed and house the homeless people in the town of San Luis Obispo. By losing owner occupied neighbors, we are losing church members. and the community help programs are in jeopardy with fewer people and financial resources to maintain the churches.
Did you know these churches provide overnight housing for homeless women, children and disadvantaged during the coldest months of the year? Did you know these churches are also on the list of organizations who prepare and bring food to the homeless shelter so those people get a meal every day? **SH-5**

It seems to me a lot of people planning a project from their office or from afar who do not want to hear about the grass roots history. As we know, people do not care if the problem "is not in their back yard."

6. **EIR** - Why are we continuing to spend time, energy and money on the current EIR to study the worst location to build this new dorm facility for the campus? I, as a business woman, am conscious of time, money and goals. You are going down the wrong path here in the opinion of many locals. **SH-6**

One last comment on campus growth...since I recommend new housing for students be built in a bike friendly, village environment. With resources in agriculture and beverages in the area, you might consider making housing more "home" friendly. Have shade trees, picnic tables, open cooking grills and food prep area. This location can also be used for a new elective class in Home Food Preparation, Food Safety, and Food Budgeting. This can help young students with their futures by learning skills to improve their lives and become practical members of society. **SH-7**

Let's get rid of the old mentality, "Let's just add dorms." How about, "Let's plan and build a homey, village environment" to teach young adults how to live and care for their own community in a more healthy and cost effective manner, so the entire town of San Luis Obispo can be proud!

Regards,

Susan Hay
Full and part time resident at the corner of Grand Ave. & Fredericks

10.2.2.12 Response to Email from Susan Hay

Comment No.	Response
SH-1	Please refer to MR-2. These comments are being included in the record for consideration by the Trustees and other project decision-makers.
SH-2	Please refer to MR-1. The University, as part of ongoing implementation of the 2001 Master Plan, continues to implement programs to reduce vehicle reliance, including completion of bicycle trails, increased bicycle parking facilities, car sharing programs, and continuing subsidization of vanpool/carpool and transit programs.
SH-3	The UC and CSU periodically complete high-level, long range projections for growth within the system. Where physical campus Master Plans are considering enrollment increases, these high-level projections serve as one indicator of potential growth. However, the adopted physical campus Master Plan and enrollment targets constitute the regulatory planning documents for each campus. The EIR bases analysis on these existing, adopted plans and policies.
SH-4	As stated previously in response to comment SH-2, vehicle traffic volumes along Grand Avenue are not projected to increase as a result of this project.
SH-5	The commenter raises a social, rather than environmental issue. Pursuant to Section 15131 (CEQA Guidelines, Economic and Social Effects): “Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes….The focus of the analysis shall be on the physical changes”
SH-6	These comments are being included in the record for consideration by the Trustees and other project decision-makers.
SH-7	The project provides patio spaces and a substantial tree planting program.

1336 Sweetbay Lane
San Luis Obispo, California 93401

March 26, 2014

CSU Board of Trustees
C/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401

Subject: Student Housing South – Recirculated Draft Environmental Impact Report

Dear Ms. Carter:

Comments on the Cal Poly San Luis Obispo Student Housing South project are listed below for your review and responses. I appreciate the extension of time and the recirculation of the Draft Environmental Impact Report. Thank you for your consideration of my comments. Please contact me at jameslopes@charter.net or 805-602-1365 if you have any questions.

Sincerely,

James Lopes

James Lopes Letter
Student Housing South Revised Draft EIR March 26, 2014

4-1 Aesthetic Resources

Impact Analysis: AES Impact 2 accurately identifies a potential impact from the visibility of structures as seen from the Slack Street neighborhood.

Mitigation Measure Discussion: The Draft EIR states, "Allow complete removal of all vegetation, and plant replacement planting to screen at least 50 percent of the project." These measures would enable grading of a mature landscaped slope, with 60-80-foot tall pine trees and others at the top. Any replacement trees will take a generation - 15 to 25 years to replace the current ones. This is an unacceptable method and time frame for a mitigation measure, and appears to be part of the project description. **JL-1**

The project site plan, Figure 2-3, shows the five-story South Building near the top edge of the Slack Street embankment. This location will cause complete disruption of this bank in order for construction to occur on the south side of the building. The close location of the building to Slack Street will intrude on necessary slope for the final embankment, which will preclude any development of a sidewalk at the bottom of the bank, unless extensive retaining walls are built or the sidewalk replaces street parking. These walls would cause potential aesthetic impacts themselves to campus visitors, residents and students. The impact discussion should address the interaction of the close placement of the southern and western buildings with the embankments. **JL-2**

Proposed Measures/Alternatives: I request that you consider a different set of mitigation measures: **JL-3**

1. Locate grading and development within the existing parking lot area, with at least a 120-foot setback from Slack Street.
2. Retain the existing vegetation, especially healthy tall trees, and provide a wider landscaped setback than exists, with supplemental planting to screen 80 percent of development.
3. The south and southwest buildings shall be limited to three stories within a 35-foot height limit, to reduce their scale to a more compatible and less visible height. This mitigation should be offset by replacement housing elsewhere on the project site or campus.
4. Revise the project site plan so that the parking structure building, wrapped by the proposed uses, is moved adjacent to or near the drive to the existing parking structure.
    a. This building should be designed to be compatible with the Performing Arts Center, with a plaza in front of it. Design the residential buildings so that the configuration is more urban in character (compact, linear, grid-like, oriented to focal points and open space), similar to Poly Canyon Village.
    b. Design the residential configuration so that the south end of the project site is in open fields for casual recreation.

Impact Analysis: The EIR did not identify a potentially significant impact from the architecture of the Project. A visual assessment should address the congruity of the Project with existing conditions of the landscape. In this setting, the landscaping is introduced and mature, and it presents a highly vegetated edge to the site, with the Santa Lucia Hills as a natural backdrop above it. The view of these landscapes presents a very unified and harmonious setting, as shown in Photo 4.1-21: **JL-4**

2

The rectilinear architecture of the Project buildings will disrupt and degrade the visual character of the landscaped areas next to the existing parking lots and the open views of hillsides, by its height, starkness and long rooflines and wall planes. If developed in the City, the Project architecture would be inconsistent with the Community Design Guidelines.

JL-4 (continued)

Proposed Measure/Alternative: Revise the proposed architecture from a modernist theme to a more residential one, with sloped roofs, eave overhangs; wall patterns such as pediments, pilasters and cornices; obvious changes in planes; all engaged in softening and "breaking up" the unrelieved wall planes and roof lines.

JL-5

My proposed mitigation measures will potentially block views of the Morros. To avoid or mitigate for the loss of these views, strategic view openings should be part of the project. Revise the site plan to orient buildings to provide two or three angled views west through the site to the Morros, in particular from an angle such as seen in Photo 4.1-17:

4.4 Noise

4.4.5.4 Nuisance Noise

Impact Analysis Discussion: Impacts from pedestrians and their bad behaviors should be addressed as an increase above existing levels, rather than being dismissed by the assessment that, the "project will not alter existing enforcement methods, and will not alter campus enrollment." The essential point about the project is that it will locate an additional 1,400 approximate students at the edge of a single-family residential area. These students will join an existing student sub-culture of walking through the neighborhood looking for parties and friends to join. The neighborhood has become a recreational zone for existing students who pass on this sub-culture to new ones. Although noise and bad behaviors from some students might be occasional, they are individually often significant. The impact assessment should consider the number of nuisance/ noise complaints that have been filed with the City, and also consider the "impact" nature of these noises.

JL-6

Impacts from mechanical equipment are not adequately addressed in terms of standard practice, partly since Cal Poly construction is not subject to City standards.

JL-7

Mitigation Measure Discussion: Nuisance impacts should be reduced by structural means, by locating walkways within the campus as much as feasible to channel circulation to California and Foothill Streets through campus from the site. Where a walkway must be placed near or at the edge of campus, a sound wall should be constructed to define the edge of the walkway and campus, and to block sound from the walkway. A wall at the edge of campus and outside a walkway is an ordinary way to define the boundary of student activity. See the following section on Pedestrian and Cyclists Off-Campus Impacts for related discussion.

JL-8

Nuisance noise should be addressed and mitigated by programmatic means as part of the project. An ongoing, permanent "good neighbor" program should be developed by Cal Poly and the City, to

JL-9

educate and warn students about the situation and how to reduce neighborhood impacts and respect the existing community.

JL-9 (continued)

To ensure that the project will adequately control mechanical equipment noise, standards similar to the City code should be included as mitigation measures, to require solid screening which will effectively reduce the noise of mechanical equipment from rooftops or other locations.

JL-10

4-6 Traffic and Circulation

4.6.4.2 Pedestrian and Bicycle Facilities

Mitigation Measure Discussion: Table TC Impact 2: Mitigation Measure TC/mm-1.a suggests a partial mitigation measure for the lack of sidewalks. It speaks to "including Pacheco Way and along the north side of Slack Street." Taken a limited way, it would require the development of sidewalks only on the frontage of the project site. However, there is no existing sidewalk west of Pacheco Way until Longview Street. This measure could leave pedestrians on the street surface at Pacheco Way and Slack Street, unless the following changes are made:

1. Clarify that pedestrian circulation shall be developed between the project site and the existing sidewalk at Longview Street. However, this mitigation is difficult to meet at the street edge:
    a. There is no space at the south edge of the project site or west of Pacheco Way for a sidewalk, since the existing embankment goes directly up from the curb of Slack Street at the project site, and directly down along the curb of Slack Street west of Pacheco Way. It would have to be graded back the necessary distance from the existing curb and fill brought in at these locations.
    b. Or, the existing 8-foot parking aisle would have to be used for a sidewalk, which would not be an adequate width. Using the parking aisle would be ineffective and counter-productive, because it would require a mid-block crosswalk at Pacheco Way and direct students to the neighborhood sidewalk on the south side of Slack Street, causing the identified potential impact.

It is not acceptable to provide just a sidewalk along the length of Slack Street to Longview Street. This is a route selection that will invite if not direct pedestrians into the neighborhood, albeit more safely. This mitigation measure should be replaced with the following concepts:

JL-11

Proposed Measure/Alternative: To reduce traffic into the neighborhood, an on-campus route through the recreation area around the track should be developed. The mitigation measure should be revised to state that a management plan shall:

1. Locate and design walkways that avoid increased pedestrian traffic and noise into the Alta Vista neighborhood.
2. Give priority to locating walkways entirely on-campus instead of at the edge of Slack Street, to connect to the sidewalk at Longview Street. Highest priority is to utilize the existing driveway onto Pacheco Way, and westerly around the track to Longview Street sidewalk, or a different extended walkway to connect to Foothill Boulevard.

If this measure is not accepted, then another measure should be written to address Slack Street:

Develop a new sidewalk on the north side of Slack Street, with at least an 8-foot width, inside a 5-foot landscaped parkway, to extend past the project site to the existing sidewalk at Longview Street. This measure will require extensive cut on Slack Street at the project site, and a retaining wall may be necessary, and it will require fill placement west of Pacheco Way. To

JL-12

accomplish this, Cal Poly should not grade the embankment on the south project site edge, but instead replace the existing street parking with this walkway. **JL-12 (continued)**

P. 4.6-24: Pedestrian and Bicyclist Off-Campus Impacts:

Impact Analysis: This section does not examine the existing and potential increase in pedestrian trips through the local streets in the Alta Vista neighborhood; yet the bad behavior of some people who are walking in the neighborhood can be attributed to Cal Poly students, as evidenced by City records of nuisance/noise complaints. The first paragraph states, "Off-campus pedestrian and bicycle trips associated with the project would be concentrated along Grand Avenue and, via internal campus roads, California Boulevard, and Foothill Boulevard, as those streets are equipped with pedestrian and bicycle facilities and provide more convenient connections." **JL-13**

This assessment says nothing about the neighborhood. Actually, trips through the neighborhood go to student houses throughout it, and funnel to Longview, Orange and Hathway Streets to connect to fraternities, sororities and student housing near or on these streets. This section should be revised and upgraded to account for actual travel routes and behavior and an anticipated increase in trips and nuisance complaints. The combination of noise and other bad behavior will accompany the project's addition of over 1,400 students in the vicinity. This fact is not accounted for or examined. It is an existing significant impact that will be worsened with the project.

The section does point out that trips to downtown, parks and surrounding roadways will increase. However, the measures in TC/mm-1 are inadequate as described above.

Proposed Measure/Alternative: Please refer to the proposed mitigation measures above for internal, on-campus pathways, and walls where necessary to control and limit neighborhood access.

4.6.6 Cumulative Impacts – Intersection Impacts.

Impact Analysis: This section discusses the California/Taft Streets intersection and states that the project would add to significant impacts here, but curiously it concludes quickly that no mitigation measures are feasible. **JL-14**

Proposed Mitigation Measure: Standard measures should be written that require "fair share" contribution to intersection improvements, including signalization. To say that there is not enough evidence that such an approach will reduce potential impacts is questionable and debatable, and TC Impact 4 should be revised to include standard mitigation measures.

Cumulative Pedestrian, Bicycle and Transit Impacts.

Impact Analysis: This section does not recognize that Teach School will add these kinds of trips, in terms of teacher and student walking and bike trips. These additional trips should be addressed in the cumulative analysis. **JL-15**

5 Alternatives Analysis

New Alternative Proposal: Move Parking Garage North – Create an Urban Village

JL-16

This alternative is discussed above as a mitigation measure to aesthetics, noise and traffic impacts, but it could be extensive enough to be evaluated as a project alternative. It would shift the project site away from Slack Street to avoid or reduce aesthetic, noise and traffic impacts.

1. The parking garage could be moved closer to the entrance drive to the Performing Arts Center (PAC), with a façade of the desired offices and visitors center facing the PAC. The building could be designed to complement the PAC but not replicate its sweeping lines. It could have a small plaza in front, but not a huge area. The garage would include the spaces lost from the proposed project's parking lots.
2. The residential buildings would also be moved north, and they would be sited in an urban village similar in compactness to the configuration of Poly Canyon Village.
3. The height of the buildings would be lower at the west and south ends of the project.
4. Student shops and services would be located on the ground floor similar to a pedestrian mall.
5. A large play field / park would be located at the south end (not as big as shown in the Master Plan).

This design would relocate the entire project closer to the Performing Arts Center and make the building distribution more compact. However, pedestrian circulation and on-site noise could still create noise and traffic impacts due to the project's close location to the neighborhood.

5.5.3 Location Alternative – H-12 and H-16 Parking Lots

JL-17

I support the alternative of locating the project to the H-12 and H-16 Parking Lots and their vicinity. A parking structure and a dining commons should also be located with this alternative. The design and features of the buildings should include these features:

1. The residential buildings in an urban village similar in compactness to the configuration of Poly Canyon Village.
2. The height of the buildings should be lower at the edges of the project.
3. Student shops and services should be located on the ground floor similar to a pedestrian mall.
4. A large play field / park should be located adjacent to the project.
5. The buildings should be residential in character, rather than modernist, to create a comfortable and familiar living environment, distinct from the utilitarian learning environment on campus.

10.2.2.13 Response to Letter from James Lopes

Comment No.	Response
JL-1	Mitigation will be amended in response to JL-3, below.
JL-2	The site plan shows a four-story building fronting Slack Street. The Final EIR will be amended to include additional mitigation as outlined in MR-9. The simulations and aesthetic impact analysis address both temporary and long-term disturbance/alteration of the embankment at the southern edge of the site. Accommodation of pedestrian pathways will not substantially alter findings regarding impact significance.
JL-3	The commenter suggests mitigation measures to address the previous two comments (JL-1 and JL-2): Response to feasibility of suggested mitigation numbered "1": Additional setback is addressed as an alternative in Section 5. Additional setback (the commenter suggests approximately three times the currently proposed 35-foot setback) is considered infeasible without major modifications in components of the project or bedcount proposed. Specifically, additional setback would require elimination of the parking garage. Because the implementation of additional setback is achieved through major modification of project components, this is addressed in the EIR as an alternative. Response to suggested mitigation numbered "2": The project, as stated in the project description, aims to retain existing mature landscaping along Slack Street if feasible. However, mitigation is proposed should retention prove infeasible. AES/mm-1 requires further refinement of the proposed landscape plan, including planting of large (48-inch minimum box size) trees, prior to final approval, subject to the listed standards. The mitigation will be amended to include the following language in response to the commenters suggestion: "AES/mm-1 Prior to approval of the development plan, the University shall prepare a comprehensive Landscape Plan for review and approval by the CSU. The Landscape Plan shall be prepared by a licensed Landscape Architect. The landscaping plan shall include the following minimum specifications for portions of the project fronting Slack Street and Grand Avenue south of Building 2: a. Trees will be planted from a minimum 48-inch box size. b. Trees and shrubs shall be planted along the southern and western perimeters of the project for the purpose of screening the new structures from off campus viewing locations to the south and west. Planting shall provide visual screening of ~~at least 50~~ 80 percent of the project at maturity as seen from viewpoints on Slack Street and shall occur as soon as practical in coordination with the grading and construction plans and schedule. c. The final site plan will ~~consider~~ use hardscape, fencing, and other features to reduce the impression of a continuous building surface. The Landscape Plan, as it relates to the plaza and surface parking areas at the northern portion of the project site, shall include the following in conjunction with other view-preserving measures determined by the Landscape Architect: a. The minimum number of trees shall be planted which meet the aesthetic and climatological need of the site. b. Trees shall be clustered, leaving substantial open areas to allow views and sightlines from Grand Avenue to the Morros."

Comment No.	Response
	Response to suggested mitigation numbered "3": The commenter is referred to the most recent site plan. The University is incorporating the following to address suggested mitigation: AES/mm-2 The final site plan shall be amended to specify three stories in Building 4 (the building fronting Slack Street). Response to suggested mitigation numbered "4": The proposed parking structure is located adjacent to the existing accessway of Parking Structure 1. The setback accommodates required short-term parking and structure ingress/egress needs. The University contends that the design of the buildings meets the suggested design criteria (compact, oriented to focal points and open space). Relocation of the open space to the southern end of the site is considered undesirable for two reasons: (a) the area currently proposed for open space is an area of excessively deep fill; location of the open space rather than structures in this locations significantly reduces the grading and excavation effort and costs and (b) location of the central open space and gathering area to the Slack Street frontage would increase student activity in that location.
JL-4	The visual analysis addressed the issue of architectural conformity throughout Section 4.1, Aesthetic Resources—pages 4.1-25 and 4.1-26 state that the project is visually compatible with other campus development. The section also notes that University development dominates the local visual context. Differing architecture in and of itself is not a significant environmental impact; the EIR address view access, and visual character, finding that the scale of the project is incompatible as viewed from certain locations, not the type or design of development proposed. The University is not subject to local land use or design regulations.
JL-5	Proposed mitigation noted. The EIR did not identify a significant impact related to the type or style of development proposed. Therefore no modifications are recommended. The commenter further states that the site should be redesigned to provide through sight lines of the Morros. Due to varying topography and the relatively depressed elevation of existing viewpoints (i.e., Slack Street), maintenance of visual access to the Morros through the project is infeasible. Visual access is provided for portions of Grand Avenue, and from more elevated roadways in the area.
JL-6	Please refer to MR-2.
JL-7	Text on page 4.4-9 of Section 4.4, Noise, will be amended as follows: "Commenters have identified concerns over noise associated with mechanical systems on site. The project has been designed with a central mechanical plant and shop space at the parking garage, approximately 1,000 feet away from the neighborhoods and other existing campus residences. The project does not include cooling towers or air conditioning units, but does include mechanical ventilation systems on individual buildings. The systems are typical of systems used for multi-family residences, and will not generate noise in excess of existing standards. Section 134801 of the project specifications establish maximum permissible sound levels from mechanical equipment in paragraph E. The design/builder will be responsible for mitigating the sound levels from the rooftop equipment to meet all of the criteria in that paragraph. Specifically, the project specifications in §134801(E) state: 3. Noise emissions from the mechanical, plumbing, elevator, and electrical equipment to the surrounding community shall be mitigated to be consistent with

Comment No.	Response
	the requirements of the San Luis Obispo Municipal Code or any other applicable requirements. 4. Mechanical, plumbing, elevator, and electrical equipment shall be designed so that noise levels at other nearby buildings (new or existing) do not exceed the measured ambient sound level. This requirement is only applicable during the equipment's hours of operation. Impulsive sources or sources with steady tones shall be at least 5 dBA less than the ambient level. Impulsive sources and steady tones shall be defined in accordance with the San Luis Obispo Municipal Code. 5. The sound level in exterior public spaces from mechanical, plumbing, elevator, and electrical equipment must meet the requirements as described in the section on Sound Isolation and Acoustical Treatment." No substantial adverse impacts are identified.
JL-8	The project provides internal pedestrian infrastructure to route students to and through campus. There is no evidence to suggest that sufficient new sound levels will be generated at walkways to warrant construction of sound walls either on site or at the campus edge.
JL-9	Please refer to MR-2.
JL-10	Please refer to response to JL-7.
JL-11	The University provides significant internal pedestrian infrastructure, as outlined in Section 4.6 and the Traffic Impact Analysis. Through routes are available to all major campus ingress/egress points. The pedestrian pathway on the north side of Slack is being proposed to improve safety in the area.
JL-12	Recommended mitigation is noted. Impacts identified in the EIR regarding pedestrian safety and travel are addressed by mitigation TC/mm-1 in the Recirculated Draft EIR. The recommended mitigation additions, which would create a pedestrian pathway separated by landscaping, is not required to reduce impacts to a less than significant level. Therefore no changes to the document are proposed in response.
JL-13	The EIR concludes that predominant pedestrian travel patterns will be via existing, developed pathways both on and off campus. Please refer to MR-2.
JL-14	The mitigation will be revised in the Final EIR as stated in MR-10.
JL-15	Based on personal communications with SLCUSD staff cited in the EIR, Teach School is replacing existing school functions and capacities on site. Future expansions are possible; however, SLCUSD has: (1) not committed to additional expansions, and (2) would displace additional existing school functions and capacities on site to achieve additional expansions. Therefore, no substantive net change in school-associated pedestrian and bicycle trips are anticipated and no changes are recommended in the EIR.
JL-16	The identified alternative is not feasible nor would it address significant and unavoidable impacts. The alternative would:

Comment No.	Response
	▪ Require development of the central portion of the site, which is limited due to juxtaposition of fill and bedrock (refer to MR-8) ▪ Significantly increase view blockage from Grand Avenue ▪ Substantially limit ingress/egress at the existing Parking Structure ▪ Relocate open space to the southern end of the project, placing major gathering areas for students proximate to the neighborhood.
JL-17	Comments noted. Suggestions are being incorporated into the record for consideration by the decision makers.

March 31, 2014

Board of Trustees, California State University
c/o Nicole Carter, Senior Planner, SWCA, ncarter@swca.com

Regarding: Cal Poly, San Luis Obispo, DEIR for Student Housing South Project, re-circulated.

General Comments: The re-circulated DEIR improves upon the first-circulated DEIR. Yet serious analytical omissions remain. These omissions relate to unanalyzed and/or unmitigated specific and cumulative Class I impacts off-site, affecting the immediate surrounding residential neighborhoods in the City of San Luis Obispo and the City as a whole. **SW(a)-1**

I will not reiterate those off-site impacts, except by reference to the January 24, 2014 letter submitted to your agency by Derek Johnson, Director of City of San Luis Obispo Community Development Department (CDD). (Please see Attachment). In my opinion, that letter effectively laid out most of the multiple existing relevant CEQA concerns regarding the off-site impacts of the current amendment to the 2001 Master Plan. However, CDD omitted pointing out that nighttime light-pollution from the dorms facing Slack Street will be significant and should be analyzed. **SW(a)-2**

I have every reason to believe the CDD will follow up with a subsequent letter that re-iterates much of the January 24th letter, and if possible strengthens it, including framing its comments with references to relevant Supreme Court CEQA precedents, particularly *City of Marina* and *City of San Diego*. **SW(a)-3**

A Preferred Alternative: The best alternative to the proposed project is to stick to the 2001 Master Plan until Cal Poly is ready to update it to accommodate President Armstrong's intention to increase student body enrollment by 4,000 to 5,000 students, bringing its population up to 24,000-25,000 by 2022 (Press Release, September 16, 2014). This alternative has at least two advantages. **SW(a)-4**

1. First, it is more transparent and realistic about potential CEQA impacts, both on campus and off-campus.
2. Second, it fosters the perception that Cal Poly values being a "good neighbor" because it would enable the City to complete its processes with respect to its recent Land Use and Circulation Update, hence require Cal Poly to rely upon the latest and most realistic information about the community's physical capacity to accommodate the University's expansion.

Sincerely,
Sharon G. Whitney
Sharon G. Whitney, PhD

CITY OF SAN LUIS OBISPO
Community Development Department • 919 Palm Street, San Luis Obispo, CA 93401-3218

January 24, 2014

CSU Board of Trustees
Nicole Carter, Senior Planner ncarter@swca.com
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo CA 93401

SUBJECT: Draft Environmental Impact Report for Cal Poly Student Housing South Project

This letter serves as the City of San Luis Obispo's comment letter on the Draft Environmental Impact Report (DEIR) prepared for the Cal Poly Student Housing South Project.

The City greatly appreciates the opportunity to comment and for providing an extended comment period for the DEIR. We understand that the University intends to respond to all comments submitted on this draft of the DEIR and proposes to recirculate the DEIR and respond to these comments and future comments provided by the community and other responsible agencies.

The City of San Luis Obispo understands the need and desire to provide on-campus housing to increase student success and the City's own policies support on-campus housing for students. The City offered comments on the Notice of Preparation and found that while the DEIR acknowledged impacts in several of the categories identified as potential issues by the City, little or no mitigation was offered for impacts occurring within the City of San Luis Obispo. The direct and indirect impacts of the growth on campus have the potential to be incompatible with the surrounding neighborhoods unless effective mitigations are provided. It is essential that Cal Poly address and mitigate University impacts to ensure that both the University and the City's long range goals are achieved. Unless the University addresses project specific and cumulative impacts, there will be an incremental impact to services and needed facilities that will negatively affect the continued success of the City and University.

The project under review will address the University's need to address existing overcrowding in dorms and provide 1,475 new beds on campus for incoming first year students. However, this project has implications beyond the Cal Poly campus which is of concern to the City of San Luis Obispo. Specifically, the City has concerns related to impacts from redistribution of trips and impacts to intersections and street segments; need for improved bicycle and pedestrian facilities to address increased non-motorized traffic associated with the project; increased demand for City services – calls for public safety service in the adjoining neighborhoods as well as neighborhood wellness, noise, and gatherings; and increased demand on the City's open space and recreational facilities.

The City has determined that the DEIR inadequately analyzes and/or mitigates the impacts associated with the proposed project, and in some instances, does not offer mitigation even though significant impacts are recognized. The comments provided below are intended to offer

mitigations to address impacts as well as produce long-term benefits for both Cal Poly and the larger community in which it lives and thrives.

In the longer view, we look forward to working with the University through the process of updating its Master Plan and further developing its plans for additional student housing on campus to accommodate the recently announced growth in enrollment.

General Comments:
The required changes to the Master Plan to accommodate a new dorm at the proposed location should address disposition of the identified housing sites in the existing Master Plan. Unless, the land uses on the existing sites are addressed and modified in the Master Plan, the analysis should assume the cumulative impact of adding the Housing South site to the areas available for the development of student housing and therefore consider the cumulative impacts.

The City's comments are framed by the *City of Marina v. Board of Trustees of California State University,* where the California Supreme Court ruled that the CSU has a duty to mitigate off-site impacts of a project. The University has identified both project specific and cumulative impacts in the Draft EIR and should work with the City to implement mitigations that require City participation. This letter serves in addition to other discussions with the University that the City of San Luis Obispo is willing to engage in discussions to identify and implement off campus mitigations.

Cumulative Impacts (Section 6 of DEIR):
On September 16, 2013, President Armstrong announced that Cal Poly is intending to seek an increase in enrollment at the San Luis Obispo campus by 4,000-5,000 students. Please update and address the cumulative impacts of the projected increase in enrollment in addition to projected growth in the surrounding community as part of the cumulative impact evaluation. Moreover, please review and include the projected growth that is identified in the City's draft Land Use and Circulation Element update. These alternatives are available at the City's project website: www.slo2035.com.

Aesthetics: (section 4.1 of DEIR)
AES Impact 1 indicates that trees and other landscaping have the potential to block quality views of Bishop Peak and Cerro San Luis. The City asserts that both the buildings and the landscaping will block views, not only of Bishop Peak and Cerro San Luis, but of other open space vistas both on campus and off campus, especially looking north and west from the intersection of Grand and Slack. In addition to the mitigation measures proposed, Cal Poly should also implement or participate in open space conservation projects that permanently protect scenic resources themselves. Both on-site and off-site opportunities exist with geographical nexus to the project site that would represent a potential mitigation measure that is adequate and feasible; please coordinate with the City's Natural Resources Manager, Robert Hill (rhill@slocity.org or 805-781-7211).

Greenhouse Gas Emissions (Section 4.2 of DEIR):
The DEIR identifies Greenhouse Gas (GHG) Emissions that are significant and unavoidable (Class I). CEQA Guidelines section 15126.4c offers several possible mitigations for GHG impacts and the City recommends that Cal Poly explore off-site sequestration opportunities in addition to the project features that encourage building energy and water efficiency, bike parking, and use of green building materials.

Land Use Planning (Section 4.8 of DEIR):
The City's response to the Notice of Preparation requested the University address neighborhood issues such as noise, parking and maintenance due to new housing for 1,475 students immediately adjacent to an existing low density neighborhood. The EIR does not adequately address potential impacts such as displaced parking from campus to the neighborhoods; adequacy of bike and pedestrian connections to City destinations from this end of campus; and potential conflicts with applicable City land use plans for the existing neighborhood that abuts this new project.

Noise (Section 4.4 of DEIR):
The DEIR lists community members' concerns with potential increases in nighttime nuisance noise events associated with the project. While site development includes orientation of buildings internal to the site, there are still concerns that have not been addressed. The University's regulations, as outlined in the DEIR, indicates that outdoor activities with amplified music or speech may occur between 7:00 am and 10:00 pm; and that activities without amplification may be conducted between 7:00 am and midnight, seven days a week. General Policy Section 141.3.1 indicates that plans for outdoor events and activities should address potential impacts on residential communities, on and *off campus* - something the EIR does not address.

The EIR needs to address the potential noise impacts related to the introduction of 1,475 students directly adjacent to a residential neighborhood. The noise monitoring done to identify baseline noise did not establish the existing ambient noise for night-time hours along Slack Street – the residential neighborhood immediately adjacent to the project site.

An increase in night-time noise in the neighborhoods from students using the outdoor basketball courts, or from students traversing through adjacent neighborhoods on the way to and from destinations during night-time hours impacts neighborhood expectations of quiet during evening and night-time hours. The City's noise ordinance specifies exterior noise limits of 50 dBA between 10:00 pm and 7:00 am for low density residential neighborhoods like those adjacent to the project site. The City's code further specifies that repetitive noises such as music or speech or hammering (i.e. basketballs bouncing) are subject to a further reduction in threshold by 5 dB. While University staff will be responsible to enforce complaints on campus, City staff will be called upon to address nuisance noise in the neighborhoods and this in has not been addressed in the DEIR.

It is recommended that the University consider a wide range of mitigations such as relocating the basketball court and committing to long term social programming activities within the dorm facilities to provide on campus social activities which have the potential to alleviate noise impacts in the surrounding neighborhoods.

Parks and Open Space (Section 4.5 of DEIR):

Impacts will occur to Parks and Open Space resources if the project results in:

1. An increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Increase in demand to recreational facilities that require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

As noted in the DEIR, the proposed project relies upon on campus recreational facilities to meet the activity needs of the students who will reside in the new housing units. This will undoubtedly meet a significant portion of the on-campus resident student's recreation needs.

Because the City of San Luis Obispo offers a diverse and unique array of recreational activity due in large measure to City open space areas and programs there are many students both on and off campus who enjoy these community amenities on a daily basis. There are two areas where there will be ongoing impacts to existing City recreational facilities and/or programs. The first is with respect to existing open space areas. Cal Poly students use multiple modes of transportation (from cars to bikes to walking) to access the thousands of acres of open space that the City maintains for multipurpose uses.

This is an impact to the maintenance and use of these facilities. For instance, a significant portion of the users of the Bishop Peak Open Space area are students – more often than not this is a healthy and positive community activity but does come with wear and tear to the open space that requires ongoing maintenance and this is but one example. The second is with respect to programmatic use. The City will be opening a new Skate Park at Santa Rosa Park by 2015 (a facility currently not available at Cal Poly) and with this will come increased use by students because the activity is engaged in predominately by those under 30.

A potential mitigation measure to address this ongoing trail impact would be to acquire and install bike parking at several open space trails including Bishop Peak and to partner with the City to address longer term parking needs at two trail heads in the City's open space network. Other potential mitigations include a negotiation of a Joint Use Agreement to allow community use to campus recreation facilities to help comprehensively meet per capita park and recreation facility needs.

Draft Environmental Impact Report (DEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
January 24, 2014
Page 5

Population and Housing (Section 4.8 of DEIR):
The DEIR determined that the Population and Housing impacts are less than significant. The backfill of housing units currently occupied by students living in the City of San Luis Obispo is acknowledged in the DEIR, but it concludes that the impact is too speculative to address. However, the project will induce substantial population growth in an area (on campus) that was not previously identified for housing without a concomitant removal of the other housing sites offered in the Master Plan. There will be a net new amount of housing in the area and this housing will be concentrated immediately adjacent to an existing single family residential neighborhood. The addition of 30 new staff positions represents a 2 ½ % increase in staff levels.

The DEIR should estimate and address the cumulative increase in population and identify and mitigate the impacts associated with creating new housing supply. While the dorm project has the potential to reduce existing impacts in some locations, it also has the potential to create cumulative impacts and project specific impacts in terms of redistributing and concentrating existing impacts in the areas surround the dorm facility. The DEIR does not adequately analyze these potential impacts or offer adequate mitigations.

Public Services (Section 4.5 of DEIR):
Police
The Cal Poly Police Department is the lead law enforcement agency on the Cal Poly campus. An increase in on campus population will create a need for personnel to adequately patrol and address enforcement issues at the proposed dorm location as well as campus wide. The DEIR indicates the impact to this concern is "*less than significant and no additional equipment or facilities are required*".

The City is concerned that this conclusion was made and the analysis that forms this conclusion is unsupported. If the increase of the on-campus population is not addressed properly, both in short and long term planning, there may be a need for City of San Luis Obispo police resources to respond more frequently on campus to provide law enforcement assistance and in the neighborhoods directly surrounding the proposed dorm. The hiring of appropriate police personnel and staff to adapt to this increase must be addressed by Cal Poly to maintain service levels to address activitees that may have an impact on the environment, such as noise.

The City of San Luis Obispo has several active and vocal neighborhood wellness proponents. The City actively engages with many of these groups to address behaviors that impact neighborhoods. The residential areas surrounding the selected site (as well as the entire campus) generate discussions about "quality of life issues" such as noise complaints, parties, fights, vandalism, alcohol violations and general public disorder that impact these residential areas. An increase and adjustment of the on-campus student population has the potential to create additional impacts for the City. Cal Poly Police will need to have an adequate contingent of personnel to not only provide enforcement capabilities, but also to engage in the discussion process to address and mitigate these concerns with neighbors.

Draft Environmental Impact Report (DEIR)
2013 Cal Poly Student Housing South Project
SCH #2013091085
January 24, 2014
Page 6

A concentration of first year students adjacent to City residential areas may generate an increased demand for services by the City of San Luis Obispo Police Department. It will be impetrative for Cal Poly to continue and expand efforts to engage students that are involved in off-campus adverse behaviors. A mitigation measure that includes a commitment for on campus housing social programming and for University law enforcement staff to partner and augment policing levels in the adjacent neighborhoods could mitigate these impacts.

The City has reviewed its public safety calls for service within a ½ mile radius from the intersection of Slack and Grand over the last three years. These numbers represent both Police and Fire responses, however, the bulk of the responses are police related.

.5 mi = Grand & Slack	2013	2012	2011
Calls for service	1431	1359	1689

Although the City is not able to conclude that all of these calls for service are the result of Cal Poly student related activity approximately 1/3 of the calls are noise and alcohol violations which are predominantly associated with the college age population. These numbers do not represent most officer self-initiated activity pertaining to traffic violations and minor infractions that take place in this heavily populated area where college age people live and travel. These dynamics require that the department regularly intensify enforcement efforts towards this particular area of the City.

City impacts for the projected student population adjustment and growth at the selected site will alter the traffic and pedestrian patterns on the City surface streets adjacent to this area. Student egress and ingress of this concentrated population into the City of San Luis Obispo will likely create several concerns including the need for safety lighting, safe pedestrian access and effective traffic engineering design to mitigate potential criminal activity or vehicle/pedestrian or bike collisions. A thoughtful consideration into these impacts will mitigate the need for response to the area to investigate these potential concerns.

Although the current EIR suggests a movement of this select population onto campus will mitigate a higher concentration of vehicles/bikes traveling to campus for classes it does not recognize the "social implications" associated with the movement of pedestrians, bicycles and vehicles impacting the area outside of "normal business hours". The north end of the City adjacent to the campus has a significant amount of night time pedestrian and vehicle traffic that impacts the surrounding residential areas. The shifting of this population will affect both Cal Poly and SLO Police resources and response to the area. Ensuring adequate personnel are available for the concentration of this population will help mitigate some concerns; however, there will continue to be impacts as students migrate on and off campus.

Historically the Police Department has had increased vehicle and pedestrian concerns centered on the arrival and departure of students to our various school sites. It is the desire of the San Luis

Coastal Unified School District to return elementary age school children to the old Pacheco school site located at Slack and Grand located directly across the street from the proposed dorm location. The DEIR must include the cumulative analysis of restoring the Pacheco campus to a functioning school site as is currently being contemplated by the School District.

A return of 150 elementary age students will impact the amount of non-motorized and vehicle traffic during the early morning drop off period, mid- afternoon pick up period and school special events. Potentially this mix will generate additional calls for service and the departments need to respond to collision investigations or other associated complaints.

The DEIR should incorporate mitigations in the City that address vehicle, bicycle and pedestrian movement patterns to determine adequate roadway engineering and lighting necessary for optimal vehicle/people movement and safety. It is imperative that Cal Poly engage these efforts jointly with the City in the development of plans for optimal student safety and residential wellness.

Fire(Section 4.5 of DEIR):

The University contracts with the City Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE) to provide fire and emergency response on campus. Cal Poly's contract with the City covers all structures on campus as well as grassland fire suppression up to 450 feet in elevation. Fires above this elevation fall under the jurisdiction of CAL FIRE. A fire occurring on the project site would be the responsibility of the City Fire Department. This contract also covers emergency medical services, which the City provides via cross-trained firefighter-paramedics in an advanced life support (ALS) capacity. All emergency medical services in the project site would be the responsibility of the City Fire Department.

The City Fire Department has a staff of approximately 50 employees, including 42 firefighters and 8 administrative and fire prevention personnel. The Department has four stations in the City. The nearest stations are Fire Station 2 at North Chorro, and Fire Station 1 at the intersection of Santa Barbara, Broad, and South Streets. Response time is measured as the time it takes for a dispatched emergency response vehicle to drive to the emergency scene using lights and siren. Current response times from Station 2 are approximately 4 minutes depending on the location of the emergency on campus. The next closest City fire station, Station 1 has an average response time to the University of between 6 and 7 minutes.

The CAL FIRE station is located at Highland Drive and Highway 1, at the Highland Drive entrance to campus.

The City Fire Department responded to the University 271 times in calendar year 2013. Calls for service to the University campus accounted for approximately 23.6% of all incidents managed by the closest fire station, Fire Station 2. In calendar year 2013, Fire Station 2 was dispatched to 1,149 incidents. The vast majority of these emergency responses to the University were medical in nature. Medical emergency responses are typically managed by one fire crew. The campus

currently has 6,239 beds of student housing. The addition of 1,475 beds represents an almost 24% increase in on-campus housing. To the extent that these new beds result in a net increase of on-campus students, there will be an increase in calls for service for the City Fire Department.

Approximately ten fire or fire system related emergencies occurred on the University property in 2013. These resulted in a response by several City Fire emergency response crews. Fire responses garner a large response from the City. The initial dispatch to a structure fire or fire alarm on the University property calls for two fire engines, one 100' aerial ladder truck, and a battalion chief. The addition of multiple buildings in this project will result in an increase in buildings protected by the City Fire Department. This fact warrants revisiting the assumptions and conclusions of the current fire, rescue and medical services contract between the University and the City.

The project site is served by existing fire suppression infrastructure (i.e., hydrant systems). The project is required to comply with existing Fire and Building Code regulations intended to reduce risk of damage to property and persons. Applicable regulations address roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. The project must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space. Preliminary engineering studies indicate adequate fire flow (water volume and pressure) at the project site. As proposed, the project does not comply with City Fire Department access requirements, and thus exceeds the threshold of operational significance unless mitigated. Mitigation may be accomplished through ensuring fire apparatus access to all buildings in the project, per the City Fire Department. Another mitigation option is through changes in construction characteristics and fire protection system installation. These construction and protection system changes should include, as a minimum, fire sprinkler protection for all structures to Type 13 system rating; Type IIIA construction; fire access stairwells and access hatches to the roof tops; and fire hydrants located within 40 feet of all building risers.

California Building Code
The project is required to comply with existing Fire and Building Code regulations intended to reduce risk of damage to property and persons. Applicable regulations address roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. The project must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space.

As proposed, the project does not comply with fire department access requirements and this situation needs to be mitigated. As previously stated, mitigation may be accomplished through ensuring fire apparatus access to all buildings in the project, per the City Fire Department. Another mitigation option is through changes in construction characteristics and fire protection system installation. These construction and protection system changes should include, as a minimum, fire sprinkler protection for all structures to Type 13 system rating; Type IIIA

construction; fire access stairwells and access hatches to the roof tops; and fire hydrants located within 40 feet of all building risers.

4.5.3 Thresholds of Significance

The thresholds of significance are based on the criteria set forth in Appendix G of the CEQA Guidelines. According to those criteria, a project would result in a fire, police protection or recreation-related impact if it would:

3. Result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities, need for new of physically altered fire or police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

As proposed, this project would negatively impact response times due to limited fire apparatus access and this situation needs to be mitigated.

4. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
5. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.5.5.1 Fire Protection

The project will introduce additional nighttime residents to the campus, and will increase the total number of buildings requiring fire protection and response. The project will not increase enrollment. While the project will not directly increase potential calls for health and safety related to the total population of enrolled University students, the project will increase calls for fire, rescue, and medical services provided by the City due to the increased population of on-campus students. It is anticipated that former off-campus student housing will be repopulated and these residents will require fire and emergency medical services as well. This project doesn't simply move emergency responses from City neighborhoods to the University; it also creates capacity for residents to repopulate City neighborhoods who will generate emergency incidents. Thus an impact of this project on the City Fire Department is a net increase in emergency incidents.

The assessment of impacts related to public services, as set forth in the CEQA Guidelines, is focused on the environmental impact of any expanded or new facilities required to achieve performance standards. The Fire Department is in dire need to construct a major renovation of Station 2. This structure is now 60 years old and greater than 10 years past its anticipated lifespan. Approximately one-quarter of all emergency response activity at Fire Station 2 is attributed to the University. This project will increase the percent of University-related emergency response activities at Fire Station 2. This will increase the wear and tear on Fire Station 2, and this will need to be mitigated.

The proposed housing is a consolidation of bed count approved under the existing Master Plan; the project does not increase bed count, enrollment, or estimates of built space beyond Master Plan projections; however, it would be inaccurate to assume that the City Fire Department's planning accounts for yet-to-be implemented development proposed by the Master Plan or that no additional impacts to facilities are anticipated. The City Fire Department has not proactively staffed and equipped, nor has the City negotiated the fire and medical services contract, based on proposed buildings in the University's Master Plan or amendments to that plan. The City has staffed, equipped and negotiated contract terms based on actual, not theoretic or unrealized infrastructure and population. This project represents a change to the infrastructure and population density on the University and this will need to be mitigated.

Students living off-campus are provided fire and emergency medical services as citizens of the City. When on-campus, including the population shift to more students living on campus, students are provided fire and emergency medical services through the contract between the City and the University. Given the forecasted shift of student population from the City to the University, the contract would need to be adjusted for the increased service demands created by the larger number of students serviced by the contract.

The Fire Department has raised concerns regarding provision of adequate access to the proposed buildings. The project does not introduce new structural heights; existing buildings on campus, including student residences, include five-story structures. Therefore, the project will not result in the need for new equipment. The project will be fully sprinklered to Type 13 standards and otherwise comply with provisions of the Fire Code. Access is proposed in several locations throughout the site, and Type IIIA construction will mitigate the negative effects of the limited fire access proposed. Final plans will be subject to approval by the City and State Fire Marshal.

Given the current layout of the proposed project, the City requests the following mitigating factors:

1. Option 1
    a. Collaborate with the City Fire Marshal to provide for the minimum required emergency response apparatus access to all structures OR;
2. Option 2
    a. Install fire sprinkler protection for all structures to Type 13 system rating; AND
    b. Construct with Type IIIA non-combustible building construction techniques and materials; AND
    c. Design and install fire access stairwells and access hatches to the roof tops; AND
    d. Install fire hydrants located within 40 feet of all building risers.

Transportation/Traffic (Section 4.6 of DEIR):

1. Trip Rates & Commute Reduction: The EIR carries forward assumed trip rates from the 2000/2001 CalPoly Master Update which assumes rates of less than 10% of the ITE apartment trip generation rates along with assumed further reductions from recommended TDM measures.

Based on current CalPoly gateway traffic volumes and student/faculty demographics those trip rates nor commute reductions have actually been realized and therefore should not be carried forward in this EIR as it may be considered an abuse of discretion in terms of estimating impacts to roadway and other transportation facilities.

Not realizing the originally assumed trips rates may be due in part to lack of implementation of several TDM measures identified in the 2000/2001 Master plan such as restricting parking permits for students that live within a certain distance off campus, and implementation of an on-campus transit/shuttle service that also provides service to key off-campus student destinations. Due to the unique nature of the development and the unrealized performance of past assumptions it is recommended that the campus be studied to develop new trip generation numbers based on current conditions and apply those rates in this EIR.

The EIR mitigation measures should include those TDM programs from the 2000/2001 master plan (i.e. Off-campus student parking pass restrictions & On-Campus shuttle) that have not yet been implemented as well as a bi-annual traffic and TDM monitoring and reporting program. The City is willing to partner with the University to implement a host of mitigation measures to address these impacts. Also these monitoring programs could be incorporated into Cal Poly academic curriculum for Transportation Engineering Courses.

2. Trip Distribution: Based on current gateway traffic volumes the trip distribution percentages are not reflective of actual conditions. It's recommended that these be adjusted to reflect current conditions.

3. Intersection Operations: There is significant inconsistency between the cumulative + project intersection levels of service of the 2000/2001 Master Plan EIR and this EIR despite proposing a zero net increase in student enrollment and minimal development in the surrounding City areas. It's recommended that the study intersections be reevaluated with the new trip generation and distribution numbers based on current conditions. Also an incorrect significance criterion was used for evaluating the California and Taft intersection and the EIR should refer to the City's Traffic Impact Guidelines. The EIR should address this project specific contribution to an already existing deficient condition and propose mitigations to address these levels of service deficiencies.

Depending on changes resulting from an update to trip rates and distribution, the DEIR should evaluate and identify operational and physical improvements at impacted intersections; Foothill & Santa Rosa, Walnut & Santa Rosa, California & Taft, and NB 101 & California Blvd. Other potential mitigations include partnering with the City to complete the sidewalk networks in the adjacent neighborhoods and to fund a fair share of bicycle facilities that will provide a range of mobility options to students, faculty and staff.

4. Parking: The parking analysis does not apply a reduction for effective capacity, which is industry standard practice. Applying an effective capacity factor (typically 80% - 90%) will increase the projected parking shortfall in the vicinity of the project.

The study incorrectly states that lots R-1 & R-2 can accommodate the displaced demand and the project's new demand; however those lots do not have the capacity. Also the project displaces parking by approximately one mile for more than 600 student residents; this distance is outside what would be a considered an acceptable distance between a parking space and the corresponding dwelling unit. All of these factors would put excessive parking demand on the surrounding residential neighborhoods impacting parking enforcement resources, neighborhood wellness resources, and neighborhood traffic conditions. Effective mitigation measures need to be implemented to address these impacts.

The EIR mitigation measures should include an augmentation of Cal Poly police resources to assist with parking enforcement and neighborhood wellness activities within the vicinity neighborhoods. Also the EIR mitigation measures should include an on-campus shuttle system providing service between student housing and remote parking facilities as previously identified, and a bi-annual parking & neighborhood traffic monitoring and reporting program.

4. Transit: On-campus residents are less likely to own or drive their own car as represented by applying trip rates below ITE rates. Although a zero net increase in enrollment is proposed by shifting students' residences from off-campus to on-campus, this will increase ridership demand on routes that are already near capacity.

The EIR mitigation measures should include a City transit monitoring program and Cal Poly participation in service augmentation if transit capacities are exceeded or services levels are degraded as a result of this project.

Utilities and Service Systems (Section 4.7 of DEIR):

The City's Utilities Department suggests the following edits to Section 4.7.1.1, Water:

> The University obtains water from both surface and groundwater sources. Cal Poly owns 33.71% capacity in Whale Rock Reservoir, located east of the town of Cayucos. The 33% ownership translates into approximately ~~13,707~~ 13,136 acre feet (AF) ~~in normal years~~. The City, which also has ownership in the reservoir, has modeled safe annual yields (SAY) for water users. The SAY for Cal Poly's share is currently estimated at ~~1,384~~ 1,306 AF per year (AFY). Average total demand for the last 3 years on record is 1,071 AF. Agricultural and landscape irrigation demand is a significant portion of the total; average agricultural demand for the same period was ~~501~~ 552 AF (~~47%~~ 50.3% of total) and annual water demand for irrigation averaged 280 AF (26%). Approximately 288 AFY (27%) was used for indoor or domestic purposes during that period…

The City's Utilities Department suggests that Cal Poly recalculate the current water surplus quantity based on the revised Safe Annual Yield figure provided above (1,306 AFY) and reference a specific year rather that state "current" or "currently" throughout this section.

The City's Utilities Department also suggests the following edits to Section 4.7.1.1, Water:

> Water from Whale Rock Reservoir is treated at the Stenner Canyon water treatment facility. Peak treatment capacity is 16 million gallons per day (mgd). Water treated at the plant comes from Whale Rock Reservoir, the Nacimiento Water Project, or the Salinas Reservoir. Cal Poly is entitled to 1,000 AFY in treatment at the plant. Domestic demand from the plant has averaged ~~568 AFY~~ 544 AFY (average of 551 in 2010, 552 in 2011, 529 in 2012) in the last 3 years, or ~~57%~~ 54.4% of Cal Poly's capacity.

Section 4.7, Utilities, does not provide information on available water storage within the campus's infrastructure or if it would rely on the City's tanks and reservoirs for adequate water storage to serve the proposed project. Consistent with the Thresholds of Significance described in Section 4.7.3 (2), please amend the EIR to address whether construction of new water storage facilities or pump stations or expansion of existing storage facilities or pump stations facilities, including those facilities operated by the City, would be required to serve the project.

Regarding the Wastewater Section on Page 4.7-5, per the City of San Luis Obispo and Cal Poly's agreement regarding water and sewer rates, dated January 5th, 1993, sewer charges will be assessed according to the metered effluent discharge flow. Wastewater from this project must be directed through Cal Poly's internal collection system to the effluent flow meter that measures the campuses wastewater flow.

Finally, the City has concluded that the development and analysis of alternatives fails to comply with CEQA, which requires an EIR to describe a range of alternatives that would avoid or substantially lessen one or more of the project's significant impacts. Portions of the proposed alternatives are inherently inadequate due to the unrealistic assumptions made in the project descriptions to meet the objectives of the project.

The City is eager to collaborate with Cal Poly to identify and implement mitigation measures that the City believes can address impacts in the community. Any mitigation proposed should include substantial and viable measures that are subject to ongoing monitoring, as CEQA requires.

The City greatly appreciates the opportunity to and help identify mitigations identified a revised and recirculated DEIR. We provide the comments in this letter with the intention that they should assist Cal Poly with DEIR revisions needed to reasonably and foreseeably reduce impacts to less

than significant levels. The City looks forward to ongoing collaboration with Cal Poly and is available to identify and develop mitigations for the next iteration of the DEIR that will be released for public circulation.

Sincerely yours,

Derek Johnson
Community Development Director

CC: City Council
Planning Commission
Department Heads

10.2.2.14 Response to Letter from Sharon Whitney

Comment No.	Response
SW(a)-1	The commenter references the City of San Luis Obispo's January letter, and notes agreement. Responses to the City's letters are provided in the Final EIR.
SW(a)-2	Impacts related to lighting are addressed in Section 4.1, Aesthetic Resources.
SW(a)-3	Responses to the City's letters are provided in the Final EIR.
SW(a)-4	Comments and responses will be incorporated into the record for consideration by decision makers.

From: Joel Neel
To: Nicole Carter
Subject: FW: New housing project
Date: Thursday, March 27, 2014 4:11:04 PM

~~~~~ ~~~~~

From: Michael Boudreau [mailto:mikeb@mtbarchitecture.com]
Sent: Thursday, March 27, 2014 3:19 PM
To: facilities-cbs@calpoly.edu
Subject: New housing project

To whom it may concern,

As a resident of San Luis Obispo, and as a relative neighbor to Cal Poly, I live on Murray Street, I would like to extend my support for the new student housing project on Cal Poly property. It makes a lot of sense. Of course, I am assuming the university owns the property currently in the spotlight . **MB-1**

With all of the modern concerns regarding travel, green house gases, too many automobiles, parking etc. A project like this address all of those matters.

I find it odd that people that consciously choose to live next to a university would complain about operations and development on university grounds.

Those that would be against such a project are comparable to people that choose to move next to airport, and then complain of noise.

Opinions from such a source are marginal at best.

Sincerely ,

Michael Boudreau
854 Murray Ave
San Luis Obispo, CA
~~~~~

10.2.2.15 Response to Email from Michael Boudreau

Comment No.	Response
MB-1	Comments and responses will be incorporated into the record for consideration by decision makers.

From:	sharon@sharonwhitney.com
To:	Nicole Carter; Derek Johnson; Kim Murry; kathy smith; cchristiansen; john ashbaugh; dan carpenter; jan marx
Cc:	sharon
Subject:	Off Site Economic and Social Impacts of the Student Housing South Project
Date:	Thursday, March 27, 2014 12:41:01 PM

Dear Nicole,

SW(b)-1

Please consider this email an addendum to the letter I sent by email yesterday (3/26), which was dated March 31, 2014.

It has occurred to me that an omitted analysis of the project for an off-site impact to the home-owners in the immediate surrounding neighborhoods relates to a predictable and quantifiable economic social impact with respect to the restricted marketability of our homes, creating increased population density in our neighborhoods. Please allow me to quote where I found the relevant reference:

CEQA Handbook, discussing Section 15064, titled "Determining the Significance of the Environmental Effects of the Project," at point (e), last two sentences. I quote: " If the physical
change causes adverse economic or social effects on people, those adverse effects may be used
as a factor in determining whether the physical change is significant. For example, if a project
would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect."

My interpretation of this guideline as it applies to Alta Vista and Monterey Heights neighborhoods is as follows: It can be shown with real estate evidence that the home-owners in these neighborhoods are adversely impacted with respect to the restricted marketability of their homes. By this I mean, the encroachment of student housing adjacent to the neighborhoods decreases the probability that current home-owning occupants and/or their descendants can sell their homes except to buyers who will turn these homes into dense student-rentals. While this may result in a favorable profitable price for the sold home for the seller, it changes the character of the neighborhood from one for a less dense one of home-owner occupants to a more dense one of student renters.

In my opinion, this project induces that off-site economic and social impact on the population and character of the neighborhood, and requires an analysis that has heretofore been omitted.

Sharon G. Whitney

10.2.2.16 Response to Email from Sharon Whitney

Comment No.	Response
	Please refer to MR-2 and MR-4. Pursuant to Section 15131 (CEQA Guidelines, Economic and Social Effects): "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes….The focus of the analysis shall be on the physical changes".
SW(b)-1	The commenter opines that the development of the project would adversely affect marketability, thereby increasing the number of homes converted to rentals in the neighborhood, and increasing population density. The statement is considered speculative as a direct or indirect physical environmental effect of the project. The project, and other housing projects developed on campus, are intended, in part, to alleviate pressure on the local housing and rental housing market. Decreased pressure may somewhat offset existing patterns of owner to rental conversion in the vicinity; however, this is likewise considered speculative for the purposes of analysis.

From: Philip Ruggles
To: Nicole Carter
Subject: Letter: Student Housing South Dormitory
Date: Friday, March 28, 2014 9:12:39 AM
Attachments: ltr CP Dorm Project.pdf

Dear Ms. Carter -

Please share this letter with the Board of Trustees.

We have emailed a copy to Cal Poly President Armstrong and the San Luis Obispo City Council.

Thank you.

Joanne and Philip Ruggles

P.O. Box 46
San Luis Obispo, CA 93406
March 28, 2014

CSU Board of Trustees
c/0 Nicole Carter, Senior Planner
Email: ncarter@swca.com

Subject: Student Housing South Dormitory Project

Dear Ms. Carter and the Board of Trustees:

We are retired professors emeritus from Cal Poly, having spent a combined total of 62 years in distinguished teaching and research at the university.

Having studied the EIR for the above-noted project, attended neighborhood meetings and discussed the Student Housing South Dormitory proposal with others, we have concluded the following four points CANNOT BE MITIGATED in any way, no matter what the university does.

These four points are clearly Class I Significant, Unavoidable, Adverse Impacts and should stop the project from being built at the proposed site.

1. It is not possible for the university to mitigate the traffic congestion at the intersection of Grand Avenue and Slack Street that this project will cause. Building this project would seriously compromise traffic and pedestrian safety for all parents and children using Pacheo School, the general safety of vehicular, bike and pedestrians as they enter and exit the university via the intersection, and will impact parking in the immediate neighborhood area for tax-paying neighbors who live close to this project. **JPR-1**

2. It is not possible to for the university to hide or subdue the the massive structures that will dominate this area, especially when viewed from lower profile structures on Slack Street. The 60-foot high dormitory structures are huge, ugly and simply can't be mitigated by trees, plants and shrubs. **JPR-2**

3. It is not possible for the university to ensure the large population of freshman students it proposes to situate at the very edge of campus will not negatively impact the adjoining neighborhood. This neighborhood is already plagued by noise and unruly gathering problems, well-documented by police agencies serving the area, as well as other consequences of student partying which include neighborhood residents finding urine, vomit, deficated matter, trash, and drug and alcohol debris in their yards. It will take only a limited percentage of the 1,475 new freshman residents from this proposed complex – added to freshmen from other dorms close by – to turn the neighborhood that is already a battle zone into a full-blown war zone. This is predictable and also unacceptable. **JPR-3**

4. It is not possible for the university to provide the essential fire and police service to this area during nighttime hours (or in a significant emergency) without adversely affecting the adjacent neighborhood where tax-paying citizens live. **JPR-4**

Given the above, the proposed Student Housing South dormitory location is unacceptable and should be re-located to another location on campus, well within the interior of the campus. **JPR-5**

We suggest, as do other responsible city residents, that Area H-12 and H-16 (now parking lots) represent the ideal location for this project. Selecting these combined sites will apparently necessitate the building of a new dining facility, a key reason the university says it did not select this site area initially. However, such a new dining facility, if built on Area H-12, would not only

service the new dormitories and existing dormitories and student housing that has recently been constructed in the area, but also be developed as a convenient food and restaurant venue for university sporting events held at the sports complex.

JPR-5 (continued)

Sincerely,

Joanne and Philip Ruggles

cc: San Luis Obispo City Council
Jeffrey Armstrong, President, Cal Poly State University

10.2.2.17 Response to Letter from Joanne and Philip Ruggles

Comment No.	Response
JPR-1	Please refer to MR-1. Pedestrian and bicycle safety, including consideration of operations at Teach/Pacheco school, are provided in Section 4.6, Traffic and Circulation, and are considered less than significant with mitigation.
JPR-2	Please refer to MR-9 and EIR Section 4-1 Aesthetics Resources. Comments and responses will be incorporated into the record for consideration by decision makers.
JPR-3	Please refer to MR-2.
JPR-4	Public services are addressed in Section 4.5, Public Services and Recreation.
JPR-5	Comments and responses will be incorporated into the record for consideration by decision makers.

Linda White
2077 Slack Street
San Luis Obispo, CA 93405
Phone & Fax (805) 543-8801
Lindaleewhite15@charter.net

March 28, 2014

CSU Board of Trustees
C/O Nicole Carter
SWCA Environmental Consultants
1422 Monterey St., C200
San Luis Obispo, CA 93401

Re: Student Housing South Recirculated Draft Environmental Impact Report
SCH No. 2013091085

Please find 71 pages plus two attachments (Letter to David Mullinax, California League of Cities and List of Media sources) as my response to the above Draft Environmental Impact Report.

Sincerely,

Linda White

Linda White

Recirculated Draft EIR SCH #2013091085

Line by Line

Notice is Hereby Given
"...and invites comments on the adequacy and completeness of the environmental analyses and mitigation measures described in the Recirculated Draft EIR."

LW(a)-1

Comment: How can this be considered an adequate and complete analysis when President Armstrong is quoted in the January 15, 2014, Mustang Daily (fully one month before the release of the draft) as saying: "Although the two other sites looked at weren't found to be suitable for freshman housing in the future, Cal Poly will likely look at their potential for upperclassman housing... There will be another 45-day comment period after a review of the two rejected sites has been added to the draft Environmental Report."

How can this EIR be considered objective when the alternate sites were "rejected" before being placed into and studied by the Recirculated Draft?

How can these alternative sites be rejected today but then be added to the new master plan as housing for upper classmen in a few months? It seems that the sites are either inferior now and in the future or superior now and in the future.

It appears that this entire Draft EIR is based on an incorrect foundation leading to inaccurate analysis leading to inaccurate conclusions and an abuse of discretion.

Executive Summary
A. Purpose of the EIR
"...is to identify the potential significant impacts of the proposed project on the environment, indicate the manner in which such significant impacts will be mitigated or **avoided**, and **identify alternatives** to the proposed project that avoid or reduce these impacts."

LW(a)-2

Comment: All impacts would be avoided by building on a site further within the campus away from the only R-1 San Luis Obispo city neighborhood composed of single-story homes (circa 1950's).

If the purpose of the EIR is to "identify alternatives" how can this be a valid EIR when the alternatives were "rejected" by President Armstrong 9 days <u>before</u> the original EIR comment period closed.

B. Project Location pg ES-2
"The University campus occupies over 6,000 acres."

LW(a)-3

Comment: Of this 6000 acres, the 12 acre proposed site is the <u>only</u> border adjacent to a City R-1 neighborhood.

1

Figure ES-2 Project Location Map on page ES-4
Comment: Please note that the proposed site is the ONLY campus border with an R-1 residential neighborhood.

LW(a)-3 (continued)

B. Project Location Pg. ES-6
"The San Luis Coastal Unified School District (SLCUSD) expects to provide space for approximately six classrooms, or 150 students, on site. San Luis Obispo Classical Academy will remain in operation. In 2018, the school district may either renew existing leases or opt to expand the Teach program on site."

LW(a)-4

Comment: This paragraph fails to mention that the Classical Academy presently serves 300 students, pre-K through 12th grade (according to Amy Calloway of the Classical Academy on 2/19/2014). This brings the school population to 450 students this year. According to Ryan Pinkerton SLCUSD personal communication (on 2/18/2014), the San Luis Coastal Unified School District is studying the enrollment of the Teach program and will be able in future years, if needed, to expand their enrollment to the 10 classrooms presently available. They are also studying the demographics of the city and when the Classical Academy lease is up in 2018 will either take over the remaining classrooms and re-open the original Pacheco facility or continue to share the facility with the Classical Academy.

The statement, as written in the EIR with the omissions above, does not provide a good faith effort at full disclosure as required by CEQA.

C. Project Background
"The 2001 Cal Poly Master Plan is the primary document governing land use and capital improvements on campus through 2020."

LW(a)-5

Comment: There is no mention that this Master Plan will need to be amended to use this site as housing. There is no mention that the Master Plan is now considered outdated, and that it is now in the process or will soon be upgraded, revised, etc. The omission of these facts does not provide a good faith effort at full disclosure as required by CEQA.

"The Residential Communities element identifies constraints associated with housing on campus and communitywide, outlines principles to guide the housing program on campus and identifies several locations for housing communities (H) on University lands (refer to Figure ES-4)."
Comment: The variances with the Residential Communities Element will be pointed out in various instances throughout the Comments.

LW(a)-6

Pg ES-7
"With the completion of the complexes outlined in Table ES-1, Cal Poly offers 6,239 beds in student housing, a significant increase from the 2,838 beds available at the time of Master Plan adoption."

LW(a)-7

2

Comment: Table ES-1 claims to have 6,239 beds for students. However, it includes the 69 beds of Bella Montana which is supposedly faculty and staff housing.

LW(a)-7 (continued)

"Constraints at the remaining housing sites identified in the Master Plan have led to the consideration of the proposed site for residential development."

LW(a)-8

Comment: We have repeatedly asked University Administration to look outside the old, outdated MP. The existing MP is already or will be revised very shortly to accommodate the additional 5,000 students that CP expects to add over the next few years. We ask that they not limit their choices to an outdated MP. We don't ask them to wait to build additional on campus housing until the new MP has been written. We realize that they must "use it or lose it" with the State Funds. We merely ask that they consider using 12 of their 6,000 acres further within the campus.

"The current site is further considered because of proximity to other existing freshman housing and existing communal dining facilities."

LW(a)-9

Comment: The sociological, cultural, and psychological studies on group psychology, mob psychology, and hazing have not been refuted to my knowlege. How can you consider adding 1475 17-& 18-year-olds to an existing 3500 freshman population across Grand Ave? How can you provide for their health, welfare, and safety? Look at what happens when you place 4000 students together at the new recreation center. See Wednesday, February 5, 2014, Tribune article "14 arrested 6 hospitalized after campus concert". Obviously, you were unable to control that group despite the fact that you supposedly "beefed up" security.

How do you keep these underage students from migrating into the adjacent neighborhood for underage drinking parties. See Cal Coast SLO Social Seen, house party 2-10-14. Justin Wellner in an August 2013, postcard to some neighbors stated:

"We believe this project will benefit not only our students but also be helpful in improving overall neighborhood wellness. For example, research strongly suggests a direct correlation between students' academic success and living on campus, particularly in their first and second years. As well, expansion of on-campus living will free up more city residences for workforce housing. Additionally, as we experienced with the completion of Poly Canyon Village, on campus housing reduces vehicle traffic to and from campus and encourages greater student involvement in on-campus activities."

We agree that placing students on-campus will improve their academic success. That is why we ask that you place them further into campus, not adjacent to the temptations that you are trying to protect them from.

We disagree that expansion of on-campus housing will free up more city residences for workforce housing. The increased 5,000 students proposed over the next few

LW(a)-10

3

years will take up the housing freed up by students living on campus. Furthermore, the prices of the mini-dorm houses housing 6 or more students are out of reach for workforce wages.

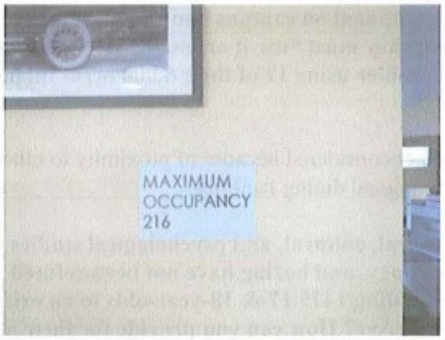
LW(a)-10 (continued)

We disagree that this project will improve overall neighborhood wellness. City police nor CP administration can control the problems that we now have.

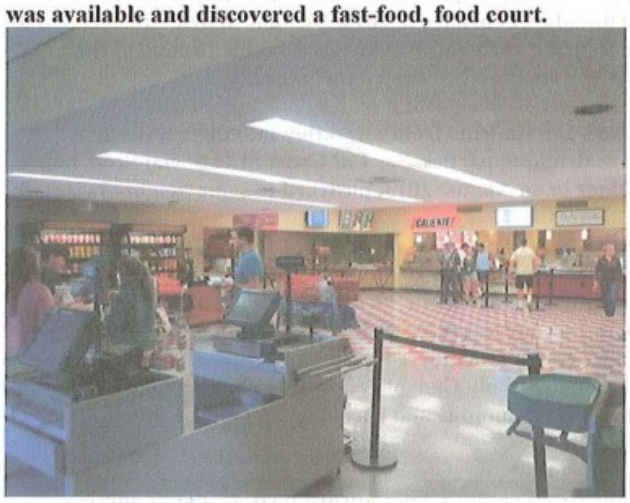
LW(a)-11

Regarding the communal dining facilities, I walked to the campus core and found only one facility that I initially considered a dining facility and this was limited to 216 students.

LW(a)-12



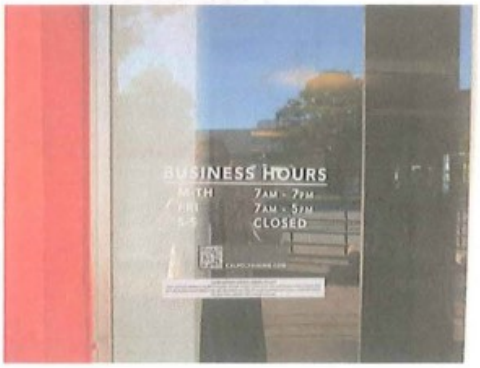
Imagine my surprise when I went around the corner from this sign to see what food was available and discovered a fast-food, food court.



4

LW(a)-12 (continued)

Is this what is considered communal dining facilities? The remainder of the core was filled with individual fast-food "dining facilities" mostly with weekday only hours. Is their no facility where students can eat a real meal? These fast food franchises can be built out and rented anywhere on campus to provide student "dining facilities".



5

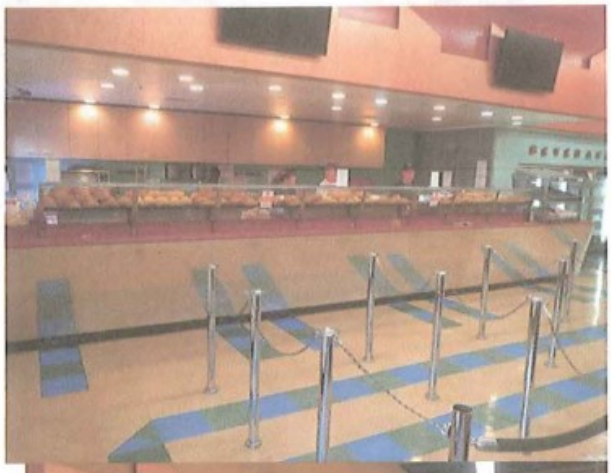
LW(a)-12 (continued)

6

LW(a)-12 (continued)

7

LW(a)-12 (continued)



8

LW(a)-12 (continued)

9

LW(a)-12 (continued)

Is this what passes for existing communal dining that we have to have these freshmen within 10 minutes walk? No wonder we are an obese society. You should place this "dining" out on the far 6000 acres and make the students jog and climb an obstacle course to get this cholesterol laden junk food.

LW(a)-13

"Under the current proposal, the bed count identified in the Master Plan for housing sites H-4 through H-7 would be consolidated at the current site and the complexes at sites H4-H7 would not be pursued under the current Master Plan."

Comment: You are consolidating four sites of 120 beds, 512 beds, 136 beds, and 612 beds (1380 beds) into one huge tower complex housing 1475 17-&18-year olds. And you are placing these vulnerable, impressionable students adjacent to the very temptations that you are trying to protect them from. What psychological, social, or educational studies tell you that this is a wise move?

Since you are amending the MP to accommodate this site, again we ask why you can't look outside the outdated MP and look toward the area of future expansion north of H-1.

Pg ES-9

LW(a)-14

"The difference in land use specified for the proposed site in the Guidelines as opposed to the Master Plan indicates an evolution in both the housing program and in the understanding of constraints to development on campus.

Comment: Evolution is a good thing. We ask that you not get stuck with a faulty, ill conceived premise and build it out in stubbornness and a desire to show strength and power. We ask that you continue to evolve your vision of the future of the University. Everyone agrees that much more on-campus housing is needed and

needed rapidly to house not only present students but the additional 5000 that will be coming to CP in the near future. Please don't be short-sited with your stubborn insistence on this site.

LW(a)-14 (continued)

Save this site for a state-of-the-art low-profile Welcome Center that transitions from the SLO residential bungalows and ranch style homes of the 50's to the ever advancing University. Build the open space, study areas, and retail that your Land Use Guidelines call for. These are all appropriate for this site---not 5 story towers of industrial, warehousing dormitories.

Please take time to read the following letter to President Armstrong from Kenneth Schwartz a prominent and knowledgeable Monterey Heights/Alta Vista resident who knows a thing or two about architecture, the university, and city of San Luis Obispo:

LW(a)-15

January 16, 2014
Dr. Jeffrey D. Armstrong
President, California Polytechnic State University,
San Luis Obispo, CA 93407

Dear Dr. Armstrong:
My name is Kenneth Schwartz. I have worn a number of titles in my life including: Professor of Architecture, Associate Dean and Interim Dean of Cal Poly's College of Architecture and Environmental Design an Institution I served from 1952 – 1988. I am an architect by profession and a Fellow of the American Institute of Architects. I have also been a Planning Commissioner for the City of San Luis Obispo and for the County of San Luis Obispo for eight years each. For ten years, I served as Mayor of San Luis Obispo and later on, another six years as a Council member. While at Cal Poly I served as architect consultant on two Agency for International Development (A.I.D.) projects, the last being EARTH UNIVERSITY in Costa Rica where I had a hand in the physical planning of that campus.

I provide this long-winded introduction in order to suggest to you that I know a wee bit about community and campus planning and a considerable bit about Cal Poly's physical and academic relationships as well as its relationships with the citizens of the City of San Luis Obispo.

My response to your email letter of January 15, 2014 and to today's front page story in the Tribune can be summed up in one word: Hogwash!

I attended the second session held on campus to acquaint city residents with Cal Poly's plans for Freshman Dormitories. (You were absent.) This session was designed as if it were a presentation to the CSU Board of Trustees instead of local citizens whose major concerns were not the learning benefits to freshman students but rather to the surrounding neighborhoods in which they lived. While this was a fundamental error of judgment on the part of Cal Poly administrators, the comment that captured my attention

was the comment by one of your vice-presidents who said, in essence, "We even considered the demolition of the 'concrete dorms' in order to intensify the use of those sites for these Freshman dorms." I thought to myself, if they are serious about this, that means they have opened their minds to a whole spectrum of site possibilities; the slate must be clean. They truly mean to select the best possible site and want to be intellectually honest about this project.
And then came this morning's Tribune. How wrong I was!

LW(a)-15 (continued)

Dr. Armstrong, the Grand Avenue site you and your advisors have selected for dormitory construction is not the best site for freshman students or any students for that matter. Any simple flow and relationship diagrams (graphic tools used by architects and planners) to determine the best relationships between buildings (or spaces) based on the circulation expected to take place between those buildings on a University campus would show conclusively that this proposed site is not the best site for freshmen. The very best site is the site of Cal Poly's administration building in which your office is located. A good planner would have put that site into the mix even though the idea of moving/converting an administration building to a Freshman Dormitory might seem daunting. The best place for a new low-level architecturally subdued administration building is on Grand Avenue where the dorms are proposed.

Consider the location of the present administration building: it is immediately adjacent to the Student Union; It is just a few steps from the main student cafeteria and dining rooms; the student health center is close by as well as is the new student recreation facilities; the Kennedy Library is within easy reach as are the principal academic classrooms and laboratories Including the new Baker Science Building; Mott Gym is a half block away. An Administration Building has little need to be adjacent to any of these facilities, but these are the facilities student housing needs to be close to. This site is the very best location for new Freshmen Dorms and architects should be set to work sketching how this building could be converted to a new purpose; should this site and adjacent parking be too small, one or more or the nearby brick dorms should be enlarged accordingly.

The closer student housing is to the center of the campus, the greater the opportunity for peace and quiet in adjacent City residential neighborhoods.

You have publically announced plans for Cal Poly to grow by another 4 – 5,000 students. The citizens of San Luis Obispo want to know where these additional students are to be housed; I dare say citizens would love to see that entire number located on campus. Is Cal Poly prepared to not only provide new classrooms, laboratories and ancillary facilities, but on-campus student housing as well? Any institution, private or public, that envisions a 25% increase in size has a responsibility, no, an obligation, to amend its master plan of land use and circulation to show how this growth is to be accommodated – well before specific plans are prepared to carry out the objectives of that amended Master Plan.

LW(a)-16

12

I detect no movement on the part of Cal Poly's administration to share its thinking about its proposed growth. While I do not represent the City of San Luis Obispo in any official capacity, I am a concerned citizen knowledgeable in these matters. I urge you to become a better neighbor. Notwithstanding Cal Poly's enviable record as an educational institution and its unique learn by doing philosophy, Cal Poly's record and standing as a neighbor leave much to be desired.

LW(a)-16 (continued)

Sincerely,
Kenneth E. Schwartz, FAIA
Cal Poly Faculty Emeritus, Architecture
201 Buena Vista
San Luis Obispo, CA 93405

Let me tell you a little about the City of San Luis Obispo and particularly about its citizens which do not fit the mold associated with most Californians. San Luis Obispo is a Charter City; does your staff know the difference between a General Law City and a Charter City? Almost immediately, San Luis Obispians desired a distinctive style to their local government. San Luis Obispo does not have any significant natural resources necessary to generate "primary industries." The most significant natural resources are a benign climate and a beautiful natural setting. San Luis Obispo has a very limited water supply; it sits on a constricted water aquifer which limits safe annual water withdrawal to 2,000 acre feet; consequently the City has entered into agreements to obtain water off-site from the Whale Rock Reservoir, the Salinas Reservoir, and the Naciemento Reservoir.

LW(a)-17

San Luis Obispo was one of the first cities to recognize the importance of air quality and do something about it by banning backyard burning of trash and to require mandatory trash collection including green waste. San Luis Obispo generated its first General Plan in 1961 and initiated a street tree program and required the undergrounding of overhead utilities long before most California cities of similar size. In the late 1960's the City did away with patronage and called on citizens to volunteer for service on the City's numerous citizens' advisory commissions and committees (now 14) a condition in which volunteerism was encouraged to the point that National Geographic researcher Dan Buettner in his book, "Trive," called San Luis Obispo, the "Friendliest City in all of North America."

San Luis Obispo was friendly enough in 1971 to elect a Cal Poly City and Regional Planning student, T. Keith Gurnee to its City council; Keith served approximately six years.

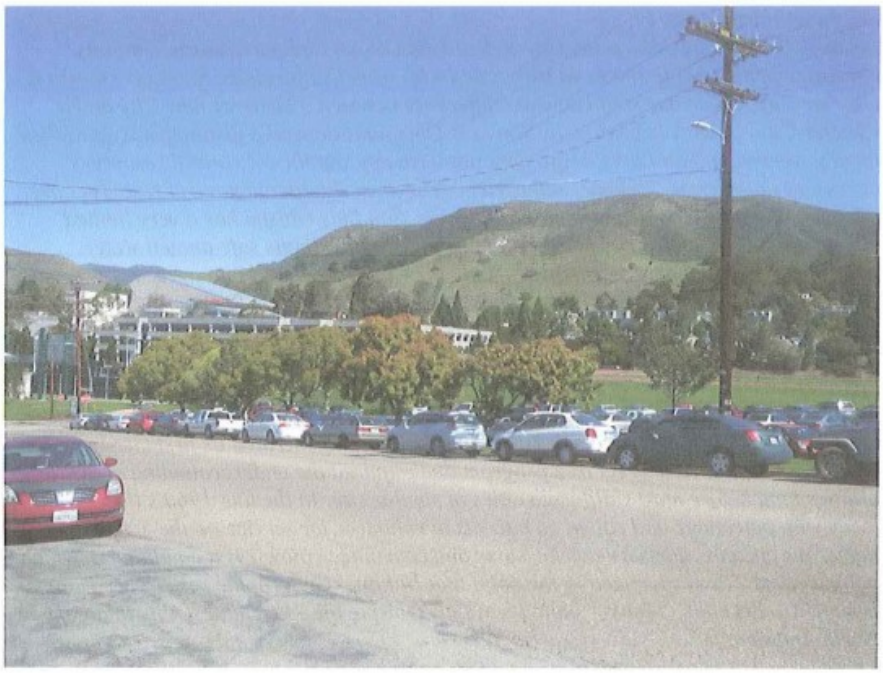
But here, Dr. Armstrong, is the kicker. In 1978 when the infamous Prop 13 was on the ballot which most Californians swallowed hook line and sinker, not one single voting precinct in the City of San Luis Obispo voted in favor. If you have done any personal research in the basic causes for the financial difficulties in financing public higher education in California, you will find the passage of Prop 13 to be one of the root causes for our problems. San Luis Obispians think differently and progressively.

13

LW(a)-18

Pg ES-8
"Additional, approved parking structures have not been built in part because of declining use of existing parking facilities..." Etc. etc, etc. to pg ES-11 where it concludes "...parking facilities on campus generally provide excess capacity."

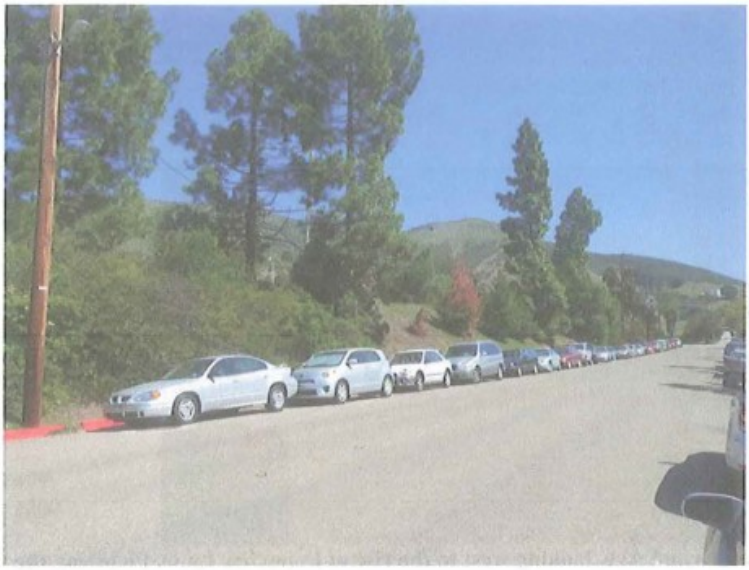
Comment: If there is so much excess available parking on campus, have you thought to ask why the adjacent City neighborhoods and retail parking lots are so heavily and negatively impacted with Cal Poly students who park and then unload their bikes, or skateboards to get onto campus.



Slack St. and Longview Lane looking toward the new Recreation Center and Parking structure.

14

LW(a)-18 (continued)

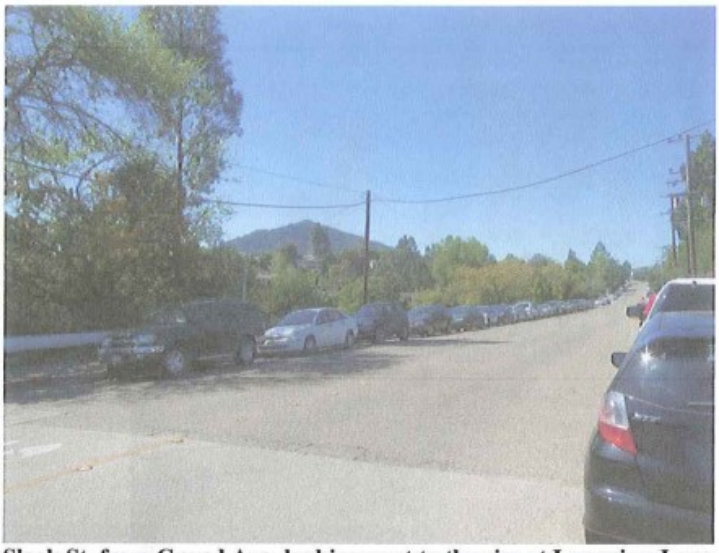


Slack Street from Pacheco Way to Grand Ave. Looking East.

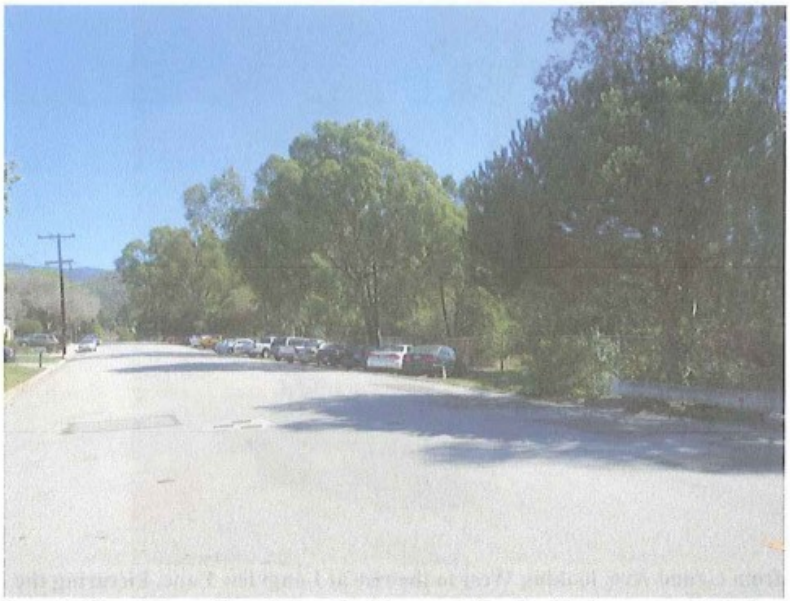
Slack St. from Grand Ave. looking West to the rise at Longview Lane. Picturing the North side of Slack St.

15

LW(a)-18 (continued)



Slack St. from Grand Ave. looking west to the rise at Longview Lane. Picturing the South side of Slack St.

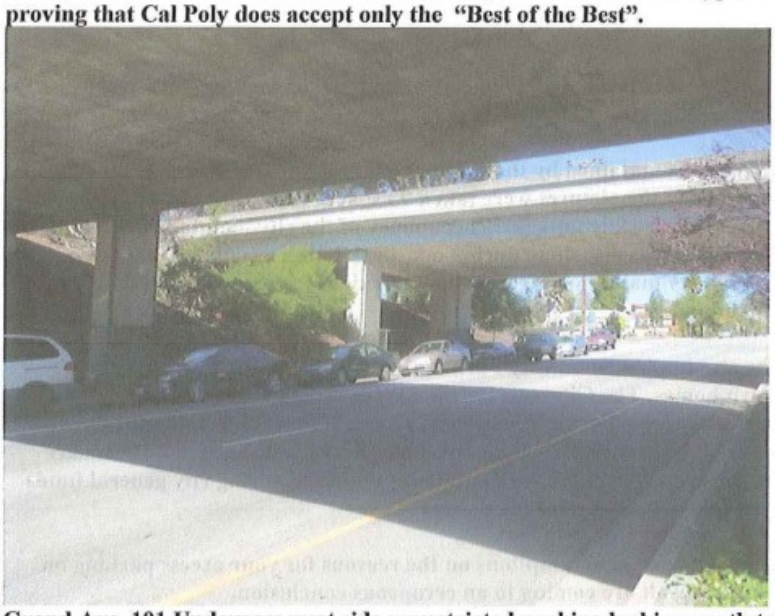


Loomis Street from Grand Ave. looking east. South side is non-restricted parking.

16

LW(a)-18 (continued)

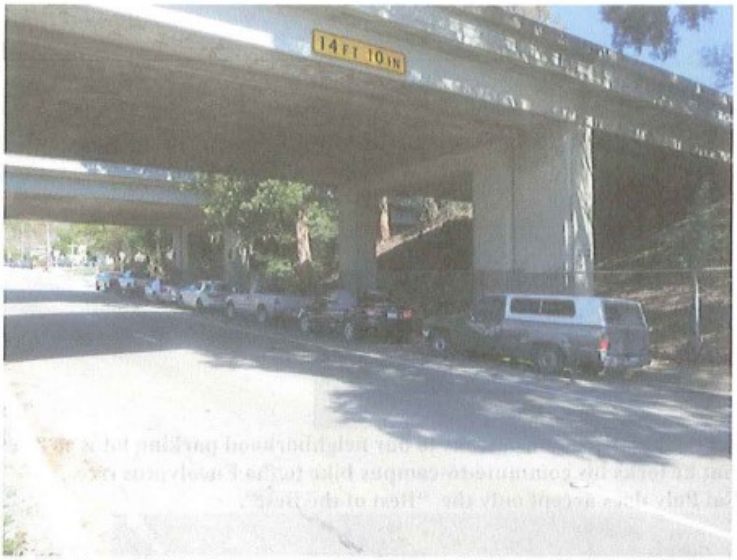
One of the Loomis Street Regular patrons to our neighborhood parking lot is so enterprising that he locks his commute-to-campus bike to the Eucalyptus tree proving that Cal Poly does accept only the "Best of the Best".



Grand Ave. 101 Underpass west side unrestricted parking looking north toward the Campus Main Entrance .

17

LW(a)-18 (continued)



Grand Ave. 101 Underpass east side unrestricted parking looking toward the Campus Main Entrance.

These City streets, maintained by the City have turned into parking lots for Poly students. On the day the pictures were taken 93 spaces were used out of approximately 103 possible for a 90% occupancy of the city maintained street parking. This count was also done during non-peak hours as defined on page 4.6-9 of the EIR. The City maintained free student parking is full during all school hours, not just peak hours.

The City has also implemented City Parking Districts so that residents can park near their own homes. The City sells Parking Placards for $10.00 each and each homeowner is allowed to purchase only two. The staff necessary to implement and manage this program are paid by the City. The parking enforcement officers are provided by the City. This program operates at a loss, requiring city general funds to be used to maintain. These are tax dollars.

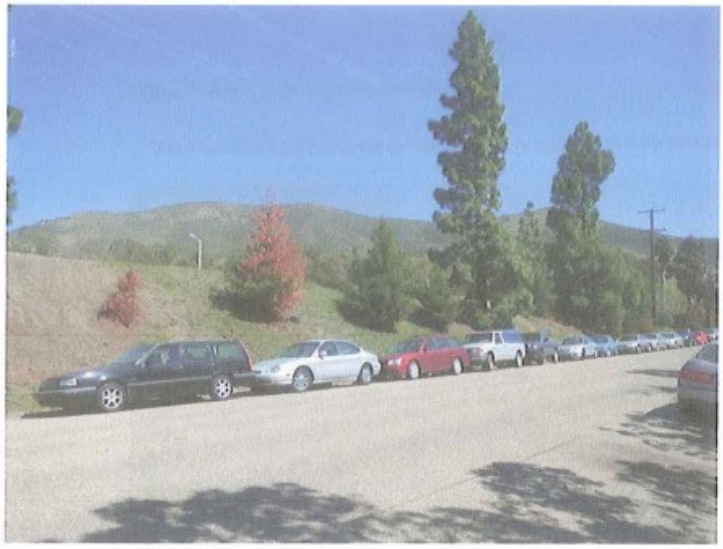
You are making incorrect assumptions on the reasons for your excess parking on campus and as a result are coming to an erroneous conclusion.

LW(a)19-

Pg ES-11
D. Project Objectives
Comments: All seven of these project objectives are great and no one disagrees with any of them. However, these objectives can also be realized at a site within the campus that doesn't adversely affect the City of San Luis Obispo and its residents.

18

LW(a)-20



This is Slack St. looking northeast toward the proposed dorm site. Please note the beautiful view of the Santa Lucia foothills available to all who walk, bike, skateboard, park, or drive along Slack St. Note the white light standard left of center in the existing parking lot. How high is the light standard? How much higher will the dorm towers be? We have repeatedly asked for height poles to be installed and told that they would be provided but as yet, have not.

The photos on the next page are copied from the draft EIR page 4.1-21 and consist of Figures 4.1-4 and 4.1-5. Please compare the above photo with the EIR photos and note the cropping on the EIR photos that crops the view of the Santa Lucia foothills.

Most of the pictures in the EIR are taken at an angle or cropped to reduce the visual impact of the dorm project on the adjacent neighborhood. This is a lack of good faith effort at providing full disclosure.

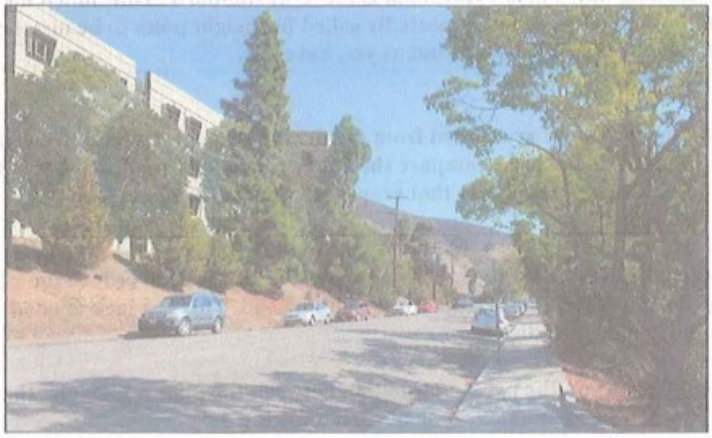
Also note the difference in the parking situation between the photos taken by the EIR and those taken by an amateur on a normal parking day.

19

LW(a)-20 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street



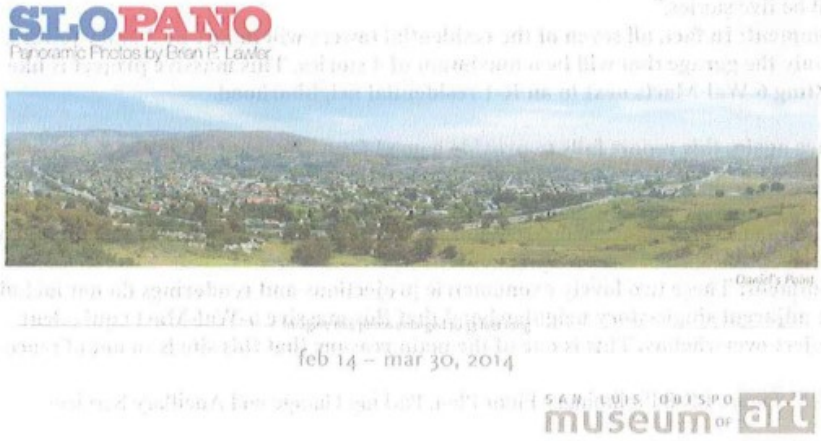
The seventh objective is to utilize campus lands for "highest and best use". The highest and best use for this site is not for dorms. It would be for a true Welcome Center, retail store selling CP goods, coffee shop, student study areas both indoors and out, classrooms and offices.

LW(a)-21

The Welcome Center is stressed in this project. However, the plans show a Welcome Center the size of the Coffee Shop. A true welcome center would inform the visiting public of the importance of this university. It would include the history of CP and its "Learn by Doing Philosophy", starting with the lobbying efforts of Myron Angel in 1894, the 1903 visit of President Theodore Roosevelt, and culminating with classes opening in 1903. It would show the growth and advancement of the various schools, the embracing of new technologies with new times, the transformation of a vocational high school into a world-class university.

Aesthetically and architecturally, it is inappropriate to slam the Visitor entering the Main Entrance with 5-story industrial warehouse towers housing their children and blocking the view of the surrounding hills for which San Luis is noted.

LW(a)-22



This is a copy of the announcement of local photographer and Cal Poly professor Brian Lawler's recent show. This is what we are attempting to preserve. This is our only natural resource. This is part of why Cal Poly is one of the most popular of State Universities. This is part of what makes us, "The Happiest City in America".

21

E. Proposed Project

1. Grading and Site preparation

Comment: This the same bank in ES-1 B Project Location paragraph 3 sentence 2 that is supposedly providing "topographical separation". Again, has the proximity of the 450 student Pacheco/Teach Elementary been taken into account in removing all of this 2.6 million cubic feet of "topographical separation" in regard to the dust, noise, and diesel fuel that these children will be exposed to for 31 months of their elementary school experience? **LW(a)-23**

"The project will result in disturbance of the entire 12-acre site." **LW(a)-24**

Comment: Please keep this in mind when evaluating the alternative sites and the grading that makes the alternatives less desirable. Here disturbing 12 acres or 2.6 million cubic feet is determined to be a less than significant impact. However, on alternatives, grade is considered to be a significant and unavoidable adverse impact.

2. Structures

"The project will provide approximately 1,475 beds in seven four-to five-story towers totaling 450,000 gross square feet. **LW(a)-25**

Comment: This sentence suggests that the housing towers could be just 4-stories when in fact a few sentences further it states:

"The preliminary site design includes seven residential structures... Residential structures will be five stories."

Comment: In fact, all seven of the residential towers will in fact be 5-story towers. It is only the garage that will be a maximum of 4 stories. This massive project is like putting 6 Wal-Marts next to an R-1 residential neighborhood.

Once again, this report fails to provide a good faith effort at full disclosure as required by CEQA.

"...Preliminary axonometric projections and renderings are provided in Figures ES-6 and ES-7. **LW(a)-26**

Comment: These two lovely axonometric projections and renderings do not include the adjacent single-story neighborhood that this massive 6-Wal-Mart equivalent project overwhelms. This is one of the main reasons that this site is so out of place.

ES-15 Figure ES-8 Preliminary Floor Plan, Parking Garage and Ancillary Services **LW(a)-27**

Comment: The Coffee House is larger than the Welcome Center. See upper left corner and enlarge the miniscule print. The Coffee House is the pink corner and the Welcome Center is the blue block next door. The Community Lounge (peach block) is larger than the Welcome Center.

The Welcome Center is stressed in this project. However, the plans show a Welcome Center the size of the Coffee Shop. A true welcome center would inform the visiting public of the importance of this university. It would include the history of CP and its "Learn by Doing Philosophy", starting with the lobbying efforts of Myron Angel in

22

1894, the 1903 visit of President Theodore Roosevelt, and culminating with classes opening in 1903. It would show the growth and advancement of the various schools, the embracing of new technologies with new times, the transformation of a vocational high school into a world-class university.

LW(a)-27 (continued)

Pg ES-17 For the Purposes of this analysis, it is assumed that the project will require entirely new on-site water infrastructure, wastewater infrastructure, and gas and electrical power infrastructure, as well as substantive new on-site stormwater facilities.
Comment: : I do not trust this EIR to objectively and in good faith provide full disclosure. For this reason I have written to David Mullinax, California League of Cities to enlist the support of the League in the event of litigation. Please see attached letter which I intend as a formal comment on this and ALL contracts with the City.

LW(a)-28

"...improvements to existing water mains at Grand Avenue are not required."
Comment: I do not trust this EIR to objectively and in good faith provide full disclosure. For this reason I have written to David Mullinax, California League of Cities to enlist the support of the League in the event of litigation. Please see attached letter which I intend as a formal comment on this and ALL contracts with the City.

"The project may also include roof-top solar energy systems to supplement climate control and power demand."
Comment: Why is this optional? Why is this being left so late in the planning process to decide? According to CEQA guidelines potential project revisions or Mitigation Measures cannot be deferred to a later date.

LW(a)-29

Pg ES-17 4 Access and Parking
"Vehicle parking will be provided in a four-story parking structure comprising 300 to 500 spaces."
What happens to the 1324 displaced parking capacity with an average occupancy of 857? You are 557 to 357 short.

LW(a)-30

Pg ES-18 F. Scoping and Notice of Preparation Process
"During the environmental determination process, an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project."

Comment: I pay taxes on five properties in the immediate neighborhood and received no notice. From the beginning, this project has lacked a good faith effort at full disclosure.

LW(a)-31

Pg. ES-19
"For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local proposed project area or the area adjacent to the proposed project."

LW(a)-32

Comment: We are the "area adjacent to the proposed project".

LW(a)-32 (continued)

Pg. ES-20 H. Areas of Controversy Known to Lead Agency
Parking. The analysis focuses on whether sufficient capacity exists within the campus parking system to accommodate redistributed commuters and residents and the environmental impacts associated with trip reduction.

LW(a)-33

Comment: Same as earlier with photos of parking on city streets. Cal Poly should mitigate this expense of the City and the neighbors who have to pay $20 dollars to secure 2 placards to park in front of their own homes?

24

Recirculated Draft EIR Part 2

Begin at page ES-20 Nuisances Associated

ES-21
3. Location Alternative-H-12 and H-16 Parking lot
"...suggested by a community member."
"This alternative may require additional components such as a new common dining facility."
Comment: Unless there is a hidden cafeteria that I missed please refer to prior statements and pictures of present "common dining facilities".

LW(a)-34

J. "Based on the analysis in Chapter 5, the H-12 and H-16 Parking Lot Alternative, No Parking Garage Alternative, and Reduced Scale Alternative ar3e considered environmentally superior.
Comment: If the Alternative suggested by a community member, is environmentally superior what other superior sites might be available if the Poly Planning and Facilities departments got together and opened their visions and outdated Master Plan consideration. The EIR evaluates only the outdated Master Plan suggestions. Since the H-12 and H-16 site is considered "Superior", it should be the site of the project since CEQA requires the use of a superior site if identified.

LW(a)-35

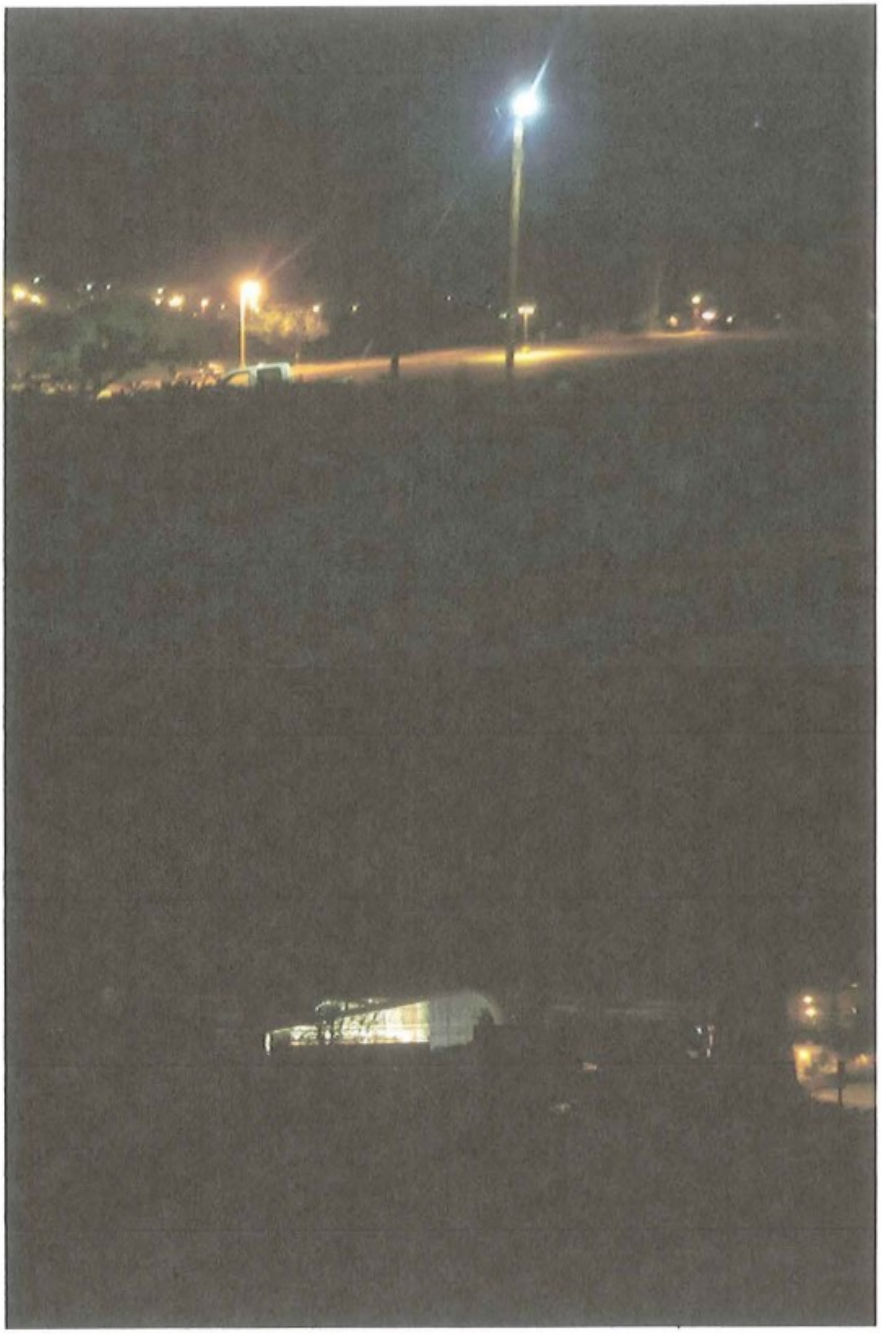
ES-24 AES Impact 4
"The project's prominent location and building heights could increase noticeability of light sources.
Comment: The EIR cannot defer potential project Mitigation Measures to a later date. Yet, AES/mm-3 does exactly that. Below are photos of the previously mitigated Recreation Center project. As you see from the photos below, the mitigations measures are NOT working. We expect better mitigation than to defer to a comprehensive lighting plan for review and approval of the State Architect. The Rec Center must have been reviewed and approved by the State Architect? IT's NOT WORKING!

The pictures below were taken on Thanksgiving weekend from 125 Longview Lane. In order to enjoy the holiday meals, the blinds were drawn at night due to the glare into the dining and living room.

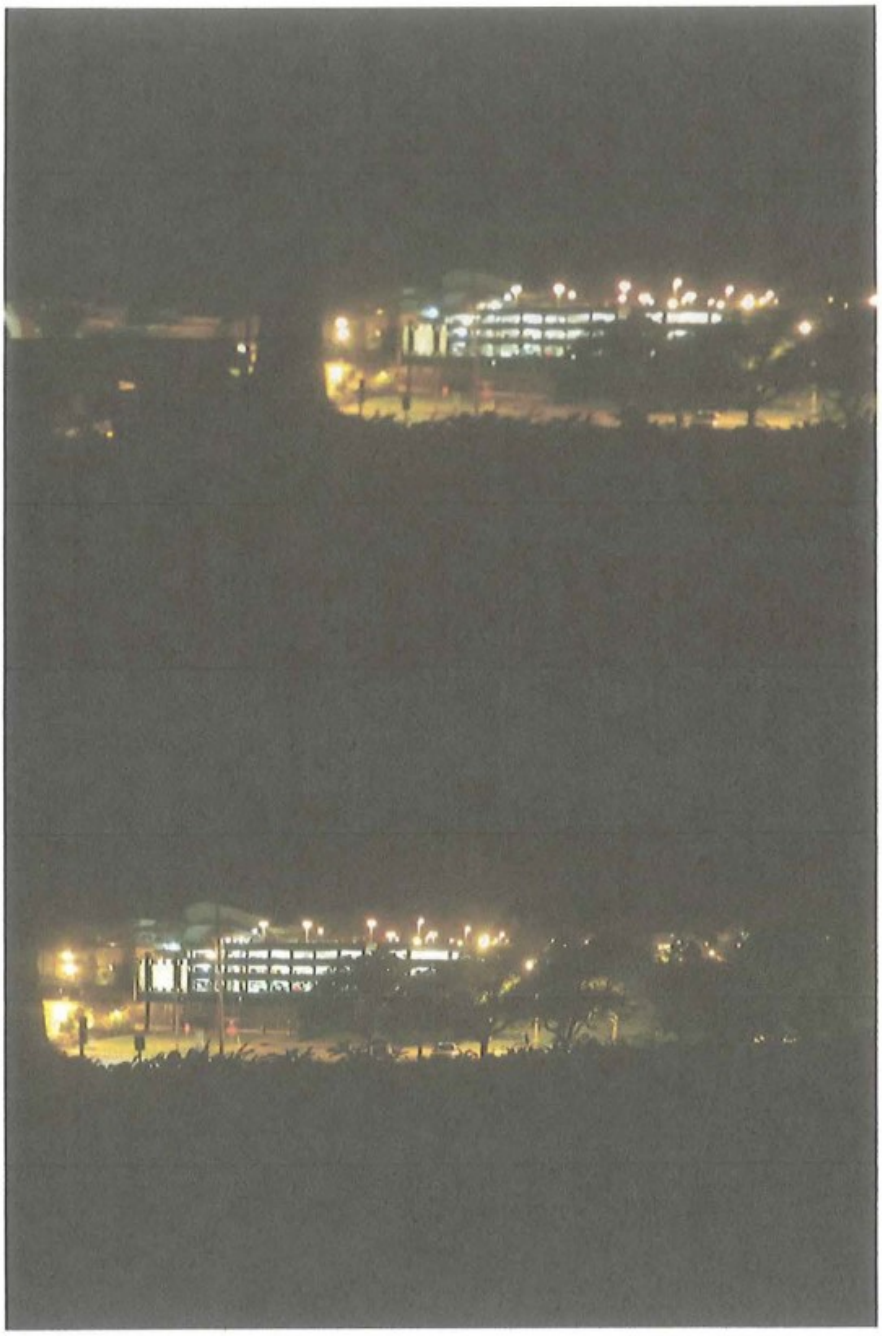
LW(a)-36

1

LW(a)-36 (continued)

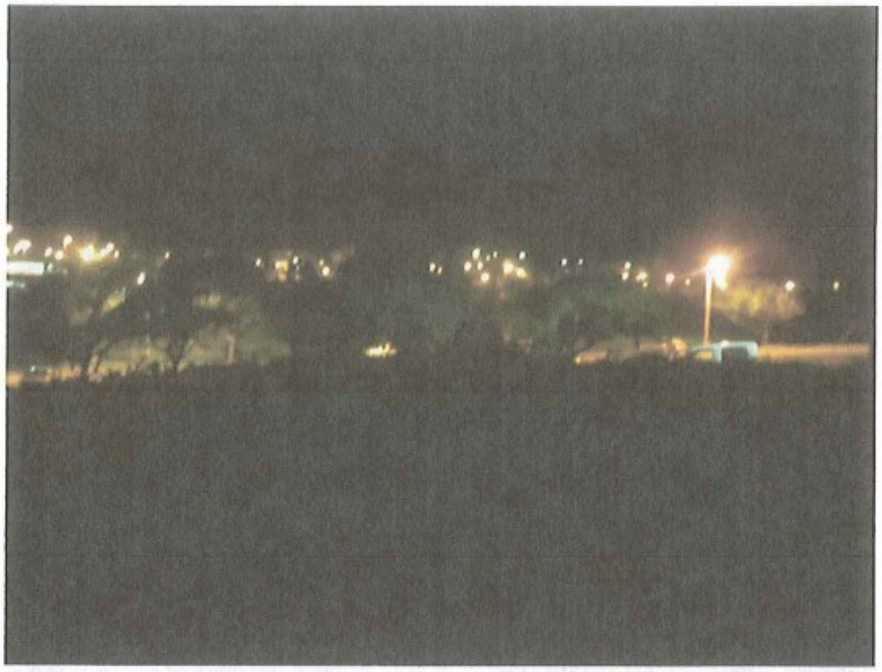


2



LW(a)-36 (continued)

3



LW(a)-36 (continued)

ES-25 Impacts

"However, as seen from public viewpoints and neighborhoods immediately adjacent to it, the project would appear out-of-scale and would reduce views to identified scenic resources. Although the project is technically considered in-fill, the interface between the large buildings along the perimeter would not have a harmonious visual transition to the surrounding community."

Comment: This paragraph says it all. It is just too massive to be adjacent to the only R-1 City neighborhood with the entire campus. We agree that this parking lot must be developed but not with seven five-story towers. A low profile buffer between the neighborhood and campus is all that we ask.

LW(a)-37

ES-34 Public Safety. Pursuant to CEQA, impacts are considered significant if the project would result in environmental impacts associated with the provision of additional structures or facilities to support police and other public services. Incremental changes associated with the location of nuisance activity in the community will not result in the need for such facilities; alteration in police may include redistribution of patrols and additional personnel.

Comment: The present status of the neighborhood public safety for both off-campus students and City residents is not acceptable. There are too few police patrols, too much underage drinking, too many assaults, drug deals gone bad, irresponsible and ultimately dangerous behavior, eg. Office chair races down Frederick's St. hill to Grand Ave. If this had occurred on a campus street rather than on a neighborhood

LW(a)-38

street toward a busy city street it would have been a cute college prank. Please see list and dates of news reports attached with this Comment and also submitted by Fred and Claudia Anderson. **LW(a)-38 (continued)**

ES-35 Pedestrian and Bicycle Circulation
Mitigation Measure
TC/mm-1
Comment: This mitigation ignores the south side of the street @ Longview to Hathway? The feeder streets have minimal sidewalks and those present are too narrow for multiple pedestrians. This omission of all facts does not provide a good faith effort at full disclosure as required by CEQA. **LW(a)-39**

ES-36 Pedestrian and Cycling Facilities.
"Off-campus pedestrian and bicycle trips associated with the project would be concentrated along Grand Avenue and via internal campus roads."
Comment: Incorrect factual foundation leading to inaccurate analysis proceeding to an inaccurate conclusion and an abuse of discretion. **LW(a)-40**

"The project would result in a reduction in peak hour vehicle trips through the Grand Avenue campus gateway. The reduction in commuter trips would ultimately provide a more comfortable travel environment in the local area as the number of potential conflicts during the periods of heaviest vehicle travel would be reduced."
Comment: Incorrect factual foundation leading to inaccurate analysis proceeding to an inaccurate conclusion and an abuse of discretion.

"The Student Housing South project has a net effect of reducing vehicle traffic in the vicinity of Grand Avenue and Slack St."
Comment: Incorrect factual foundation leading to inaccurate analysis proceeding to an inaccurate conclusion and an abuse of discretion.

"Substantial bicycle facilities exist in the project vicinity as described in Section 4.6.1.2, above and would provide adequate connection to areas where trips are likely to occur..." **LW(a)-41**
Comment: Class III or less Bikeways are not substantial. Incorrect factual foundation leading to inaccurate analysis proceeding to an inaccurate conclusion and an abuse of discretion.

ES-37 **LW(a)-42**

TC Impact 4
The project will have significant impacts when considered along with cumulative development.
Residual Impacts: Significant and unavoidable
Comment: So what is proposed? Mitigation Measures cannot be deferred to a later date.

Cumulative Pedestrian, Bicycle, and Transit **LW(a)-43**

"The project is not expected to result in a substantial contribution to cumulative impacts to pedestrian, bicycle or transit facilities in the project area."
Comment: The EIR cannot be speculative. This is very speculative considering that this intersection was never studied. Why? What is the University afraid of in studying this intersection?

LW(a)-43 (continued)

Chapter 1
1.1 "...identify alternatives to the proposed project that avoid or reduce these impacts."
Comment: The only reasonable alternative was suggested by a community member and none from the University. The alternative sites were rejected by President Armstrong and the University before study and inclusion in this re-circulated draft?

LW(a)-44

1.5.1 Background
"Cal Poly has also prepared additional visual simulations for the project."
Comment: Either the simulations are incorrect or the verbiage in the EIR. They do not match. See details in 2.3.2

LW(a)-45

Chapter 2
2.1.1 Project Location
Comment: The underlined addition finally updates the fact that the San Luis Coastal Unified School District will reopen the original Pacheco School with the Teach elementary program of 150 students in Fall 2014. However, the EIR fails to mention that the Existing San Luis Obispo Classical Academy that will remain in operation has an enrollment of 350 bringing the Fall 2014 student population to 500 students. Failure to present all facts result in a failure to provide a good faith effort at full disclosure.

The EIR quotes Ryan Pinkerton, SLCUSD, as either renewing the Classical Academy lease in 2018, or opt to expand the Teach program. Again the EIR stops the quote at the point where Ryan Pinkerton states that demographic studies are presently being conducted by the district. Current elementary schools are becoming overcrowded and the District will possibly take over the entire campus in 2018 when the Classical Academy lease expires. Failure to present all facts result in a failure to provide a good faith effort at full disclosure.

LW(a)-46

2.3.2 Structures Pgs. 2-10-11
"The project will provide approximately 1,475 beds in seven four-to five story towers totaling approximately 450,000 gross square feet."
"The preliminary site design includes seven residential structures,..."

Comment: Figure 2-6 Rendering of Building shows a four-story tower and yet all of the written statements clearly state that the residential towers will be five stories. See page ES-12 2. Structures "The project will provide approximately 1,475 beds in SEVEN FOUR-FIVE-STORY TOWERS totaling approximately 450,000 gross square feet. The preliminary site design includes SEVEN RESIDENTIAL STRUCTURES. RESIDENTIAL STRUCTURES WILL BE FIVE STORIES.

LW(a)-47

6

This project is the equivalent of 6 Walmarts being built across from a City R-1 neighborhood.

NONE of the renderings or axonometric drawings show the buildings to be 5 stories---only 4.

Inaccurate or misleading wording or renderings results in a failure to present a good faith effort at full disclosure as required by CEQA.

LW(a)-47 (continued)

2.3.4 Access and Parking
"Vehicle parking will be provided in a four-story parking structure, comprising approximately 300 to 500 spaces."

Comment: Who parks here? What of the 800 to 1000 lost parking spaces? Where do the 857 average occupants of this present lot park? If parking spaces are so underutilized on campus, why build a parking structure at all? See Table ES-3 on pg ES-9.

LW(a)-48

Figure 2-8 Axonometric Projection of Proposed Project
Comment: This projection does not portray the words of the EIR. All buildings, with the exception of the building along Pacheco Way, are represented as four stories high not the five stories as stated on page ES-12 Section 2. Structures "The project will provide approximately 1,475 beds in SEVEN FOUR-FIVE-STORY TOWERS totaling approximately 450,000 gross square feet. The preliminary site design includes SEVEN RESIDENTIAL STRUCTURES.

Figure 2-9
Comment: Same as above.

LW(a)-49

Figure 2-10
Comment: As stated earlier, the Welcome Center is the same size as the coffee shop. Since being close to communal dining is so important, do away with this plan and use this entire ground floor for fast food franchises. This whole project could then be moved and built anywhere on campus.

LW(a)-50

Part 3 Recirculated Draft EIR

3.1.1 Physical Setting

LW(a)-51

Comment: Again the number of students (500) attending the original Pacheco campus is being minimized. This draft EIR has not made a good faith effort at full disclosure on this issue, parking, and intersection studies.

Pg 3-6 Table 3-2 Consistency with Plans and Policies

LW(a)-52

Cal Poly Master Plan

Compatibility-Establish and maintain buffers between the campus and neighborhoods.

Comment: This is all we ask. There is no buffer. The wall of dorms is right on Slack St. adjacent to our city neighborhood blocking not only our view of the Santa Lucias but also anyone riding, biking, walking, driving down our street.

Environmental Impacts Analysis: Aesthetic Resources

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

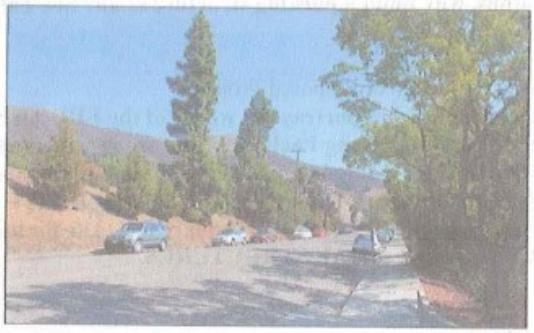
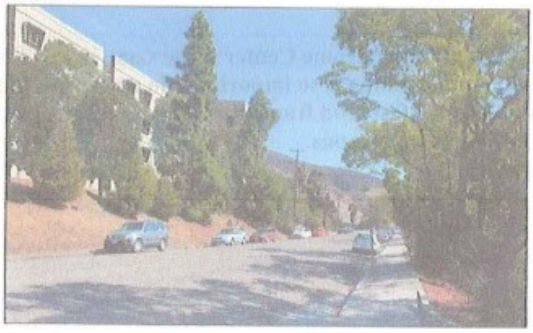


Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street



Student Housing South
Recirculated Draft Environmental Impact Report

4.1-21

8

Pg 3-6 Table 3-2 Consistency with Plans and Policies
Cal Poly Master Plan
Proposed Action
"The project provides housing proximate to other, existing freshman housing and existing support services such as dining halls."
Comment: See photos in ES section of the existing dining halls. These fast food franchises could be replicated anywhere on campus.

LW(a)-53

Residential Communities.
"External Community Impact-Housing on campus should mitigate immediate impacts on the local housing market."
Comment: This is a speculative statement with no basis in fact or studies to support it. An EIR should quantify impacts.

LW(a)-54

Proposed Action
"The project includes student learning components and addresses needs of freshmen with modern amenities. The project includes support services including small-scale retail and recreational facilities, and is ADA compatible."
Comment: This can be replicated anywhere on campus.

LW(a)-55

Table 3-2 Consistency with Plans and Policies
Parking
Comment: Why is parking decreased on campus? You make assumptions that are false. You don't take into account the negative impact on the neighborhood parking. See photos of City streets used for Cal Poly parking in the ES section.

LW(a)-56

4.1 The Campus
"From the more elevated portions of campus, including the project site, distant views include Cerro San Luis and Bishop Peak (part of the Morros chain of mountains) to the west and the Santa Lucia Mountain foothills to the east."
Comment: From the standpoint of the campus, the views have been preserved. What about the residents of the City who are being deprived of their views of the same peaks and foothills?

Section 15021 (d) of the CEQA Guidelines states that, "In determining whether a project should be approved, a public agency must balance a variety of project objectives including economic, environmental, and social factors and in particular, the goal of providing a decent home and satisfying living environment for every Californian."

This statement holds true for many of the sections in this draft EIR and the EIR does not take this into consideration.

LW(a)-57

9

"Two- and three-story student housing complexes are located immediately across Grand Avenue from the project site. Larger-scale on-campus housing is found northeast of the campus core in and near Poly Canyon."
Comment: These towers even dwarfs the existing on-campus housing complex buildings immediately across the street. A buffer is provided between these existing housing complexes and the neighborhood. This new project does not provide a buffer.

LW(a)-58

Photo 4.1-5 View of the site from the intersection of Grand Avenue and Slack Street.
Comment: It amazes me that in all pictures taken for the EIR, the angle and cropping of the photos minimizes the existing views, and diminishes the impact of the project. This misrepresentation does not provide a good faith effort at full disclosure. Below is an un-cropped amateur photo taken of the same intersection of Grand and Slack Street.

Please note that the mature trees that block the view of the mountain will be removed during grading. The EIR states, "Allow complete removal of all vegetation, and plant replacement planting to screen at least 50 percent of the project". It will take a generation to replace the 60-80 ft. pines and other trees. This is an unacceptable mitigation and time frame.

LW(a)-59

Pg.4.1-5
Surrounding Neighborhoods
"...single-family detached homes are predominant to the south and southeast..."

LW(a)-60

10

"The section of Grand Avenue approaching campus is designated as a Scenic Roadway in the City's Circulation Element."
Comment: This is true but doesn't seem to have been taken into account when placing seven five-story towers the equivalent of six Walmarts directly across the street from our homes and on a Scenic Roadway.

LW(a)-60 (continued)

Pg 4.1-8 to 4.1-9 2001 Cal Poly Master Plan
Land Use
3) Compatibility: be considerate of impacts on neighborhoods near campus.

Comment: This is all we ask. We have said from the beginning that this project is not compatible with the neighborhood. This would be a terrific project if it were further into the campus and not immediately adjacent to an R-1 neighborhood. We who live in this neighborhood are here because of CP. We are among the most ardent supporters of CP because we have been affiliated with the University for generations.

LW(a)-61

Natural Environment
8) Stewardship: develop and use management practices that protect and enhance natural resources; permanently protect especially sensitive areas; be an example to the greater community."
Comment: Protection of the natural resources is what we want. Our views of the morros and foothills are the only natural resources we have in SLO. We want to protect this sensitive area. We would like Cal Poly to be an example of good stewardship and partnership with the community.

14) Aesthetics: protect scenic resources and take advantage of them in new designs.
Comment: We want our scenic resources protected. This is why we don't want a five story wall blocking the views of the foothills to anyone traveling on Slack Street.

70) Beautification: gateways and corridors should be attractive.
Comment: We agree that this gateway to the University should be attractive. Five story warehouse towers is not our idea of beautification of the University gateway. Nor should it be considered beautification by a University noted for its School of Architecture.

Parking
81) Neighborhoods: be sensitive to impacts on adjacent neighborhoods.
Comment: This is all we ask, that the University be sensitive not only to our parking but views, peace and quiet enjoyment of our homes.

LW(a)-62

Pg. 4.1-9
4.1.2.2 City of San Luis O)bispo Planning Documents
San Luis Obispo General Plan Circulation Element
15.0.3 Development along Scenic Routes.
B. Development projects should not wall off scenic roadways and block views.

LW(a)-63

11

Comment:
Please look one more time at page 4.1-21 of the Recirculated draft EIR. This project violates all of the principals stated above. Even with the foliage immediately grown to maturity(through Photoshop) to camouflage the building, it still violates the principles. The principle will be violated for a generation until the new trees mature.

LW(a)-63 (continued)

12

LW(a)-63 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

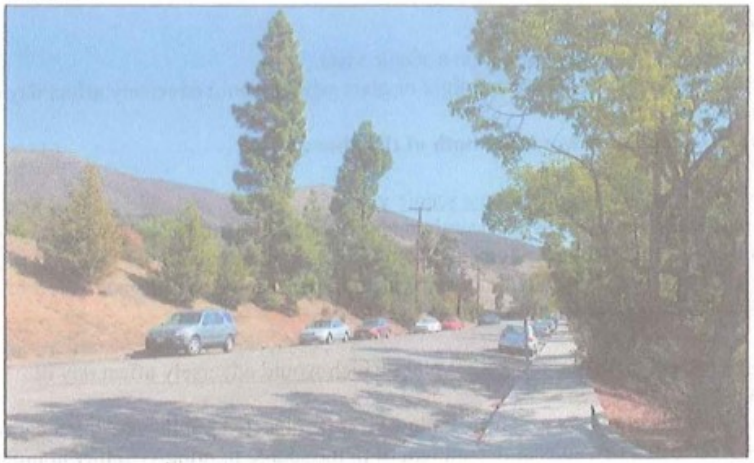
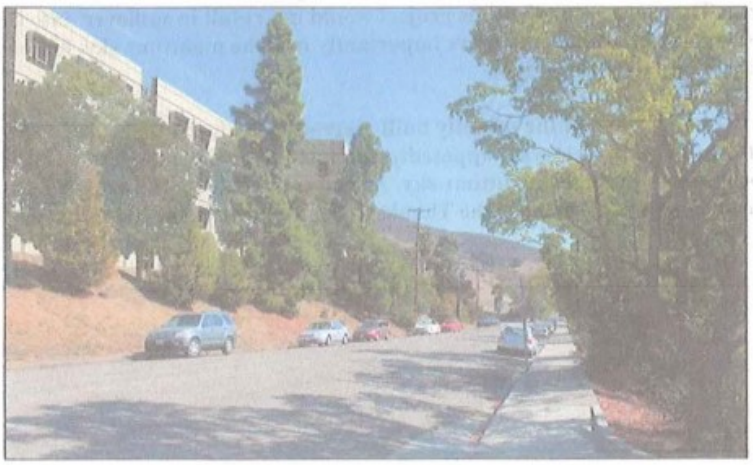


Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street



Pg4.1-10
4.1.3 Thresholds of Significance
"If a change in visual criteria was identified, this change was analyzed for its potential effect on the existing scenic character. This analysis was combined with the potential number of viewers, their sensitivities, and viewing duration in order to determine the overall level of impacts."

LW(a)-64

4.1.3.1 CEQA Guidelines
1. Have a substantial adverse effect on a scenic vista.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.
Comment: This project would do both of the above.

Have a substantial adverse effect on a scenic vista.
If the proposed project could significantly degrade the scenic landscape as viewed from public roads, or in particular designated Scenic Roadways, or from other public areas, this would be considered a potentially significant impact on the scenic vista.
Comment: This project would do all of the above.

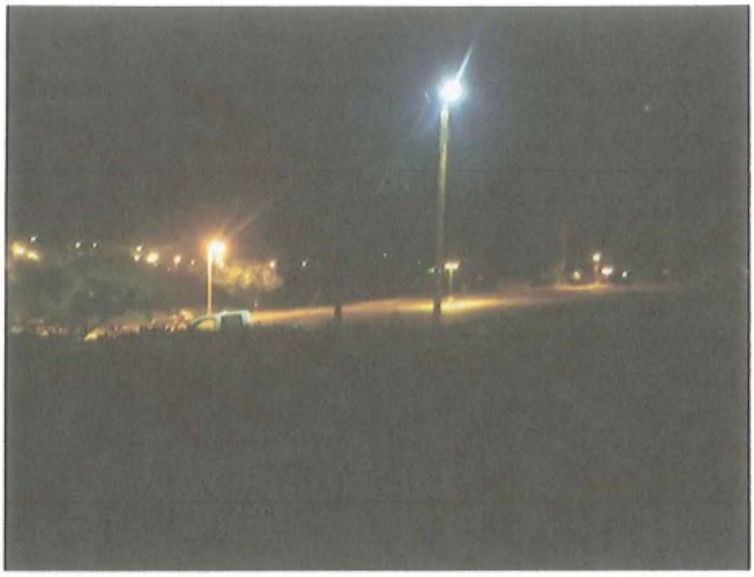
LW(a)-65

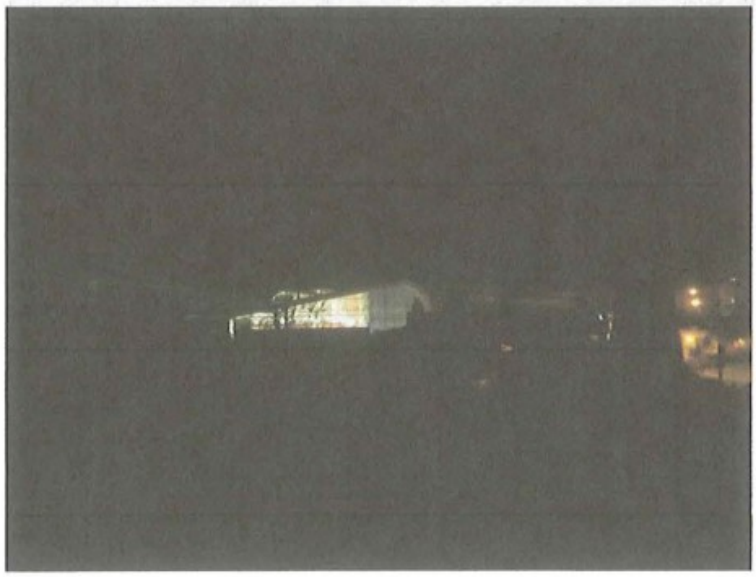
Create a new source of substantial light glare which would adversely affect day or nighttime views in the area.
"The project would result in a significant impact if it subjected public viewing locations or adjacent residents to a substantial amount of point-source lighting visibility at night, or if the collective lumination of the project resulted in a noticeable spillover effect into the nighttime sky, increasing the ambient light over the region."
Comment: There is no way that this project would not result in spillover into the surrounding neighborhood and more importantly into the nighttime sky, increasing the ambient light over the region.

LW(a)-66

Below are photos taken of the recently built recreation center at the end of Slack and Hathway. This project was supposedly mitigated to avoid spillover to adjacent neighborhoods and into the nighttime sky. As you can see, it's not working. These amateur photos were taken over the Thanksgiving weekend from 125 Longview Lane.

14

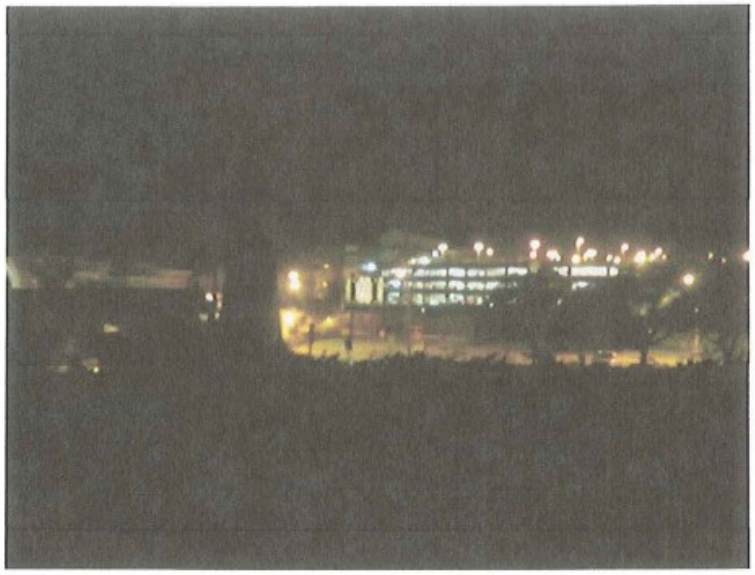


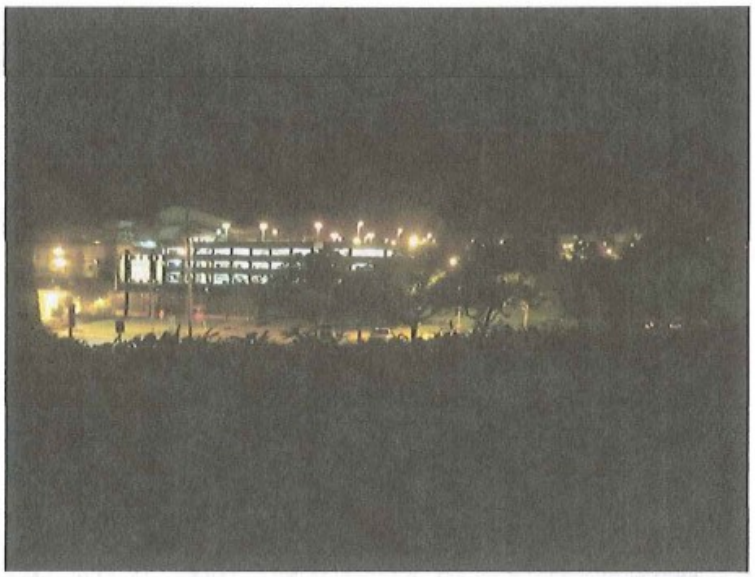


LW(a)-66 (continued)

15

LW(a)-66 (continued)





16

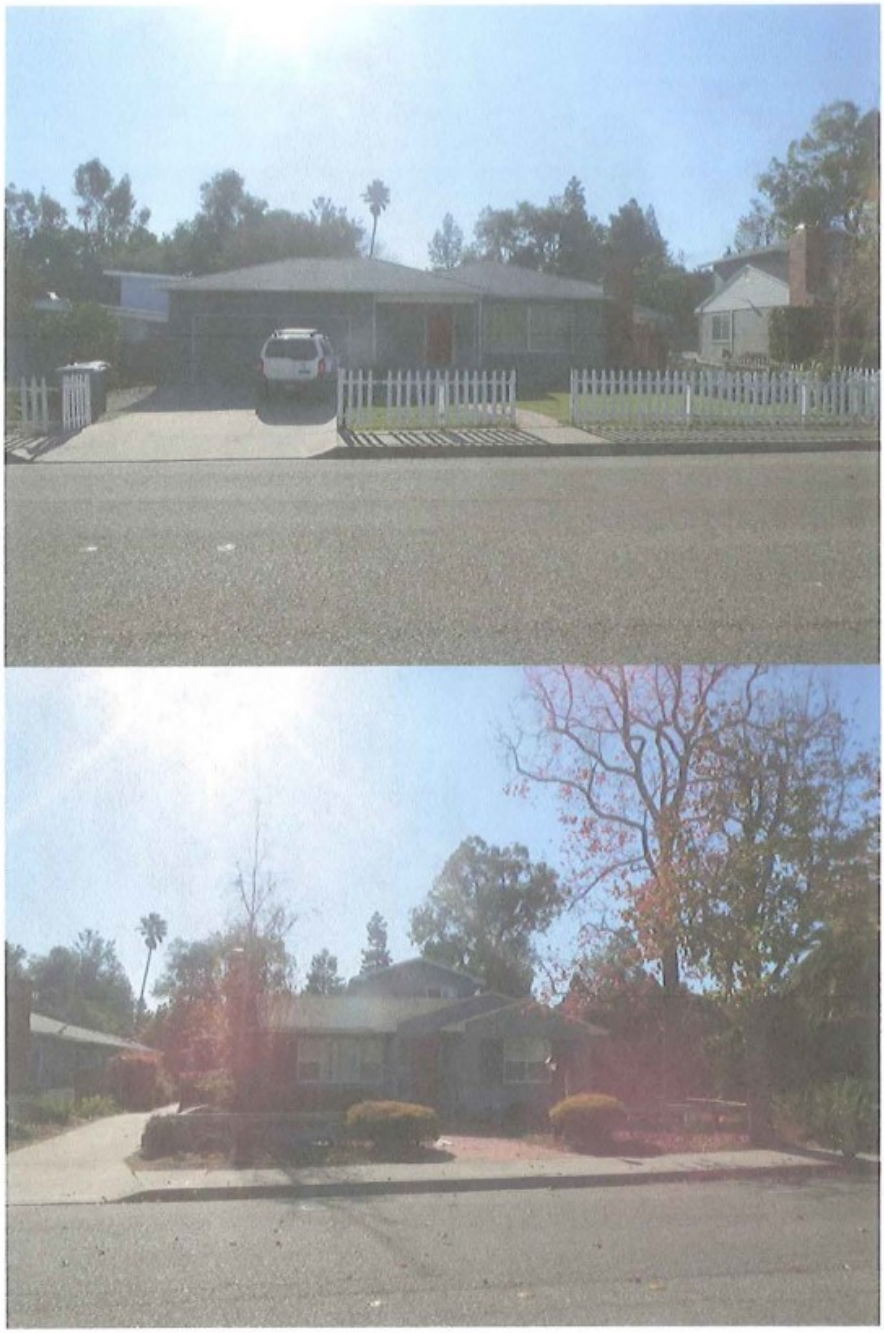
LW(a)-(continued)

Pg 4.1-11 to 4.1-13
4.1.4.1
Analysis Methodology
"The analysis considers the existing development as part of the visual baseline. This includes the neighborhoods immediately surrounding the project as well as the developed campus, ... The visual quality of the community has as much to do with the built environment as the natural setting. Patterns of development, architecture, scale, massing and vegetation define how the campus and community are perceived by residents and visitors.

"...Existing visual resources and site conditions were photographed and recorded.
Comment: The photos produced are cropped to minimize the effects of the project or taken at such an angle as to distort the view. Many of the photo exhibits are of the asphalt roadways rather than the adjacent houses. Below are photos of the neighborhood that give a better representation of the true nature of the neighborhood. Again, this EIR does not provide a good faith effort at full disclosure which is required by CEQA.

LW(a)-67

18



LW(a)-67 (continued)

19

LW(a)-67 (continued)

20

LW(a)-67 (continued)

21

LW(a)-67 (continued)

22

Please note that in most of these photos, the homeowner or tenant has kept foliage away from the windows that give view to the surrounding hills. Later in the EIR it is stated that the residents wouldn't be affected by the construction because of the mature screening foliage obstructing their view.

LW(a)-67 (continued)

"...Representative photo simulations were prepared which would best illustrate the visual changes proposed by the project (refer to 4.1.5..."

Comment: The referenced photo is copied here. It says it all, despite cropping and addition of photo shopped mature foliage. This photo does not, however photo shop the loss of sunlight that will be experienced with this project. This photo is reminiscent of the Berlin Wall except for the small windows peeping down onto us.

LW(a)-68

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

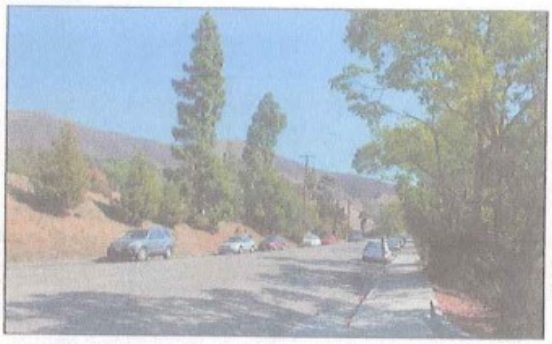
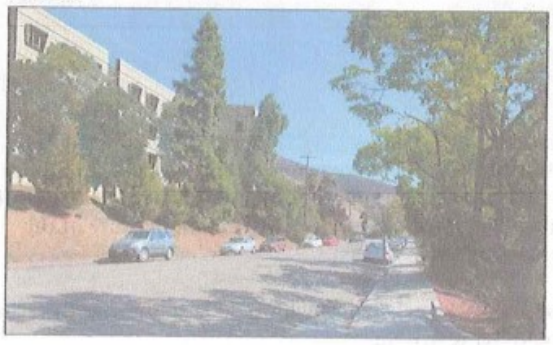


Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street



LW(a)-68 (continued)

"... the analysis defines the visual environment of the project area, quantifies the visual resources, and considers expected viewer response to those resources. The analysis identifies the resource change that would be introduced by the project and the corresponding viewer response to that change."

LW(a)-69

Comment: How can this report quantify our response to the change in our viewshed? It is apparent from the public outcry that this report has diminished the public response.

"To understand and predict viewer response to the appearance of a project, the viewers who may see the project are identified, along with the aspects of the visual environment

LW(a)-70

24

to which they are likely to respond. ...The receptivity of different viewer groups to the visual environment is not equal.
" Viewer response assumptions include consideration of viewing proximity, duration of views, activity while viewing, and overall viewing context. Local values based on visual preferences historical associations, and community aspirations and goals are important indices of predicting viewer sensitivity and response to change."

Comment: An EIR cannot be speculative. An EIR must be objective. However, this statement calls for speculation and subjectivity.

LW(a)-70 (continued)

Pg. 4.1-14
Surrounding Community
"The project would be seen to varying degrees from the surrounding residential neighborhoods.
"Topography, residential development, and mature vegetation limit much of the views to the project site from the surrounding neighborhoods."
Comment: This is simply not true as demonstrated in the pictures shown before of the neighborhood. Vegetation was planted carefully to preserve the views and this vegetation has matured but not obstructed the view.

LW(a)-71

"Currently, the project site includes mature trees around much of its perimeter along Grand Ave and Slack Street. The existing trees along Slack St. combined with the parking lot's elevated position screen much of the view of the project site.
Comment: Later in the report when grading is discussed, these mature screening trees are removed. Five feet of this screening elevation is to be removed to build the project.

LW(a)-72

Pg 4.1-15
The local topography causes portions of the adjacent residential neighborhoods to be somewhat elevated above the campus and the project site. As a result, some of these areas can have broader views of the surrounding landscape. The surrounding hills are also often part of the overall viewshed from these locations. Because of the mature trees and landscaping throughout these established neighborhoods, views of the campus and the project are often filtered or blocked.
Comment: Please refer once again to the pictures of the established neighborhood and the care that was taken to not obstruct or filter the view of the viewshed.

LW(a)-73

Photos 4.1-20 through 4.1-26

Comment: As mentioned before, the photos used in the EIR are cropped or taken at an angle or focused down toward the street minimizing the effects of the project. An EIR must provide a good faith effort at full disclosure. These photos appear to filter full disclosure.

LW(a)-74

Pg. 4.1-17
4.1.5.1 Have a substantial adverse effect on a scenic vista.

LW(a)-75

25

"... The section of Grand Avenue that approaches campus from the south and extends north along the project site for approximately 150 feet is a designated Scenic Roadway (City of San Luis Obispo 2006). ...From the designated Scenic Roadway section of Grand Avenue (refer to Photo 4.1-27), views of the Morros are substantially blocked by intervening vegetation and development.

Comment: Photo 4.1-27 is not a photo of the City's portion of the Scenic Highway but taken on campus and of the existing parking lot. As for the intervening mature vegetation that blocks the view, this will be removed during the five feet of soil removal and grading for the proposed dorms. Replacements will take 20 years to grow to maturity.

LW(a)-75 (continued)

Pg. 4.1-19 to 4.1-24

Figure 4.1-2 Photo simulation of the student housing project, as seen from the Corner of Grand Avenue and Slack.

Comment: This simulation, as with all other simulations (4.1-5, 4.1-7, 4.1-9) has only 4 stories rather than the proposed 5 stories for all residential towers. Furthermore, this photo does not provide a wide angle view that includes the one-story original Pacheco School and the neighborhood of 1-story homes.

Pg. 4.1-21 Figures 4.1-4 and 4.1-5 so vividly displays the scale, dominance, incompatibility of this project with the residential neighborhood that I will include it once again. Remember the simulation shows the tower only 4-stories high, not the 5-stories. Imagine how one more story will adversely affect this neighborhood.

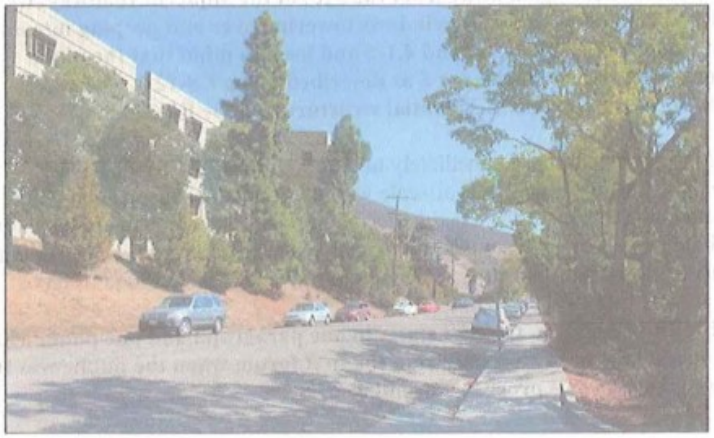
LW(a)-76

26

LW(a)-76 (continued)

Figure 4.1-4. Existing View of the Student Housing South Site, Looking Northeast from Slack Street

Figure 4.1-5. Photo-simulation of Student Housing South Project, Looking Northeast from Slack Street



Pg.4.1-25
AES Impact 1
The height and location of the proposed housing structures would block existing quality views of Bishop Peak, Cerro San Luis and the Santa Lucia foothills. ...resulting in a direct long-term impact to the scenic vistas.

Residual Impacts
The project would have an adverse effect on scenic vistas as seen from portions of Grand Avenue and Slack Street. ...impacts are considered significant and unavoidable.

Comment: Moving the location of this project to the environmentally superior H-12 H-16 parking site would mitigate this significant and unavoidable impact.

LW(a)-77

Pg 4.1-25 to 4.1.-27
4.1.5.2 Substantially degrades the existing visual character or quality of the site and its surroundings.
"...The proposed structures would be visually compatible with the somewhat modern, institutional architecture of campus development constructed over the last several years. Proposed buildings would generally include articulated exterior walls and would be angled away from the axes of adjacent roadways, which would add visual interest and reduce the project's spatial dominance on the surrounding area."
Comment: How can the spatial dominance of 6 Walmarts be reduced to fit in a single-story 1950's style residential neighborhood? Furthermore, the dorm building along Slack Street is not angled away from the axes of the adjacent roadway. It appears as a solid concrete wall with windows towering over and peeping into our houses. Again refer to Figures 4.1-4 and 4.1-5 and keep in mind that the photo simulation simulates only 4-stories not 5 as described on pg ES-12 2. Structures "...seven residential structures...Residential structures will be five stories."

LW(a)-78

"As seen from the neighborhood immediately to the south along the Slack Street frontage, the project would appear out-of-scale with the residential character and low-profile institutional buildings of the existing neighborhood. The perception of height of the proposed buildings along the southern perimeter of the project would be exaggerated by the elevated building site above the adjacent roadway and neighborhood (refer to Figure 4.1-5)."
Comment: In this paragraph, the EIR states in one paragraph and one photo what we, the neighbors have been stressing from the first forum when the public was first invited to participate in this process, November 6, 2013.

LW(a)-79

Pg. 4.1-27
AES Impact 2
The project would potentially conflict with the visual character with portions of the surrounding community.
Comment: An EIR cannot be speculative and the first sentence is speculative in using the word "potentially". There is no potentially about this project. It does and will conflict with the surrounding community.

LW(a)-80

28

The scale of the proposed residential structures bordering Slack Street would be visually incompatible with the adjacent neighborhood.
Comment: The scale of the dorms are visually incompatible. This is what we have been saying.

LW(a)-81

Inappropriate or insufficient planting along the southern and western perimeters of the project could cause an increased visibility of the structures as seen from Slack Street and neighborhoods to the south, resulting in a direct long-term impact to the visual character of the site and surrounding.
Comment: How can appropriate and sufficient plantings ever be expected to hide the equivalent of 5 Walmarts from our sight? What about the loss of sunlight from this 5-story tower?

If Cal Poly was a University totally surrounded by the City and residential neighborhoods with nowhere else to go, we would have to accept this mammoth project. However, the University has 6000 acres in which to grow and expand. Use this site to complement the "Gateway to the University", the Main Campus entrance. Use this site to transition from one-story 1950's homes to the multi storied, industrial style architecture of the campus.

Finally, a superior site has been identified in the EIR. Why is it being ignored?

LW(a)-82

AES Impact 2
"The project would be visible throughout much of the surrounding area. ... from sensitive viewpoints immediately adjacent to the project, the heights and massing of the proposed student housing would appear out-of-scale and incompatible with the surrounding residential development."
Comment: Why is this point repeatedly ignored when a superior site has been identified.

LW(a)-83

Pg 4.1-28
4.1.5.3 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.
"No specific lighting plan is included as part of the project plans at this time, however the EIR analysis assumes that exterior lighting would be included as part of the project. Consistent with other lighting schemes on campus it is expected that the project's exterior lighting plan would provide high light in areas such as paths and walkways, entrances and exits, parking and emergency areas, and places and buildings of interest.
Comment: The EIR cannot defer potential project revisions or Mitigation Measures to a later date. This is exactly what is being done here. Moving into campus to the superior site of H12-H16 would alleviate this impact. This paragraph is also speculative. Please refer to the pictures of the new Recreation Center and parking structure for results of past Mitigation efforts that are not working.

LW(a)-84

Pg 4.1-29
"The project has the potential to cast a substantial new source of light and glare into the area."
Comment: Again speculative. In order to provide for the safety and security of the students living here there better be no "Potential" about the lighting. The project WILL cast substantial new light and glare into the area---our neighborhood. Taking away not only our views of the surrounding hills but our nighttime sky.

LW(a)-85

Pg. 4.1-31
"As seen from many viewpoints in the surrounding area, the project would appear consistent with the development patters on campus, and would not be an unexpected visual feature."
Comment: This statement is true as long as the project is viewed from the campus.

LW(a)-86

"However, as seen from public viewpoints and neighborhoods immediately adjacent to it, the project would appear out-of-scale and would reduce views to identified scenic resources. Although the project is technically considered as in-fill, the interface between the large buildings along the perimeter would not have a harmonious visual transition to the surrounding community.
Comment: After a statement like this how can the superior site not be chosen?

LW(a)-87

Pg. 4.2-5
4.2.2.3
Local Policies and Regulations
Comment: This should be reviewed by the appropriate City department. However, due to my distrust of this seriously flawed EIR, I refer to the letter sent to David Mullinax, California League of Cities as part of my comments.

LW(a)-88

Pg. 4.4-1
4.4.1.1
Background
"Certain land uses are considered more sensitive to ambient noise levels than others. In general, noise-sensitive land uses include, but are not limited to, the following:

- Residential areas;
- Schools-preschool to secondary, college; specialized education and training."

Comment: What about all of the above? We are a residential neighborhood, with 450-500 preschool to secondary students, we have the existing college dorms on Grand, and Chris Jespersen School is a specialized education and training.

LW(a)-89

Pg 4.4-4
Other Sources
"Contributors to the existing noise environment include generalized crowd noise on campus, bus traffic, and amplified sound at the outdoor athletic fields east of the site. The site is also used to stage special events, including fire department exercises, drilling for the Grizzly Academy, tours, and construction vehicle parking as needed. All of these sources can be characterized as sporadic noise events of limited duration. Noise

LW(a)-90

30

associated with special events can vary widely in terms of intensity of noise level and perceived nuisance."
Comment: I have yet to be disturbed by the fire department exercises or Grizzly Academy drilling. The busses transporting partiers to and from their events, however are a predictable events. The noise from these busses and the partiers are not sporadic but constant from 9PM to 1AM at least and many times to 3AM. This "limited duration" is not acceptable.

LW(a)-90 (continued)

Noise Management on Campus
Housing Services.
"Noise Because the on-campus housing facilities are student communities, it is important to acknowledge and respect the rights and needs of others. This is especially true in reference to sound. All Cal Poly residential communities operate under continuous 24-hour Courtesy Hours, meaning that regardless of the time of day, any amplified sound or activity loud enough to be heard outside a room should be curtailed. All Licensees agree to observe courtesy hours as stated in the "University Housing Resident Handbook". THE RIGHT TO QUIET SUPERSEDES THE RIGHT TO MAKE NOISE."
Comment: If these same courtesies could just be extended to the neighbors, we would not be as opposed to the site of this project. However, the University and the City have been unable to implement any program that gives us quiet enjoyment of our homes. Promises that "We will do better in the future" no longer move us. We need to see positive results before we believe in future attempts.

LW(a)-91

Pg 4.4-6
4.4.2.2 Local Regulations
"The University does not maintain its own standards for exposure to noise. Bothe the County and City of San Luis Obispo have established standards for exterior and interior exposure to noise for different land use categories..."
Comment: Who monitors this? How? Is it enforced? By whom?

LW(a)-92

Pg. 4.4-7
4.4.5.1 Exposure to or Generation of Noise
Short term (Temporary)
"Construction-related noise is a short-term, periodic, and temporary impact of the project... During construction activity, noise would potentially impact sensitive land uses, including schools and residences, in the vicinity. Construction noise will be temporary, restricted to daylight hours."
Comment: This project is slated to be 31 months in duration. This is a rather long "temporary" impact. This "temporary" impact will effect the children attending the school across the street for their ENTIRE school attendance at Teach Accelerated Program. The noise restricted to daylight hours happens to be the same hours that students will be in attendance at the original Pacheco campus, now Teach.

LW(a)-93

"The project is not expected to require pile drivers, which would increase potential for vibration or noise above typical levels."

LW(a)-94

31

Comment: Rather speculative for an EIR. "Not expected" is less objective than "Will not".

LW(a)-94 (continued)

Pg. 4.4-8
4.4.5.2 Exposure of Student Residents to Noise
"...Impacts are considered less than significant."
Comment: How can this be less than significant when we already have significant problems with noise without the dorms. How will these residents be different?

LW(a)-95

Pg4.4-8 to 4.4-9
Commenters have indicated that groups of students who access the neighborhoods during nighttime and weekend hours are sources of nuisance noise. Commenters have stated that the project will increase such occurrences in the neighborhood. This type of noise is considered highly sporadic and variable...
Comment: Rather than highly sporadic and variable, it is continuous and predictable Friday and Saturday 9PM to 3AM.

LW(a)-96

Nuisance noise is currently addressed through both campus regulations, as outlined in existing Housing Policy, and by campus and City Police, in response to specific noise complaints. The project will not alter existing policy and enforcement methods, and will not alter overall campus enrollment. No substantial measurable adverse impacts are therefore identified.
Comment: This is the problem. It is NOT being addressed adequately by either the Campus nor City Police.

LW(a)-97

Pg. 4.4-10
4.4.6 Cumulative Impacts
"Continued increases in enrollment and staffing at the University and implementation of proposed facility projects listed in the cumulative development scenario would incrementally increase noise in the area.
Comment: This project is supposed to be enrollment neutral. There is not supposed to be an increase in enrollment with this project.

LW(a)-98

Enrollment and staffing growth may result in additional traffic; facility improvements on campus are not otherwise expected to be significant source of noise.
Comment: Enrollment and staffing "may result" in additional traffic. This is rather speculative. EIRs are not supposed to be speculative. Growth will result in additional traffic just as all previous growth has resulted in increased traffic.

Traffic growth is expected to be moderate, and would be dispersed to the various campus entry points.
Comment: Is this "moderate" expected growth in traffic the same growth that "may" occur in the previous sentence? How did "may result" turn into "moderate growth" in the space of one sentence?"

LW(a)-99

The project would not add perceptibly to the long-term ambient noise environment in the area; cumulative impacts are therefore considered less than significant (Class III).
Comment: Rather speculative considering that we move from "may" to "moderate" with respect to traffic. Howe can we believe these assumptions regarding noise?

LW(a)-99 (continued)

Pg 4.5-2
4.5.1.3 Recreation
Former Pacheco Elementary School/proposed Teach School
Comment: There is no "proposed" about Teach School. 150 3-5 grade students be attending in addition to the 350 students also attending from the San Luis Classical Academy.

LW(a)-100

"Several of these entities will be displace to provide space for approximately 150 public students."
Comment: An EIR must provide a good faith effort at full disclosure. The subject of the original Pacheco campus has repeatedly been mischaracterized by either ignoring or understating repeatedly the number of students attending.

LW(a)-101

Pg 4.5-4
4.5.1 Fire protection
"...the project will not directly increase potential calls for health and safety related to the population; the project will potentially increase nighttime call volume at the University."
Comment: So which is it? It will not increase or it will "potentially" increase? This is extremely ambiguous. An EIR must be objective and provide a good faith effort at full disclosure.

LW(a)-102

"The University regularly negotiates a service contract with the City Fire Department to cover service and associated costs. No specific additional improvements to facilities which could have an environmental impact have been identified."
Comment: I do not trust this seriously flawed EIR to objectively and in good faith provide full disclosure. For this reason I have written to David Mullinax, California League of Cities to enlist the support of the League in the event of litigation. Please see attached letter which I intend as a formal comment on this and ALL contracts with the City.

LW(a)-103

Pg. 4.5.5.3 Off-campus Recreation
"Community members identified concerns withj students potentially accessing the former Pacheco Elementary School/proposed Teach School site. ...The lack of lighting deters use at night."
Comment: Once again, there is no "Proposed" about the campus. It is a done deal. Also, the darkness of the school grounds does not deter students from using the cover of darkness for their "keg" parties now. What will deter the 1475 additional students that is not deterring them now?

LW(a)-104

Pg 4.6-1
4.6.1.1 Street system

LW(a)-105

■ Grand Avenue is a north-south arterial roadway that runs from Monterey Street inb the south into the center of the Cal Poly campus.

Comment: This north-south arterial roadway is also the on and off ramp for the 101 Freeway. It is also the "Gateway to Cal Poly". It also has an elementary school drop off/pick up circle for 450 elementary students only yards from the Gateway. It is also inadequately controlled by a 4-way stop.

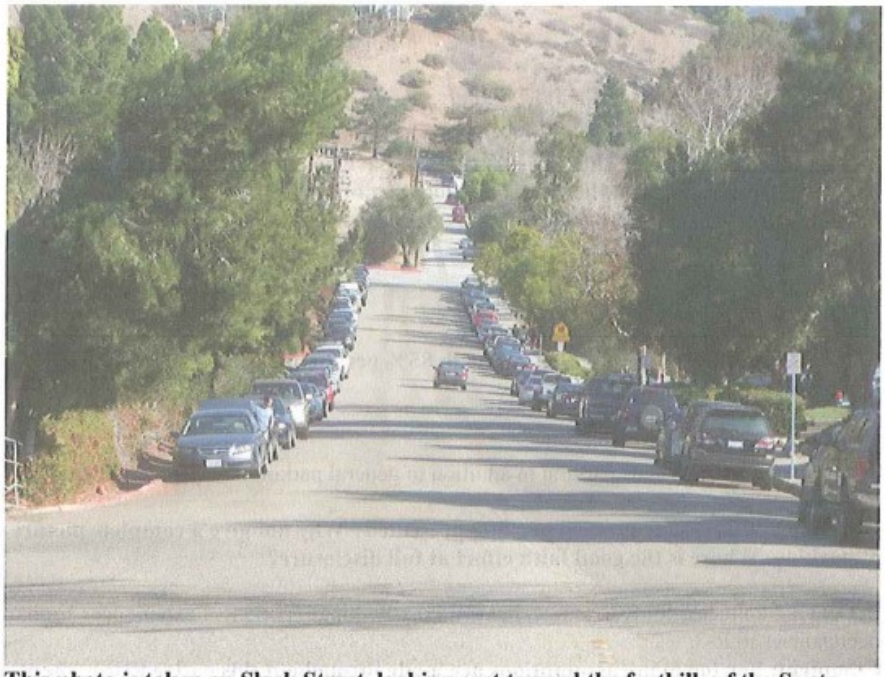
The blue truck is crossing at Slack Street. The left turn lane onto Slack Street is just in front of the island.

LW(a)-106

■ Slack Strteet is an east-west collector roadway that runs from the eastern foothills of San Luis Obispo to Longview Lane in the west.

Comment: Again, the good faith effort at full disclosure has been ignored. Slack Street from the foothills to Grand Ave is only ½ street wide. Parking is allowed only on the south side of this ½ street. There are NO sidewalks. The remainder of the ½ street minus parked cars must accommodate walkers, skateboarders, bicyclists and TWO-WAY car traffic.

34



This photo is taken on Slack Street, looking east toward the foothills of the Santa Lucias. Note the ½ street of Slack east of Grand slightly above center. The proposed dorm towers are to be built just north of the Mature trees that will be removed and replaced with new foliage that will take a generation to cover the new buildings.

LW(a)-106 (continued)

Pg. 4.6-2

Comment: Of the seven intersections studied, the Grand/Slack intersection is glaringly missing. The Gateway to the University, the corner on which the huge proposed project will be built, the street with 101 freeway on and off ramps, the intersection with an elementary school, the intersection with a ½ street wide is not considered significant enough to study. This is a total failure of good faith and full disclosure. This omission can only provide an incorrect factual foundation, leading to inaccurate analysis producing inaccurate conclusions and an abuse of discretion.

LW(a)-107

Pg 4.6-4

4.6.1.2 Pedestrian and Bicycle Facilities

Pedestrian Facilities

"Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian sighns. The streets surrounding the project site all have sidewalks on at least one side of the street; however, sidewalks are not present along the east side of Pacheco Way, which is not a through street, or on the north side of Slack Street."

Comment: Totally inaccurate! Again a lack of good faith effort at full disclosure.

LW(a)-108

35

Pg 4.6-5
Bicycle Facilities
"In the vicinity of the project site, Class II bicycle facilities are provided along the length of Grand Avenue. A Class III bicycle facility is provided along Slack Street."
Comment: Wrong again. There are no signs or pavement markers. A less than Class III bicycle facility in the immediate location of the proposed dorms seems to be grossly inadequate and a safety issue that is being ignored along with the traffic study of this intersection. **LW(a)-109**

4.6.1.4 Parking
Table 4.6-3 Existing Parking Lot Counts
Comment: G-1 parking of 426 spaces with 85% occupancy will be eliminated. Where do these cars park. **LW(a)-110**

Notes
"1. Structure includes staff parking in addition to general parking. Only general parking data presented."
Comment: Why is only general parking presented? Why not give a complete picture of parking. Where is the good faith effort at full disclosure? **LW(a)-111**

2. Data not collected for R-4 garage, but Cal Poly Parking reports R-4 experiences similar occupancies to R-3.
Comment: Far too many assumptions are made throughout this entire EIR without adequate facts. Where is the good faith effort at full disclosure? With an incorrect factual foundation, inaccurate analysis is done leading to inaccurate conclusion and an abuse of discretion. **LW(a)-112**

Pg4.6-14
4.6.5.1 Intersections
Trip Generation
■ Commute trip reduction for freshmen who would no longer drive to campus due to the addition of available on-campus housing.
Comment: This is speculative. Were is the objective data, studies, etc. **LW(a)-113**

Pg 4.6-15
"300 general occupancy"
Comment: Here its 300 on other pages it is 500. Which is it 300 or 500? **LW(a)-114**

"Because no residential parking would be provided on-site, this demand would be redistributed to alternative lots on campus."
Comment: Or onto our City streets. **LW(a)-115**

"Assuming the use of available parking capacity..."
Comment: Speculative. An EIR must be objective. **LW(a)-116**

36

Pg 4.6-21
Mitigation Analysis
"However the likely success and feasibility of these measures is difficult to establish at this time due to the nature of the proposed project..."
Comment: Mitigation measures cannot be deferred to a later date. Mitigation Measures must be identified that are capable of reducing or eliminating significant impacts.

On-site Parking Replacement
"...At this time, however, the ultimate feasibility of a 500 space parking area has not yet been determined. ...The financial feasibility for a 500-space parking structure has yet to be determined; therefore, development of such a structure cannot be counted toward mitigation for the project's impact.
Comment: Mitigation measures cannot be deferred to a later date. Mitigation Measures must be identified that are capable of reducing or eliminating significant impacts. This comment holds true for the entire two on-site parking paragraphs.

Transportation Demand Management and Monitoring Program
Comment: Mitigation measures cannot be deferred to a later date. Mitigation Measures must be identified that are capable of reducing or eliminating significant impacts. This comment holds true for the entire nine TDM paragraphs and renders TC Impact 1 useless.

LW(a)-117

Pg 4.6-24
Pedestrian and Bicycle Facilities
Off-Campus
"...students housed on campus **may**, ...housing in this location **may**, ... Off-campus pedestrian and bicycle trips associated with the project **would be** concentrated along Grand Avenue and, via internal campus roads.
Comment: may and may suddenly becomes would be. How do these very wishy-washy statements suddenly enable a definite conclusion of where the students will bicycle. Isn't this another example of incorrect factual foundation, leading to inaccurate analysis further leading to inaccurate conclusions and an abuse of discretion.

LW(a)-118

"The project would result in a reduction in peak hour vehicles trips through the Grand Avenue campus gateway."
Comment: Where is the evidence or supporting data? Another example of incorrect factual foundation, leading to inaccurate analysis further leading to inaccurate conclusions and an abuse of discretion.

LW(a)-119

SLCUSD plans to replace private school tenants at the former Pacheco Elementary school with the public Teach School program...
Comment: This entire underlined paragraph is filled with misinformation violating the good faith effort at full disclosure. The assumptions and conclusions made are all based on an incorrect factual foundation.

LW(a)-120

"Substantial bicycle facilities exist in the project vicinity as described in Section 4.6.1.2..." **LW(a)-121**

Comment: Since when is less than Class III considered "substantial"? It is glaring misrepresentations and errors like this that make this entire EIR suspect.

Pg 4.6-25 **LW(a)-122**

4.6.5.4 Site Design Criteria

Parking Capacity

Comment: All three paragraphs are filled with incorrect, misleading or inaccurate information and assumptions too numerous for me to retype. Another example of incorrect factual foundation, leading to inaccurate analysis further leading to inaccurate conclusions and an abuse of discretion.

Pg 4.6-26

4.6.6 Cumulative impacts

Cumulative Intersection Impacts & Table 4.6-8

Comment: This section cannot be considered complete as the Grand/Slack intersection was never studied. This is therefore, subjective rather than objective as required by CEQA. It does not provide a good faith effort at full disclosure. As a result, it has an incorrect factual foundation, leading to inaccurate analysis further leading to inaccurate conclusions and an abuse of discretion.

Pg 4.6-27

Cumulative Pedestrian, Bicycle and Transit Impacts

Comment: Incorrect factual foundation, leading to inaccurate analysis further leading to inaccurate conclusions and an abuse of discretion.

Pg 4.7-1 to 4.7-9

4.7 Utilities

Comment: I do not trust this EIR to objectively and in good faith provide full disclosure. For this reason I have written to David Mullinax, California League of Cities to enlist the support of the League now and in the event of litigation. Please see attached letter which I intend as a formal comment on this and ALL contracts with the City.

Pg 4.8-7 **LW(a)-123**

Conflicts with Plans o Policies

Comments: The Master Plan (2001) calls for recreational facilities at this location not housing and will require an amendment to the MP.

Pg 4.8-12 to 4.8-23 **LW(a)-124**

Comment: So many of the topics on these pages were missing on the original draft EIR and added only after comments were submitted that I cannot feel at ease in believing what is stated. As with so much of the original and re-circulated EIR, there are omissions, misstatements, inaccuracies, etc. that I cannot trust what is said

38

in these technical areas. For this reason, I use my letter to David Mullinax, California League of Cities as a formal comment on this entire section.

LW(a)-124 (continued)

LW(a)-125

Chapter 5
Alternatives Analysis
5.1 Introduction
"...describe a reasonable range of alternatives to a project or to the location of a project...
"...the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."
Comment: Based on the previously cited quote by President Armstrong, rejecting two alternatives before inclusion in the Recirculated EIR, I question how seriously the "lead agency" could examine the feasibility of the previously rejected alternatives.

The Master Plan is considered an inviolate document if it supports the proposed site. If it stands in the way of the proposed site, it is easily amended. Sites previously identified on the 2001 Master Plan were considered as alternatives despite the fact that everyone acknowledges that the MP needs to be rewritten. Evaluating these sites was a waste of time.

We know that trustees and administration expect the Cal Poly population to grow by 5000 students (some unpublished reports state that it is to be 12,000) over the next few years. The only area for growth to accommodate these students is north, into the remaining 6,000+ acres of the campus. CP has already built two beautiful villages in Poly Canyon to house upperclassmen. These villages are not adjacent to the only neighborhood that abuts the campus but rather well into the campus. The students can behave as the young people they are, without adversely affecting the quiet enjoyment of life in the neighborhoods.

Since the university MUST grow in that direction, we ask why you can't include that eventual northern growth into you choice of sites since the proposed site will require a MP amendment.

"The northernmost site is also distant from existing freshman housing, impacting program coordination.
Comment: I can't believe that CP must have 5,000+ students living in close proximity to coordinate programs. How are off-campus freshmen coordinated into programs, lacking their close proximity? Wouldn't programs be more effective if coordinated through each dorm building, tower, or group of buildings.? Where do these 5000 students congregate for these programs?

Many of the constraints to alternatives are merely administrative preferences as reflected in the previously mentioned quote by President Armstrong, rejecting the alternatives.

"...Master Plan goal to maintain 10-minute passing periods among instructional spaces".
Comment: This old, out-dated Master Plan did not plan for the addition of at least 5,000 students. If CP is to grow as indicated, the campus core must expand to accommodate these new students and classrooms. If it expands outside the "goal" of

1

10-minutes passing periods, perhaps trolleys, or some other form of clean energy transportation could be utilized.

Put the needed additional classrooms and offices on the Grand/Slack site implementing a low- profile architectural transition from the neighborhood to the institutional architecture found on campus. Provide a buffer between the neighborhood and new classrooms.

LW(a)-125 (continued)

"The 7.8-acre site was not considered further; the slope and drainage on site would require substantive additional work, and structures would exceed seven stories in height, significantly increasing cost and visual impact."
Comment: By eliminating the Welcome Center, and parking structure for the Grand/Slack site you could afford substantive slope and drainage costs. Is this increased cost another assumption or have these costs actually been investigated? How much more are these costs than the cost of removal of 2.6 million cubic feet or 5 feet of soil across the entire 13 acre proposed site?

How can seven stories within the campus cause more visual impact than five stories of institutional architecture adjacent to single-story, 1950's style, residential, City homes?

How again are the costs of two additional stories significant? Is this another assumption? As suggested before, charge a premium for the penthouse, view-units to offset the additional cost if any.

LW(a)-126

5.3 Project Alternatives
"Through the scoping process, if an alternative was found to be infeasible, as defined above, the it was dropped from further consideration."
Comment: Who determines when an alternative is infeasible? Where are objective studies that reduce the subjectivity of this decision?

LW(a)-127

"...CEQA states that alternatives should '...attain most of the basic objectives of the project'".
Comment: All of the objectives included are to be commended. All of the alternatives could be met at an alternative site.

LW(a)-128

Rejected alternatives included:
California Boulevard Site:
Comments: This site does have many of the characteristics outlined by CEQA Guidelines making it infeasible. It appears that an alternative demonstrating those very constraints was chosen. We have consistently asked that CP Planning and Facilities departments to be open to including alternatives that do not have these CEQA problems. The campus is 6000 acres and there must be some site that CP Administration can find that can be studied as an alternative. After all, the H12-H16 site was suggested by a community member.

LW(a)-129

"...development on other outlying ranches."
Comment: No one is suggesting that housing be developed on outlying ranches. However, the 6000 acres begins at the fringe of the campus core. This is the area that the school must expand. This University is not surrounded by an established City requiring expansion into the City or adjacent to the City. Expansion must take place by enlarging the campus core northward into existing open space.

LW(a)-129 (continued)

5.4 Alternative Analysis
"...the overarching objective of the project to provide on campus housing for freshmen.
Comment: We too want on-campus housing. However the proposed site is the closest to off-campus as can be achieved. You are placing the most impressionable, vulnerable, students closest to the very temptations from which you seek to protect them.

5.5.1 No Project Alternative
5.5.2 No Project-Existing Master Plan
Comment: These two are a waste of time and effort. No one suggested either of these alternatives. We are all in support of more on-campus housing. We want only a buffer between our single-story neighborhood and the institutional high-rise construction and influx of 1475 17-18 year old proposed on this site.

5.5.2.1
Aesthetics
Comment: Agree that the aesthetic impacts are reduced significantly if the site is moved. Also traffic impacts and lighting.

LW(a)-130

5.5.2.3
The implementation of the Master Plan for residential communities would still involve construction and operational emissions near student residences, which are considered sensitive receptors.
Comment: Student residences on-campus should be empty during the daytime construction hours as students should be attending class, in the library, eating at the communal dining, recreating, etc. During the nighttime hours when students would be inhabiting the residences, construction will be completed for the day. At the proposed Slack/Grand site, the 500 elementary students, also sensitive receptors, will be in attendance during the construction hours exposed all day for almost three years to the noise and air pollution. It may be argued that these younger students are even more sensitive receptors due to their age.

LW(a)-131

5.5.2.5 Geology and Soils
"...sites at the campus fringe on hillsides where geotechnical constraints are anticipated."
Comments: Subjective without further study.
"Impacts are less than significant, and slightly more adverse than the proposed project."
Comment: How can "anticipated" constraints with "Impacts less than significant" become slightly more adverse than the proposed project?

LW(a)-132

3

5.5.2.6 Hazards and Hazardous Materials
Comment: The hazards may not be reduced at an alternative site but they would, at least, be further from 500 Elementary Students.

LW(a)-133

5.5.2.9 Noise
Comment: At least the noise of construction would be further from the 500 Elementary Students. The neighborhood would, in the long term, be spared the noise of 1475 17-18 year-olds living next to them. The students would also be further from the noise engendered by the parties that tempt toward the behaviors that on-campus housing is trying to mitigate.

5.5.2.11 Traffic and Circulation
"Impacts related to traffic associated with the alternative are difficult to predict."
Comment: To which alternative are you referring? How is it that impacts to alternatives are so difficult to predict but the Grand/Slack site can be deemed insignificant without even studying the intersection?

LW(a)-134

5.5.3 Location Alternative H-12 and H-16 Parking lots.
Comment: You lose only 948 parking spaces with the use of these lots as opposed to 1324 with the Grand/Slack site. You have excess parking already as stated in this report. Why are you building an unnecessary parking lot? Use the entire site for additional housing.

LW(a)-135

"This alternative would meet most of the project objectives."
Comment: Which objective does it miss? In re-reading the seven objectives on Pg. 5-3 It appears that it meets ALL objectives not Most. This once again questions whether a good faith effort at full disclosure is being provided.

LW(a)-136

Pg 5-9
As stated in Section 5.2, this alternative was considered in the site selection process and was rejected.
Comment: Why was it rejected? Many of the constraints to alternatives are merely administrative preferences as reflected in the previously mentioned quote by President Armstrong, rejecting the alternatives.

LW(a)-137

Locating the housing to the H-12 and H-16 parking lots under this location alternative would require the development of additional dining facilities.
Comment: As demonstrated earlier with the photos of "communal dining facilities" already on campus, the first floor of each tower could be rented to a fast food provider, providing the same dining facilities. This is a captive consumer of 1475. Franchisees would be lining up to rent space.

LW(a)-138

This location would also place freshmen housing near an area of upper division housing at Poly Canyon Village.
Comment: The distance between the upper-division housing and the freshmen is greater than the distance between the freshmen and our neighborhood. What

LW(a)-139

possible harm could the upper-division students impose on the freshmen. How could this influence of upper division students be worse than the availability of the underage, illegal, drunken, drug parties going on weekly in the neighborhood? Would the freshmen not derive a calming benefit from the successful upper classmen?

LW(a)-139 (continued)

The Housing Department at Cal Poly prefers to maintain separation between upper-division and freshman housing when feasible.
Comment: WHY? Why would the housing department be more concerned with separating the freshmen from upper classmen than from the illegal, unhealthy, dangerous conditions of the neighborhood in its present uncontrolled state? Please refer to the San Luis Obispo Police logs for records of sexual assault, drunkenness, thefts, DUIs. The neighbors want to keep these 1475 most impressionable students away from the neighborhood so we can begin to vigorously tackle the problems that we have now and restore this neighborhood to a diverse mix.

LW(a)-140

The freshman housing program is designed to more intensively manage the transition to independent living, including through supportive dining, additional resident staffing, and closer proximity to campus facilities such as the University Union.
Comment: The supportive dining can be incorporated into the towers. There is nothing stopping the additional staffing from being available at H-12 H-16. The students can still avail themselves of the University Union at night if they wish to leisurely walk. They can also meet and mingle with their fellow freshmen community in the tower lounges, fast food dining facilities, coffee house that were planned for the Grand/Slack site. The Welcome Center could be converted to a game room.

LW(a)-141

5.5.3.1 Aesthetics
Comment: This entire paragraph is a ringing endorsement for H-12-H-16 concluding that it has fewer adverse impacts than the proposed project. The list includes: views, existing character and quality is more compatible, views of the Morros are not blocked, and lighting would not spill over as the area is already well lit.

LW(a)-142

5.5.3.3 Air Quality
"The location is proximate to other, existing student residences and would therefore pose risks to sensitive receptors related to emissions during construction."
Comment: Student residences on-campus should be empty during most of the daytime construction hours as students should be attending class, in the library, eating at the communal dining, recreating, etc. During the nighttime hours when students would be inhabiting the residences, construction will be completed for the day. At the proposed Slack/Grand site, the 500 elementary students, also sensitive receptors, will be in attendance during the construction hours exposed all day for almost three years to the noise and air pollution. It may be argued that these younger students are even more sensitive receptors due to their age, intensity, and length of exposure.

LW(a)-143

5

This EIR finds the H-12-H-16 to be similar to Grand/Slack but I believe that a case could be made that the Grand/Slack sensitive receptors are more sensitive than the upper division sensitive receptors.

LW(a)-143 (continued)

5.5.3.4 Biological Resources
"The alternative would involve removal of mature trees, and would therefore pose potential risks to nesting birds."
Comment: Why are the H-12-H-16 mature trees and nesting birds more biologically important than the Grand/Slack mature trees and nesting birds?

LW(a)-144

"...requiring additional mitigation to prevent adverse impacts to that riparian ecosystem..."
Comment: The Grand/Slack site requires storm water runoff mitigation. Hopefully, the neighbors would be afforded mitigation measures as carefully planned as the riparian ecosystem.

LW(a)-145

5.5.3.5 Geology and Soils
"...would require preparation of the site for foundations and concrete."
Comment: Grand/Slack also requires preparation of the site for foundations and concrete. Remember the 5 feet or 2.6 million cubic feet of soil that has to be removed at Grand/Slack.

LW(a)-146

5.5.3.8 Land Use and Planning
"The Alternative site is designated Parking in the 2001 Master Plan. The development of the site with housing and parking would require amendment of the Master Plan."
Comment: And the Grand/Slack site is designated recreational facilities and would require amendment of the Master Plan.

LW(a)-147

5.5.3.9 Noise
"...The development of this site would reduce noise exposure to off-campus residential areas, compared to the project. Overall, impacts are less than significant, and are similar to the proposed project."
Comment: If the Grand/Slack analysis of the EIR had been objective rather than speculative, regarding Noise impact, it would have found Grand/Slack to be significant rather than less than significant. Making this the better site. It was mentioned before that impacts were minimized, ignored, or found to be less than significant on the Grand/Slack site. There seems to be a differing scale for Grand/Slack and the alternatives when determining impact.

LW(a)-148

5.5.3.10 Public Services and Recreation
Comment: Again all of these impacts were minimized, ignored, or found to be less than significant when evaluating Grand/Slack. Remember the late night keg parties on the Pacheco unlit playing field and the regularly held illegal, underage drinking, drug parties held on Slack that were both ignored. This alternative is much less significant than Grand/Slack.

LW(a)-149

5.5.3.11 Traffic and Circulation
Development of the site with housing would result in closure of the existing surface parking lot, resulting in a loss of 942 general parking spaces.
Comment: Compared to a loss of 1324 at Grand/Slack. LW(a)-150

"A portion of the lost parking would be addressed through construction of the parking structure." LW(a)-151
Comment: You keep forgetting that you have an excess of parking on campus and this the reason you have not pursued the parking structures outlined in the Master Plan. Forget the parking structure. You need more beds for freshmen.

The remainder of this paragraph is speculative, guessing at where the traffic would be diverted. This site would certainly reduce the concerns brought up by citizens regarding the traffic of 450 parents trying to drop children at the Pacheco/Teach/Classical Academy. LW(a)-152

If the Grand/Slack intersection had ever been studied it would be found that this site would not have the negative impacts of Grand/Slack. Perhaps this is the reason that Grand/Slack was ignored.

5.5.4 Layout Alternative A-Slack Street Parking Structure LW(a)-153
Comment: I'm not even going to waste my time commenting on this alternative. The ignored impacts are the same as the original layout. If a good faith effort of full disclosure had been used on the Grand/Slack site originally, it would be apparent by now that the H-12-H16 site is far superior.

5.5.5 Reduced Project Alternative-Bed Count LW(a)-154
Comment: Same as above. This is a waste of time. We want you to build more beds, not less.

5.5.6 Reduced Project Alternative-No Parking Garage LW(a)-155
Comment: Again this does not mitigate any of the ignored impacts on Grand/Slack.

5.5.7 Location Alternative-Via Carta LW(a)-156
Comment: Since a good faith effort at full disclosure was not made on the Grand/Slack site, this entire EIR is based on an incorrect factual foundation leading to inaccurate analysis leading to inaccurate conclusions and abuse of discretion. For this reason, I once again am not wasting time on this alternative.

5.5.8 Location Alternative-R-1 Lot
Comment: : Since a good faith effort at full disclosure was not made on the Grand/Slack site, this entire EIR is based on an incorrect factual foundation leading to inaccurate analysis leading to inaccurate conclusions and abuse of discretion. For this reason, I once again am not wasting time on this alternative.

7

5.5.9 Reduced Scale Alternative

Comment: I'm not even going to waste my time commenting on this alternative. The ignored impacts are the same as the original layout. If a good faith effort at full disclosure had been used on the Grand/Slack site originally, it would be apparent by now that the H-12-H16 site is far superior and these alternatives are merely filler.

LW(a)-156 (continued)

5.6 Environmentally Superior Alternative

Based strictly on an analysis of the relative environmental impacts, the H-12 and H-16 Parking Lot Alternative, No Parking Alternative, and Reduced Scale Alternative are considered environmentally superior.

Comment: If a good faith effort had been made at full disclosure regarding the Grand/Slack site many more negative impacts would have been identified. However, in the absence of a good faith effort at full disclosure many negative impacts were:

LW(a)-157

Ignored totally

- **A. traffic & circulation**
- **B. negative impact of adding 1475 17-18 year olds into a neighborhood already struggling to maintain its Neighborhood Wellness**
- **C. safety of students placed so close to regularly held illegal underage parties**
- **D. social and economic impacts**

Minimized

- **A. number of students in attendance at Pacheco/teach/Classical Academy),**
- **B. loss of viewshed**
- **C. lighting overspill**
- **D. law enforcement impacts**
- **E. fire safety demands**

If a good faith effort had been made at full disclosure, it would be apparent that the H-12 and H-16 site is by far, the superior site. The H-12-H-16 site removes all of the negative impacts and concerns addressed by the public at the two Cal Poly forums, numerous City Council meetings, City Council held Town Hall Meeting, letters and e-mails to City Council and University Administration.

Attachments: Letter, March 27, 2014, David Mullinax League of California Cities

News Media Supporting Documentation

LW(a)-158

Linda White
2077 Slack Street
San Luis Obispo, CA 93405
Phone & Fax (805) 543-8801
Lindaleewhite15@charter.net

March 27, 2014

David Mullinax
League of California Cities
1400 K Street Suite 400
Sacramento, CA 95814

Dear Mr. Mullinax,
I heard your interview on the February 27, 2014, Dave Congalton show. As I understand, the League is an advocate for cities and taxpayers when taxes are involved.

Cal Poly State University in San Luis Obispo, is planning to build seven, five-story dorm towers to house 1475 17-18 year-olds. They plan to build this on the southernmost border of the campus which is adjacent to our R-1 San Luis Obispo City neighborhood. Incidentally, out of Cal Poly's 6,000 acres, this is the ONLY border with an R-1 city residential neighborhood.

I and my neighbors have been commenting on the re-circulated draft EIR SCH#2013091085 prepared by SWCA Environmental Consultants, 1422 Monterey Street, Suite C200, San Luis Obispo, CA 93401. Our Contact is: Nicole Carter, Project Manager (805)543-7095.

I have no technical background in evaluating the EIR but am doing my best to comment. From my lay perspective, there are a number of glaring misrepresentation or ignored topics. Traffic, aesthetics, social and economic are some that I can muddle through.

We have been informed that if we do not comment on a particular item in the EIR during this public comment period (ending March 31 at 5PM), we are barred from litigating on this matter even if it is discovered to be valid.

The day, of your interview, you were followed by City Councilman John Ashbaugh. At a City Council Meeting and on the program that day he stated that he and the Vice-Mayor Carlyn Christianson were not willing to re-evaluate the many contracts that the City has with Cal Poly and use these contracts when seeking mitigation.

It is my fear that because of these two council members, the City will not negotiate adequate mitigation regarding traffic signaling, street maintenance, 101 freeway interchange, water and sewer treatment, fire and police response for which they have contracts.

LW(a)-158 (continued)

I now have copies of these contracts but they are beyond my comprehension. However, there are so many deficiencies in the EIR in areas that I do understand, that I can't help but fear that there are deficiencies in these contract areas also.

If the City does not negotiate adequately for the taxpayers, we will be responsible for mitigating these failures with our general fund tax dollars. Is this what your League advocates against? Is there anything that you can do on this very short notice? We need all the help that we can get.

Because we were told at the first forum, by Nicole Carter, the project manager that it was not "within the scope of the EIR to evaluate social and economic factors" I do not trust her. I found in Section 15021 (d) of the CEQA Guidelines that, "In determining whether a project should be approved, a public agency must balance a variety of project objectives including economic, environmental, and social factors and in particular, the goal of providing a decent home and satisfying living environment for every Californian."

President Armstrong was quoted in the Mustang Daily on January 16, 2014 as saying "We could've taken a shortcut that would have been completely legal, but we wanted to engender that communication", Armstrong said. Another administrator at the first forum stated that they did not need to comply with CEQA but were holding these forums to satisfy the neighbors. For these reasons, I don't trust the University administration.

I would like to use this letter to you as my official comment regarding the various technical contracts between the City and University. If this goes to litigation, we will be contacting your office for support regarding the tax implications for mitigating negative impacts. If you could help us before the final comments period by asking the EIR to quantify the economic impacts raised by this deficient EIR, we would be very grateful and hopefully avoid litigation.

Sincerely,

Linda White

Linda White
cc. Nicole Carter, Project manager
Mayor Jan Marx
Councilmen Dan Carpenter, Kathy Smith, Carlyn Christianson, John Ashbaugh

LW(a)-159

Poly Dorms, Student Misbehavior, Supporting Articles in the News

Must See Examples of Student Behavior

http://calcoastnews.com/2014/02/slo-social-seen-house-party-2-10-24/
http://calcoastnews.com/2014/01/slo-social-seen-downtown-2-23-14/

Other Cal Coast News Articles

2014 02 27	Woman Assaulted on Cal Poly Campus
2014 02 13	Cal Poly Greek Parties Enter Near-Alcohol Prohibition
2014 02 05	14 Arrested During Cal Poly Concert
2014 01 30	Truck Hits Cal Poly Professor Riding a Bicycle
2014 02 27	Suspect in Shooting (drug deal gone bad) of Former Cal Poly Football Player Arrested
2014 01 15	Woman Sexually Assaulted on Cal Poly Campus
2014 01 14	Cal Poly puts all Fraternities and Sororities on Probation
2013 11 21	Cal Poly Partiers Accused of Racism
2013 11 04	Dorm Fire Displaces 10 Cal Poly Students
2013 09 26	Cal Poly Student Dies of Apparent Suicide
2013 09 23	Cal Poly Police searching for Attempted Robbery Suspect
2013 09 17	Cal Poly's Increasing Student Body
2013 05 16	Cal Poly Apartment Catches Fire
2013 04 30	Sexual assault reported on Cal Poly Campus
2013 04 16	Woman Assaulted on Cal Poly Campus
2013 04 11	Drugs & Alcohol Ruled Out In February Death of Cal Poly Student
2013 03 11	Firefighter Injured In Student Housing Fire
2013 02 27	Cal Poly Student Discovered with Rifle on Campus
2013 02 22	Cal Poly Sorority Facing Hazing Investigation
2013 02 13	Code Violations Displace 40 Students In SLO
2013 02 12	Cal Poly Student Struggled To Breathe At Party Before Death

San Luis Obispo Tribune & Other Print Media

2014 03 28	Look beyond dorm project and improve nearby neighborhood Councilman John Ashbaugh
2014 03 26	Residents slam Poly dorm plans
2014 03 11	College mental health hurdles
2014 03 11	Pledge system alive and well at Poly frat houses, sororities
2014 03 10	Starkey fraternity ditches pledging
2014 03 06	***New Times*** White Flag Athletic Dept Blind Eye on Misbehavior

LW(a)-159 (continued)

2014 03 06	***New Times*** Spoilsports
2014 03 03	Be a good neighbor
2014 02 24	***SLO City News*** Divided Council Gears up for Dorm Forum
2014 02 27	Does Tribune go easy on Cal Poly?
2014 02 20	***New Times*** SLO schedules a town hall on the Cal Poly Dorm project
2014	***SLO City News*** Poly Parties Resume with Restraints
2014 02 24	Lessons to Learn
2014 02 19	***E-Insider SLO Chamber of Commerce*** Heated debate at city council
2014 02	RE Flyer Triplex 2045 Slack St. (This is an R-1 neighborhood) $865,000
2014 02	RE Mailer 1631 McCollum $899K 6 parking spaces $4,600/mo lease
2014 02	RE Mailers RE Group Melissa Kues property ONLY on Slack, Only on Henderson, Only on Hope, Only on Hays
2014 02 22	Disappointing Rules
2014 02/03	***SLO Life Magazine*** Bursting at the Seams Follow-up
2014 02 21	No Negative News?
2014 02 18	Move those dorms
2014 02 16	Poly dorm plan sought
2014 02 13	Poly, Greek community OK changes
2014 02 12	Learn by Thinking
2014 02 10	Private Parties
2014 02 10	Significant problems
2014 02 05	6 hospitalized, 14 arrested at Poly event
2014 02 03	Poor Poly Process
2014 02 02	Cal Poly must do more to put brakes on vehicle traffic
2014 01 15	Letter Office of the President
2014 01 15	Cal Poly to Continue with Student housing Project at Grand Avenue Entrance
2014 01 15	Dear Cal Poly Students, Faculty, and Staff
2014 01 16	***Mustang News*** A GRAND HOUSING PROJECT
2014 01 23	Obama targets sexual assaults at US colleges
2014 01 23	Grand Avenue site poor for dorms by Kenneth Schwartz former Mayor, City Councilman, professor of architecture, associate dean and interim dean of CP College of Architecture and Environmental Design
2014 01 16	POLY PICKS GRAND AVE. FOR STUDENT HOUSING
2014 01 16	Police look into 2 sexual assault attempts in SLO
2014 01 16	Cal Poly needs more housing
2014 01 08	***Mustang News*** Cal Poly buys four houses adjacent to campus on Grand
2014 12/01	***SLO Life Magazine*** Like
2013 12 15	SLO gets more time to comment
2013 12 18	Bigger beats for campus police
2013 12 18	Opposed to dorm
2013 12 08	Vicious cycle: City bike lanes can be a risky ride
2013 12 06	Students and the community by Dan Carpenter City Councilman
2013 12 03	Poly dorm site not set in concrete
2013 12 01	Cal Poly plans forum to discuss dorms
2013 11 29	Traffic study on agenda at upcoming Cal Poly forum on proposed dorm

LW(a)-159 (continued)

2013 11 19	SLO trustees approve new site for Teach Elementary School
2013 11	Teach Elementary should move to old Pacheco site
2013 11 15	Teach Elementary may move to former Pacheco School site
2013 11 09	Public pans proposed Cal Poly dorm at Grand Avenue entry
2013 11 07	Cal Poly neighbors voice opposition to dorm plan
2013 11 06	Teach Elementary needs a campus by next year, district panel says
2013 10/11	***SLO Life Magazine*** Bursting at the seams
2013 10/11	***SLO Life Magazine*** A New Way Forward?
2013 09 29	Cal Poly's Social Costs
2013 09 17	Poly's Goal: 24,000 students
2013 09 16	CP should consider increasing enrollment by as much as 5,000 president says
2013 08	RE Flyer announcing Sale of Four Homes on Three Lots110-140 Grand Ave. $1,175,000 Poly Foundation will buy few months later for $1,900,000.
2013 07 18	The Psychology of Mob Mentality and Violence by Wendy James, PhD.
2015 05 15	Cal Poly plans to build more student housing on campus
2013 02 12	40 students displaced after safety violations found at SLO condos

From:	Linda White
To:	Nicole Carter; Kathy Smith; Carlyn Christianson; Dan Carpenter; Jan Marx Mayor; John Ashbaugh; Johnson, Derek; Rachel Kovesdi; President Jeffrey D. Armstrong
Subject:	Recirculated Draft SCH2013091085
Date:	Saturday, March 29, 2014 10:11:47 PM
Attachments:	Part 1 Recirculated Draft EIR SCH #2013091085 (1).pdf Part 2 Recirculated Draft EIR Chapters 2 3 4.pdf Part 3 Recirculated Draft EIR SCH #2013091085.pdf 2014 03 27 David Mullinax draft.doc News Media supporting docs.doc

Attached are three PDF files and two Word documents that present my comments on Recirculated Draft SCH2013091085 Cal Poly San Luis Obispo Student Housing South. Printed copies will be delivered Monday, March 31, 2014 to Nicole Carter, Senior Planner SWCA Environmental Consultants at 1422 Monterey Street, Suite C200, San Luis Obispo, CA 93401.

Linda White
2077 Slack St.
San Luis Obispo, CA 93405

10.2.2.18 Response to Letter from Linda White

Comment No.	Response
LW(a)-1	Alternatives are not formally adopted or rejected except as part of the Board of Trustees decision making process. The development of sites analyzed as alternatives in the SHS EIR as part of a future Master Plan is speculative; the reasonable future scenario is the current Master Plan.
LW(a)-2	Please refer to LW(a)-1, above.
LW(a)-3	Comment noted.
LW(a)-4	The information provided in the EIR is consistent with the information presented by the commenter.
LW(a)-5	Page 2-7 of Chapter 2, Project Description, states that the Master Plan will be amended to allow the various land uses proposed on the site. The University continually evaluates the need to update the Master Plan.
LW(a)-6	Please refer to responses to specific comments.
LW(a)-7	The text on page ES-7 will be amended as follows: With the completion of the student housing complexes ~~outlined~~ included in Table ES-1, Cal Poly offers 6,239 beds in student housing, a significant increase from the 2,838 beds available at the time of Master Plan adoption. The bed totals do not include the Bella Vista neighborhood.
LW(a)-8	Alternative sites were assessed in Chapter 5, Alternatives Analysis.
LW(a)-9	Please refer to MR-2 and MR-4.
LW(a)-10	The commenter's noted disagreement will be considered by the Trustees and project decision-makers.
LW(a)-11	The commenter's noted disagreement will be considered by the Trustees and project decision-makers.
LW(a)-12	The main communal dining facilities are housed in Building 19 and Vista Grande, both of which have sufficient capacity to serve the project.
LW(a)-13	The commenter is not presenting an environmental issue. Alternative sites were assessed in Chapter 5, Alternatives Analysis.
LW(a)-14	The commenter's statements will be considered by the Trustees and project decision-makers.
LW(a)-15	The commenter incorporates a letter from Kenneth Schwartz, faculty member, to President Armstrong. The letter is noted and will be considered by the Trustees and project decision-makers. Please refer to MR-7.

Comment No.	Response
LW(a)-16	Please refer to MR-5.
LW(a)-17	The incorporated letter addresses several planning and city government points; no environmental issues are raised.
LW(a)-18	Please refer to MR-6.
LW(a)-19	Evaluation of each alternative's consistency with project objectives is provided in Section 5.
LW(a)-20	Simulations were provided in lieu of story poles on site. The base photographs used for simulations were not altered to diminish impacts. The number of vehicles in the photographs does not affect conclusions regarding baseline visual quality or character or project impacts.
LW(a)-21	Information regarding consistency with plan policies is project in the EIR for use and review by project decision-makers.
LW(a)-22	The commenter's statements will be considered by the Trustees and project decision-makers.
LW(a)-23	The site plan proposed for the project will include grading across the site and may require re-grading of the southern embankment depending on the engineer's determination of suitability of existing fill; however, the ultimate site footprint will include an embankment along the southern edge similar to existing topography. Impacts related to sensitive receptors, including school children, are addressed in Section 4.2, Air Quality.
LW(a)-24	The commenter references "grade"; it is inferred that the commenter is referring to the steep slopes which posed a constraint at certain alternative sites. Differing geotechnical conditions pose different constraints, some of which are more costly or difficult to address.
LW(a)-25	Building 4, fronting Slack Street, is specified as four stories. Please refer to MR-9 for amendments to aesthetics mitigation.
LW(a)-26	Please refer to EIR Section 4-1, Aesthetic Resources, which evaluates the proposed project as seen from public viewing areas, and considers the proximate residential neighborhood.
LW(a)-27	The design and appropriation of space for auxiliary facilities on site has not been finalized.
LW(a)-28	The commenter references an attached letter which has been reviewed by the University.
LW(a)-29	The project description describes a range of project components where the final selection has not been made. The content of the project description is guided by Section 15124 of the CEQA Guidelines, which states that the project description should not "supply extensive detail beyond that needed for evaluation and review of the environmental impact." The environmental review accounts for the various technologies referenced.

Comment No.	Response
LW(a)-30	A detailed description of parking impacts, replacement parking, and availability in the greater campus parking system is provided in Section 4.6, Traffic and Circulation.
LW(a)-31	Notification and scoping for the project occurred in accordance with the CEQA Guidelines, as described in Section 1.2 of Chapter 1, Introduction.
LW(a)-32	Comment noted.
LW(a)-33	Please refer to MR-6. The commenter references an existing condition, not an impact of the project.
LW(a)-34	Comment noted. Please see response to previous comments.
LW(a)-35	As stated in Section 5.6, the decision makers may "select the project as proposed, an alternative, or a specified combination of particular elements identified in the Alternatives Analysis, as the approved project. Primary importance is placed on meeting objectives specified herein, as well as in adopted campus and CSU planning documents. In all scenarios, the Mitigation and Monitoring Program (MMRP) would be applied to the approved project."
LW(a)-36	The mitigation program described for the project goes above and beyond existing mitigation specified in the Master Plan EIR. The commenter is particularly referring to the Recreation Center, which is a different type of use than the proposed project.
LW(a)-37	The commenter's statements will be considered by the Trustees and project decision-makers.
LW(a)-38	Please refer to MR-2. The commenter attaches a list of media reports regarding the University or its students. The reports have been reviewed and do not include information which would alter analysis or conclusions in the EIR.
LW(a)-39	There is significant pedestrian and bicycle infrastructure throughout the campus; it is the University's intent to protect neighborhoods by generally directing such traffic via internal infrastructure (roads and pathways), rather than encouraging pedestrian and bicycle travel through neighborhoods.
LW(a)-40	Please refer to MR-1.
LW(a)-41	Class II bikeways exist along the entire extent of Grand Avenue; internal routes exist as well, which connect to the California Boulevard bike and pedestrian pathway.
LW(a)-42	Mitigation has been revised as outlined in MR-10.
LW(a)-43	Please refer to MR-1.
LW(a)-44	Please refer to response to LW-1.
LW(a)-45	The commenter refers to subsequent specific comments, which are addressed as noted.

Comment No.	Response
LW(a)-46	The commenter is describing existing conditions, which are stated in the EIR. The EIR does state that SLCUSD has the option to expand, displacing the Classical Academy, at the termination of that school's lease. No changes are required.
LW(a)-47	Please refer to previous responses; buildings on site will range from three to five stories. The axonometric drawings are accurate.
LW(a)-48	The parking structure is designed to replace some of the parking lost to lot closure. An assessment of alterations in parking is provided in Section 4.6, Traffic and Circulation. The University has determined that replacement parking is needed in this location to provide additional parking at a reasonable distance to facilities and classrooms at the southern end of the campus core.
LW(a)-49	Please refer to previous responses.
LW(a)-50	The commenter is addressing the site plan, not an environmental issue. Comments will be considered by the Trustees and project decision-makers.
LW(a)-51	Please refer to previous responses.
LW(a)-52	The southernmost building in the project (4) is setback an average of 35 feet from Slack Street.
LW(a)-53	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-54	The referenced text is an excerpt from the Master Plan. The discussion provided is regarding general consistency with the policy statement.
LW(a)-55	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-56	Decreases in parking are based on review of current data compiled by the Parking Department. The commenter references neighborhood parking. Please refer to MR-6.
LW(a)-57	The project has varying degrees of aesthetic impact, some of which are mitigable, and some of which are identified as significant and unavoidable. Please refer to MR-4.
LW(a)-58	The southernmost building in the project (4) is setback an average of 35 feet from Slack Street.
LW(a)-59	The photographs taken and used for simulations were not cropped to diminish impacts. Mitigation regarding landscaping has been amended outlined in MR-9.
LW(a)-60	The environmental baseline and context of the project is considered and addressed in EIR Section 4-1 Aesthetic Resources.
LW(a)-61	The commenter's statement will be considered by the Trustees and project decision-makers.

Comment No.	Response
LW(a)-62	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-63	University development is not subject to local land use regulation. The project obstructs views from portions of certain public vantage points (i.e., sections of roadway). Mitigation has been amended in MR-9 to address this issue.
LW(a)-64	Please refer to AES Impact 1 and AES Impact 2, which identify significant an unavoidable impacts to aesthetic resources. Light and glare are evaluated in the EIR (see AES Impact 4) and mitigation is identified that would reduce the identified effect to less than significant.
LW(a)-65	Please refer to LW(a)-64 above.
LW(a)-66	The commenter references the Recreation Center, a different land use, and Parking Structure I, both of which were subject to different standards than the mitigation proposed in the EIR. The mitigation proposed in the EIR goes above and beyond existing Master Plan mitigation.
LW(a)-67	Photographs included in the EIR provided representative public streetscapes, which included examples of existing architecture. As stated in Section 4.1, Aesthetic Resources, the visual character of the surrounding neighborhoods is more unified because of mature streetscape, rather than design.
LW(a)-68	There is no evidence provided to suggest solar access would be limited by the project; the building are set back an average of 35 feet north of the northern edge of Slack Street, and 200 feet north of occupied structures off campus.
LW(a)-69	Viewer response to change is addressed on page 4.1-10 of Section 4.1, Aesthetic Resources. A relatively sensitive viewing public is a component of the significant impact findings.
LW(a)-70	The visual analysis does not speculate, however, certain aspects of a visual quality are somewhat subjective (i.e., people's varying opinions as to types of architecture, landscaping, etc.). The visual analysis utilizes specific criteria to evaluate existing value and condition, and impacts of the project (page 4.1-10).
LW(a)-71	The referenced text describes existing conditions; views of the site itself are obstructed by vegetation.
LW(a)-72	Please refer to previous responses.
LW(a)-73	The EIR accurately describes existing conditions from surrounding neighborhoods.
LW(a)-74	Photographs were not manipulated to minimize effects.
LW(a)-75	Please refer to previous responses.
LW(a)-76	The simulations provide representative, not comprehensive, views of conditions resulting from the project. As stated previously, the southernmost buildings are four stories and the

Comment No.	Response
	simulations accurately depict heights.
LW(a)-77	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-78	Please refer to the site plan; the building is angled away Grand Avenue, the intersection of Grand and Slack, and Slack Street. See previous responses regarding building heights.
LW(a)-79	Comment noted.
LW(a)-80	The first sentence describes the potential impact; after application of mitigation, a conclusion of residual impact is provided.
LW(a)-81	Comment noted.
LW(a)-82	Mitigation regarding landscaping has been amended as outlined in MR-9. There is no evidence provided to suggest solar access would be limited by the project; the building are set back an average of 35 feet north of the northern edge of Slack Street, and 200 feet north of occupied structures off campus. The current Master Plan supports compact infill development in the general vicinity of the campus core. This overarching principle guides the selection of alternatives.
LW(a)-83	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-84	The commenter refers to the Recreation Center and Grand Avenue Parking Structures, which were both built to different lighting specifications than the project proposes. The EIR does not defer mitigation; specific standards are outlined in the discussion and mitigation; refinement of the lighting plan as part of final plan approvals is acceptable under CEQA Guidelines §15126.4(b) which states: "…measures may specify performance measures which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." Comments regarding the H-12 and H-16 Alternative are noted.
LW(a)-85	Again, the language describes a potential impact; in the ensuing discussion, a preliminary determination is made, mitigation is applied, and a conclusive impact determination is provided.
LW(a)-86	Aesthetic expectations are discussed from both the campus and neighborhood point of view.
LW(a)-87	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-88	The commenter refers to an attached letter. The letter does not raise environmental issues which would require revision of the EIR.

Comment No.	Response
LW(a)-89	Evaluation of noise impacts included proximity of sensitive receptors.
LW(a)-90	The commenter is addressing existing operations the University, not an impact of the project.
LW(a)-91	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-92	The County and City, as well as the University, address noise during project planning (site design, environmental review, and plan check), and during operation (response to specific complaints or through mitigation monitoring where applicable).
LW(a)-93	The comments do not alter analysis or conclusions in the EIR.
LW(a)-94	The current program does not include the use of pile drivers, however, should such equipment be required, the Master Plan noise mitigation program includes measures to address their use.
LW(a)-95	The reasoning for a determination of less than significant impact is provided in the referenced section.
LW(a)-96	Please refer to MR-2.
LW(a)-97	The EIR addresses environmental impacts of the project; enforcement of existing nuisance noise policies is addressed in Section 4-4.
LW(a)-98	The cumulative scenario assumes continued growth in accordance with the existing adopted Master Plan.
LW(a)-99	The text on page 4.4-10 will be amended as follows: "Continued increases in enrollment and staffing at the University, and implementation of proposed facility projects listed in the cumulative development scenario would incrementally increase noise in the area. Enrollment and staffing growth ~~may~~ would result in additional traffic; facility improvements on campus ~~are~~ would not otherwise ~~expected to~~ be significant source of operational noise due to the largely academic nature of buildings proposed. Traffic growth is expected to be moderate, and would be dispersed to the various campus entry points. Affected roadways include California Boulevard, Foothill Boulevard, Santa Rosa Street (Highway 1), and Highland Drive; these roadways are heavily traveled and the increment of change would not alter noise levels perceptibly. The project would not add perceptibly to the long-term ambient noise environment in the area; cumulative impacts are therefore considered *less than significant (Class III)*.
LW(a)-100	The EIR text is accurate based on referenced communications with SLCUSD staff.
LW(a)-101	The EIR text is accurate based on referenced communications with SLCUSD staff.
LW(a)-102	Again, the language describes a potential impact; in the ensuing discussion, a preliminary determination is made, mitigation is applied, and a conclusive impact determination is provided.

Comment No.	Response
LW(a)-103	The commenter's statement and attached letter will be considered by the Trustees and project decision-makers.
LW(a)-104	The referenced text addresses use of recreational facilities on site; violations of regulations for use are addressed, as noted in Section 4.0, through police enforcement.
LW(a)-105	Please refer to MR-1.
LW(a)-106	No alterations are proposed except for deletion of reference to "shared bicycle facilities" along Slack Street noted in Section 4.6.
LW(a)-107	Please refer to MR-1.
LW(a)-108	The selected text references the streets immediately abutting the project; the description provided in accurate.
LW(a)-109	The City's Bicycle Plan identifies this as an existing Class III bicycle route.
LW(a)-110	An analysis of parking supply and demand is provided in Section 4.6.
LW(a)-111	Staff parking is not available to the general population.
LW(a)-112	Comment noted. The EIR references substantial evidence, in the form of communications with Cal Poly Parking staff, to support this conclusion.
LW(a)-113	The assumptions related to trip commute reduction for new residents of the proposed project are outlined in detail in section 4.6.
LW(a)-114	As noted throughout the EIR, the size of the parking structure has not been finalized.
LW(a)-115	Please refer to MR-6.
LW(a)-116	Assumptions made in the various analyses in the EIR are disclosed throughout the document to inform reviewers about the parameters and methodologies used.
LW(a)-117	Text has been amended as outlined in MR-10.
LW(a)-118	Again, the language describes a potential impact; in the ensuing discussion, a preliminary determination is made, mitigation is applied, and a conclusive impact determination is provided.
LW(a)-119	Please refer to MR-1.
LW(a)-120	The EIR text is accurate based on referenced communications with SLCUSD staff.
LW(a)-121	The TIA evaluated the combination of facilities available in the area, including on campus.
LW(a)-122	The commenter states generally that there are inaccuracies without provided specific

Comment No.	Response
	instances. Comments are noted. Please refer to MR-1.
LW(a)-123	The project includes amendment of the Master Plan to allow the land use. This alteration will be considered by decision makers in their review of the project.
LW(a)-124	Comment noted. Amendments for the Recirculated EIR were limited to additional information regarding a potential pipeline in the vicinity.
LW(a)-125	Please refer to MR-5. The current Master Plan supports compact infill development in the general vicinity of the campus core. This overarching principle guides the selection of alternatives. Please refer to MR-7.
LW(a)-126	The impacts related to removal of the parking structure are addressed in Section 5. Other information regarding the feasibility of alternatives is provided in MR-9.
LW(a)-127	Alternatives will be considered by the decision makers (Board of Trustees); as stated in Section 5, the Board may adopt the project as mitigated, add mitigation or alter the project, adopt an alternative or combination or new alternative, or deny the project.
LW(a)-128	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-129	The commenter's statement will be considered by the Trustees and project decision-makers. Please note that the CEQA Statute and *Guidelines* require evaluation of a No Project Alternative.
LW(a)-130	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-131	All students are considered sensitive receptors; sensitive receptors, including campus residents, may be in the vicinity of construction activity throughout its duration.
LW(a)-132	Please refer to MR-8.
LW(a)-133	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-134	The excerpted text refers to the No Project – Existing Master Plan.
LW(a)-135	Please note relative occupancy statistics for the affected parking lots.
LW(a)-136	Please refer to MR-8.
LW(a)-137	Please refer to MR-8.
LW(a)-138	The commenter's statement will be considered by the Trustees and project decision-makers.

Comment No.	Response
LW(a)-139	The EIR states in Section 5 that it is the preference of the Housing program to coordinate and co-locate the freshman or first-year housing program. The EIR references different programming and living arrangement concerns (i.e., dormitories versus apartments with kitchens) among the issues associated with locating first-year and upper division student housing together.
LW(a)-140	The EIR states in Section 5 that it is the preference of the Housing program to coordinate and co-locate the freshman or first-year housing program. The EIR references different programming and living arrangement concerns (i.e., dormitories versus apartments with kitchens) among the issues associated with locating first-year and upper division student housing together.
LW(a)-141	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-142	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-143	Sensitive receptors are defined in Section 4.2.
LW(a)-144	Mitigation would be required for both. Impacts are considered less than significant with mitigation.
LW(a)-145	Information regarding stormwater design is provided in Sections 3 and 4 of the EIR.
LW(a)-146	The referenced text provides general information about how the alternative may be developed.
LW(a)-147	This information is provided in Section 3 of the EIR.
LW(a)-148	Please refer to MR-2.
LW(a)-149	Please refer to MR-2.
LW(a)-150	Please note relative occupancy statistics for the parking lots affected.
LW(a)-151	The relative effects of removing the parking structure are detailed in Chapter 5.
LW(a)-152	Please refer to MR-1 and MR-8.
LW(a)-153	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-154	The commenter's statement will be considered by the Trustees and project decision-makers.
LW(a)-155	Please refer to MR-1.

Comment No.	Response
LW(a)-156	Comment noted. The commenter does not provide evidence to support claims regarding validity of the analysis of impacts related to location alternatives. Specific responses regarding analysis of the proposed project have been previously made.
LW(a)-157	The commenter summarizes previous comments and reiterates support of the H12/H16 alternative. The comments are noted and specific responses have been previously made.
LW(a)-158	The commenter includes a letter soliciting assistance from the League of California Cities. No information is contained in the letter which would alter the analysis or conclusions reached in the EIR.
LW(a)-159	The commenter includes a list of news reports regarding Cal Poly student behavior. Please refer to MR-2, regarding student nuisances. Staff have reviewed the reports referenced; no information is provided therein which would alter the analysis or conclusions reached in the EIR. The information is being forwarded to decision makers for their consideration.

From: sharon@sharonwhitney.com
To: letters; letters newtimes
Cc: Derek Johnson; Kati Lichtig; Kim Murry; Keith Humphrey; Nicole Carter; Jean DeCosta; sharon; jarmstrong@calpoly.edu; john ashbaugh; dan carpenter; kathy smith; cchristiansen; jan marx
Subject: Asbaugh"s Creative Fix to One Current Town-Gown Conflict
Date: Friday, March 28, 2014 10:49:53 AM

Dear Editor,

Councilman John Ashbaugh's Viewpoint is right on. It is easy for any of us to get stuck in a rhetorical rut in how we approach a conflict; sometimes it takes a quick swift kick in the behind to really hear "the other side" and concede at least some of their position is right. I think Councilman Ashbaugh's recent Viewpoint demonstrates that civil discourse quality. It also demonstrates the kind of creative "win-win" "fix-it" thinking I value from our city council. **SW(c)-1**

Councilman Ashbaugh's creative fix to the undesirable historical "town-gown" conflict over student housing is "restrictive covenants." True, the details have not been worked out. The idea is that "restrictive covenants" would stabilize residential neighborhoods surrounding our valued college campuses.

In my vision, this fix could enable a return to the city's neighborhood quality and wellness that has become increasingly lost to us and is being even more jeopardized by Cal Poly's current site proposal for on-campus student housing. Maybe it would return our residential neighborhoods into affordable places for new faculty, staff, and middle-class city workers. I, for one, want to add my support to working out the details for this idea.

Sharon G. Whitney

10.2.2.19 Response to Email from Sharon Whitney

Comment No.	Response
SW(c)-1	The commenter's statements will be considered by the Trustees and project decision-makers.

From: Zaf Iqbal
To: Nicole Carter
Subject: EIR
Date: Saturday, March 29, 2014 8:14:48 PM

Dear Ms. Nicole:
I am a Professor Emeritus of Accounting and a past associate dean of Cal Poly's Orfalea College of Business.
I write a monthly column for San Luis Obispo newspaper, The Tribune. The topic of next column is on the proposed freshman dormitory complex. It is scheduled for publication on Sunday, April 6.
I am sure you know the project is facing strong opposition from the contiguous residential neighborhoods. The City Council had a town hall meeting on March 25 to provide an opportunity to the neighbors to express their concerns. The City Council, according to reliable resources, plans to issue a strong letter to the university calling for an improved project. City Councilman John Ashbaugh stated in an article, published in The Tribune on March 28, "The final EIR must do a credible job analyzing and mitigating traffic impacts, particularly at Grand and Slack." He also wrote that, "... it's clear there are many flaws in the project and in its draft Environmental Impact Report."
I am interested in your reaction, response, planned changes in the draft EIR (if any) and anything else you think would be potentially helpful to me for the column. My submission deadline is Wednesday, April 2. Thank you for your assistance.
Regards,
Zaf Iqbal
M. Zafar Iqbal PhD, CPA, CMA, CIA
Professor Emeritus of Accounting
Orfalea College of Business
California Polytechnic State University
San Luis Obispo, CA

ZI-1

10.2.2.20 Response to Email from M. Zafar Iqbal PhD, CPA, CMA, CIA, Professor Emeritus of Accounting

Comment No.	Response
ZI-1	Dr. Iqbal was provided with information regarding the CEQA process in a responding email, which is included in the Administrative Record.

From: Terry Elfrink
To: Nicole Carter
Subject: DRAFT EIR Comment Request
Date: Sunday, March 30, 2014 11:27:02 PM
Attachments: CP DRAFT EIR RESPONSE 3-2014.pdf

Attached you will find my letter of comment re: the Cal Poly Draft EIR. Please confirm receipt of this email. Thank you.

March 30, 2014

CSU Board of Trustees
Nicole Carter, Senior Planner ncarter@swca.com
SWCA Environmental Consultants
1422 Monterey St., C200
San Luis Obispo, CA 93401

Subject: Comments on Draft Environmental Impact Report, Student Housing South Project

Dear Ms Carter,

Provided below are my comments on the Draft Environmental Impact Report (EIR) for the proposed Student Housing South. My comments are based upon my thorough review of the document as well as consultation with several CEQA experts.

There are several major flaws and/or omissions from the Draft EIR within the following four topic areas: 1) Impacts Upon Adjacent Neighborhoods; 2) Alternative Project Sites; 3) Proposed Parking Facilities and Potential Impacts, and 4) Law Enforcement Services and Student Behavior. Following each discussion of these impacts is a citation of relevant sections from the California Environmental Quality Act Guidelines.

1) Impacts Upon Adjacent Neighborhoods

TE-1

The Draft EIR provides no analysis or discussion of the impacts on the existing residential neighborhoods adjacent to the proposed project. These effects of the proposed project represent the most significant, unavoidable adverse impact associated with the proposed project.

The EIR states (Pages ES-19 and 20) that "community members commented repeatedly on concerns over the project's contributions to ongoing nuisances with students trespassing, congregating and walking through neighborhoods, particularly at night. Community members were concerned with the project contributing to this ongoing problem by concentrating on-campus population near the neighborhoods. Community members were also concerned with night trespass into the neighborhood from the project".... "it should be noted that the behavior of individual students or groups of students does not necessarily cause quantifiable environmental impacts, however, this document attempts to address potential impacts where necessary." This single paragraph represents a poor justification for the EIR to otherwise totally ignore the social and economic impacts of the proposed project upon the adjacent neighborhoods. These impacts directly relate to the potential loss of privacy, depreciation of home values and the increase of disruptive and unlawful behavior resulting from the addition of 1,475 students to the area.

It should be noted that several of the impact assessments in the Draft EIR, most notably aesthetic resources, geology and soils, and public services and recreation were not quantified. Yet, these assessments were still performed.

T FLEPINK CR DRAFT EIR COMMENTS MARCH 2014 1

Given the significance of the potential impacts upon the adjacent neighborhood as noted above, the EIR is obligated to make a good faith effort to fully disclose these impacts, regardless of whether or not they can be "quantified." The fact that an impact cannot be quantified does not diminish its significance nor does it relieve the EIR of the obligation to address this issue. A full disclosure document should provide impact assessments based upon neighborhood research and basic logic.

TE-1 (continued)

This issue can, to a certain degree, be quantified as follows:

A. The potential loss of property value can be quantified through contacting local real estate brokers and other experts.
B. The potential for families moving from the area can be quantified by conducting surveys of existing full-time residents.
C. The potential increase in law enforcement and emergency medical calls can be quantified through contact with the City (not University) police and emergency medical officials.

Completion of these tasks would provide a complete and site specific assessment of the most potentially significant unavoidable adverse impact of the proposed project.

CEQA Justification-

An EIR must provide a good faith effort at full disclosure. Section 15003(i) of the CEQA Guidelines states: "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure".
Section 15012(d) of the CEQA Guidelines states that, "In determining whether a project should be approved, a public agency must balance a variety of project objectives including economic, environmental and social factors and in particular, the goal of providing a decent home and satisfying living environment for every Californian". Section 15126.2 further states: "The discussion [of project impacts] should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality and public services. The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected." Section 15064(e) also states: "economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect."

2) Alternative Project Sites

The analysis of Project Alternatives does not provide a full range of alternatives and contains several biased and illogical conclusions.

TE-2

The Draft EIR addresses only one alternative site location. This alternative site location was not considered by Cal Poly, it was generated and proposed by the local residents and is located at the existing Parking Lots H-12 and H-16. By relocating the project on the opposite side of the campus from the currently proposed location, this alternative totally eliminates the significant, unavoidable adverse impacts of the proposed project upon the existing surrounding neighborhoods. The Draft EIR, however, states on page 5-8 that the potential land use impacts associated with this alternative site are "similar to the proposed project". This conclusion in the document lacks any substantiation or supporting evidence. The Draft EIR (page 5-9) states that the noise impacts of this alternative site are also similar. While not only lacking any factual foundation, these conclusions defy any form of logic. This alternative site is located approximately one mile north of the existing neighborhoods adjacent to Grand Avenue and Slack Street. Given this physical separation, the conclusions in the EIR that this alternative has impacts similar to the proposed project is obviously incorrect.

TE-2 (continued)

This alternative was rejected (on page 5-6) due to "the lack of proximity to other freshman housing and existing communal dining facilities." Attached you will find a campus map with maximum distances indicated between the furthest point of the proposed (2495') and alternate (2754') sites and the current dining facility. The difference of approximately 259' hardly represents a significant distance that would eliminate the alternate site from consideration. Again, the Draft EIR fails to quantify the basis for rejection. Additionally, this alternative location is just as close to the Student Union and other student activity areas and could include its own dining facilities if necessary to mitigate the additional 259'. Also, instead of rejecting this alternative due to the need for proximity or interaction with other freshman housing, it should be acknowledged that a facility with 1,475 beds will provide more than adequate opportunities for sufficient student interaction. Keeping the freshman students together in one location and the lack of communal dining does not override the significant adverse impacts of the proposed project upon the surrounding neighborhood. In fact, page ES-19 states that this alternative may require additional components such as new common dining facilities. There is no disagreement with this statement. Any additional costs associated with these dining facilities are miniscule in light of the overall budget for future implementation of the Campus the Master Plan.

TE-3

Since this alternative site location eliminates the primary significant adverse impact of the project, the Lead Agency (Cal Poly) per the CEQA Guidelines, is obligated to either adopt this alternative or make specific findings for its rejection. Such findings are not provided in Section 5.6 of the Draft EIR.

CEQA Justification-

An EIR must provide a complete analysis of all feasible project alternatives. Section 15126.6(a) of the CEQA Guidelines states: "Alternatives to the proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessens any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(c) states: "Because an EIR must identify ways to mitigate or avoid the significant effects that a Project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

An EIR must fully identify all reasonable mitigation measures and/or project alternatives that are capable of reducing or eliminating significant, unavoidable project related impacts. Section 15021 (a)(2) of the CEQA Guidelines states: "A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment." **TE-3 (continued)**

3) Proposed Parking Facilities and Potential Impacts

The discussion of project-related impacts relative to parking is confusing and incomplete. The Draft EIR states (pages ES-12, ES-19, 2-13 and Section 4.6) that the proposed parking structure will contain 300 to 500 parking spaces. Since the proposed project would remove 1,324 existing parking spaces, this range of proposed spaces results in a significant difference in the impacts upon parking demands both on- and particularly off-campus. Page 4.6-21 states that at this time, "the ultimate feasibility of a 500 space parking structure has not yet been determined" and that the "financial feasibility of a 500 space structure has yet be to determined." On the same page, the Draft EIR states that "incorporating a 500-space garage as part of the project would reduce parking redistribution and lessen the severity of while not eliminating the [roadway] intersection impacts." Given this fact, a decision concerning the size of the proposed parking should not be deferred to a future unspecified date. Instead, the Draft EIR should analyze the impacts of the actual proposed parking structure instead of a speculative range of parking spaces. In so doing, a far more accurate assessment of both traffic and parking impacts would be provided. **TE-4**

In addition, there is very little analysis of the actual redistribution of parking demands throughout the remainder of the campus. The Draft EIR should specifically address how much of the future parking demand will, in fact occur on-campus and how much future parking demand will be directed to areas immediately off-campus, throughout the areas south of the campus which do not have parking districts. It is naïve and highly speculative that all redirected student parking will occur on-campus. **TE-5**

Since the available parking at the southern end of the campus will be eliminated by the proposed project, it is assumed that parking demands will be redirected. The Draft EIR incorrectly assumes that all redirected parking will occur elsewhere on campus. However, as available parking is directed to other outlying areas, drivers will likely forgo the inconvenience and costs of on-campus parking and instead park on public streets in the adjacent off-campus areas. This situation currently occurs on Highland Drive immediately west of campus and within existing neighborhoods to the south of campus, many of which do not have parking districts. It is reasonable and logical to assume that students parking off-campus will increase with the redirection of parking away from the campus core. An analysis should be conducted similar to a traffic distribution model where points of origin (i.e., peripheral on-campus parking lots) and destinations (classrooms, library, student union, etc.) are identified. And how the loss of 824 – 1,024 spaces will affect overall parking patterns. The distances between on-campus parking and anticipated destinations should then be compared to the shortest distances between adjacent off-campus streets and the same destinations. In so doing, it is likely that off-campus roadways are in fact closer to many on-campus destinations, thereby encouraging and increasing off-campus parking as a result of the proposed project. **TE-6**

There is also no discussion of parking impacts during construction of the proposed 300 to 500 space parking lot in combination with construction of the proposed project facilities. This scenario truly **TE-7**

T.FLEPINK CR DRAFT EIR COMMENTS_MARCH 2014

represents a "worst case" project impact relative to the parking issue. The Draft EIR is obligated to analyze this aspect of this proposed project since it will likely severely impact adjacent neighborhoods. No mitigations are proposed for impacts associated with on-and off-site project related parking impacts during construction.
CEQA Justification-

Mitigation Measures must be specific and should distinguish those currently proposed to be included in the project and those which may be provided at a later date. Proposed mitigations to short- and long-term project impacts fail to make this distinction.
An EIR cannot be speculative. Section 15064(f)(5) of the CEQA Guidelines states: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts."

TE-7 (continued)

4) Law Enforcement Impacts and Student Behavior

Page 4.5-5 of the Draft EIR states that community members have cited ongoing concerns with nighttime partying within existing neighborhoods and with nighttime noise and trespassing. The Draft EIR also states that the proposed project will relocate students to areas closer to existing neighborhoods immediately south of the campus. This discussion in the Draft EIR presumes that "the number of calls for off-campus police services would not change due to the proposed relocation of students." The rationale for this conclusion is because "students who choose to engage in nuisance behavior or law violations in the city limits may continue this behavior. The level of nuisance may change incrementally depending on where the students relocated from; however this is difficult to quantify or predict." The challenge of preparing a difficult analysis is not a basis for ignoring the issue. The discussion in the Draft EIR cited above is also very vague and confusing and has no basis in fact. Basic logic would conclude that by introducing a significant number of new students in an area along the southern periphery of the campus, a significant increase in unlawful or nuisance behavior in adjacent areas will occur.

TE-8

The Draft EIR further states "ongoing public safety concerns associated with the students are addressed by local ordinances, University programs and the continued improvement of the on-campus community. The University will continue to work with the surrounding community to address concerns over student behavior." This conclusion assumes that local ordinances which restrict gatherings and associated nuisances are effective, which they are not. Provision of additional "University programs" and "the continued improvement of the on-campus community" are very vague and speculative and defers any action to an unidentified future date.

The description of law enforcement impacts upon off-campus areas within the City's jurisdiction should include input from the City Police Department, City Fire Department and emergency service providers since they (not the campus police) will be the agencies most severely impacted by the proposed relocation of 1,475 students to the area adjacent to existing neighborhoods south of the campus. This potential impact should be quantified using the existing number of police and emergency calls to this area as a baseline. The increase in the number of students associated with the proposed project can then be used as a basis for quantifying the future demands upon law enforcement and emergency services.

Since these neighborhoods are significantly impacted by the current students residing in the area, it is logical to conclude that by introducing a significant number of new students to the southern end of the campus will significantly, not incrementally, increase such behavior.
The Draft EIR severely underestimates these potential public safety and law enforcement impacts upon existing neighborhood communities south of the campus.

TE-8 (continued)

CEQA Justification-

An EIR must provide a good faith effort at full disclosure. Section 15003(i) of the CEQA Guidelines states: "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure."
An EIR cannot be speculative. Section 15064 (f)(5) of the CEQA Guidelines states: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts."

Additionally, I would request responses to the following non-CEQA Guidelines issues that have been inadequately addressed in the Draft EIR:

TE-9

- Where and what are the impacts associated with the intended staging area for construction materials and contractors' offices/trailers?

TE-10

- Where and what are the impacts associated with the lost faculty/staff, construction workers, and student parking during the construction phase?

TE-11

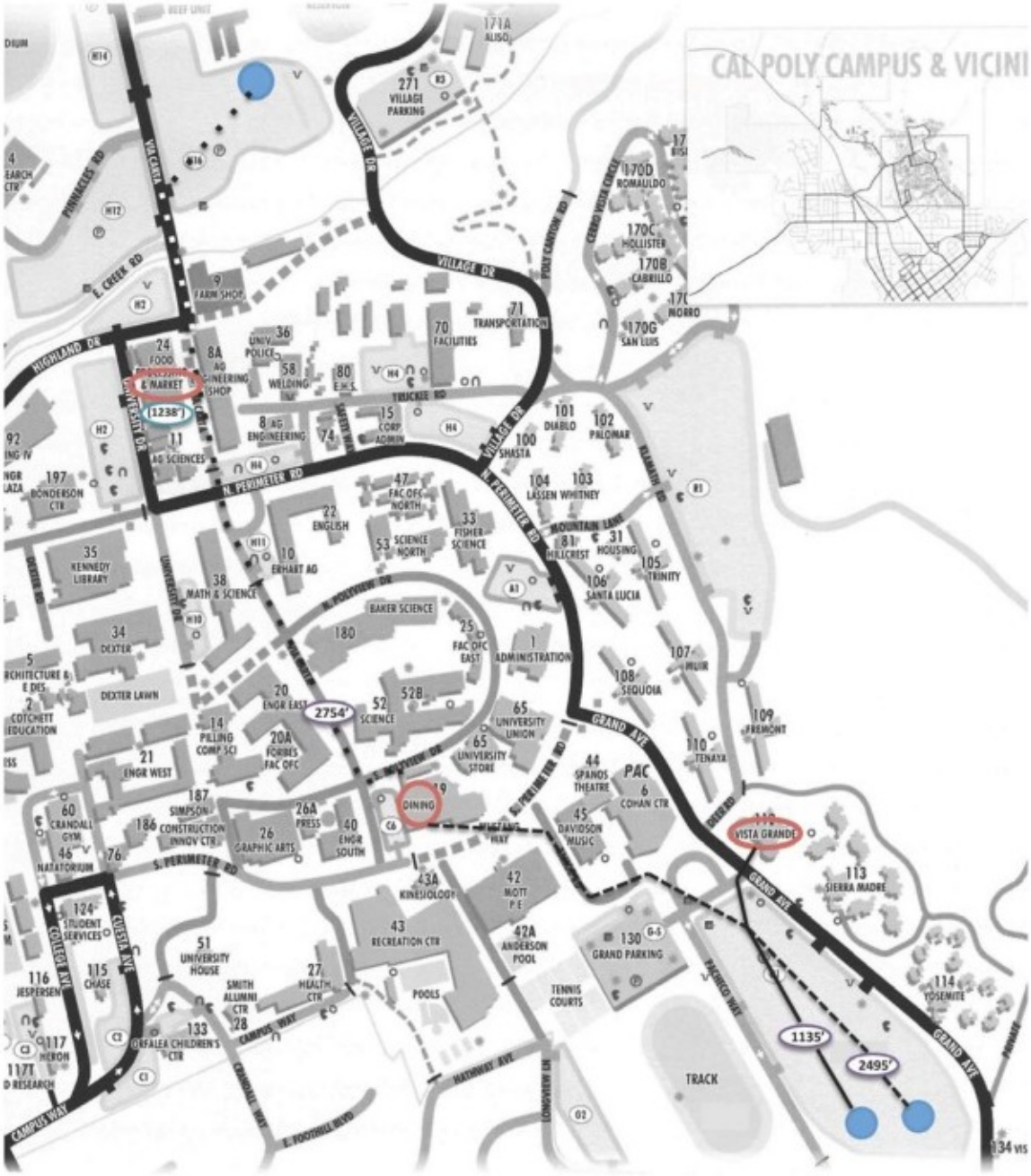
- What were the dates, means, and breadth of neighborhood residents' initial notification of 1) the proposed project and 2) the Notification of Preparation/Scoping Meeting of October 8, 2013?

The above comments and concerns are being submitted with the reasonable expectation of a full and complete response to all of the above noted concerns. As is evident, the overall theme of these comments involve the potentially significant and likely unmitigable impacts of the proposed Student Housing South project upon the immediately adjacent residential neighborhoods. In order to comply with the CEQA Guidelines directive of "full and complete disclosure", these potentially significant impacts must be fully addressed in the Final EIR documentation. Any effort to avoid or minimize addressing these issues is considered unacceptable. I respectfully request receipt of a complete set of all comments and responses to the Draft EIR.

Thank you for your consideration,

Mr. Terry Elfrink
1983 Slack St.
San Luis Obispo, CA 93405
(805) 550-2336
slofrink@gmail.com
Attachment: Cal Poly Campus Map

T ELFRINK CR DRAFT EIR COMMENTS MARCH 2014



T ELERINK CP DRAFT EIR COMMENTS MARCH 2014

10.2.2.21 Response to Email and Letter from Terry Elfrink

Comment No.	Response
TE-1	Refer to MR-2.
TE-2	The selection of alternatives is guided by Section 15126.6, which states, in part, that "An EIR shall describe a range of reasonable alternatives to the project…An EIR need not consider every conceivable alternative to a project…" Several site alternatives were considered, and disclosed in the analysis. Impacts related to land use and noise are discussed in respective paragraphs. The discussion of an alternative's impact may be in less detail than the proposed project [§15126.6].
TE-3	The referenced discussion noted that the H12/H16 site was not considered further during the planning process. The EIR includes an evaluation of the relative impacts of the alternative. The feasibility of this alternative is addressed in more detail in MR-8.
TE-4	The traffic analysis accounts for a 300-space parking garage, the minimum facility to be provided on site. The traffic analysis identifies sufficient on-campus parking to accommodate redistribution and demand under this scenario. Additional parking spaces, if approved, would reduce redistribution to other campus lots. The traffic analysis accounts for the reasonable worst case scenario (300 spaces) in the analysis.
TE-5	Please refer to MR-6.
TE-6	Please refer to MR-6.
TE-7	Section 4.6.5.5 of Section 4.6, Traffic and Circulation, addresses construction traffic. The circulation plan typically identifies staging and parking areas.
TE-8	Please refer to MR-2.
TE-9	The ultimate staging location has not yet been determined. For the purposes of analysis, it is assumed that staging will occur on site.
TE-10	Please refer to TE-7 above.
TE-11	The scoping and notification process is outlined in Section 1.2 of Chapter 1, Introduction.

From: Virginia Jensen
To: Nicole Carter
Subject: Fwd: Proposed location for new dorm
Date: Sunday, March 30, 2014 1:43:09 PM

Virginia Jensen
virjensen@gmail.com

> March 30, 2014
>
>
>
> CSU Board of Trustees
> % Nicole Carter, Senior Planner
> SWCA Environmental Consultants
> 1422 Monterey St
> SLO, CA 93401
>
> Dear Nicole,
>
> I am writing because I am opposed to location of the new dormitory on Grand and Slack Streets.
>
> The entrance to the beautiful Cal Poly should reflect the pride our community has in the University. First view of the campus entrance on Grand should have the appearance of a university, not a set of high rise dorms. There are other proposed sites that would better serve the aesthetics of this Grand entrance and give a sense of pride to all. **VJ-1**
>
> This is really just a minor point as there are many more detrimental impacts:
>
> The traffic congestion on Grand Ave is going to be a nightmare for students, faculty, and residents. **VJ-2**
> It would be so much better for the community if this new traffic could be shifted to the West end of the campus on the Highland Entrance.
>
> The concerns of the local residents need to be addressed. We know that Cal Poly wants to be a good neighbor, but the uncontrolled increases of traffic and bands of "partying" students is going to put an end to any good neighbor policy. **VJ-3**
>
> I hope that Cal Poly will revisit the decision of dorm location and does the right thing by the local community. The location of the dormitories needs to be moved to well within the campus boundary.
>
> Sincerely,
> Virginia Jensen

10.2.2.22 Response to Email from Virginia Jensen

Comment No.	Response
VJ-1	Alternative sites are addressed in Chapter 5, Alternatives Analysis.
VJ-2	Please refer to MR-1.
VJ-3	Please refer to MR-2. The commenter's statement will be considered by the Trustees and project decision-makers.

From: Home
To: Nicole Carter
Subject: Dorm
Date: Sunday, March 30, 2014 5:40:37 PM

Greetings, Ms. Carter and CSU Trustees:

We are fully in favor of housing all of the freshmen on campus, within the campus and providing dining and parking for them adequately. We do have grave reservations regarding the Grand/Slack location. **ML-1**

Slack belongs to SLO and houses there must adhere to the height requirements. CP should conform to City requirements for structures on both sides of Slack in deference to good relations with the City and CalPoly's neighbors' wishes.

The neighborhood streets from Foothill to Grand named Carpenter, Hathway, Longview and Slack are all too narrow to safely support pedestrian, bicycle,and automobile traffic, often at the same time. **ML-2**
These streets would be used by the freshmen as the main route to the new dorm if it is built on Grand. Highland Avenue which is wider, with bike lanes and sidewalks, should be promoted as the main entrance to the campus instead of little neighborhood streets with driveways entering out.

Don't endanger the lives of our 500 elementary students walking around the two school campuses, Teach and the Classical Academy, at the corner of Slack and Grand. If a child were hit it would be a tragedy not only for his family but also for the freshman who hit him in the excited flush of new found independence, probably in a car new to her.

Please adhere to California's SEQUA regulations. **ML-3**

Honor the buffer zone between the City neighborhoods and the campus buildings. See the plans of Pepperdine, Davis, and many other universities. They are set apart from the City and the surroundings are park-like. Save and savor the lovely view upon entering campus on Grand that greets the visitor to the Performing Arts Center. The view is of the bucolic city of San Luis Obispo nestled in the valley with San Luis Mountain and the Sisters rising up around us. The community of San Luis Obispo is one reason that students and their parents want to come to Cal Poly. **ML-4**

10.2.2.23 Response to Email from Martha Lindholm

Comment No.	Response
ML-1	The University is not subject to local land use regulations.
ML-2	Section 4.6, Traffic and Circulation, identifies substantial internal infrastructure to support bicyclists and pedestrians on campus. The EIR also identifies measures to improve pedestrian and bicycle safety in the vicinity of Grand and Slack. The EIR incorporates current information regarding the operation of Pacheco Elementary/Teach School in its evaluations.
ML-3	The proposed project was evaluated pursuant to and consistent with the CEQA Statute and *Guidelines.*
ML-4	Please refer to MR-3.

March 30, 2014

CSU Board of Trustees
c/o Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey Street, C200
San Luis Obispo, CA 93401
Email: ncarter@swca.com

Dear Ms. Carter,

By way of introduction my name is Mila Vujovich-La Barre. As a community resident, I have been concerned about "smart growth" in our community for over two decades. **MVLB-1**

Although I had the opportunity to address the San Luis Obispo City Council members and San Luis Obispo City staff at the public forum held last week, I wanted to be sure that my concerns were addressed in the Draft Environmental Impact Report (DEIR) documents for Student Housing South.

I am opposed to the dorms of approximately 1,475 beds of student housing in seven, four- to five-story structures at the current location of the R-1 and R-2/G-4 surface parking lots at Grand Avenue and Slack Street for a variety of reasons.

The DEIR is incomplete in regard to the environmental impacts this structure will have and the impacts that its eventual inhabitants will have on the surrounding area.

First and foremost I find the size, and scale of the proposed dorms to be "inconsistent with neighborhood character." The surrounding neighborhoods are established neighborhoods of quality, R-1 working-class homes.

Currently the Cal Poly parking lot supplies a much needed buffer from the existing dorms on Grand Avenue and these neighborhoods. It provides a feeling of openness, a view and air flow to the existing neighborhoods and the existing dorms. The depiction of the proposed dorms dwarfs the neighborhoods and detracts from their view and the view of the people in the other dorms.

Currently, there is a sense of serenity in the R-1 neighborhood surrounding Slack Street and Grand Avenue. Adding 1,500 inhabitants to this adjacent space would detract from that serenity and negatively impact the value of their homes. For the record, I do not live in this neighborhood but know various people who do. **MVLB-2**

Aside from the visual impacts there is also the increased noise and pollution that each and every body and their mode of transport cause. **MVLB-3**

The traffic study at the corner of Slack Street and Grand Avenue is totally insufficient for cars, bikes, pedestrians and skateboarders. There are not appropriate curbs, easily accessible bike lanes or walking paths in this area. **MVLB-3 (continued)**

I also view the 300- to 500-space parking structure adjacent to the proposed dorms as being woefully insufficient to meet the needs of 1,500 new residents and current students. **MVLB-4**

One must also take into consideration that there is an elementary school at the corner of Slack Street and Grand Avenue. That elementary school will have approximately 500 students "coming and going" in vehicles at roughly the same hours the college students and staff are headed to class. To impact this intersection to this degree is exceptionally poor planning. I do not envision any appropriate mitigation that would make that intersection functional without significant impacts. **MVLB-5**

Furthermore, as a result of the insufficient traffic study, I also question the response times and methods delineated in the DEIR for emergency services whether they be for a fire truck, police, paramedic or ambulance. **MVLB-6**

The good news is that there are other locations on the Cal Poly campus for these dorms. These sites were not given appropriate consideration and they should be revisited immediately. **MVLB-7**

As the parent of a Cal Poly graduate and as a post-graduate alumna, I sincerely appreciate everything that Cal Poly does for our community. It is a jewel in the crown of our county. That being said, with all of its innate expertise and resources in architecture and engineering, there is not a doubt in my mind that Cal Poly can be a good neighbor and fully develop plans for the alternate sites delineated in the DEIR.

The alternate sites would provide access to the lecture halls, dining commons, recreation areas, bike paths, and parking. Additionally, they would not create gridlock and visual blight as would the location at Slack Street and Grand Avenue.

Please feel free to contact me in the event that you have any questions or would like further explanation.

Sincerely,

Mila Vujovich-La Barre

Mila Vujovich-La Barre
650 Skyline Drive
San Luis Obispo, California 93405
Mobile: 805-441-5818
E-mail: milavu@hotmail.com

10.2.2.24 Response to Letter from Mila Vujovich-La Barre

Comment No.	Response
MVLB-1	The commenter reiterates findings of the EIR regarding aesthetic impacts. No alterations are required.
MVLB-2	Please refer to MR-2.
MVLB-3	Impacts related to noise and air quality are addressed in the EIR; Section 4.6, Traffic and Circulation, calls for improvements to infrastructure for bicyclists and pedestrians. Please refer to MR-1.
MVLB-4	Evaluation of parking supply and demand is provided in Section 4.6.
MVLB-5	The EIR includes existing and planned operations at the former Pacheco Elementary school in evaluating impacts; please refer to Section 4.6, Traffic and Circulation.
MVLB-6	Please refer to MR-1.
MVLB-7	The commenter supports alternatives identified in the EIR. The commenter's statement will be considered by the Trustees and project decision-makers.

From: Judy West
To: Nicole Carter
Subject: Dorm site
Date: Sunday, March 30, 2014 1:34:57 PM

Dear Nicole Carter

I am writing to you to oppose the new location of the freshman dorm bordering Alta Vista Monteray neighborhood. This location will create even more traffic and noise pollution in an already stressed neighborhood. I am not opposing a new dorm but only the location. Cal Poly has many acres to choose a different site from.

Thank you,
Judy West

JWe-1

10.2.2.25 Response to Email from Judy West

Comment No.	Response
JWe-1	Please refer to EIR Sections 4-4 Noise and 4-6 Traffic and Circulation, which address the project's effect on noted resources. The commenter's statements will be considered by the Trustees and project decision-makers.

From: Claudia Andersen
To: Nicole Carter
Subject: Fwd: Student Housing South
Date: Monday, March 31, 2014 5:13:54 PM

Hello Nicole, and CSU Trustees,

The Freshman dorm proposed by Dr Armstrong is proposed for the opposite side of the street that my family has lived on for 50 years. SLO was 14,000 pop, Poly about 5,000 (guessing)when we moved here. We have seen & felt Poly's encroachment for many years now. But the Freshman dorm, so thoughtlessly proposed for residential neighborhoods has us scratching our heads as to the logic of placing institution style buildings in front of the hills that have been our view for decades. There has been no long term study or reveal of a Master Plan to support this.

CA(b)-1

The view of the hills & PAC, now seen at the entry onto campus, will be obscured by 5 story Freshman dorms, welcoming center, & a huge parking garage. The hills are SLO's only natural resource, a source of pride.

In Poly's haste to build, an admittedly rushed band aide solution to overcrowding, Armstrong is in a hurry to remove the Freshmen from the Upper class students. His staff held an incredibly unprofessional presentation to the public on the same day we watched the crew measure the site for construction. Two meetings that Dr Armstrong just didn't have time to attend, altho he really cares about our community, we are told.

It confounds me that Poly chooses to build in a residential neighborhood when there are several other sites that make more sense. He rejected the Via Carta site telling us it is too far from the dining facilities. Then we read in the Mustang News that he plans to build a dorm there later! He proposes a 25% increase of students with no long term plan.

CA(b)-1 (continued)

The impacts we endure include increased traffic, noise, alcohol &

crime. In recent years, just 100 yards from our home there have been sexual assaults, a suicide, a shooting, & many many citations for alcohol. We have been told that Poly now holds the distinction of being the biggest party school among the CA universities. My husband & I have to go out into the street at midnight & ask drunken students to move away from our bedroom window. They are so drunk they hardly see us. We then call the police. Then our LR is lit up with flashing red lights in our Living Room. This year has been the worst ever for student noise & alcohol. Poly works hard to obscure the citations.

CA(b)-2

These dorms will exacerbate a situation that is already untenable. Poly's "good neighbor policy' is laughable. Parking issues have already been exacerbated by increased parking fees on campus. The result is that it pushes more students into our residential streets.

Please listen to the many retired Poly professors in our neighborhoods, and to the residents of the town that has been so good to and for Poly. Consider the remarks of Ken Schwartz seriously: he is a Professor Emeritus of Architecture!!

CA(b)-3

Please delay this poor plan until there is an amended Master Plan that makes more sense. The administration building of Poly sits right next to dining facilites, rec center, library, the very core that Freshmen students should be near. Build a low, architecturally congruent facility for the administrators at Grand/Slack & accommodate the Freshmen where they belong: near the core of the campus. Please remember, when you hear Armstrong say this dorm is on campus, know that it is the very same street upon which we live.

CA(b)-4

Thank you for any consideration that you are able to give these comments. Know that our lives will be forever changed unnecessarily when there is a better way to accommodate these Freshmen.

Claudia Andersen

1405 Slack St

San Luis Obispo, CA 93405

10.2.2.26 Response to Email from Claudia Andersen

Comment No.	Response
CA(b)-1	The commenter's statement will be considered by the Trustees and project decision-makers.
CA(b)-2	Please refer to MR-2.
CA(b)-3	Please refer to MR-6.
CA(b)-4	Please refer to MR-7. The commenter's statements will be considered by the Trustees and project decision-makers.

From: Paso Almond
To: Nicole Carter
Subject: Response to raft EIR
Date: Monday, March 31, 2014 4:45:35 PM
Attachments: EIR Response.docx

Dear Ms Carter,

Attached is my response to the draft EIR.

Russell Hall

Russell H Hall
179 Longview Lane
San Luis Obispo, CA 93405

31 March 2014

Nicole Carter, Senior Planner
SWCA Environmental Consultants
1422 Monterey St. C200
San Luis Obispo, CA 93401

Dear Ms. Carter,

RH-1

Although I am not a geologist, I am troubled by some apparent discrepancies between the draft EIR for the Student Housing South project and the February 1998 final EIR for Parking Structure 1, the multi-storey structure located just northwest of the proposed dorms.

On page 5.2-6 of the 1998 EIR, it states:

"The area immediately east of the (parking structure) *site is underlain by a large landslide mass that extends from Pacheco Way northeast for approximately 2,000 feet. To our knowledge the stability of the landslide has not been evaluated."*

The EIR then references a 1997 study done by Fugro West, Inc. which encountered these landslide deposits in several borings drilled on the surface parking lot now being considered for the dorms, and concluded:

"Although there are existing structures sited within the area of the mapped landslide, there is a potential that new or additional structures located on the landslide could have an impact on the stability of these deposits. Movements of the landslide could occur as a result of changes in the existing drainage conditions, additional load being applied to the surface of the landslide, periods of rainfall or a seismic event. Landslide movements could have impacts of the stability and safety of site improvements."

I apologize for not including the relevant maps and boring logs from the 1997 EIR—but presume you have ready access to them, or if not, I can provide hard copies at a later time—but my concerns are understandable without them. The draft EIR states on page 4.3-7:

"The Soils Engineering Report (Earth Systems Pacific 2013) included an evaluation of previous literature (including the Fugro study) *and site conditions to determine presence or absence of landslides. No deposits were found in any of the eight borings drilled at the project site to a*

RH-1 (continued)

maximum depth of 21.5 feet, and no other evidence was found that the landslide extended onto the project site."

Yet the Boring Location Map for the 2013 study shows the locations of at least some of the borings to be quite close to Fugro borings that clearly *did* show evidence of landslide. How is that possible?

Furthermore, if the proposed site is indeed underlain by landslide, does the expected damage that would be caused by the maximum earthquake reasonably foreseeable within the life of the dorms make this no longer the most economic option? Though the buildings might be marginally less expensive to construct, they could be much more expensive to repair or rebuild.

Thank you for considering these questions.

Sincerely,

Russell H Hall

10.2.2.27 Response to Email from Russell Hall

Comment No.	Response
RH-1	The information contained in and referenced in the EIR, including recent geotechnical studies, is the most up-to-date information regarding the project site conditions. As stated in Section 4.3, Geology and Soils, specific study was made of the potential for landslide; no evidence of such conditions on site were found.

Page 1 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

RECEIVED MAR 31 2014

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

☒ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☒ EIR
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

DEIR March 31, 2014

COMMENTS Alternative Project Sites:

The Draft EIR Identifies Parking Lots H-12 and H-16 As a Superior site. It has been stated that this site is more expensive to develop. There needs to be a cost comparison that substantiates the cost for developing the proposed site (with off site mitigation costs included) and Parking lots H-12 and H-16. JK-1

Fiscal Impact:

Agreements, Memorandum of Understanding. At least 4 City - University agreements remain unmitigated and will be directly effected by the proposed dorm project.

(1) Agreement for Emergency Services JK-2

OPTIONAL ☒ Please check here if you would like to be contacted for additional follow up.

NAME John Keisler

EMAIL rebjohn50@hotmail.com

ADDRESS 144 Henderson Ave. SLO

PHONE 805 543-4259

CAL POLY
SAN LUIS OBISPO

COMMUNITY OPEN FORUM

Page 2 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

DUE MARCH 31, 2014

☒ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☒ EIR
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

COMMENTS between the University and City of SLO. 1400 additional Students will require additional increases in cost, equipment, personnel and liability exposure to the City (July 1, 2013 payment Schedule)

JK-2 (continued)

② Transit Service Agreement
62% of Bus Ridership are Cal Poly Students. Increased Ridership will effect the Cal Poly Subsidy Schedule (January 2011 agreement unsigned)

JK-3

③ MOU Regarding Capicity Interest In City Facilities
Water + Sewer Systems will be affected. Wastewater treatment capacity projections by the University will change with the proposed project.

JK-4-

④ Industrial Waste and Wastewater Pretreatment Agreement between the City and University.

JK-5

OPTIONAL ☒ Please check here if you would like to be contacted for additional follow up.

NAME John Keisler

EMAIL febjohn50@hotmail.com

ADDRESS 144 Henderson Ave

PHONE 805-543-4259

CAL POLY
SAN LUIS OBISPO

COMMUNITY OPEN FORUM

Page 3 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

☒ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☒ EIR
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

COMMENTS Disclosure of Design and Build Documents Prepared by the University: Student Housing South At the December 2, 2013 Open Forum, Facilities Planning and Capitol Projects Director Joel Neel stated that the University had solicited bids for the Student Housing South Project. He stated 4 or 5 bids had been received and they were going to narrow them down to 2 or 3 and interview the contractors. Disclosure of the documents in the response to this comment would provide details for the EIR consultant, SWCA, cost estimates, and how the University intended to develop the site and possible off site mitigations. The bids were solicitated in October/November 2013. There has been no mention of these bids or costs in the DRAFT EIR. JK-6

OPTIONAL ☒ Please check here if you would like to be contacted for additional follow up.

NAME John Keisler

EMAIL rebjohn50@hotmail.com

ADDRESS 144 Henderson Ave.

PHONE 805-543-4259

CAL POLY
SAN LUIS OBISPO

COMMUNITY OPEN FORUM

10.2.2.28 Response to Letter from John Keisler

Comment No.	Response
JK-1	The commenter requests a cost comparison for the H12/H16 alternative and the proposed site. The EIR does not reject the H12/H16 alternative; decision makers may adopt the project as mitigated, apply additional mitigation, adopt and alternative, or other alternative subject to specific findings and statements of overriding consideration.
JK-2	As stated in Section 4.5, Public Services and Recreation, of the EIR, the University's agreements for emergency services are subject to periodic renegotiation. Text on pages 4.5-4 and 4.5-5 will be amended as follows to clarify the process for agreements: "~~The University regularly negotiates a service contract with the City Fire Department to cover service and associated costs~~. No specific additional improvements to facilities which could have an environmental impact have been identified. The proposed housing is a consolidation of bedcount approved under the existing Master Plan; the project does not increase bedcount, enrollment, or estimates of built space beyond Master Plan projections; therefore, assuming fire department planning accounts for development under the Master Plan, no additional impacts to facilities are anticipated. ~~Ongoing contract negotiation and revision will be sufficient to address the University's contribution to wear and tear on existing facilities~~. The City and the University entered into an agreement for the provision of fire and emergency medical services in July 2013. The agreement extends through 2018. No amendments or modifications to the agreement are contemplated at this time."
JK-3	EIR Section 4.6, Traffic and Circulation, notes that the transit agreements are subject to regular renegotiation, and will be reviewed prior to occupancy of the project.
JK-4	The EIR notes supply and capacity impacts in Section 4.7, Utilities, and identifies where agreements may require alteration.
JK-5	The EIR notes supply and capacity impacts in Section 4.7, Utilities, and identifies where agreements may require alteration.
JK-6	The EIR project description is based on the most recent information available regarding the site plan and project development.

March 31, 2014 Page 1 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

RECEIVED MAR 31 2014

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

☐ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☒ EIR DEIR due Mar. 31
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

COMMENTS

Parking: Building on the parking lot site causes loss of 1350 spaces. A new garage for 300-500 (designated for visitors and staff) replaces less than half the existing parking spaces. Where will the new students and already present students park? To expect them to walk to Poly Canyon Village to retrieve their cars is ludicrous. (And to expect them to pay $175 a quarter (10 week instruction period) for the privilege of walking to their cars). Parking tickets in the neighborhood are $38 and there is no penalty for multiple tickets. It's reasonable to assume there will be more illegal parking in the neighborhood. RKe-1

What about special events at Cal Poly? Graduation, RKe-2

OPTIONAL ☐ Please check here if you would like to be contacted for additional follow up.

NAME Rebecca Keisler

EMAIL rebjohn50@hotmail.com

ADDRESS 144- Henderson Ave

PHONE San Luis Obispo, CA 93405

CAL POLY
SAN LUIS OBISPO

COMMUNITY OPEN FORUM

March 31, 2014 Page 2 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

☒ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☒ EIR
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

COMMENTS Open House, move-in and move-out days, back to back sports events and PAC performances fill the present lot at different times throughout the year. Where will these cars park? RKe-2 (continued)

Circulation and Traffic: At the very least Slack St. will require a sidewalk on the Cal Poly side (perimeter) to keep students safe. Likewise, a signal at Grand Ave & Slack will be essential. Bikes coming off the campus are not stopping now. Over a thousand more pedestrians and bikers will require stringent safety measures. There will also soon be elementary age students using this intersection. RKe-3

Aesthetics: The construction of this complex will cause long-time residents to lose their views RKe-4

OPTIONAL ☐ Please check here if you would like to be contacted for additional follow up.

NAME Rebecca Keisler
EMAIL rebjohn50@hotmail.com
ADDRESS 144 Henderson Ave
PHONE San Luis Obispo, CA 93405

CAL POLY
SAN LUIS OBISPO
COMMUNITY OPEN FORUM

March 31, 2014 pg 3 of 3

First Year Student Housing South Project

COMMUNITY OPEN FORUM | DECEMBER 2, 2013

We welcome your comments, questions and suggestions. Please specify whether your comment is intended to be considered by the Environmental Impact Report (EIR) or is related to the general project.

☐ GENERAL PROJECT
Justin Wellner
jwellner@calpoly.edu
Government and Community Relations Director
Cal Poly, San Luis Obispo, CA 93407-0443

☐ EIR
Nicole Carter
ncarter@swca.com
Senior Planner, SWCA Environmental Consultants
1422 Monterey Street, C200, San Luis Obispo, CA 93401

COMMENTS of the surrounding peaks and hills forever. During night time hours the nearby neighbors will endure the blight of harsh security lighting on 4 or 5 story buildings forever. The Poly Canyon Village dormitory towers are nearly identical in height and impact to the planned dorms. Their night lighting is highly visible from Highway 1 over a mile away. **RKe-4 (continued)**

CEQA law insures Californians a certain level of peace and security in their homes by requiring that agencies do not undertake projects that seriously impair quality of life. This project does just that. **RKe-5**

OPTIONAL ☐ Please check here if you would like to be contacted for additional follow up.

NAME Rebecca Keisler
EMAIL rebjohn50@hotmail.com
ADDRESS 144 Henderson Ave.
PHONE San Luis Obispo, CA 93405

CAL POLY
SAN LUIS OBISPO
COMMUNITY OPEN FORUM

10.2.2.29 Response to Letter from Rebecca Keisler

Comment No.	Response
RKe-1	An analysis of parking demand and redistribution associated with the project is provided in Section 4.6, Traffic and Circulation. Please refer to MR-6.
RKe-2	Events are addressed on page 4.6-24 of Section 4.6, Traffic and Circulation. The University Parking Department manages event parking through special signage, including directional signage to designated parking facilities, special payment arrangements, and shuttles or bussing if necessary.
RKe-3	Please refer to MR-1. Section 4.6, Traffic and Circulation, outlines potential impacts related to bicycle and pedestrian safety, and includes mitigation to improve conditions in the vicinity; this includes providing pedestrian walkways along Slack Street fronting the project.
RKe-4	The evaluation of the severity of impacts related to lighting are based in part on existing lighting in the area; Section 4.1, Aesthetic Resources, of the EIR finds that there are substantial existing lighting sources in the area; the project lighting, as mitigated, is determined not to constitute a substantial increase over existing conditions.
RKe-5	Comments and responses are being included for consideration by planners and decision makers as part of the project review process.

From: Rachel Kovesdi
To: Nicole Carter
Subject: Cal Poly Recirc EIR Comments
Date: Monday, March 31, 2014 3:02:57 PM
Attachments: Kovesdi Recirc EIR Comments.pdf

Good Afternoon Nicole:

I hope you're doing well. Attached please find comments to the recirculated Draft EIR for the Cal Poly Student Housing South project. Please let me know if you have any questions.

Thank you and best regards,
RKK

Rachel Kovesdi
Kovesdi Consulting
3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

Kovesdi Consulting
Land Use & Environment
A CALIFORNIA CORPORATION
"Building Legacies"

CSU Board of Trustees
Nicole Carter, Senior Planner, via email: ncarter@swca.com
SWCA Environmental Consultants
1422 Monterey St., C200
San Luis Obispo, CA 93401

Dear Ms. Carter:

RKo-1

Thank you for recirculating the Draft EIR for the Cal Poly Student Housing South project, and for extending the comment period. We hope that the CSU Trustees will respond in a meaningful way to the comments generated by the recirculated draft.

The concept of additional on-campus housing is almost universally accepted as a benefit to both the University and the City of San Luis Obispo. However, serious concerns remain regarding the siting and design of the proposed project. I will limit my comments to the issue of off-site significant impacts to the City of San Luis Obispo, of the kind identified in the recirculated draft.

I encourage you and the Board to review the California Supreme Court decision in the *City of Marina et. al. v. Board of Trustees of the California State University*, as well as the Fourth District Court of Appeals decision in the *City of San Diego et. al. v. Board of Trustees of the California State University* (granted Supreme Court review April 18, 2012). The State Courts have determined that "A public agency's noncompliance with procedures required by law, including the California Environmental Quality Act's substantive requirements and information disclosure provisions, constitutes a prejudicial abuse of discretion."

In both the original and recirculated draft EIRs for the Cal Poly Dorm project, significant, unavoidable impacts were identified as occurring off-site, within the City of San Luis Obispo. Yet adequate off-site mitigation is not proposed. Additionally, several environmentally superior alternatives were identified and rejected without offering any explanation of how the environmentally superior alternative sites are infeasible in any way:

3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

"5.5.3 Location Alternative – H-12 and H-16 Parking Lots

This alternative, suggested by a community member, would consist of relocation of the proposed development to the current site of the H-12 and H-16 parking lots, north of Highland Drive and Brizzolara Creek (refer to Figure 5-2). The existing surface parking lots in this location would be removed, and 1,475 beds, a dining facility, and a 300- to 500-space parking structure would be constructed. These parking lots were designated for Parking in the 2001 Master Plan. This alternative would meet most of the project objectives."

RKo-1 (continued)

CEQA requires that feasible mitigation measures for significant environmental effects be set forth in an EIR for consideration by decision makers and the public prior to certification of the EIR and approval of a project. It permits government agencies to approve projects with significant impacts, but only after they justify those choices through findings of overriding considerations. Furthermore, an agency can adopt a statement of overriding considerations only after it has first found that mitigation measures are truly infeasible.

RKo-2

Among other deficiencies, both iterations of the Draft EIR fail entirely to analyze the two closest intersections to the proposed development: Slack Street and Grand Avenue, and the Grand Avenue/101 Interchange. This alone presents a "fatal flaw" in the environmental document. Without any information regarding how the proposed project will affect these intersections, the University Board cannot legally certify this EIR.

RKo-3

Again, multiple California Court cases have determined that failure to comply with the law subverts the purposes of CEQA if it omits material necessary to informed decision-making and informed public participation. We urge the Board of Trustees to correct the EIR so that it conforms to CEQA.

By not substantively investigating and addressing the proposed project's impacts on aesthetics, land use, noise, traffic and utility infrastructure, emergency (public) services, population and housing and cumulative impacts, CSU has not proceeded as required under State law.

We appreciate the opportunity to comment on the recirculated Draft EIR, and look forward to the Trustees' efforts at full disclosure and mitigation.

Thank you again for your time and consideration.

Rachel K. Kovesdi
President

3940-7 Broad Street, #139
San Luis Obispo, CA 93401
(805) 471-2948
Rachel@KovesdiConsulting.com

2

10.2.2.30 Response to Letter from Rachel Kovesdi

Comment No.	Response
RKo-1	The commenter references CEQA mitigation and decision-making criteria and processes. The mitigation program in the EIR for aesthetics, air quality, and traffic, has been amended to incorporate additional mitigation options. The feasibility of alternatives will be addressed in more detail through the decision-making process by the Board of Trustees. The commenter is referred to MR-8, 9 and 10.
RKo-2	Please refer to MR-1.
RKo-3	The commenter states that general deficiencies exist in sections of the EIR. No specific information is provided. The EIR has been amended in response to comments received, and may be further altered through the decision-making process.

From: Angela McNulty
To: Nicole Carter
Cc: cchristi@slocity.org; jashbaug@slocity.org; dcarpent@slocity.org; ksmith@slocity.org; jmarx@slocity.org
Subject: Neighborhood Comments on Cal Poly Proposed Student Housing South
Date: Monday, March 31, 2014 3:30:16 PM
Attachments: student .doc

March 31, 2014

CSU Board of Trustees

c/o Nicole Carter
Senior Planner SWCA Environmental Consultants
1422 Monterey St., Ste.200
San Luis Obispo, CA 93401
>
> Re: Proposed Student Housing South
>
Dear Board of Trustees,
>
> We are writing to alert you about our concerns regarding the proposed Cal Poly Student Housing South Project. We are primarily homeowners in the neighborhood just south of Highway 101. Streets bordering our neighborhood include Grand Avenue, Monterey Street, California Boulevard, and Highway 101. As long-standing neighbors to Cal Poly we echo the concerns voiced by the multitude of speakers at the Town Meeting on Tuesday, March 25. In addition to the significant environmental impact of aesthetic views, noise, and light, we are concerned about the effects on pedestrian and vehicle safety, student safety, and nuisance issues. **N-1**
>
> We agree with President Armstrong in his conclusion that additional housing is needed on the University, however high-density housing on the south perimeter of campus has significant impacts which can be mitigated by relocating the project toward the interior of the campus. We agree that the H-12 and H-16 lots accommodate both student housing needs and environmental impact concerns. The H-12 and H-16 lots are central to campus, close to other recently constructed dormitories, close to existing dining facilities, close to recreational fields and facilities, and close to emergency police and fire services. There is also room to develop an infrastructure to accommodate the 1,475 students academically and socially. **N-2**
>
> As to traffic and road safety, we believe the primary conduit to Cal Poly should be Highway 1 and the Cal Poly extension of Highland Drive. There is not an elementary school at this location, the roads are rural and can be widened to expand traffic needs, and there is no residential housing. In contrast, city maintained Grand Avenue supports an elementary school site and is dotted with residential homes and driveways. Contrary to the information in the Recirculated EIR, it is projected that the elementary school site will expand to accommodate 500 students. This would be a combination of Teach Elementary School and the **N-3**

1

SLO Classical Academy. The chaos of adding 1,475 freshman to this intersection on the south perimeter of campus will generate a great risk to the pedestrian and bike traffic.

N-3 (continued)

>
> We have witnessed far too many tragedies involving student pedestrian traffic in past years. Although I do not have all the statistics, I recall an 8-year-old Pacheco Elementary student was hit and killed by a student driver on South Street in the area of Hawthorne Elementary School in 2005, I recall a 9-year-old boy was hit and killed by a bus in the crosswalk on Laurel Lane in the vicinity of Sinsheimer Elementary school in 1999, I recall a Cal Poly student hit and killed on his skateboard on Grove Street in 2012. I also recall other students hit and killed by Amtrak trains as they weave their way back to campus at night. We believe more amenities in a centrally located and patrolled campus residence would mitigate these types of tragedies.
>
> Besides traffic and safety there is the issue of pedestrian impacts to our neighborhoods. Students continually get lost in our neighborhood after midnight as they find their way back to Cal Poly, often in a state of inebriation. Since September my family and I experienced two incidents which could have been much more serious. In September had to guide a student home when he entered our backyard by climbing over our fence (and also attempting to enter our house through the back door). In November, we had to physically remove a student who entered our neighbor's fenced yard when they were out of town (as the student refused to leave voluntarily when requested) and walk the student part way home at 3 in the morning. My concern is not only the interruption of much-needed sleep, but more so the safety of the students. Clearly, each could have been hit by a car or train, been assaulted by a predator, or been injured by someone protecting their home. The yard and home invasions by Cal Poly students are common events in our neighborhood. In addition, we experience regular incidents of vandalism, mischievous theft, trash, and noise created by students walking through or stopping in our neighborhoods on their way back towards campus.

N-4

>
> Clearly, housing 1,475 freshman students on the south perimeter of campus, rather than on an interior location, is going to aggravate these safety, crime, and nuisance issues.
>
> We also have concerns about the aesthetic impacts Housing South would have: the height of the dorms, the views that would be blocked from the surrounding neighborhoods and entrance to the school, the projection of the lighting, the noise, the added trash and pollution, etc. These impacts would have a very negative ripple effect on outlying neighborhoods as long-term residents sell their homes and those nicely maintained properties become poorly maintained student

N-5

rentals. Please do not contribute to this foreseeable consequence, and instead help us preserve the integrity of surrounding neighborhoods in San Luis Obispo as we have grown to love them.
>
> Again, we urge you to centrally locate dense Cal Poly housing and student facilities to mitigate environmental and community impacts. Please endorse a plan that preserves the safety, traffic, and environment of Cal Poly in its partnership with the City of San Luis Obispo.
>
> Sincerely,
>

N-5 (continued)

Angela McNulty
mcnultys5@sbcglobal.net
645 Grove Street

Taffy Gonzales
Gary Gonzales
alltraditions@att.net
1635 Hillcrest Place

Landy Fike
John Forseberg
665 Grove Street

Stan Rosenfield
Elaine Rosenfield
1561 Hillcrest Place

Marvin Dee
Nancy Hayward
633 Grove Street

Leo Fedewa
623 Grove Street

T.Carr
t.carr@charter.net
Phillips Lane

Lori Fletcher
Bill Fletcher
1626 Hillcrest Place

Kate Reck
1661 Wilson Street

Matthew Callahan
Kathy Callahan
slocals@sbcglobal.net
1661 Hillcrest Place

Ron O'Brien
Kathy O'Brien
1604 Hillcrest Place

Paula Delay
Don Delay
1618 Hillcrest Place

Tom Nulman
Sherry Nulman
sherrynulman@Yahoo.com
691 Grove Street

Jan von Engel
Verena von Engel
verenave@gmail.com
1638 Hillcrest Place

Debra Farwell
df53@earthlink.net
1551 Palm Street

Matthew Di Salvo
Natalie Di Salvo
1606 Mill Street

Sean Cheney
Lindsey Cheney
1624 Phillips Lane

Pat Howard
Mike Harkness
1610 Phillips Lane

Richard Weber
Sarah Weber
758 Grove Street

Claire Mastin
cjmastin@gamil.com
1533 Hillcrest Place

Ken Marion
Janine Marion
kj9marion@gmail.com
634 California Boulevard

Jill Hoskins
jdkhoskins@msn.com
1956 McCollum Street

Ellie Eaton
Tom Eaton
655 Grove Street

Roger Suiker
Michele Abba
Roger-Michele@att.net
1666 Phillips Lane

Tony Herrera
Bobbi Herrera
676 Grove Street

>
>
>
>

5

10.2.2.31 Response to Letter from Neighborhood Commenters

Comment No.	Response
N-1	The commenters state general opposition to the project, and list environmental concerns addressed more specifically in the following paragraphs. The comments are noted and specific responses are provided below where particular issues are raised.
N-2	The commenters note preference for the H12 and H16 parking lot alternative. The commenter's statement will be considered by the Trustees and project decision-makers.
N-3	Based on information provided in Section 4.6, Traffic and Circulation, of the EIR, the project reduces vehicle traffic in the project vicinity, rerouting trips to other major campus gateways. The EIR provides specific information about potential uses of the former Pacheco Elementary school site in Section 4.5, Public Services and Recreation, and includes operations at the school in discussions regarding safety presented in Section 4.6, Traffic and Circulation.
N-4	Please refer to MR-2. Pedestrian safety is addressed in Section 4.6, Traffic and Circulation.
N-5	Impacts to aesthetic resources are addressed in EIR Section 4-1 Aesthetic Resources. Please refer to MR-2 regarding nuisances. The commenter's statement will be considered by the Trustees and project decision-makers.

From: Jeniene White
To: Nicole Carter
Subject: Comments on the proposed on-campus dormatories for the corner of Slack and Grand
Date: Tuesday, April 01, 2014 9:19:17 PM

JWh-1

Hello. I'm sorry these comments are coming late. I just received your email address about an hour ago. If it is possible to add the below comments, I would very much appreciate it. If not, I understand. Thank you.

I'd like to comment on the proposed on-campus dormitories for the corner of Slack and Grand. I believe it is in both the general public and also Cal Poly's students's best interest for these dorms to be re-positioned to an area away from the edge of Cal Poly's land.

It has been said by President Armstrong that of the highest goals of the placement of said dorms is to achieve an optimal study environment. Here are the reasons why moving these students away from a residential neighborhood will benefit that goal:

1) Less temptation to party and drink: Having the dorms farther from off-campus housing will allow students to spend their evenings around fellow students in positive and healthy environments. They will have time to study and build lasting friendships. Students close to off-campus housing will spend more evenings walking into these neighborhoods attending parties, and drinking; taking away from time they could be in study groups and working on homework or reading. Also they will experience students coming back to the dorms from parties inebriated and unable to socialize in healthy and beneficial ways, and disturbing them from their studies and rest.

2) Fewer arrests, which means less stress by the students, and more time for study: Students walking around neighborhoods inebriated will defecate on, litter, and deface public and private areas, causing arrests by the police. Students will not have time to study or attend classes if they are having to appear in court, take on a part time job to pay for fines, or stress about their behavior the night before.

3) Encouraging responsible behavior: Students who have a healthy life environment and who can be proud of their actions will be better students. Freshman students are experiencing their first time away from the boundaries of their family. What they do their first year in college will have a big impact on their character growth. These students should be encouraged to spend that time in beneficial, healthy ways in an environment sustainable with that goal. Students not close to neighborhoods will not be encouraged to behave in ways mentioned in the paragraph above, and not be forced to be surrounded by other students who constantly act in disrespectful ways towards their off-campus neighbors.

One excuse I've heard for the placement of this on-campus dorm to be placed on Slack and Grand is that it will be close to the other freshman dorms and therefore encourage friendships among students. My rebuttal to this is that with over 1400 additional students in these dormitories, they will have more than enough opportunities to network and develop friendships. Students will form social groups determined by room-mates, students near their rooms, or those in their major. Such needs are adequately met no matter where the dorms are placed on campus.

Another excuse is that the other proposed sites for these dorms are too far away from the center of campus. Students have feet. They can walk and bike to campus. The exercise will do them good and provide them with the invaluable life skill of Time Management. If a Freshman rented a house in the adjoining neighborhood, it would take them just as long or even longer to get to campus. For those with disabilities, there are nearer dorms they can be placed in, and transportation would be provided regardless. I remember one year Cal Poly provided student housing at a hotel on Grand street. Those were pretty far away. If I recall correctly, a shuttle services was used, which apparently was still profitable for Cal Poly. **JWh-2**

The final excuse I've heard of is that the second year students don't want the freshman to be placed closed to them. To that I can only scratch my head and ask if Cal Poly is honestly acquiescing to such requests. We can't have freshman next to second year students, that would be disruptive, but there is no apparent problem putting them next to an elementary school and single family residences? I see a huge double standard here. If the goal was really a greater learning environment, placing freshman and upperclassmen by each other would be welcomed. Freshman could benefit by learning subject material and good study habits from older students who might be in the same classes as them or ones further on in the series, and the older students could hone their knowledge by teaching what they have learned to the younger. **JWh-3**

One more concern I have for the placement of the dorms on Slack and Grand is that as long-term plans state that there will be roughly 5000 more students. I'm concerned that with the new dorms placed there, it will be a "foot in the door" so to speak for placing more dorms around that area in the future, causing even more problems for the neighborhood and for the students as well. **JWh-4**

Thank you for your time,
Jeniene

10.2.2.32 Response to Email from Jeniene White

Comment No.	Response
JWh-1	The commenter raises issues related to student behavior, not the environment; please refer to MR-2. Comments will be included in materials reviewed by the project decision makers.
JWh-2	The EIR notes concerns over distance to existing communal dining as among the site selection criteria discussion in Chapter 5, Alternatives Analysis.
JWh-3	The EIR states in Chapter 5, Alternatives Analysis that it is the preference of the Housing program to coordinate and co-locate the freshman or first-year housing program. The EIR references different programming and living arrangement concerns (i.e., dormitories versus apartments with kitchens) among the issues associated with locating first-year and upper division student housing together.
JWh-4	Please refer to MR-5.

California State Board of Trustees,

SN-1

As you know, Cal Poly is planning a new housing project for freshmen and sophomores. There has been much controversy between Cal Poly and the local residents on whether or not the project should be passed and/or where it should be built. I currently am a first year student attending Cal Poly and am living on-campus in the dorms. Because of this, the issue at hand is very important to me as it will have an effect on my career as a student and also those students to come.

I believe that Cal Poly is making a very educated decision in building more on-campus housing. There are a few reasons why I have this view. One of these is that there have been studies showing that students who live in the dorms actually perform better academically than those who do not. This is partly due to the learning environment that the dorms provide.

I live in a major specific dorm, meaning that a vast majority of occupants have the same or very similar majors to myself. This has been extremely beneficial for me. If I ever need help with my work, then there is always somebody who is in the same class as me that I can get help from. Study groups are available there is always an RA that could help if needed. There are quiet study rooms in case the actual dorm room is too noisy. If advising is ever needed, there is also a community advisor who has his office in our dormitory. The point I am trying to make is that the dorms provide an excellent environment to excel in classes. I think that this reason is enough for the housing project to be approved. The new dorms would have the same or even more resources to help out students. Cal Poly is attempting to provide students with the best chance for academic success and these new dorms will help do that.

The local residents, however, are rather unhappy about more students attending the college and also, the location of where the dorms are set to be built. Right now the new housing project is supposed to be right across the street from off-campus houses. The residents say that more students will lead to more partying, trash, noise, and traffic and the residents would be correct. What they are not correct about is where the extra partying, trash, noise, and traffic will take place. Although the dorms are to be built across the street from houses, the parking structure that will be constructed with the dorms is going to be placed between the houses and the dorms. At least this is the current plan. There is also a chance that a green buffer zone would go where the parking structure would go. Both of these could provide a solid barrier between the houses and the new project. On top of these barriers, there would also be a fence on the other side of either the green buffer zone or the parking structure to provide extra separation from the dorms and the neighborhood. Cal Poly does not want to upset the residents and is coming up with every way possible to make them happy and work with their concerns.

Another reason why the housing project would be beneficial to all students is that it actually would lower the cost per bed for students. Every college student knows the importance of saving money wherever they can and lowering room costs would be a huge benefit. I know that many college students are having to pay their way through school on their own and need to save every penny they can. Even if a student has the blessing of his/her parents being able to pay for their schooling, the parents would greatly appreciate a price reduction just as much as the student would.

The dorms also give students the opportunity to make lifelong friendships. Friendships are extremely crucial to succeeding and enjoying life and even excelling in school, as many studies have shown. Friendships can reduce stress, increase motivation, and most importantly: increase happiness.

As you can see, there are many advantages of this housing project being passed. Lower costs per bed, higher academic performance, and the opportunity to build friendships. I don't see a valid reason why this project should not go through as there are many more pros than cons and the arguments against it are not as excellent as the ones for it. I hope that you make the correct decision based on the information presented to you and I trust that you will.

SN-1 (continued)

Sincerely,

Scott Nichols

10.2.2.33 Response to Letter from Scott Nichols

Comment No.	Response
SN	The commenter's generally supportive comments are noted. Further clarification regarding buffers can be found in MR-3. The parking structure and additional setback alternatives are addressed in Chapter 5, Alternatives Analysis, but are not part of the proposed project at this time.