MEMORANDUM OF UNDERSTANDING (MOU) WITH CAL POLY REGARDING IMPLEMENTATION OF MITIGATION MEASURES IDENTIFIED IN THE CAL POLY MASTER PLAN ENVIRONMENTAL IMPACT REPORT (EIR).

RECOMMENDATION

Authorize the City Manager to execute the proposed MOU (Attachment A) with Cal Poly and direct staff to continue to engage in the Cal Poly Master Plan process to ensure that impacts on City services and infrastructure associated with build-out of the Master Plan are properly identified and mitigated.

REPORT-IN-BRIEF

On December 19, 2019, Cal Poly published the Draft EIR for its 2035 Master Plan. The 45-day public review period ended on February 3, 2020, and the City submitted comments identifying its concerns with the potential environmental effects associated with build-out of the Master Plan (Attachment B). The City provides a wide range of services to the campus, including emergency response, water and wastewater treatment, and transit to name a few. Therefore, City review of the Master Plan and Draft EIR is important to ensure that service impacts associated with development of the Master Plan are identified and that agreements are developed as may be needed to address changes in the scope or level of service provided to campus.

While developing the Draft EIR for the Master Plan, Cal Poly engaged with City staff to discuss key issues where the City would likely play some role in mitigating identified impacts. For example, Cal Poly lacks sufficient potable and non-potable water supply to complete build-out of the Master Plan. A Memorandum of Understanding (MOU) is now recommended to address mitigation measures in the Draft EIR associated with Water and Wastewater, Transportation, and Housing. Through the normal EIR review process, the City has provided comments on other issue areas such as biological resources, air quality and greenhouse gas emissions, and public services. City staff is seeking direction from the City Council to continue to engage with Cal Poly on all of the issues related to development under the Master Plan to ensure that impacts to the City are appropriately addressed.
DISCUSSION

Background
On December 19, 2019, Cal Poly published the Draft EIR for Cal Poly’s 2035 Master Plan. The 45-day public review period ended on February 3, 2020, and the City submitted comments identifying its concerns with the potential environmental effects associated with build-out of the Master Plan (Attachment B). The City’s comments were based on direction previously provided by the City Council in the form of “Guiding Principles” (see Attachment C, Council Resolution 10676, 2015 Series).

The City has been engaged in the effort of working with Cal Poly on the Master Plan, informed by the Guiding Principles since 2015. The Draft EIR published this past December is the second Draft EIR developed for the Master Plan. The first Draft EIR was published, but the comments provided by the City, the public, and other agencies never received a response. Instead, Cal Poly took the input received, modified its project description to avoid certain environmental impacts, and published a new Draft EIR based on an updated project description.

Although not in the City “limits”, the City of San Luis Obispo and Cal Poly are intertwined in social, economic, environmental, and shared infrastructure and services. The City provides a wide range of services to the campus, including emergency response, water and wastewater treatment, and transit to name a few. For its part, Cal Poly is an important economic partner for the City – it is one of the largest employers in the County, generating significant economic activity and benefit for City residents and businesses alike. As Cal Poly is planning to increase enrollment to 25,000 students from the 2019 enrollment figure of 21,242, it must work in concert with the City to ensure the health and safety, and mobility, of its student body and its existing and future staff and faculty.

While developing the Draft EIR for the Master Plan, Cal Poly engaged with City staff to discuss key issues where City cooperation would have a role in mitigating identified impacts. Meetings between City staff and Cal Poly staff have focused on the following topics:

1. Water and Wastewater
2. Transportation
3. Housing and Population
4. Public Safety
5. Public Facilities, including Parks and Recreation

Purpose of Proposed Memorandum of Understanding (MOU)
MOU’s are intended to be an expression of a working relationship between two or more parties. The proposed MOU is not a legally binding document. In short, the proposed MOU expresses both organization’s good faith understanding of how they can work together to accomplish certain mitigation measures identified in the areas of Water and Wastewater, and Transportation. To that end, the MOU contemplates a variety of future agreements and collaborations, which will be necessary to the implementation of the Master Plan, as envisioned. All of these future agreements and activities must be authorized by the City Council in the future; either directly during a public hearing, or through the approval of departmental work programs. In no way does
the MOU bind this or future City Council members to any particular decision as it relates to future negotiated agreements with Cal Poly; it simply formally acknowledges the need for such future efforts.

Why is the MOU Limited to Water and Wastewater, Transportation, and Housing?
Ultimately, it has been Cal Poly’s assessment that City participation in the implementation of mitigation measures is only required in the areas of Water and Wastewater, and Transportation. Coordination in these areas would facilitate on campus housing production in the future. In discussions with Cal Poly, City staff conveyed the City’s desire to reach agreement to accomplish the following, associated with increased enrollment:

1. Linking enrollment growth to the provision of housing on campus so that implementation of the Master Plan does not contribute to the scarcity of housing opportunities in the City, which drive up housing costs for everyone.
2. Fair share contributions to General Government, Public Safety, and Parks and Recreation facilities that are impacted by increased population.

Linking Enrollment Growth and On-Campus Housing

Cal Poly has rebuffed attempts to come to agreement on the concept of linking enrollment growth to the provision of housing on campus. In general, two reasons are provided for this. First, that Cal Poly has been making steady progress in its efforts to house all first and second-year students. The following chart is provided to illustrate this trend. Second, Cal Poly and the State University system are unwilling to set a precedent that new housing has to be provided for new students.

It should be noted that one of the near-term projects in the Master Plan is a major new student housing project. The construction of up to 2,000 beds is anticipated in the North Campus area adjacent to Brizzolara Creek. The project description for the Master Plan EIR indicates that these beds could be available as soon as 2022. This one project would increase the percentage of all students living on campus from 35% to 44% and would eclipse projected enrollment growth over the same timeframe. As a result, staff’s efforts have been focused on identifying constraints and providing constructive feedback to Cal Poly staff regarding issues that could prevent plan implementation.
In 2018 the City Council adopted a new Capital Facilities Financing Plan that identified appropriate fees for General Government, Public Safety, and Parks and Recreation facilities that would be assessed on new development. This “nexus study” is compliant with State law (AB 1600), which gives jurisdictions the ability to levy fees on new development that represent the development’s fair share of the costs needed to provide identified services. On several occasions, City staff has discussed this issue with Cal Poly and provided its EIR consultants with a copy of the nexus study. Staff believes that enrollment growth can cause an increase in population in the City, which has costs. In 2017 when there was a spike in enrollment at Cal Poly, the City was able to quantify and document those costs (Attachment B, 2017 letter from Katie Lichtig to Jeffrey Armstrong, dated 9/11/2017). Although Cal Poly is not required to pay into the City’s impact fee programs, the program provides a method to mitigate the impacts of increased population on City facilities. However, this is another area where Cal Poly disagrees that there is an impact on City facilities that requires mitigation. Ultimately, the Master Plan provides for a decrease in the number of students living off campus from 14,113 in 2020 to 9,988 students in 2035. The City staff’s concern is that there is nothing in the Master Plan that links increased enrollment to the provision of housing on campus for students or faculty, or commits Cal Poly to accommodate increased enrollment to mitigate against anticipated impacts in the event that enrollment growth does, in fact, outpace on campus housing production. Moreover, housing production alone does not address other potential impacts in the City of on campus population growth. Therefore, the potential is high for the City to experience increased demand for its facilities along with associated costs.
Highlights of the Proposed MOU Terms

Recitals in the Memorandum of Understanding are provided for context and in recognition of the cooperative relationship that exists between the campus and the City on many issue fronts. City Council direction to staff is to work with Cal Poly to ensure that the Master Plan EIR explores the impacts of growth on campus on City services and facilities. Notably, the ability of the City to come to agreement on MOU terms for two issue areas does not mean that the City is otherwise in agreement with all provisions of the Master Plan and the impact analysis contained in the Draft EIR. Significantly, staff will continue to follow up on and work with Cal Poly on all of the issues commented on (Attachment B). It is important to note that the City’s ability to effectively implement MOU terms is dependent on Cal Poly’s response to the City’s EIR comment letter and how issues raised are addressed in the Final EIR and Final 2035 Cal Poly Master Plan. Cal Poly staff has indicated that the Master Plan and Final EIR will be presented to the California State University, Board of Trustees, at their May 2020 meeting. The City will be closely following that process and staff intends to attend the Trustees meeting and will be prepared to address any outstanding issues concurrently through that process.

Water and Wastewater Impacts

The City provides water distribution and treatment and wastewater collection and treatment services to the Cal Poly campus by agreement (Attachment D). The following impacts are identified in the Draft EIR and will require Cal Poly to reach agreement with the City to implement appropriate mitigation measures.

Impact 3.14-3: Have Insufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development during Normal, Dry and Multiple Dry Years

Development of the 2035 Master Plan would result in increased population levels and development of new buildings, which would increase demand for water supply. Campus water demand would be reduced through conservation measures, transfer of water supply service from Cal Poly to the City, and a new non-potable source would be provided through the development of the WRF. Under the 2035 Master Plan, adequate water supplies would be available to meet future demands if the first phase of the WRF is operational in 2022 and the second phase is operational in 2028. Without the availability of reclaimed water from the WRF, there would not be adequate supplies beginning in 2025. Because the design, timing, and other details of the WRF are not yet established, it cannot be determined with certainty that water supplies would be available to meet increased demand from implementation of the 2035 Master Plan. Thus, the impact on water supply would be significant.

Source: Master Plan Draft EIR Page 3.14-16
Terms Proposed and Subsequent Agreements Necessary to Support Implementation of Related Water and Wastewater Mitigation Measures

a) Develop mechanisms to confirm operational resiliency of Cal Poly’s water supply.

b) Cal Poly to secure additional, temporary non-potable water supply and wastewater capacity, if needed, to support the development of on-campus housing.¹

c) Reach agreement on Cal Poly fair-share financial contribution to support required upgrades of City’s water treatment plant and distribution system.

d) Reach agreement on Cal Poly fair-share financial contribution towards required upgrades of City’s water resource recovery facility and wastewater collection system.

e) Cal Poly to regularly inform City of progress towards reducing municipal sewer inflow and infiltration.

f) Establish protocol and objectives for annual partnership meeting to address items such as anticipated facility upgrades and related fair share contributions, inflow and infiltration reduction projects, smart meters installation to track water supply use/flow rates, adaptive management of water supply storage and other related water and waste water matters.

Transportation Impacts

The City provides transit services to the campus through an existing contract. The City’s ability to help address the following environmental impacts relates directly to the success of current and future negotiations between the City and Cal Poly to identify and provide appropriate levels of transit service on campus to achieve shared goals.

¹ The provision of a temporary non-potable water supply would require City Council approval of a General Plan amendment. Temporary non-potable water from the City could offset Cal Poly’s current use of its Whale Rock water supply used for agriculture irrigation. However, as it would only be provided for a short-term, this would not provide the permanent water source needed for planned enrollment growth and on-campus housing under the Master Plan. Cal Poly would need to acquire a permanent water source to meet this demand.
Terms Proposed and Subsequent Agreements Necessary to Support Implementation of Related Transportation Mitigation Measures

a) Ensure the City and regional stakeholder agencies (County, RTA, SLOCOG, APCD) are informed and consulted as Cal Poly develops and implements its Transportation Demand Management Program (TDM).

b) Scale and optimize transit services available to the Cal Poly community in accordance with changing population and utilization, with the objective of reducing Vehicle Miles Traveled (VMT).

c) Consolidate and/or coordinate active transportation projects to optimize results and avoid conflicts between vehicles, bicycles and pedestrians.

d) Collaborate on initiatives to improve mobility safety off campus.
e) Develop procedures for determination of Cal Poly’s fair-share financial contributions towards required upgrades of City’s transportation infrastructure.

f) Establish protocol and objectives for annual partnership meeting to address transportation planning, TDM program evaluation issues, and potential transportation enhancement projects, including trip monitoring, ongoing evaluation of VMT reduction, transit service enhancements, and programs/projects to enhance active transportation and mobility safety.

**Housing Impacts (Population and Housing)**

The Draft EIR disclosed that it is likely enrollment increases will occur before new housing is available on campus. This additional housing demand will drive down vacancy rates and potentially increase the cost of housing in the City, however, this is not identified as an environmental impact of the Master Plan. Throughout the DEIR impacts to other issue areas are evaluated as less than significant since it is assumed additional housing on campus will have mitigating effects in other issue areas - like Transportation and demand for public services and facilities. As noted in the City letter to Cal Poly (Attachment B), staff is concerned that there will be challenges for Cal Poly to make housing available in phase with enrollment increases due to a variety of factors including needed additional environmental studies, resource agency permitting, and additional water and wastewater capacity requirements. Although MOU terms for Housing are not specific with respect to mitigation measures in the Draft EIR, the terms do highlight Cal Poly and City agreement to remain engaged and work towards the expeditious development of new on-campus housing supply.

**Terms Proposed and Subsequent Agreements Necessary to avoid impacts to City Housing stock and facilities**

a) Continued active work by Cal Poly to construct the next student housing project which will provide 1600-2000 new student beds.
b) Cal Poly will regularly inform the City of progress towards its construction of on campus housing and provide information on capital projects, occupancy rates, and enrollment targets.
c) Establish protocol and objectives for partnership meetings to address issues related to University and City growth and best accomplish transportation, public service and other resource planning.

**Other Environmental Impacts of Concern**

As previously discussed, the City submitted a letter (Attachment B) detailing a variety of concerns with the scope, analysis, and conclusions made in the Master Plan Draft EIR. The following issue areas are covered in the letter.

1. **Aesthetics** – The Draft EIR identifies significant and unavoidable impacts as it relates to development of the Grand/Slack site for faculty/staff housing. The City recommends that Cal Poly incorporate standards for appropriate setbacks and height reductions on the edge of campus to help address this issue.
**Air Quality, Energy Consumption and Greenhouse Gas (GHG) Emissions** – The City commends Cal Poly’s commitment to using 100% on-site generated renewable energy to support its growth. The renewable energy goal is identified as a requirement in the GHG Analysis, Chapter 3.8, however, the associated mitigation measures do not require all building to be powered by 100% renewable energy. In addition, the EIR does not evaluate any large-scale energy projects that may be needed to actually achieve the goal.

2. **Biological Resources** – The City expressed concern about the scope of the biological resource evaluation, particularly as it relates to the North Campus housing site, planned for a near-term student housing project. The lack of detailed analysis indicates that plans for delivering new student housing on campus by 2022 will be difficult to achieve, particularly if a habitat conservation plan is required to secure resource agency permits.

3. **Hydrology and Water Quality** – The Draft EIR does not evaluate impacts that could occur due to flooding. The City and County both use the same standards found in the San Luis Obispo Waterways Management Plan and Drainage Design Manual. If the Master Plan identified compliance with these standards it would address City concerns that future development on campus will be designed to accommodate flood waters appropriately and not create downstream impacts.

4. **Noise** – Impacts on City residents related to noise from the Spanos Stadium Expansion are not evaluated for considered in the Draft EIR. In addition, there is no analysis of noise generated by construction activities, including construction traffic. It is important that Cal Poly engage with the City to ensure that noise impacts are addressed and having appropriate policies in the Master Plan and mitigation measures identified in the Final EIR for noise is strongly encouraged by the City.

5. **Public Services** – The City highlights its concern about the impacts of growth on campus to public facilities. As previously discussed, the City’s Capital Facilities Fee Program nexus study identifies the incremental cost of new residents on the public facilities. The Draft EIR lacks a complete evaluation of these impacts on facilities. It should be noted that public safety services are covered by existing agreements and contracts that do adequately address the cost of services for emergency response, fire suppression, and law enforcement.

**Previous Council or Advisory Body Action**
The City Council has conducted the following meetings with associated actions as it relates to the Cal Poly 2035 Master Plan:

1. November 17, 2015 – City Council adopts Resolution 10676 (2015 Series) with guiding principles for engagement in the Master Plan process and authorizes the Mayor to send a letter to Cal Poly with associated information about City policies and guidance.

2. March 5, 2019 – City Council reviewed its policy for short-term water supply alternatives for users outside of the City and directed staff to return with a General Plan amendment to clarify that outside users may receive non-potable water and recycled water. A proposed General Plan amendment is necessary for the City to have an agreement with Cal Poly to provide it with a short-term, non-potable water supply. (Attachment D)
Policy Context
Council Resolution 10676 (2015 Series) identifies the specific General Plan policies that support City engagement in the Master Plan process across a wide variety of policy areas, including Land Use, Circulation, Housing and Neighborhood Wellness, and Safety.

Public Engagement
City staff has corresponded with members of the public and regional agency staff on the matter of the Cal Poly Master Plan Draft EIR. Staff has provided notification to interested parties of the City Council meeting for this item.

CONCURRENCE
The recommendation was developed with concurrence from Utilities, Public Works, Police, Fire, Parks and Recreation, and Administration.

ENVIRONMENTAL REVIEW
The California Environmental Quality Act does not apply to the recommended action in this report by general rule, because the action does not constitute a “Project” (CEQA Guidelines Section 15378). The proposed MOU is a non-binding document that describes issue areas that the City and Cal Poly agree to work on for the purpose of implementing mitigation measures identified in the Cal Poly 2035 Master Plan EIR. Any future projects carried out under the MOU will need to be approved along with an environmental determination, however, assumptions made at this time about future impacts would be speculative.
FISCAL IMPACT

Budgeted: No  Funding Identified: No

Budget Year: N/A

Fiscal Analysis:

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*Note: Cal Poly pays the City for water and wastewater services by agreement, most recently updated in 2013. An update to the existing rate agreement is planned in 2020 to ensure the City collects adequate revenue to the City’s Water and Sewer Funds, including fair share contributions to infrastructure projects.

Increased enrollment on campus includes costs for the City. The cost of increased, unplanned enrollment was evaluated in 2017 when Cal Poly experienced a spike in enrollment that resulted in impacts to the transit system, emergency services, parking, code enforcement, housing (Attachment B, Attachment C, Letter Dated 9/11/2017). City staff’s analysis is that Cal Poly can and should make fair-share contributions to the costs of City services and infrastructure needed to serve it. The Draft EIR and Master Plan fail to take these costs into account. If costs to the City are not adequately addressed, the fiscal impact could be significant, potentially resulting in the delayed implementation of important infrastructure projects or unmitigated safety risks.

ALTERNATIVES

1. **Continue Consideration of Draft MOU** – The City Council could continue consideration of the draft MOU for water and wastewater, and transportation items. Council should provide staff with direction on changes or additional information needed to make a decision on this item.

2. **Do Not Authorize the MOU** – The City Council could direct staff not to enter into the MOU at this time. Direction should be provided if there are changes to the document that would be sufficient to gain the support of a majority of Council Members.

Attachments:

a - Draft City-Cal Poly MOU
b - Letter on Cal Poly Master Plan Update DEIR with attachments
c - Council Resolution 10676 (2015 Series)
d - Council Reading File - 03-05-2019 Item 14 Cal Poly Regional Water Supply Alternatives
MEMORANDUM OF UNDERSTANDING
BETWEEN
CALIFORNIA POLYTECHNIC STATE UNIVERSITY
AND
THE CITY OF SAN LUIS OBISPO

This Memorandum of Understanding (“MOU”) is by and between California Polytechnic State University (“Cal Poly”) and the City of San Luis Obispo (“City”).

I. Background

Cal Poly and the City of San Luis Obispo have a long and successful history of working together to achieve shared objectives and solve problems. Evidence of this can be found in various agreements including those addressing transit bus service, fire protection, water and wastewater, as well as cooperative policing. Numerous other points of collaboration large and small are indicative of a strong and growing “town-gown” relationship. In 2016, the City and Cal Poly received a prestigious award for the shared effort of creating the San Luis Obispo Neighborhood Wellness/Community Civility Effort (Civility Report). The Civility Report remains an important guiding document that supports resident quality of life and student success.

The City and Cal Poly have been similarly engaged in a process to understand the impacts of the Cal Poly 2035 Master Plan as identified in its Draft Environmental Impact Report, and the infrastructure and service needs, including water, wastewater and transportation, for both Cal Poly and the City. The parties understand that maintaining a high level of partnership will contribute to more effective outcomes as Cal Poly and the City continue to grow. Recognizing the importance of this overarching objective, the purpose of this MOU is limited to documenting certain key objectives identified by the parties as critical to accommodating further development on campus.

II. Goals and Principles

a. The parties enter this MOU to promote cooperation, and further develop their growing relationship.

b. The parties will endeavor to improve communication by sharing information consistently and meeting regularly.

c. This MOU is a statement of broad policy objectives and interests of the parties that will inform future discussions and negotiations between Cal Poly and the City and is not intended to create any contractual commitments.

d. In the event the parties identify projects or services requiring legal and/or financial commitments between each other, the parties will negotiate in good faith toward written agreements.

III. Water and Wastewater

The parties have enjoyed a longstanding partnership around water as reflected in various agreements including those addressing water and wastewater treatment as well as shared supply (e.g., Whale Rock Commission). Over the past year, staff from both entities have collaborated...
closely to develop strategies to ensure the availability and reliability of Cal Poly’s water supply and wastewater capacity in support of development planned in the 2035 Master Plan. The following objectives will be addressed via amendment of existing agreements or establishment of new agreements:

a. Develop mechanisms to confirm operational resiliency of Cal Poly’s water supply
b. Secure additional, temporary non-potable water supply and wastewater capacity for Cal Poly if needed to support the development of on-campus housing
c. Reach agreement on Cal Poly fair-share financial contribution to support required upgrades of City’s water treatment plant and distribution system
d. Reach agreement on Cal Poly fair-share financial contribution towards required upgrades of City’s water resource recovery facility and wastewater collection system
e. Cal Poly to regularly inform City of progress towards reducing municipal sewer inflow and infiltration
f. Establish protocol and objectives for annual partnership meeting to address items such as anticipated facility upgrades and related fair share contributions, inflow and infiltration reduction projects, smart meters installation to track water supply use/flow rates, adaptive management of water supply storage and other related water and wastewater matters.

IV. Transportation

The City and Cal Poly recognize the opportunity to increase their level of partnership around transportation planning and programs. Coordination of effort is essential to adapting and building systems that are responsive to growing populations and evolving transportation trends.

The value of collaboration in this area has long been realized with respect to the City’s transit system, which provides excellent service to both the City and Cal Poly populations. Continued efforts to evaluate and, where appropriate, expand transit service and Transportation Demand Management (TDM) policies at the Cal Poly campus will play an essential role in supporting Cal Poly’s robust TDM program and in the City’s overarching climate action and sustainability goals to reduce Vehicle Miles Traveled (VMT) and greenhouse gas emissions. Cal Poly and City agree that continued cooperation is essential to achieve these goals and are deeply engaged in discussions around an expanded form of partnership with the shared objective of building a more dynamic, sustainable, and mutually beneficial transportation program.

In addition to transit service, which is critical to the parties’ transportation plans and objectives, other specific areas that would benefit from intentional partnership include traffic safety (on and off campus), regional transit, and increased support for active transportation projects and programs. For example, City and Cal Poly recently initiated a collaborative effort to assess and procure a bike share program to serve the entire community.

The parties have identified the following interests and actions for near-term implementation:

a. Ensure the City is informed and consulted as Cal Poly develops and implements its TDM Program
b. Scale and optimize transit services available to the Cal Poly community in accordance with changing population and utilization, with the objective of reducing VMT
c. Consolidate and/or coordinate active transportation projects to optimize results and avoid conflicts between vehicles, bicycles and pedestrians
d. Collaborate on initiatives to improve mobility and safety off campus
e. Identify potential mechanisms for Cal Poly to participate financially towards implementation of transportation safety and mobility improvements that directly benefit university students, staff and visitors.
f. Collaborate on strategies to address concerns related to campus spillover parking within adjacent residential neighborhoods
g. Establish protocols and objectives to address transportation planning, TDM program evaluation issues, and potential transportation enhancement projects, including trip monitoring, ongoing evaluation of VMT reduction, transit service enhancements, and programs/projects to enhance active transportation and mobility safety.

V. Housing

Since 2000, Cal Poly has tripled its student occupancy on campus, investing more than half a billion dollars into student housing facilities without the use of any state funds. During that same period, Cal Poly enrollment has grown by just over 4,300 students while the university has added more than 5,100 beds to its housing inventory. Cal Poly has provided additional housing capacity for all student enrollment growth since 2000. Despite Cal Poly’s enrollment increases, there were approximately 658 fewer students living off campus in the fall of 2019, as compared to the fall of 2000, because Cal Poly increased the percentage of students living on campus from 17% to 37%.

The Cal Poly 2035 Master Plan sets an even more ambitious goal of housing on-campus more than 60% of anticipated enrollment. As part of the Master Plan, Cal Poly is preparing to provide for California’s critical higher education needs by increasing headcount enrollment by 4,056 students. As it has done over the last two decades, Cal Poly plans to house all of its enrollment growth, as well as significantly reduce the number of students living off campus. With Cal Poly’s planned increase of 7,200 on-campus beds articulated in the 2035 Master Plan, the university is working to reduce the number of students living off campus by more than 3,100 students.

Cal Poly has elasticity in its current on-campus bed capacity within residence halls. When necessary and feasible, Cal Poly will evaluate whether increased bed density should be implemented to accommodate enrollment growth.

The parties have identified the following interests and actions for near-term implementation:

1. The parties understand the importance of the university’s next student housing project and the related enabling projects (i.e. on-campus WRF to support water/wastewater capacity). The University is actively working on the university’s next student housing project to build 1600-2000 new student beds.
2. Cal Poly to regularly inform the City of progress towards constructing additional housing on campus and share its five-year capital plan, housing occupancy rates, and enrollment targets.
3. Establish protocol and objectives for annual partnership meeting to address issues related to university and city growth and best accomplish transportation, public service and other resource planning.

City and Cal Poly leadership hereby commit to act in good faith in pursuit of these shared objectives.

CITY

______________________________  CAL POLY

______________________________

Date  Date
February 3, 2020

Jeffrey Dumars
Associate Director of Environmental & Space Planning
Facilities Management and Development
Cal Poly
1 Grand Avenue, San Luis Obispo, CA 93407

SUBJECT: Cal Poly 2035 Master Plan Draft EIR (SCH#2016101003)

Dear Mr. Dumars:

The City of San Luis Obispo provides this letter with attachments as its formal comments on the Draft EIR for Cal Poly's 2035 Master Plan. We appreciate the opportunity to comment, and the time and coordination that has occurred on the mitigation measures that require City participation. Ultimately, the City asserts that the EIR has improved and the purpose of these comments are intentionally put forward to strengthen the analysis of the environmental impacts and fully disclose those impacts so that environmental impacts can be fully mitigated to the extent reasonably feasible.

As you know, the City and Cal Poly have existing agreements that cover a wide range of services where the campus and community support each other's mutual success. With this in mind, we have used the Draft EIR as a tool to better understand how these agreements will continue to serve the campus and community as the campus grows with development under the 2035 Master Plan.

The comments provided herein are intended to be constructive to help ensure the City's ability to support implementation of the Master Plan. In this regard, the Draft EIR and Master Plan are tools that will help us identify Cal Poly's fair share of the costs of public facilities and services needed to support growth on campus.

Attached to this comment letter is a 2015 communication authorized by the City Council including "City Comments on the Cal Poly Master Plan Update," and "Guiding Principles for Input on the Cal Poly Master Plan Update." The following comments are made with
City of San Luis Obispo Comments
Cal Poly 2035 Master Plan Draft EIR

this guidance in mind, and in consideration of the City's current Major City Goals for Housing and Climate Action.

Please don't hesitate to reach out should you have any questions about the information contained in this letter.

Sincerely,

Michael Codron
Community Development Director

Attachments: Draft EIR Comments
Letter from Mayor Marx to Jeffrey D. Armstrong (December 1, 2015)
Letter from Katie Lichtig to Jeffrey D. Armstrong (September 11, 2017)

CC: San Luis Obispo City Council
Ray Aronson, Executive Director of Facilities, Planning, and Capital Projects
Jessica Darin, Chief of Staff
Christine Dietrick, City Attorney
Juanita Holler, Associate Vice President for Facilities
Keith Humphrey, Vice President for Student Affairs
Derek Johnson, City Manager
Courtney Kienow, Director of Community Relations
Cindy Villa, Vice President for Administration and Finance
Draft EIR Comments

Introduction/Project Description

The City is concerned about enrollment growth on campus to the extent that it is not planned for and that it is not phased to occur subsequent to the provision of additional housing on campus. A spike in enrollment that occurred in 2017 provided the City with an opportunity to quantify costs associated with unplanned enrollment growth, which resulted in unplanned costs to the City in the areas of emergency response and transit, for example (Katie Lichtig; September 11, 2017, attached).

The project description assumes that enrollment will increase at a lower rate over the next two decades than it has during the past two decades, but no evidence is cited to support this assumption. In fact, the data identified in the DEIR of past enrollment growth supports a growth rate of 280 students per year, not the 205 students per year used throughout the DEIR. This is equivalent to a 26.8% decrease in historic enrollment growth. No evidence has been cited or supplied to explain why it was assumed that such a significant decrease will occur, nor does the DEIR include any assurances in the form of enforceable project components or mitigation measures to ensure that the planned rate of enrollment growth will actually occur.

The way to remedy this is through enforceable policies in the master plan and/or mitigation measures in the Final EIR that would prevent increases in enrollment beyond what is planned for, or that trigger additional measures to mitigate impacts should increased enrollment occur. Phasing enrollment growth in alignment with the provision of facilities on campus (e.g. water supply, active transportation projects, transit service, housing, etc.) is recommended as a method to address the potential for unmitigated impacts associated with unplanned enrollment growth.

Aesthetics

Slack and Grand Project

The Faculty and Staff Workforce Housing (Slack and Grand) project is identified as a near term project in Table 2-12. The proposed development is up to five stories in height which greatly exceeds that of the adjacent single-family residences along Slack Street.

Although the DEIR identifies this as a significant and unavoidable impact, Mitigation Measure 3.1-1 relies only on landscaping to mitigate impacts and would not reduce impacts to the maximum extent feasible. Feasible mitigation could also include detailed architectural design to provide a more compatible transition to the surrounding neighborhoods, consistent with the City's property development standards for Edge Conditions (SLOMC 17.70.050). The City believes that compliance with its standards for Edge Conditions would be feasible and effective mitigation for the project contemplated on the Slack and Grand site.
Air Quality, Energy Consumption and GHG Emissions

City comments on these three topic areas are combined to focus comments on specific policy interests of the City with respect to GHG emissions reduction strategies. The City of San Luis Obispo is pursuing a 2035 Carbon Neutral goal and has taken a leadership role across the State and country with respect to programs and standards to help achieve this outcome. Specifically, the City has adopted a policy preference for all-electric new buildings and is pursuing adoption of a Clean Energy Choice Program to incentivize all-electric new development. The City is developing a Carbon Offset Requirement and has negotiated with new housing developers to eliminate the use of natural gas in major new subdivisions.

Therefore, the City finds the commitment that all buildings constructed under the Master Plan will be powered by 100% on site renewable energy commendable. The City notes that this renewable energy goal is identified as a requirement in the GHG analysis in Chapter 3.8. However, mitigation measures in Chapter 3.8 concerning GHG emissions do not require that all buildings be powered by 100% renewable energy. For instance, will the WRF be 100% powered by on-site renewable energy? If so, where will the renewable energy be generated? The DEIR does not describe or evaluate any large-scale renewable energy projects to indicate that the requirement can be achieved. Implementation of the Master Plan goals on energy and GHG reduction would benefit greatly by a more detailed discussion of how the on-site renewable energy goals can be feasibly accomplished.

The DEIR relies on the VMT model to supply estimates for the Master Plan’s operational GHG emissions. However, the VMT model excluded vehicle miles traveled by vendors and visitors to the campus. As a result, a GHG analysis that relies on that VMT model may not include the full scope of GHG emissions generated by this project.

The DEIR states that daily VMT estimates were “adjusted to annual VMT using a conversion factor of 267 days per year, which accounts for Cal Poly’s academic schedule, holidays, and enrollment levels during summer and regular academic quarters.” (DEIR, p. 3.8-15.) Although VMT may be lower when school is not in session, the campus is still in operation and people still visit it during those times (i.e. move in, orientation, summer sessions, construction projects, etc.). As a result, GHG emissions still occur on the days that the annual VMT estimate has excluded with no basis and thus is incomplete and deprives the public from understanding the full GHG emissions of campus operations. By basing its GHG emission estimates on a VMT model that excluded 98 emission producing days per year, the GHG analysis is potentially underreporting the potential GHG impacts associated with this project. In addition, Chapter 3.3 of the DEIR acknowledges that the project will increase trip counts by 7,495 daily trips. The GHG analysis should likewise take these trips into account and fully disclose and evaluate impacts to GHG.
Biological Resources

Generally, the City is concerned that the EIR and Master Plan fail to provide a program for evaluating impacts to biological resources to guide project designs and streamline subsequent environmental review. The presence of special status plant and animal species is identified, but there is no guidance through Master Plan policies or detailed mitigation measures regarding the scope and scale of future biological studies needed to avoid impacts and secure resource agency approval for projects contemplated in the Master Plan. The need for certain resource agency approvals (an Incidental Take Permit and a Habitat Conservation Plan are both noted as possible requirements) may significantly delay housing and water projects that are relied upon in the DEIR to self-mitigate impacts to housing, transportation, GHG emissions, noise and other issue areas identified throughout the DEIR.

Plants

The analysis in this section relies on deferral of studies to identify and mitigate impacts at some future point, however, no program for future studies is provided to guide future investigations. Mitigation measure 3.5-1a states surveys should be conducted prior to approval of “specific projects under the 2035 Master Plan.” This mitigation measure is vague as to what projects would trigger this measure (i.e. projects that may otherwise qualify for an infill exemption). The DEIR appears to base analysis of potential impacts to protected plant species on one reconnaissance level survey that was completed in June 2019. As noted in Table 1, Appendix E, there are many protected plant species that may be present on the site that do not flower in June. Mitigation Measure 3.5-1b only provides for avoidance of impacts to special status plants in the area outside of the footprint of structures and site features. Proper evaluation in advance of the approval of building footprints should inform their final location to potentially avoid or minimize impacts to the greatest degree possible and avoid potential delays in Master Plan implementation.

Hydrology and Water Quality

The DEIR does not evaluate potential impacts that could result from flooding. One way to address this would be for DEIR and Master Plan to include specific references to the regional San Luis Obispo watershed Waterway Management Plan (WMP). The WMP has been adopted by both the City and County as the agreed upon standard for the San Luis Obispo watershed. The impact of not analyzing flooding is that the project may cause an increase in the rate or amount of surface water that would result in flooding both on and off-site, it may impede or redirect flood flows, or it may cause the release of pollutants due to inundation that may occur within the flood plain. CEQA requires a full evaluation of these impacts, as stated in CEQA Guidelines Appendix G. By not including this full evaluation in the DEIR, the project creates potential unmitigated impacts that have not be disclosed to the public or decision makers.

Slack and Grand project and Retirement Community

The DEIR does not evaluate impacts to City stormwater facilities and potential runoff from the Slack and Grand site that will flow into the City’s stormwater system and into San Luis
Obispo Creek. Once water from on-site impervious areas enters the City right’s-of-way, Cal Poly would be subject to the City’s stormwater permits. No analysis is provided demonstrating how the project would comply with City permit requirements.

No analysis is provided on how the development of the retirement community may also impact the City’s stormwater system as drainage is likely to be directed to City infrastructure. No evidence is provided of how these projects will comply with City permit requirements or how San Luis Obispo Creek will not be impacted by development. A requirement for WMP compliance would address the concern.

**Flooding**

The DEIR does not evaluate potential floodplain impacts. City and County Floodplain Management Regulations should be disclosed and pre- versus post-development impacts should be analyzed. The DEIR states that buildings will be located above the floodplain but there is no analysis or clear mitigation to ensure that floodwaters will not be displaced creating downstream impacts. These are significant issues that could create hazardous conditions and property damage. In particular, the DEIR does not evaluate the extent of construction within the Base Flood Elevation (BFE) and whether it is feasible to locate new construction outside this zone. If flood flows are obstructed or capacity of the floodplain is altered without appropriate mitigation, impacts will result.

**Noise**

**Spanos Stadium**

The Master Plan Update includes a 4,000 seat increase in capacity at Spanos Stadium and there is no quantified analysis of existing or anticipated noise levels during events. Absent a noise evaluation, the DEIR and Master Plan could include Mitigation Measures or policies to ensure disclosure of future noise levels and that feasible mitigation is applied. For example, the DEIR and/or Master Plan could provide direction regarding the orientation of speakers away from sensitive receptors, acceptable volume levels, restrictions on hours of events, and clear thresholds to guide the evaluation of future stadium expansion projects.

**Construction Noise**

Implementation of the Master Plan Update would include construction of millions of square feet of academic and support buildings, infrastructure improvements, a new Wastewater Reclamation Facility (WRF), expansion of Spanos Stadium, and several housing projects to be constructed over a period of 15 years. These activities will introduce significant new noise sources to the areas surrounding the entrances to campus and have the potential to create long term impacts to the surrounding areas. The DEIR does not include disclosure of potential impacts associated with construction traffic under 3.10-1, Impact 3.1-2, or elsewhere in the DEIR. The DEIR appropriately references City noise thresholds and it would also be appropriate to make use of standard City noise reduction methods as outlined in the City General Plan Noise Element and Noise Standards contained in its Municipal Code. Some of the standard noise reduction measures include:
• Limit the operating times of noise-producing activities and compliance with City Municipal Code requirements for construction hours of operation.
• Rerouting traffic and construction truck trips onto streets that can maintain desired levels of service and which do not adjoin noise-sensitive land uses. The DEIR includes a measure for a materials haul routes, but the City should be consulted on these routes since City residents will be affected and City streets will be used.
• Lowering traffic speeds through street or intersection design methods.
• Conduct focused noise studies to supplement overall programmatic noise analysis to determine specific measures to avoid or minimize noise impacts.
• Best Management Practices (BMP’s) should be established which include measures such as use of sound blankets, mufflers, temporary sound barriers, locating stationary equipment away from residences, neighboring property owner notification and a process to address construction noise complaints.
• Lastly, City Streets will be impacted from construction trips and the University should implement a pavement index evaluation before and after construction and cover the incremental costs for impacts related to the degradation of city roads.

Population and Housing

The City appreciates and supports the Master Plan’s efforts to plan for and provide a significant amount of student housing. The housing goals stated in the Master Plan, if reached, will benefit Cal Poly’s students and, importantly, the surrounding community as well, returning needed housing stock to non-students and decreasing neighborhood compatibility issues. However, the DEIR relies on the housing goals stated in the Master Plan without providing assurances that the housing will actually be built or that it will be built in time to mitigate the impacts of increased enrollment. If the on-campus housing contemplated under the Master Plan is not timely built, impacts to transportation, air quality, noise, and housing will be more significant than evaluated in the DEIR.

Table 2-9 sets forth a helpful yearly estimate of enrollment and on-campus housing through the planning horizon of the Master Plan. However, the estimates are based on two assumptions that lack substantial evidence: (1) enrollment will increase at a steady yearly rate of only 205 students; and (2) new housing will actually be constructed consistent with stated goals, with no enforceable accountability measures or mitigations required if goals are not actually met. Because enrollment increases may occur at rates and in amounts that are much greater than have been estimated in the DEIR, and because housing may not be built on campus consistent with the Master Plan’s stated goals, the DEIR’s assumptions lack substantial evidence as a basis for its conclusions about environmental impacts.
Affordable Housing
The DEIR does not include an analysis regarding potential housing impacts associated with the increased faculty, staff, vendors, and construction personnel necessary to complete the Master Plan and support the increase in enrollment. The 380 units proposed for the Slack and Grand project will not accommodate the 787 new employees anticipated under the Master Plan (when compared to 2015 levels), nor will it address housing needs generated by the 15-year construction period or the additional employees anticipated to use the expanded Technology Park. (See DEIR, p. 2-18.) The DEIR also does not evaluate impacts to housing that will result from the new employees required to support the staff at the new retirement community. If sufficient affordable housing is not available in the City, these employees will be required to commute to the campus and to the retirement community from outside of the area. The DEIR lacks sufficient evidence to show that these constraints were taken into account in the VMT analysis, the estimate of transportation impacts, or in the analysis of impacts on housing contained in this chapter. As the DEIR admits, the City is a high-cost housing market. (DEIR, p. 3.11-15.) Yet the DEIR does not contain any analysis of the potential impacts associated with the increased demand for affordable housing to support the new employees associated with the Master Plan. Both the City and County have Inclusionary Housing policies and ordinances to ensure that new development that creates a demand for affordable housing either directly or indirectly contributes to the construction of affordable housing units. The lack of analysis in the DEIR could be addressed through compliance with City or County inclusionary housing requirements.

Off-Campus Housing
The DEIR says that enrollment increases are likely to occur before new housing is constructed on-campus, which will require more students to seek housing in the City and County than are already living off-campus. (DEIR, p. 3.11-20.) The DEIR then dismisses impacts to housing in the City and County by arguing that vacancy rates would accommodate this influx of new residents. This conclusion is not supported by substantial evidence. First, vacancy rates in the City are less than 4%, not 6.3% as reported in the DEIR. According to the Census ACS Survey, the rental vacancy rate in 2017 was 3.63%. Moreover, the DEIR does not cite to evidence that a 6.3% vacancy rate equates to enough housing to accommodate at least 416 additional students (the number of additional enrolled students anticipated in the DEIR for the years 2020 and 2021). Nor does the DEIR provide any evidence or analysis of what will occur if new on-campus housing is not constructed by the year 2022, however, delays could occur and there are no mechanisms in the DEIR or Master Plan that link enrollment growth to the provision of new housing supply on campus. Therefore, the DEIR should have evaluated impacts to housing resulting from delays in construction of housing on-campus. The failure to do so results in underreported and unevaluated potentially significant impacts to housing.

Public Services
In April 2018, the City of San Luis Obispo published a Capital Facilities Development Impact Fee Nexus Study (EPS; April 16, 2018). The Nexus Study provided the City with
the necessary technical documentation to adopt updated fee programs to ensure that new development covers its fair share of the costs of infrastructure and public facilities that benefit the new development. Although the City’s fee programs do not apply to development on campus, the Nexus Study provides a sound methodology under CEQA for the analysis of impacts to public facilities. The City encourages Cal Poly to use this Nexus Study as a basis to determine fair share contributions associated with the provisions of new residential uses on campus (other than student housing), such as the Grand/Slack workforce housing project and the retirement community project located west of Highway 1, near Stenner Creek Road. The City has available mitigation either via agreement or using impact fee methodology in the Nexus Study for each of the following issue areas.

Emergency Response
The DEIR evaluates potential impacts on fire service based on per capita calls for service to the campus in the year 2017 as well as off-campus calls for service made by students. (DEIR, p. 3.12-15.) These projections do not include any per capita analysis of calls for service to the new residents at the workforce housing (Slack and Grand) project or the retirement community project. In fact, there is no discussion of how fire and police services will be provided to these new communities, which are outside of the core area covered by the current emergency services agreement. In addition, the future population and planned uses at the retirement community are very different from the population and uses planned for the remainder of the campus. Therefore, the student-related calls used to estimate a rate of per capita calls for service cannot be relied upon to estimate impacts to public services associated with these projects. As a result, the DEIR should identify the need to update the current Emergency Services Agreement (July 1, 2018) prior to development and occupancy of either project.

Law Enforcement
The DEIR does not take into consideration additional demands on SLOPD services that will be generated by the retirement community and Slack and Grand projects. These projects are likely to require SLOPD services as non-student residents seek help from the San Luis Obispo police department in addition to University PD. Moreover, the retirement community’s separation from the main campus makes it even more likely that calls for service will be answered by the Sheriff’s Department as the site is located outside of City limits and across Highway 1 from the main campus. The DEIR does not disclose or evaluate how police services will be provided to these new communities nor how impacts to SLOPD and the Sheriff’s Department will be addressed.

Parks and Recreation
The DEIR analyzes potential impacts to recreational and park facilities using an estimated total campus population of 28,935 to determine the total acres of recreational facilities needed to serve the population. This estimate excludes the proposed retirement community population, and possibly the Slack and Grand project population as well, which together may add another 1,025 residents and 60 employees to the Master Plan’s
total population. As a result, the DEIR potentially underestimates the recreational needs and impacts of the increase in population contemplated under the Master Plan.

**Transportation**

*Facility Expansion*

The Master Plan project description includes expansion of existing sport and special event facilities on campus, including a 4,000-seat expansion of Alex Spanos Stadium. Trip generation from these expansions would generate thousands of additional trips in relatively short time periods and there are no policies or programs that would limit the use of these facilities. While level of service (LOS) or other measures of auto capacity may no longer be required as applicable thresholds of significance for analysis of transportation impacts under CEQA, the magnitude of additional trip generation (auto, bikes, peds, transit) from these expansions should be quantified to guide system planning and traffic handling plans and programs. The DEIR's transportation analysis should be updated to include an evaluation of the venues and events proposed in the Master Plan and the adequacy of the existing circulation system to accommodate these increased demands. In addition, the Master Plan should be updated with policies and programs that govern the use of these facilities.

*Enrollment and Housing Linkage*

The Master Plan provides estimates or forecasts for student enrollment levels and on-campus housing production through a phased development program through 2035. The transportation impact analysis provided in the DEIR considers the increased production of on-campus housing as a significant contributor towards reducing campus-generated VMT by providing opportunities for students to live in a location where most of their daily travel is possible via short trips by foot, bicycle or transit. However, the Master Plan does not include any formal policies, programs or mitigation mechanisms that govern actual enrollment levels or require the timely production of on-campus housing in tandem with, or in advance of, increases in on-campus enrollment or traffic-generating development. To address this, the Master Plan and DEIR should include policies or programs to govern actual enrollment and development to a level that is on pace with actual production of on-campus housing and informed by the actual effectiveness of the proposed Transportation Demand Management (TDM) programs as evaluated by regular trip/VMT monitoring activities.

*Multimodal Transportation Demand*

It is understood that auto level of service (LOS) and other measures of traffic congestion were not included to determine transportation impacts under CEQA pursuant to SB 743. In turn, the EIR Transportation section includes no quantitative estimates of auto traffic generation associated with buildout of the Master Plan. While the DEIR may not be required to evaluate auto traffic generation with respect to LOS or other capacity-related significance criteria to determine transportation impacts, complete omission of this information from the Transportation chapter presents significant challenges for entities such as the City with respect to system planning for streets and intersections that provide direct access to the Cal Poly Campus. For purposes of full disclosure, the City request that
the Final EIR include the estimated number of net new daily, AM and PM peak hour vehicle trips expected to be added to City streets within the vicinity of the campus. This information was provided in Appendix G for bicycle and pedestrian trips and should be replicated for auto trips.

**VMT Impacts and Mitigation**

The DEIR identifies a potentially significant impact (Impact 3.13-1) due to project-generated VMT that exceeds regional VMT thresholds. The corresponding mitigation measure (Mitigation 3.13-1) requires development and implementation of a Transportation Demand Management (TDM) plan and concludes that this impact would be reduced to a "less-than-significant" level. The adequacy of this mitigation approach is questionable for several reasons.

The EIR concludes that the TDM measures outlined in Mitigation Measure 3.13-1 would reduce campus-wide VMT to the level required to mitigate the identified impact—a net reduction of 5.04 VMT per service population (about 21% below the baseline Existing plus Project VTM estimates). However, the document provides no supporting analysis or documentation to verify whether this level of reduction is feasible or whether similar results have been achieved at comparable university campuses. Studies show that the ultimate efficacy of a TDM program can vary significantly from project to project. While there is available data and planning-level models that can be used for estimating TDM reductions—such as the CAPCOA model referenced in the CSU Transportation Impact Study Manual—the DEIR provides no supporting analysis or documentation to support the claims presented.

The CSU CEQA Handbook recommends caution regarding use of mitigation measures that could be interpreted as “deferred mitigation.” On pg. 84-85, the Handbook states:

> “Mitigation measures cannot defer to future studies, consultations, or future undefined time. Such measures are called “deferred mitigation” and are easy points for legal challenge. In some situations, it is not known whether there will be an impact without doing additional surveys or studies, especially for large and long-term projects or programs for which a Program EIR is prepared. To avoid improper “deferred mitigation” you must clearly identify what you will do if any future studies identify that there could be an impact. Alternatively, if such information is not yet available, you need to incorporate performance standards or criteria into the measure to ensure that the strategies ultimately selected in fact will reduce the impact as reported in the CEQA document.”

The Handbook continues with the following guidance:
“Remember: If some doubt exists as to whether a mitigation measure will fully mitigate the impact, it is good practice to indicate that the impact will remain significant and unavoidable even with the incorporation of mitigation.”

As currently presented, the strategies identified under Mitigation Measure 3.13-1 appear to be deferred mitigation. The DEIR recommends development of a TDM plan and identifies potential strategies that could be implemented to reduce vehicle trip generation, including a biennial monitoring program to track the efficacy of the TDM plan.

Of particular concern is the fact that this mitigation measure does not describe how VMT will be measured as part of this monitoring program, what performance criteria will be used to evaluate progress towards achieving the targeted VMT reduction, or what specific actions will be taken if monitoring results reveal that TDM strategies have not been sufficiently effective. The City has relayed on several occasions that this was a minimum measure that must be met and its absence is noticeable and does not provide the level of confidence that TDM or monitoring will be an integral part of achieving the University’s projected mode shifts.

Furthermore, this mitigation strategy does not require any measurable level of TDM implementation or VMT reduction prior to implementation of potential VMT-increasing activities, such as increases to student enrollment and on-campus employment without corresponding production of on-campus housing, allowing impacts to occur before mitigation would be implemented. This strategy relies on monitoring every two years to verify if required VMT reductions have been achieved, which potentially defers necessary mitigation until after an impact has materialized. Monitoring should be conducted annually, and mitigation measures should be taken immediately if VMT is higher than projected.

- It should be noted that a primary component of the TDM plan includes expansion of local and regional public transit services to the campus through coordination and fair-share contributions towards increasing SLO Transit and SLORTA bus services. However, because these transit services are not operated by Cal Poly, the university cannot ensure that these services are expanded as needed to meet the required VMT reduction targets. If VTM increases are not closely monitored and needed fair-share contributions are not provided prior to impacts occurring and/or if the amount of fair-share contributions is inadequate, the City would be put in a position of having to fund the gap to provide the increased service, or the City may not be able to shoulder the increased financial burden depending on the budget priorities at the time. The City of San Luis Obispo is agreeable to negotiating an MOU with the campus for the purpose of implementing this mitigation measure that broadly seeks to bring Cal Poly contributions in line with current and future operational needs.

Within the Master Plan, Implementation Program 20 states that “Cal Poly should partner with the City to help develop off-campus bicycle improvements as prescribed in the City’s bike plan and that improve connections between the campus and community.” Further, DEIR Mitigation Measure 3.13-1 outlines a TDM program that includes a general recommendation to “support active transportation projects on and near campus through
infrastructure improvements to enhance safety and efficiency of these travel modes.” The City of San Luis Obispo is agreeable to negotiating an MOU with the campus for the purpose of implementing this mitigation measure.

However, the DEIR should identify more specific recommendations or mechanisms for contributing towards active transportation infrastructure improvements within the vicinity of the campus. Potential mechanisms for proportionate contribution may include participation in the City’s Transportation Impact Fee program, which funds citywide bicycle and pedestrian infrastructure improvements, or direct participation in projects near campus, such as the addition of separated/protected bicycle facilities, installation of accessible pedestrian curb ramps, additional street lighting, and intersection crossing enhancements.

Traffic Safety
The Environmental Setting section of the EIR Transportation Chapter provides a brief summary of existing collision trends for streets within the vicinity of the campus, as referenced from recent editions of the City’s Annual Traffic Safety Report. However, the Impacts and Mitigation Measures section includes virtually no discussion or analysis of potential traffic safety issues outside of the campus boundaries with implementation of the Master Plan.

Per the DEIR, build-out of the Master Plan is projected to add approximately 930 new bicycle trips, 850 new pedestrian trips, and 133,000 net new VMT per day to City transportation facilities within the vicinity of the campus. There is no discussion of whether these increases in multimodal traffic demand can be accommodated by existing off-campus infrastructure, or whether this demand has potential to exacerbate existing traffic safety issues within the campus vicinity. Additional analysis of potential traffic safety considerations should be provided as follows:

A. Evaluate potential for additional traffic (auto, bike & pedestrian) generated by the campus to increase collision rates at the following high-collision rate locations as identified in recent City Traffic Safety Reports:
   - California/Taft
   - California/Monterey
   - California/US 101 NB Ramps
   - Grand/Loomis
   - California/Mill
   - Foothill/Santa Rosa
   - Foothill/Casa
   - Santa Rosa/Boysen
   - Foothill Boulevard (Tassajara to California)

B. While auto traffic capacity analysis may no longer be required to determine impacts to transportation, vehicle queuing analysis should be provided for the abovementioned intersections for the purposes of evaluating potential safety
impacts related to turn pocket queue spillback, or sight distance impacts as a result of project traffic.

Parking
The project does not include sufficient parking improvements to accommodate the increase in on-campus population contemplated in the Master Plan. It is also unclear if this is a formal aspect of the proposed TDM program. Even if first and second-year students are precluded from parking cars on-campus, the addition of only 174 new parking spaces will not be sufficient for the new faculty, support staff, and employees who will be working on campus, nor has evidence been presented that sufficient parking will be available for vendors, temporary employees, or event attendees, including attendees at the planned expansion of Spanos Stadium and the Technology Park expansion. Moreover, the project description indicates that Cal Poly intends to limit parking for certain students, however, these limitations are stated as intentions and not enforceable restrictions and the DEIR provides no evidence that the lack of parking on campus will actually persuade new students, employees, and visitors to not drive personal automobiles to campus. As the on-campus population increases, it is reasonable to assume that more cars will come with their owners. The DEIR does not describe how Cal Poly intends to ensure that students who live on or off campus do not bring cars to the area and park them off campus. This lack of planning for parking will perpetuate and increase impacts on the neighborhoods surrounding the campus where employees and visitors will be forced to search for parking. This, in turn, will create additional impacts to noise, roadway maintenance, and air quality in these areas. These impacts have not been evaluated properly in the DEIR. The City believes that coordination of specific mitigation measures on the matter of parking is important to ensure that any impacts created by a lack of parking on-campus do not simply spill over to City neighborhoods off-campus.

Utilities and Service Systems Utilities

Water Supply Resiliency
The DEIR is required to evaluate water resiliency to ensure that sufficient water supplies will exist to serve buildout under the Master Plan. The DEIR includes no evidence or information regarding how Cal Poly is planning for water resiliency during times when Whale Rock dam, spillway, pump stations, or pipeline are unavailable due to maintenance needs or construction. Cal Poly worked with the City to identify potential water supply alternatives to improve its water resiliency; however, Cal Poly did not provide this information in the DEIR. The 2007 Memorandum of Understanding (2007 MOU) between City and the University regarding capacity interest in City water and wastewater facilities does not address water supply resiliency.

Water Storage/Reservoir Expansion
The DEIR does not include an analysis of the impacts associated with the expansion of Cal Poly’s existing reservoir system for recycled water storage necessary to support Cal Poly’s proposed Water Reclamation Facility (WRF) and future water needs contemplated under the Master Plan. Appendix H, page 24, explains that Cal Poly’s “proposed WRF would also require expansion of the existing reservoir system to a maximum (total) of 100
AF. If the existing reservoir system cannot be expanded then the University may potentially construct two additional reservoirs for recycled water storage from the WRF.”

Water storage is also generally described on Project Description on page 2-40 and page 2-47. This expansion, or new construction of additional reservoirs, is not included in the impact analysis. One hundred acre-feet of water storage is nearly 32.6 million gallons - a substantial amount of water. The Master Plan EIR does not identify where this storage will be located, nor does the DEIR analyze the environmental impacts associated with construction and maintenance of these significant new facilities. It is also unclear whether the storage will be sized and under the jurisdiction of the Division of Safety of Dams. If so, the Division of Safety of Dams should be identified as a responsible agency and should be consulted regarding the adequacy, design, and permitting of the storage facilities. Because this information is not provided in the DEIR, impacts associated with providing the water and wastewater services necessary to support buildout of the Master Plan may be understated.

The DEIR does not include analysis of daily and monthly non-potable water demands to support its water supply impact analysis. The daily and monthly demand pattern for agricultural and landscape irrigation is relevant to determining whether Cal Poly’s proposed WRF will generate a sufficient and reliable water supply. Based on 2015 and 2019 data, Cal Poly’s non-potable demand was over 850,000 gallons per day in July, when average daily wastewater generation was ~38,000 gallons in 2015 and ~75,000 gallons in 2019 for the entire existing campus.

The DEIR does not include information regarding the existing non-potable water storage capacity on-campus, the extent to which existing daily agricultural water demand will be feasibly supplied with water from the WRF, and the availability of sufficient storage to ensure delivery of enough water to meet agricultural demand. In other words, existing daily agricultural water demand is not estimated in the DEIR to support the concept that this demand will be offset with non-potable water from the proposed WRF. This information is necessary to inform the sizing of the needed storage and to illustrate that the planned water sources required to support buildout of the Master Plan are feasible. As a result, the DEIR does not include the information necessary to support its conclusions regarding impacts to agricultural uses and to water demands resulting from buildout of the Master Plan.

The DEIR acknowledges that “some adjustments to the system, such as increased pumping to reservoirs or storage tanks may be necessary,” however, no analysis was provided regarding the environmental impacts associated with the siting, construction, and maintenance of these new reservoirs and storage tanks. (DEIR, p. 3.14-14) In fact, neither the DEIR nor the Master Plan identify how many of these storage facilities are needed, where they will be located, or whether it is feasible to locate them in places that will not impact biological, cultural, hydrologic, and other resources. Instead, it is likely that the amount of storage that will be necessary to serve the new development contemplated in the Master Plan will be significant, which will likewise create significant impacts to sensitive resources. As a result, the DEIR fails to identify potentially significant impacts
associated with the infrastructure necessary to provide sufficient water to campus under the Master Plan. The DEIR’s conclusion that the Master Plan will not require or result in the relocation or construction of new or expanded water infrastructure is not consistent with what is proposed by Cal Poly in the Master Plan (100 acre-feet of storage). This is a significant problem for the DEIR, as well as the Master Plan, as new housing and other amenities will not be able to be completed until these necessary improvements are completed and thus potentially creates a cascade of unmitigated impacts if campus population increases through increases in enrollment that does not include concomitant housing.

**Short-Term Non-Potable Water Supplies**

Mitigation Measure 3.14-3 relies on the possibility that the City may provide short-term non-potable water supplies to Cal Poly in the event that the WRF is not completed and capable of providing sufficient water supplies for near term projects. A number of important actions by the City would be required in order to enable this to occur. The City’s General Plan will need to be amended to enable it to provide non-potable water to Cal Poly on a short term-basis, and an analysis must be completed to ensure that providing this water would not interfere with the City’s existing entitlements and permits. A contract will also be required, which has not been negotiated between the City and Cal Poly. The City is open to discussing this arrangement, but additional time, resources, and City Council action is necessary, which the DEIR should acknowledge. Additionally, this measure defers an analysis of whether the provision of such non-potable water by the City would create its own negative environmental impacts.

A provision should be added to Measure 3.14-3 to allow reliance on such temporary non-potable sources only if no negative environmental impacts would occur as a result and for the sole purpose of delivering on campus housing. Finally, this measure does not include specific requirements for measuring and monitoring water demand in conjunction with any arrangement for short-term water supplies from the City and expected completion of the WRF. The measure should be amended to require measuring and monitoring of water demand and supplies in sufficient intervals and using realistic and supported projections of future supply and demand to ensure that enough potable water will truly be available to serve new construction and non-potable water will be available to continue to serve Cal Poly’s existing agricultural uses.

The DEIR concludes that the Master Plan will have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years due to implementation of Measure 3.14-3. However, this measure does not account for the possibility that new housing and other water-dependent construction

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1 General Plan Policy 1.13.2. Recycled Water. Provision of recycled water outside of City limits may only be considered in compliance with Water and Wastewater Element Policy A 7.3.4 and the following findings: A. Non-potable/recycled water is necessary to support continued agricultural operations. B. Provision of non-potable/recycled water will not be used to increase development potential of property being served. C. Non-potable/recycled water will not be further treated to make it potable. D. Prior to provision of non-potable/recycled water, the property to be served will record a conservation, open space, Williamson Act, or other easement instrument to maintain the area being served in agriculture and open space while recycled water is being provided.
may be built under the Master Plan before the WRF and associated expansion of existing water storage reservoirs, or construction of new water storage reservoirs, are completed or capable of providing sufficient water to offset demand and that short-term non-potable water supplies may be available for some period of time but become unavailable before the WRF is completed. In this event, the new housing and other buildings would be occupied but Cal Poly would not have sufficient potable water available through its Whale Rock entitlement, or through a temporary non-potable supply from the City, to supply all of its demand. It is also possible that problems will occur during the design, construction, and permitting of the WRF and associated expansion of existing water storage reservoirs, or construction of new water storage reservoirs, such that it becomes significantly delayed or rendered infeasible altogether. Because the design of the WRF is not complete and there is currently no plan for sufficient storage capacity, it is questionable that reliance on the WRF is feasible to mitigate the Master Plan’s future water demand.

It is highly unlikely that the WRF and associated water storage will be constructed and operational by the year 2022. Design, construction, and permitting of new water reclamation and water storage facilities take significant amounts of time and resources. As a result, it is likely that Cal Poly will require alternative water sources to supply new development under the Master Plan, as contemplated in Mitigation Measure 3.14-3, and additional capacity within the City’s WRRF to accommodate growth until Cal Poly’s WRF is operational. To the extent that a delay in completion of the WRF also delays completion of new on-campus housing to defray housing, transportation, air quality, and GHG impacts caused by increased enrollment, these would be new or substantially increased impacts of the Master Plan that are not evaluated or disclosed in the DEIR.

**Impacts to the City’s Water Resource Recovery Facility (WRRF)**

Table 3.14-8 summarizes projected wastewater flows under full buildout of the Master Plan. However, the table does not include an estimate of flows occurring during the years 2015-2020. From 2015 to 2019, flows have increased from 197,557 gallons per day (gpd) in 2015 to 274,795 gpd in 2019, an increase in the annual average 79,480 gpd. The 2007 MOU identifies Cal Poly’s capacity interest as “daily dry weather flow calculated on a monthly average of .471 million gallons daily.” Cal Poly’s monthly average dry weather flow has increased from 302,595 gpd in 2015 to 384,627 gpd in 2019, an increase in 82,032 gpd. By not including the increased flows that have occurred since the year 2015, the DEIR underestimates the total amount of wastewater that will be generated under the Master Plan. This underestimation impacts Cal Poly’s ability to rely on its proposed WRF and the City’s wastewater services to meet total Master Plan demand.

The baseline wastewater flows identified in Table 3.14-10 do not identify appropriate flows to accurately measure impacts associated with increased wastewater generated under the Master Plan. Table 3.14-10 identifies an “average annual flow” in 2015. However, as described above, the 2007 MOU for wastewater treatment services uses *daily dry weather flow calculated on a monthly average*, which is higher. Using Cal Poly’s wastewater flow for 2019 leaves less than an additional 100,000 gpd available for the year 2020. If projected flow increases are correct for the year 2025 as identified in Table 3.14-10 (114,433 gpd), Cal Poly does not have sufficient capacity under the 2007 MOU.
regarding capacity interest in City facilities to support Master Plan development planned to be online in 2025. This is a potentially significant impact that is not disclosed, evaluated, or mitigated in the DEIR.

Given the likelihood of delays in completion, permitting, and operation of the new WRF, it will be likely that Cal Poly will rely on increased wastewater treatment services the City to support the Master Plan. Mitigation Measure 3.14-4a would preclude operation of new facilities under the Master Plan until the WRF is completed or sufficient wastewater services are available from the City. However, as stated above, based on the trend from 2015 to 2019, Cal Poly is expected to exceed existing capacity at the City’s WRRF in the year 2025 under the 2007 MOU. As a result, it is likely that new on-campus housing projects will be delayed even though enrollment is expected to increase. This will result in new and increased impacts to housing, transportation, air quality, and GHG that have not been analyzed in the DEIR.

Impacts to the City’s Wastewater Collection System
The DEIR acknowledges that Cal Poly’s existing peak wet weather wastewater flows exceed the 1.2 mgd limitation included in the 2007 MOU between the City and Cal Poly, that flows exceeded the limit in the year 2015, and that even implementation of the WRF and other conservation measures will not adequately address these exceedances. Mitigation Measure 3.14-4b addresses this issue by requiring Cal Poly to implement inflow and infiltration reduction projects to reduce peak wet weather flows, which the City appreciates. However, the measure requires that the inflow and infiltration reduction projects reduce flows to 2018/2019 levels, not to the 1.2 mgd limitation stated in the 2007 MOU which is not adequate mitigation nor consistent with its commitment to the City of San Luis Obispo.

The DEIR does not evaluate the environmental effects of peak wet weather flows caused by inflow and infiltration into Cal Poly’s sewer pipes. These peak flows utilize capacity reserved for future development in the City and can lead to sanitary sewer overflows in the City’s wastewater collection system. Sanitary sewer overflows are a public health risk and can result in NPDES (National Pollutant Discharge Elimination System) Permit violations, fines from the Central Coast Water Board, beach closures by the San Luis Obispo County Public Health Department, Clean Water Act third party lawsuits, or a long-term enforcement agreement referred to as a consent decree. Environmental impacts from Cal Poly’s peak wet weather flows must be disclosed and evaluated in the DEIR.

Impacts to the City’s Water Treatment Plant and Water Distribution System
The Water Supply Assessment, included in DEIR Appendix H, assumes that the portion of Cal Poly’s Whale Rock supply currently used for agricultural uses will be replaced with non-potable water from Cal Poly’s proposed WRF, freeing up all of Cal Poly’s Whale Rock water for potable use to serve new residents, students, and employees on campus. (DEIR, p. 3.14-12.) This will require the City to treat more water than it is currently treating for Cal Poly. Although the DEIR acknowledges that the 2007 MOU provides Cal Poly up to 1,000 AFY of water treatment services (1.44 mgd), peak day projections provided in Table 15 exceed 1.44 mgd. This impact is not identified in Impact 3.14.1.
Additionally, the impact analysis in section 3.14.1 references the Water Supply Assessment which includes numerous assumptions related to the operation of the City’s water distribution system that are not identified in the 2007 MOU and were not validated by the City prior to inclusion in the DEIR. Without a detailed review and understanding of the modeling assumptions, the City does not agree with the conclusion under Impact 3.14.1, on page 3.14-14 that “Modeling indicates that there is adequate conveyance capacity to accommodate anticipated development associated with the 2035 Master Plan under average day demand, peak daily demand, and peak hourly demand.” Also, due to these assumptions, the City does not agree with the determination provided in Section 1.4 (3) that “There is adequate City potable water conveyance capacity under ADD, PDD, PHD, and PDD + City FF for all Cal Poly flow conditions modeled.” Both Section 3.14 and Appendix H refer to a Cal Poly Utility Master Plan with an anticipated completion date in early 2020. This document has not been made available for City review and may also include invalid assumptions related to the operation of the City’s water distribution system. A modification to the MOU between Cal Poly and the City is needed to clarify assumptions related to peaking factors, fire flow, storage, and conveyance capacity to determine whether significant capital improvements are necessary to Cal Poly’s or the City’s water distribution systems for buildout of the Master Plan.

**Water and Wastewater Service to the Proposed Retirement Community**

The DEIR does not disclose impacts associated with connecting the planned retirement community located west of Highway 1 from the rest of campus and may rely on the City’s water distribution system for its water service (including fire flow and storage) and/or the City’s wastewater collection system. It is unclear whether any planning or environmental analysis has been conducted to determine that water and wastewater services to these areas is available and can be feasibly provided, or if Cal Poly is intending to rely on the City to provide domestic water, fire flow, and water storage and treat wastewater from this facilities. As identified in the City’s General Plan, the City’s wastewater collection system is capacity constrained during peak wet weather in the service area adjacent to Cal Poly’s proposed retirement community. Average wastewater flow is estimated at 21,129 gpd in Appendix I, Table 1, in 2030. If Cal Poly is proposing to connect to the City for wastewater collection service, mitigation would be required to achieve an adequate, measurable offset of wet weather wastewater flows.

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1 “ADD” is average day demand; “PDD” is peak daily demand; “PHD” is peak hourly demand; City FF is City fire flow.
December 1, 2015

Jeffrey D. Armstrong
President
Office of the President
Cal Poly State University
San Luis Obispo, CA

SUBJECT: City Comments on the Cal Poly Master Plan Update

Dear President Armstrong:

Please consider the attached City comments on land use concepts under consideration for the Cal Poly Master Plan update. The comments were endorsed by the City Council on November 17, 2015. Final City comments are based on the "Guiding Principles for Input on the Cal Poly Master Plan Update," which were adopted by the City Council on September 15, 2015. The "Guiding Principles" were informed by General Plan policies relevant to the update covering topics such as: Neighborhood Wellness, Economic Health, Housing, Multimodal transportation, Protection of Agriculture and Open Space Resources, Diversity, and Public Services.

On behalf of the City Council, I'd like to express our appreciation for the efforts Cal Poly has put forth to reach out to the community and collaborate with the City of San Luis Obispo as a key stakeholder. It is in this spirit that you will see many of the City comments include continued and enhanced communication and collaboration between Cal Poly and the City of San Luis Obispo.

Thank you for your consideration of the City of San Luis Obispo's comments on the Cal Poly Master Plan Update.

Sincerely,

[Signature]

Jan Marx
Mayor
City of San Luis Obispo

Attachments: City Comments on Cal Poly Master Plan Update
Guiding Principles for Input on the Cal Poly Master Plan Update

CC: San Luis Obispo City Council
Katie Lichtig, City Manager
Michael Codron, Community Development Director
1) Explore implementation of programs and incentives for faculty and staff to live within existing neighborhoods (not on campus) to stabilize neighborhoods close to campus.

2) Master Plan policies/principles should address neighborhood compatibility in terms of scale, density, character of development and residential neighborhoods should be limited and only be designated for staff, faculty and family housing. Neighborhood Sensitivity zones should also be added to the residential neighborhood area west of Highway 1 that is adjacent to existing City neighborhoods.

3) The Master Plan update should include recommendations of the Neighborhood Wellness/Community Civility Report where applicable.

4) Proposed Residential Neighborhood Development should be sited and developed in order to avoid or minimize impacts to scenic view sheds and environmental resource impacts (riparian, creek, agriculture).

5) New development in the Poly Canyon area and on land adjacent to City Open Space should consider regional trail connections and coordinated with City and US Forest Service Staff.

6) Large events resulting from new facilities and expansion of existing facilities (e.g. Arena, Agriculture Events Center, Mott Gym, Spanos Stadium, etc.) that have the potential to affect the City transportation system should include advance notification and coordination with City staff to minimize impacts; and any potential cumulative impacts on the City’s infrastructure, including but not limited to the transportation, streets, and bikes systems associated with large events at those facilities should be fully evaluated and mitigated in the Campus Master Plan Update EIR.

7) Impacts to City emergency services and Police mutual aid response should be evaluated and mitigated since the expansion of these facilities have the potential to result in increased calls for fire, rescue, and medical service during large events.

8) Further evaluation of the wastewater facility west of California Boulevard should assess potential impacts on existing uses in the vicinity and consider relocation of the facility to a location with greater separation from existing residential neighborhoods and City boundaries.

9) Master Plan and EIR should explore the impact of growth on City services, including but not limited to recycled water, wastewater, police, fire, and neighborhood wellness.

10) Coordinate future development plans for review and cooperation in planning with City Departments (Transportation, Police, Fire, Utilities, Natural Resources, Planning).

11) Fiscal Impact Analysis. In order to accurately evaluate potential service impacts the University should prepare a Fiscal Impact Analysis.

12) The final Refined Master Plan Update should consider the City’s Guiding Principles for the Master Plan Update and relevant City General Plan policies for which they are based.
CITY'S GUIDING PRINCIPLES FOR CAL POLY MASTER PLAN UPDATE

The following principles are not prioritized, and are each supported by a few, exemplary goals or policy statements from the City's General Plan (see Appendix that follows).

1. **Neighborhood Wellness** – The Master Plan should support efforts to provide a safe and positive living environment for all residents in City neighborhoods. The recommendations found in the Neighborhood Wellness/Community Civility report should be implemented wherever possible. The Master Plan should include buffers between areas of campus activities and adjoining residential neighborhoods; protect neighborhoods from light, noise, and glare from campus development; pull more intensive uses to the interior of campus; and provide suitable locations for parties and Greek life housing and activities on campus.

2. **Economic Health** – The Master Plan should support the economic health of the City, and negative fiscal impacts created by Plan implementation should be mitigated by the University. The Master Plan should support consideration of a hotel/conference facility within the City limits.

3. **Housing** – The Master Plan should continue to push to house all undergraduate students on campus. In the interim, future increase in enrollment should be linked to prior provision of on-campus housing. Programs should be included to encourage housing for faculty and staff within existing neighborhoods (not on campus) to both stabilize neighborhoods close to campus and encourage residents to rely on active transportation and transit to get to and from campus.

4. **Multi-Modal Transportation** – The Master Plan should support City goals for modal-split, encourage walking, cycling, and the use of transit by students and employees, and discourage single-occupant vehicle trips from the University into the City. Programs should support continued contribution to City transit; provision of an internal campus shuttle system; improved hub for a transit center; and restriction of parking passes for residents living within one (1) mile of campus.

5. **Protection of Open Space and Agricultural Resources** – Land planning for future growth should take into account impacts on natural resources, preserve agricultural land to the greatest extent feasible, and identify opportunities preserve important open space resources while making important connections to other public open space lands adjacent to the University. The Master Plan should include provisions for conservation easements on open space lands.

6. **Diversity** – The Master Plan should support a diverse population and contribute positively to a larger community that welcomes and respects all people.

7. **Public Services** – The Master Plan and EIR should fully explore the impact of growth on City services: recycled water, wastewater, police, fire, and code enforcement and should include a fiscal impact analysis for City services to ensure that future growth of the
City Guiding Principles – Cal Poly Master Plan Update

University contributes its fair share to support city services, so that existing levels of service to the community are not eroded as the University enrollment continues to grow.
POLICY SUPPORT FOR GUIDING PRINCIPLES

NEIGHBORHOOD WELLNESS

Land Use Element (LUE) LUE 2.1. Neighborhood Focus. The City shall preserve, protect and enhance the City’s neighborhoods and strive to preserve and enhance their identity and promote a higher quality of life within each neighborhood.

LUE 2.3.11. Residential Project Objectives. Residential projects should provide:
   A. Privacy, for occupants and neighbors of the project;
   B. Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine
   C. Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support.
   D. Pleasant views from and toward the project;
   E. Security and safety.
   F. Bicycle facilities consistent with the City’s Bicycle Plan;
   G. Adequate parking and storage space;
   H. Noise and visual separation from adjacent roads and commercial uses. (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)
   I. Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways.
   J. Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

LU 2.2.6 Neighborhood Characteristics

The City shall promote livability, quiet enjoyment, and safety for all residents. Characteristics of quality neighborhoods vary from neighborhood to neighborhood, but often include one or more of the following characteristics:
   A mix of housing type styles, density, and affordability.
   Design and circulation features that create and maintain a pedestrian scale.
   Nearby services and facilities including schools, parks, retail (e.g., grocery store, drug store), restaurants and cafes, and community centers or other public facilities.
   A tree canopy and well-maintained landscaping.
   A sense of personal safety (e.g., low crime rate, short police and emergency response times).
   Convenient access to public transportation.
   Well-maintained housing and public facilities.

LU 2.6.5 Fraternities & Sororities
The City shall work with Cal Poly to develop a proposal to locate fraternities and sororities on campus for consideration by the CSU Board. If locations on campus cannot be provided, fraternities and sororities should be limited to medium-high and high-density residential areas near the campus.

Housing Element (HE) HE 8.18 Jointly develop and implement a student housing plan and continue to support "good neighbor programs" with Cal Poly State University, Cuesta College and City residents. The programs should continue to improve communication and cooperation between the City and the schools, set on-campus student housing objectives and establish clear, effective standards for student housing in residential neighborhoods.

ECONOMIC HEALTH

LUE San Luis Obispo should:
14. Retain existing businesses and agencies, and accommodate expansion of existing businesses, consistent with other goals.
15. Emphasize more productive use of existing commercial buildings and land areas already committed to urban development.
16. Provide an adequate revenue base for local government and public schools.
17. Provide high quality public services, ensuring that demands do not exceed resources and that adequate facilities and services can be provided in pace with development.
18. Cooperate with other agencies in the county to assure that increases in the numbers of workers and college and university students in the San Luis Obispo area do not outpace housing availability.
24. Provide a resilient economic base, able to tolerate changes in its parts without causing overall harm to the community.
25. Have developments bear the costs of resources and services needed to serve them, except where the community deliberately chooses to help pay in order to achieve other community goals.
27. Serve as the county's hub for: county and state government; education; transportation; visitor information; entertainment; cultural, professional, medical, and social services; community organizations; retail trade.

HOUSING

LUE Goal 18. Cooperate with other agencies in the county to assure that increases in the numbers of workers and college and university students in the San Luis Obispo area do not outpace housing availability.

LUE 2.6.1 Cal Poly
The City shall encourage Cal Poly to build housing on campus for all of its students, to the extent feasible. On-campus housing should be expanded at least as fast as enrollment increases. Consideration shall be given for housing for faculty and staff as student enrollment increases.
LUE 2.6.4 Location
The City shall encourage the development of housing likely to attract faculty, staff, and students to locate close to Cal Poly. The City shall work with Cal Poly to facilitate faculty and staff owning or renting housing in adjacent neighborhoods.

HE 8.4 Encourage Cal Poly University to continue to develop on-campus student housing to meet existing and future needs and to lessen pressure on City housing supply and transportation systems.

HE 8.5 Strengthen the role of on-campus housing by encouraging Cal Poly University to require freshmen and sophomore students to live on campus.

HE 8.6 Locate fraternities and sororities on the Cal Poly University campus. Until that is possible, they should be located in Medium-High and High Density residential zones near the campus.

HE 8.7 Encourage Cal Poly University to develop and maintain faculty and staff housing, consistent with the General Plan.

MULTI MODAL

Circulation Element (CE) CE 1.6.1. Transportation Goals
1. Maintain accessibility and protect the environment throughout San Luis Obispo while reducing dependence on single-occupant use of motor vehicles, with the goal of achieving State and Federal health standards for air quality.
2. Reduce people’s use of their cars by supporting and promoting alternatives such as walking, riding buses and bicycles, and using car pools.
3. Provide a system of streets that are well-maintained and safe for all forms of transportation.
4. Widen and extend streets only when there is a demonstrated need and when the projects will cause no insignificant, long-term environmental problems.
5. (Omitted)
6. Promote the safe operation of all modes of transportation.
7. Coordinate the planning of transportation with other affected agencies such as San Luis Obispo County, Cal Trans, and Cal Poly.
8. Reduce the need for travel by private vehicle through land use strategies, telecommuting, creative transportation demand management, and compact work weeks.
9. Support the development and maintenance of a circulation system that balances the needs of all circulation modes.

CE 1.7.1. Encourage Better Transportation Habits
Increase the use of alternative forms of transportation (as shown on Table 1) and depend less on the single-occupant use of vehicles.
LUE 2.2.3 Neighborhood Traffic

Neighborhoods should be protected from intrusive traffic. All neighborhood street and circulation improvements should favor pedestrians, bicyclists, and local traffic. Vehicle traffic on residential streets should be slow. To foster suitable traffic speed, street design should include measures such as narrow lanes, landscaped parkways, traffic circles, textured crosswalks, and, if necessary, stop signs, speed humps, bollards, and on-street parking and sidewalks.

LUE 2.2.4 Neighborhood Connections

The City shall provide all areas with a pattern of streets, pedestrian network, and bicycle facilities that promote neighborhood and community cohesiveness. There should be continuous sidewalks or paths of adequate width, connecting neighborhoods with each other and with public and commercial services and public open space to provide continuous pedestrian paths throughout the city. Connectivity to nearby community facilities (such as parks and schools), open space, and supporting commercial areas shall also be enhanced, but shall not be done in a method that would increase cut-through traffic. (See also the Circulation Element.)

PROTECTION OF OPEN SPACE AND AGRICULTURAL RESOURCES

LUE Goal 4. Protect, sustain, and where it has been degraded, enhance wildlife habitat on land surrounding the city, at Laguna Lake, along creeks and other wetlands, and on open hills and ridges within the city, so that diverse, native plants, fish, and animals can continue to live within the area.

LUE Goal 6. Recognize the importance of farming to the economy of the planning area and the county, protect agriculture from development and from incompatible uses, and protect remaining undeveloped prime agricultural soils.

Conservation and Open Space Element (COSE) COSE 8.1 Greenbelt. Open space outside the urban area

Secure and maintain a healthy and attractive Greenbelt around the urban area, comprised of diverse and connected natural habitats, and productive agricultural land that reflects the City's watershed and topographic boundaries.

COSE 8.2.1 Open space preserved.
City Guiding Principles – Cal Poly Master Plan Update

The City will preserve as open space or agriculture the undeveloped and agricultural land outside the urban reserve line, including the designated Greenbelt as shown in Figure 5, and will encourage individuals, organizations and other agencies to do likewise.

DIVERSITY

HE Goal 4. Preserve and accommodate existing and new mixed-income neighborhoods and seek to prevent neighborhoods or housing types that are segregated by economic status.

LUE Goal Society and Economy. San Luis Obispo should be a well balanced community. Environmental, social, and economic factors must be taken into account in important decisions about San Luis Obispo's future. A healthy economy depends on a healthy environment. The social fabric of the community for both residents and visitors must also be part of that balance.

LUE Goal San Luis Obispo should:
23. Enrich community cultural and social life by accommodating people with various backgrounds, talents, occupations, and interests.

PUBLIC SERVICES

LUE Goal 17. Provide high quality public services, ensuring that demands do not exceed resources and that adequate facilities and services can be provided in pace with development.

LUE Goal 25. Have developments bear the costs of resources and services needed to serve them, except where the community deliberately chooses to help pay in order to achieve other community goals.

LUE Goal 42. San Luis Obispo should: Be a safe place to live.

Water and Wastewater Element (WWE) WWE B2.2.3 Wastewater Service for New Development
New development shall pay its proportionate or "fair share" of expanded treatment and collection system capacity and upgrades. New development will only be permitted if adequate capacity is available within the wastewater collection system and/or Water Reclamation Facility.

Safety Element (SE) SE 3.0 Adequate Fire Service
Development shall be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development.
September 11, 2017

Dr. Jeffrey D. Armstrong  
President, California Polytechnic State University  
Administration Building  
San Luis Obispo, CA 93407

Dear Dr. Armstrong,

I am writing to provide you with the City of San Luis Obispo’s assessment of the impacts associated with the increased enrollment expected on campus for Fall 2017. On August 15, 2017, Keith Humphrey presented the specifics to our City Council, indicating that 1,000-1,200 additional students are expected to be enrolled in classes this Fall.

During his presentation, Keith was very clear that this was a surprise. In fact, the University has consistently messaged to City leaders and the community that enrollment would be kept at a “steady state” until a variety of changes occurred on campus, including increased housing to accommodate any increase to the student body.

The news that enrollment would not be held at a steady state – and would actually increase by a significant percentage – is not welcome because increased enrollment will increase the cost of services provided by the City to the campus and community and these costs have not been planned for or budgeted.

The City and Cal Poly have a mutually beneficial relationship and a variety of partnerships and agreements that benefit both City residents and the campus. These include law enforcement, emergency response, water and sewer service, transit service, neighborhood wellness initiatives, and information technology infrastructure. Both the City and the University embrace sustainability as a guiding principle for future decision-making.

Given our close relationship and the goal of moving forward to a productive and sustainable future together, we are hopeful that the University will give careful consideration to the following assessment of impacts and the associated request for resources to mitigate the impacts that the City expects to realize with increased enrollment.

In some cases, our agreements are somewhat formulaic (water and sewer service) and the increased enrollment can be translated into a direct cost in line with existing methodology. In the case of transit, impacts are anticipated that go beyond the scope of our existing agreements, but those costs can be fairly easily predicted based on our extensive experience serving campus based on our review of empirical data. With respect to law enforcement, emergency response, and code enforcement, the City has identified the impacts expected from the increased enrollment and has identified ways that these impacts can be mitigated through the assignment of additional resources, the costs of which should be borne by Cal Poly.
Emergency Response (Fire and Medical Services)

The Fire Department has invested significantly in partnering with the University to improve decision making of incoming students with a goal of increasing student safety by decreasing overconsumption of alcohol, thus decreasing the need for emergency medical services. Alcohol-influenced decision making is a primary factor in calls for service related to the University student population.

The Fire Department routinely tracks all emergency medical responses based on location and patient demographics, including all calls to the University campus and all calls involving University students. On a daily basis beginning during the Week of Welcome (WOW), the Fire Chief and his staff will evaluate system-wide emergency response coverage related to University impacts. If the increase in enrollment is attributed to an anomalous increase in fire and/or medical calls for service, the Fire Department will need to increase staffing to ensure the availability of sufficient resources to serve the campus and the City.

If this is the case, the most likely scenario would result in putting into service a two-person medical response unit to address emergency call volume trends. The cost for this increased service (equipment and personnel) is $112 per hour. If, for example, this staffing adjustment was necessary for 12-hour periods on Thursday, Friday, and Saturday, the weekly cost of this scenario will be $4,032. The authority to exercise staffing adjustments resides with the Fire Chief, who will consult with the University Police Chief prior to implementing any planned staffing increases. The length of this enhanced staffing model would also be based on emergency response trends related to providing service to the University.

Law Enforcement

In consideration of the projected increase of 1,000 to 1,200 students for the 2017/18 Cal Poly school year, the San Luis Obispo Police Department believes there will be increases in certain student related call types. Call types that significantly involve students are alcohol related, noise, DUI and parking/abandoned vehicles.

Noise, nuisance and alcohol:
Considering the majority of the student population increase is within the freshman class, we anticipate there will be a significant impact on neighborhood wellness. This will include students attending house parties, under-aged drinking, open containers and added foot traffic within the neighborhoods that also leads to nuisance related activity.

Some of the anticipated impacts can be handled by our SNAP (Student Neighborhood Assistant Program) employees. SNAP employees are current Cuesta and Cal Poly students. SLOPD believes an increase of 2 SNAP employees, for 36 weeks, each at 20 hours per week, would address these impacts. At the current salary rate for SNAP employees ($12.96) this would be an added cost of $18,662 a year to SLOPD’s budget.

This will not address any increases in criminal activity, property crime, or second response/long term noise impacts that cannot be addressed by SNAP. However, SLOPD and UPD are currently in an MOU that allows UPD to enforce municipal code violations within a 1-mile radius of the Cal Poly campus. This MOU was established to help address neighborhood wellness issues involving
students within the neighborhoods surrounding Cal Poly, and can now be utilized to further address the impacts associated with increased enrollment.

In order to further address anticipated impacts, SLOPD is asking that Cal Poly PD increase staffing on San Luis Obispo’s busiest days and times. The additional staffing would be assigned to the neighborhoods surrounding Cal Poly to help enforce municipal code violations related to the potential increase in student related violations. Our busiest days while Cal Poly is in session is Thursday night to early Sunday morning between 8:00 p.m. and 2:00 a.m.

SLOPD will be tracking student related (CP, Cuesta and other) calls for service during the 2017/18 school year. Currently there is no definitive data to project the impacts related to the increase in the student population. SLOPD will evaluate the statistical impacts throughout the year to further determine the impacts related to the increased number of students added in the 2017/18 school year.

Parking

Cal Poly has implemented a policy, which does not allow incoming freshman to park their vehicles on campus. It is our belief there will still be a percentage who bring their vehicles to San Luis Obispo and potentially park in neighborhoods. If only 15% bring a vehicle to San Luis Obispo, there will be an additional 150 vehicles on SLO streets without a corresponding residence. Many of the neighborhoods surrounding Cal Poly have parking restrictions that will require stepped up enforcement to reduce negative impacts. With limited parking near campus, many will have to park their vehicle further away from campus and may legally park their vehicles for no more than 72 hours in one location. This will likely create an increase in the number of calls regarding abandoned vehicles in addition to additional calls for vehicles violating other parking regulations. Vehicles reported as abandoned must be marked and tagged with a 72-hour notice and rechecked at the conclusion of the 72-hour period. The additional staff costs for increased enforcement and monitoring are calculated at $10,130 during the school year, based on hourly rates for enforcement staff that would be assigned the work.

Transit

As a direct result of increased enrollment and the prohibition of Freshman bringing cars on campus, additional and unbudgeted transit services will need to be deployed to meet increased passenger loads and maintain the reliable service area residents depend on. Based on prior years’ assessments (e.g. Closure of Grand Ave Parking Lot, Farmers Market nights, extra late evening service and associated fuel expenses, etc.), no less than $26,000 in unbudgeted services would need to be deployed. This value is directly tied to additional services SLO Transit has provided for the direct benefit of the University and does not account for the loss in revenues from the riding General Public who complained of “being crowded out” of public transit by the increased transit use by students, faculty, and staff.

- Additional Tripper Service - $14,000
- Additional Farmers Market Service - $5000
- Additional Late Evening Service - $5000
- Associated Fuel - $2,000
Neighborhood Services and Code Enforcement

The Community Development Department is active in the neighborhoods around campus performing pro-active code enforcement to implement the City's Neighborhood Enhancement Ordinance. In addition, traditional code enforcement addresses complaints related to construction without permits, such as garage conversions. The area around the Cal Poly campus experiences a greater incidence of activities that require code enforcement resources than other neighborhoods in the City. Increased enrollment is expected to exasperate this effect, particularly until the new dorms open in Fall 2018, which may temporarily reduce this pressure.

Over the past few years, progress has been made in the area of neighborhood wellness. The neighborhoods around Cal Poly campus have been closely monitored by City Code Enforcement Technicians who routinely make contact with residents. New regulations regarding property maintenance, storage of refuse containers, outdoor furniture, and maintenance of weeds/lawns has had a beneficial impact and raised expectations for all City residents. For students living in neighborhoods - often living alone for the first time - this program has had a demonstrably positive impact. The improvements have been noted during recent neighborhood walk-abouts with Cal Poly and City officials.

A Code Enforcement Technician I position that normally helps patrol the neighborhoods is currently filled by a contract employee. That contract is set to expire on November 29, 2017, which would leave one technician to patrol all property within the city limits. If this resource is eliminated during a time of increased enrollment, much progress in the area of neighborhood wellness around campus could be lost.

As a result, the City is requesting that Cal Poly fund the contract of a Code Enforcement Technician I between November 29, 2017 and June 27, 2018 at a cost of $37,500. Maintaining this resource during a time of increased enrollment will help maintain neighborhood wellness prior to the availability of new on-campus housing.

Summary of Impacts

The following table summarizes the costs associated with increased services required by over-enrollment that the City would expect to realize. The total dollar value the City is requesting to address the impacts of increased enrollment is $92,292 during the 2017-18 academic year.

In addition, as previously discussed in this letter, if the increase in enrollment is attributed to an anomalous increase in fire and/or medical calls for service, the Fire Department will need to increase staffing to ensure the availability of sufficient resources to serve the campus and the City. The costs associated with this additional resource would be $4,032 per week.

Finally, in order to further address anticipated impacts, SLOPD is asking that Cal Poly PD increase staffing on San Luis Obispo's busiest days and times. The additional staffing would be assigned to the neighborhoods surrounding Cal Poly to help enforce municipal code violations related to the potential increased in student related violations. Our busiest days while Cal Poly is in session is Thursday night to early Sunday morning between 8:00 p.m. and 2:00 a.m.
It is our request that Cal Poly evaluate this information carefully and agree to cover the costs identified to ensure that the services provided by the City may be continued in a manner that does not impact the quality of life on campus or within the City.

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Scope of Additional Service</th>
<th>Cost Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Response</td>
<td>Two-Person Medical Response, 36-Hour total, Thursday-Sunday</td>
<td>$4,032/week if warranted by calls for service</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>UPD up-staff Thursday PM to early Sunday AM</td>
<td>(Cal Poly cost)</td>
</tr>
</tbody>
</table>

**Known Direct Costs to City**

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Scope of Additional Service</th>
<th>Cost Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law Enforcement</td>
<td>Two additional SNAP employees, 20-hours/week for 36 weeks</td>
<td>$18,662</td>
</tr>
<tr>
<td>Parking Services</td>
<td>Stepped up parking enforcement in neighborhoods</td>
<td>$10,130</td>
</tr>
<tr>
<td>Transit Service</td>
<td>Additional services to meet demand</td>
<td>$26,000</td>
</tr>
<tr>
<td>Neighborhood Wellness</td>
<td>One Code Enforcement Technician I (11/30/17-6/27/18)</td>
<td>$37,500</td>
</tr>
<tr>
<td><strong>TOTAL (2017-18)</strong></td>
<td></td>
<td><strong>$92,292</strong></td>
</tr>
</tbody>
</table>

Thank you for your attention to this important matter, and to ongoing collaborations between campus and city leadership that help ensure and maintain a high level of service for residents and community members on and off campus.

Sincerely,

![Signature]

Katie Lichtig
City Manager

Cc: Cynthia Vizcaino Villa, Vice President for Administration and Finance
    Dr. Keith Humphrey, Vice President for Student Affairs
    Jessica Darin, President’s Office Chief of Staff
    Mayor and City Council
    Derek Johnson, Assistant City Manager
    Michael Codron, Community Development Director
    Deanna Cantrell, Police Chief
    Garret Olson, Fire Chief
    Daryl Grigsby, Public Works Director
RESOLUTION NO. 10676 (2015 Series)

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN LUIS OBIOSPO, CALIFORNIA, PROVIDING CITY INPUT TO CAL POLY FOR CONSIDERATION IN THEIR MASTER PLAN UPDATE PROCESS (GENP-2088-2015)

WHEREAS, the City Council of the City of San Luis Obispo has established Guiding Principles based on General Plan Policies which the Planning Commission has used as a basis to provide recommendations on the Cal Poly Master Plan; and,

WHEREAS, the Planning Commission of the City of San Luis Obispo conducted a public meeting in the Council Chamber of City Hall, 990 Palm Street, San Luis Obispo, California, on October 28, 2015, for the purpose of reviewing draft land use concepts under consideration by Cal Poly for the Campus Master Plan Update and provide recommendations to the Council based on Guiding Principles supported by General Plan policy; and

WHEREAS, the City Council of the City of San Luis Obispo conducted a public meeting in the Council Chamber of City Hall, 990 Palm Street, San Luis Obispo, California, on November 17, 2015, for the purpose of considering Planning Commission recommended input on land use concepts being considered for final inclusion in the Cal Poly Master Plan Update; and

WHEREAS, the City Council has duly considered all evidence, including the testimony of the public and interested parties, recommendations of the Planning Commission, the evaluation and recommendations by staff, and refined land use concepts provided by Cal Poly, and presented at said hearing.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of San Luis Obispo as follows:

SECTION 1. Based upon all the evidence, the Council makes the following findings:

1. City comments to Cal Poly are based on City Land Use Element Policy for Neighborhood Wellness goals to preserve and enhance the quality of life within each neighborhood (LUE 2.1 Neighborhood Focus, LUE 2.3.11 Residential Project Objectives) and provide high quality public services ensuring that demands do not exceed resources (LUE Goal #17).

2. City comments to Cal Poly are consistent with Land Use and Housing Element policies to facilitate faculty and staff housing in neighborhoods adjacent to Cal Poly and to locate fraternities and sororities on the Cal Poly campus (LUE 2.6.4 & HE 8.4 through 8.7).
3. City comments to Cal Poly are consistent with Circulation Element Policy to coordinate planning of Transportation with other affected agencies such as Cal Poly and support the development of a circulation system that balances the needs of all circulation modes (CE 1.6.1).

4. City comments to Cal Poly are consistent with Land Use Element Goals and Conservation and Open Space Element Policy to preserve protect scenic vistas, preserve agricultural land, and enhance wildlife habitat on land surrounding the City. (LUE Goals 4 & 6 and COSE 8.1).

5. City comments to Cal Poly consistent with Safety Element policy to ensure adequate fire services are available concurrent with development (SE 3.0) and Wastewater Element policy and new development pay its proportionate “fair share” of expanded collection system capacity and upgrades.

SECTION 2. Environmental. City of San Luis Obispo input on land use concepts under consideration by Cal Poly (agency with jurisdiction) for further development in the Master Plan update process is not an action which is subject to CEQA.

SECTION 3. Recommendation. The City Council of San Luis Obispo does hereby approve the following input to Cal Poly for consideration in their Master Plan update process:

1) Explore implementation of programs and incentives for faculty and staff to live within existing neighborhoods (not on campus) to stabilize neighborhoods close to campus.

2) Master Plan policies/principles should address neighborhood compatibility in terms of scale, density, character of development and residential neighborhoods should be limited and only be designated for staff, faculty and family housing. Neighborhood Sensitivity zones should also be added to the residential neighborhood area west of Highway 1 that is adjacent to existing City neighborhoods.

3) The Master Plan update should include recommendations of the Neighborhood Wellness/Community Civility Report where applicable.

4) Proposed Residential Neighborhood Development should be sited and developed in order to avoid or minimize impacts to scenic view sheds and environmental resource impacts (riparian, creek, agriculture).

5) New development in the Poly Canyon area and on land adjacent to City Open Space should consider regional trail connections and coordinated with City and US Forest Service Staff.
6) Large events resulting from new facilities and expansion of existing facilities (e.g., Arena, Agriculture Events Center, Mott Gym, Spanos Stadium, etc.) that have the potential to affect the City transportation system should include advance notification and coordination with City staff to minimize impacts; and any potential cumulative impacts on the City’s infrastructure, including but not limited to the transportation, streets, and bikeways systems associated with large events at those facilities should be fully evaluated and mitigated in the Campus Master Plan Update EIR.

7) Impacts to City emergency services and Police mutual aid response should be evaluated and mitigated since the expansion of these facilities have the potential to result in increased calls for fire, rescue, and medical service during large events.

8) Further evaluation of the wastewater facility west of California Boulevard should assess potential impacts on existing uses in the vicinity and consider relocation of the facility to a location with greater separation from existing residential neighborhoods and City boundaries.

9) Master Plan and EIR should explore the impact of growth on City services, including but not limited to recycled water, wastewater, police, fire, and neighborhood wellness.

10) Coordinate future development plans for review and cooperation in planning with City Departments (Transportation, Police, Fire, Utilities, Natural Resources, Planning).

11) Fiscal Impact Analysis. In order to accurately evaluate potential service impacts the University should prepare a Fiscal Impact Analysis.

12) The final Refined Master Plan Update should consider the City’s Guiding Principles for the Master Plan Update and relevant City General Plan policies for which they are based.

Upon motion of Council Member Carpenter, seconded by Council Member Christianson, and on the following roll call vote:

AYES: Council Members Carpenter, Christianson, and Rivoire, and Mayor Marx
NOES: Vice Mayor Ashbaugh
ABSENT:
Resolution No. 10676 (2015 Series)

The foregoing resolution was adopted this 17th day of November 2015.

Mayor Jan Marx

ATTEST:

[Signature]
Jon A. Ansolabehere
Interim City Clerk

APPROVED AS TO FORM:

[Signature]
J. Christine Dietrick
City Attorney

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Luis Obispo, California, this ___ day of ___, 2016.

[Signature]
Jon A. Ansolabehere
Interim City Clerk