

COMMENTS AND RESPONSES TO COMMENTS

This chapter of the final environmental impact report (Final EIR) contains the comment letters received during the public review period for the Draft EIR, which concluded on December 5, 2022. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared to address comments on significant environmental issues received from reviewers of the Draft EIR.

COMMENTERS ON THE DRAFT EIR

Table 1 lists the comment letters received, and the alphanumerical designation, author, and date of each letter. Comment letters are numbered in the order in which they were received by Cal Poly Humboldt.

Table 1 List of Commenters

| Letter Number | Agency/Organization | Commenter | Date |
|-----------------------|---|---|-------------------|
| State | | | |
| S1 | California Department of Transportation, District 1 | Jesse Robertson | December 5, 2022 |
| S2 | California Department of Toxic Substances Control | Isabella Roman | December 7, 2022 |
| Local | | | |
| L1 | Arcata Fire District | Randy Mendosa | December 2, 2022 |
| Organization | | | |
| O1 | Coalition for Responsible Transportation Priorities; Environmental Protection Information Center; Northcoast Environmental Center | Colin Fiske; Tom Wheeler; Caroline Griffith | December 1, 2022 |
| Individual | | | |
| I1 | Glen Colwell | | November 1, 2022 |
| I2 | Margaret Kelso | | November 29, 2022 |
| I3 | Fred Johansen | | November 30, 2022 |
| Public Hearing | | | |
| PH1-1 | Fred Johansen | | November 15, 2022 |
| PH1-2 | Anne Carlisle | | November 15, 2022 |
| PH1-3 | Natalie Calderon | | November 15, 2022 |
| PH1-4 | Anne Carlisle | | November 15, 2022 |
| PH1-5 | Anne Carlisle | | November 15, 2022 |

COMMENTS AND RESPONSES ON THE DRAFT EIR

The written comments received on the Draft EIR and the responses to those comments are presented below. Each comment is reproduced in its entirety and is followed by the response. Comment letters in their original form are included in Appendix G; individual comments are bracketed and numbered, and correspond to the comments presented in this section.

State

LETTER S1 CALIFORNIA DEPARTMENT OF TRANSPORTATION, DISTRICT 1

Jesse Robertson, Transportation Planning

December 5, 2022

Comment S1-1

Thank you for giving Caltrans the opportunity to comment on the Draft Environmental Impact Report (EIR) to develop student housing for California State Polytechnic University, Humboldt (Cal Poly Humboldt). The project would include the development of up to 964 student beds in approximately 240 apartment-style, student residence units. The project site is located near the intersection of the St. Louis Road and U.S. Highway 101 (US 101) overcrossing, approximately 0.5 mile north of Cal Poly Humboldt. We offer the following comments for your consideration:

Response S1-1

The comment provides an introduction to the letter and describes the project site in terms of its proximity to U.S. Highway 101 (US 101). No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Comment S1-2

Hydrology

With respect to the physical improvements at the Craftsman Mall/project site, we note that Caltrans has a two-foot diameter culvert at US 101 postmile 87.26 that discharges to the area that is planned as parking in the southeast corner of the planned project. The expectation is that storms will become more intense with climate change which may result in the need to increase the diameter of this culvert to accommodate an increase in storm water runoff. If stormwater quantities do increase over time, Caltrans will continue to accept and convey storm water at this location. We note that storm water will be retained on-site, however we suggest that the parking and water conveyance facilities be designed to ensure that the potential increase in flow rates can be accommodated.

Response S1-2

The comment provides suggestions related to existing and future flows of stormwater through a culvert at US 101 postmile 87.26 onto the southeastern corner of the project site. Stormwater collection and drainage is addressed in Section 3.12, "Utilities and Service Systems," in the Draft EIR. Impact 3.12-4 discusses the potential relocation or construction of new or expanded stormwater drainage facilities, noting that the project would include low impact development (LID) methods to be implemented to maintain pre-project runoff level...." The Draft EIR, within Impact 3.12-4, further states that, "[b]ecause final drainage design specifications have not been completed, including stormwater flow paths and magnitudes based on a finalized site plan, development of the project site has the potential to cause an increase in surface runoff that would exceed the capacity of the stormwater drainage system, resulting in on-site and off-site flooding and erosion. As a result, this impact would be considered **significant** (second paragraph on page 3.12-16 of the Draft EIR)." Mitigation Measure 3.12-4 requires, "adequate on-site storm drainage retention/detention facilities to accommodate the potential stormwater demands and runoff from the project site to rates not exceeding pre-development conditions (first paragraph on page 3.12-17 of the Draft EIR)."

Although the comment indicates that some stormwater flows to the site via a culvert that exists under US 101, implementation of the proposed mitigation measure, as well as compliance with National Pollutant Discharge Elimination System (NPDES) requirements would ensure that stormwater flows at the project site are conveyed, detained, and treated appropriately at the project site and to existing stormwater facilities. In addition, stormwater flows generated at the project site would generally be conveyed to the west of the project site and are not anticipated to increase flows to Caltrans right-of-way. No changes to the document are required in response to this comment.

Comment S1-3

The DEIR discusses the cumulative effects from Cal Poly Humboldt's enrollment increases on transportation and it notes the location and scale of other campus educational and student housing facilities. We have not evaluated the potential impacts of increased stormwater runoff from increased development on campus as this review appears to be for the proposed new housing to the west of 101 only. The cumulative impacts of additional stormwater runoff with Cal Poly Humboldt infrastructure improvements do not appear to have been addressed. We offer to work with Cal Poly Humboldt to evaluate any needed improvements to US 101 cross drains as a result of increased impervious surfaces.

Response S1-3

The comment states that the project contribution to cumulative impacts on stormwater do not appear to have been evaluated in the Draft EIR. In response, it is noted that cumulative impacts of the project are addressed in standalone Chapter 4, "Cumulative Impacts," in the Draft EIR. As stated in the last paragraph on page 4-13, "...future utility demands include development within the cumulative context, the analysis provided in Section 3.12, "Utilities and Service Systems," is considered inherently cumulative. As a result and based on the analysis provided above and in Section 3.12, the project would not make a cumulatively considerable contribution, and impacts would be **less than significant** with respect to utilities and service systems." As discussed above in Response S1-2 above, Mitigation Measure 3.12-4 requires, "adequate on-site storm drainage retention/detention facilities to accommodate the potential stormwater demands and runoff from the project site to rates not exceeding pre-development conditions (first paragraph on page 3.12-17 of the Draft EIR)."

The comment does not cite the cumulative utilities and service systems impact discussion in Chapter 4 or provide substantial evidence to support a significant cumulative impact to stormwater accumulation on the project site under existing or proposed conditions. Further, Chapter 4 does consider individual projects that are currently planned and under construction within the Cal Poly Humboldt campus. Cal Poly Humboldt will also be initiating a Master Plan process in the near future to address potential additional land use changes associated with campus growth. However, at this time, no plans have been developed and the potential changes in pervious versus impervious and stormwater flows are not able to be assessed. Consistent with CEQA requirements, Cal Poly Humboldt will evaluate the potential need for additional stormwater infrastructure within the campus as a result of future Master Plan development within the forthcoming Master Plan EIR. No changes to the document are required in response to this comment.

Comment S1-4

Transportation

As it relates to State priorities to reduce Vehicle Miles Traveled that result from new development, we support the project objectives as described in E.S.2.3, particularly with respect to providing additional housing near existing and planned mobility infrastructure (i.e., pedestrian and bicycle facilities and transit) to reduce vehicle trips, vehicle miles travelled, and parking demand; and to support and advance Cal Poly Humboldt's educational mission by guiding the physical development of housing proximate to campus to accommodate gradual student enrollment growth up to a future enrollment of 12,000 full-time-equivalent students per the 2004 Master Plan while preserving and enhancing the quality of campus life.

We concur with the conclusions of the Vehicle Miles Traveled (VMT) assessment; that the student housing project is expected to result in insignificant levels of VMT. We recognize and appreciate Cal Poly Humboldt's efforts to contribute toward the State's Greenhouse Gas (GHG) emission reduction goals and to incorporate multimodal travel into the design and mitigation for the project. We offer to partner with Cal Poly Humboldt, the City of Arcata, and other local transportation stakeholders to ensure that students have safe and accessible modes of travel to and from the University campus.

The following insights are offered for further consideration with the proposed mitigation efforts or as part of Cal Poly Humboldt's ongoing transportation center/Travel Demand Management (TDM) program. The recommendations are not CEQA-required mitigation measures for this project, but may contribute towards other campus-expansion projects:

- The DEIR Appendix A, NOP project description on page 5 (pdf p. 300) proposes a bus/shuttle stop along the project site, as stated here: In addition, the project would include creation of a bus/shuttle stop at the St.

Louis Road turnaround, located along the eastern boundary of the project site." (DEIR App A, p.5, pdf p. 300)." While the concept from the NOP was not carried through to the DEIR project concept and mitigation, we encourage Cal Poly Humboldt to provide a transit bus or shuttle stop for the project site, with or without coordinated HTA service. The transit facility should include an all- weather bus shelter, signage, lighting, ADA and other improvements.

- Cal Poly Humboldt is encouraged to work with Caltrans and the City of Arcata to further improve a connection between the Annie & Mary Trail and campus, as well as pedestrian and bicycle access along Sunset Avenue at L.K. Wood Boulevard and H Streets should be considered.
- As part of the mitigation proposal to provide a connected bicycle and pedestrian facility to L.K. Wood Blvd via St. Louis Road, we recommend extending the southbound bike lane from St Louis Road beyond where the bike lane ends at Granite Ave to the intersection at Sunset Ave. If there is an intent for cyclists destined for the University campus to exit L.K. Wood right-of-way at Granite Ave, please consider working with the City of Arcata to provide an intersection crossing treatment to protect bicyclists making left turns across uncontrolled travel lanes in the north- and southbound directions.
- We encourage Cal Poly Humboldt to add a parking study and parking management to the suite of existing Travel Demand Management (TDM) measures already employed for students, faculty, and staff.

Feel free to contact me with questions or for further assistance with the comments provided at (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Response S1-4

The comment correctly states that the NOP indicates that a bus/shuttle stop would be located along the project site. The bus/shuttle stop is also identified in Chapter 2 of the Draft EIR, "Project Description," in the last sentence of the second paragraph on page 2-17, of the Draft EIR. Recommendations related to the design of the transit facilities, including an all-weather bus shelter, signage, lighting, and ADA improvements will be considered and evaluated by Cal Poly Humboldt during detailed design of the project.

The comment expresses general support for the project objectives and Vehicle Miles Traveled (VMT) assessment and provides recommendations for other campus expansion projects and off-site improvements. Cal Poly Humboldt, as part of implementation of Mitigation Measure 3.11-1, would work with the City of Arcata to ensure pedestrian and bicycle facilities are provided, based on the analysis conducted, for the safe passage of pedestrians and bicyclists to and from the project site to the main campus. However, the additional recommendations provided by Caltrans will be considered and evaluated by Cal Poly Humboldt with respect to future campus growth and opportunities for interagency coordination in order to provide a more integrated multimodal transportation system.

LETTER S2 CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Isabella Roman, Environmental Scientist

December 7, 2022

Comment S2-1

I had a comment for the Cal Poly Humboldt Student Housing Project. I had the comment drafted, but didn't get around to sending it until now. I realize I'm now outside the comment period, but thought I'd send you my comment anyway, in case you can include it. See my comment below:

Response S2-1

The comment correctly acknowledges that the Draft EIR public comment period ended before it was submitted. Regardless, the comment and a response have been incorporated into the Final EIR. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Comment S2-2

Hello,

I represent the Department of Toxic Substances Control (DTSC) reviewing the Draft Environmental Impact Report (DEIR) for the Student Housing Project.

The DEIR states that the site was used as a lumber mill until the 1970s. The DEIR does not provide much information about lumber mill operations, especially not in relation to potential contamination at the site. Past land uses could have resulted in hazardous materials releases within the project area that should be investigated for public health protection. Past land uses could indicate the need for conducting a Phase 1 Environmental Site Assessment (ESA), Phase 2 ESA or other environmental sampling activities.

Response S2-2

The comment states that past land uses of the project site, including lumber mill operations, may have resulted in release of hazardous materials. Consistent with the recommendations in the comment, as stated at the beginning of Chapter 3 of the Draft EIR, Environmental Impacts and Mitigation Measures, under Effects Found Not To Be Significant – Hazards and Hazardous Materials (p.3-3) and as cited in Chapter 8, References, the Draft EIR reflects the results of a Phase I Environmental Site Assessment (ESA) and a Phase II ESA that were prepared for the site in 2015. While several recognized environmental conditions were identified in the Phase I ESA, further testing indicated that there are no recognized environmental conditions or hazardous materials on the project site (Blue Rock Environmental 2015a and 2015b). The text in the second paragraph of Draft EIR has been modified as follows to address the results of the Phase I and Phase II ESAs

The SWRCB GeoTracker website does not identify any active hazards related to underground storage tanks (USTs) and other types of contamination within the project site or surrounding area (SWRCB 2022). A Phase I Environmental Site Assessment (ESA) and a Phase II ESA were prepared for the site in 2015. While several recognized environmental conditions were identified in the Phase I ESA, including two properly disposed underground storage tanks, further testing indicated that there are no recognized environmental conditions or hazardous materials on the project site (Blue Rock Environmental 2015a and 2015b). Historically, two USTs were located on-site and were disposed of appropriately. As a result, they are not considered current recognized environmental conditions at the project site (Blue Rock 2015). Further, the California Department of Toxic Substances Control's (DTSC's) EnviroStor website also does not identify any hazards related to any cleanup sites within the project site (DTSC 2022). For these reasons, the project site is not included on a list of hazardous-materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) (CalEPA 2022).

Transportation of hazardous materials on area roadways is regulated by the California Highway Patrol and California Department of Transportation, whereas use of these materials is regulated by DTSC, as outlined in CCR Title 22. Cal Poly Humboldt would be required to use, store, and transport hazardous materials in compliance with local, State, and federal regulations during facility construction and operation. Any disposal of hazardous materials would occur in a manner consistent with applicable regulations and at an appropriate off-site disposal facility. Therefore, adverse impacts related to the handling of potentially hazardous materials as a result of the project are not anticipated.

Local

LETTER L1 ARCATA FIRE DISTRICT

Randy Mendosa, President, Board of Directors
December 12, 2022

Comment L1-1

The Arcata Fire District (AFD or District) provides fire services within a 62 square mile District that has a resident population of approximately 36,000 residents living in five communities: the City of Arcata; Bayside; Manila; McKinleyville; and Jacoby Creek. The City of Arcata, including the Cal Poly Humboldt campus, is the largest community served by AFD with a population of about 18,000. Fire services include fire prevention and suppression, emergency medical services, rescue, hazardous materials response, and public assists among others. AFD responds to approximately 3,300 incidents per year; about eight percent are fires and about 50 percent are medical. The District has 20 fire suppression employees, only seven of which are typically on duty at any time, including one duty chief, operating from three stations (McKinleyville, Mad River, and Arcata), each with one engine staffed with two firefighters.

The AFD and its predecessors have provided fire protection to the University since 1913. AFD provides full-service emergency response to the Cal Poly Humboldt campus as the entirety of the main campus is located within the District boundary. AFD and Cal Poly Humboldt have partnered for over 20 years in conducting joint training with University Police and Housing staff.

The AFD is supportive of the transformation from Humboldt State University to Cal Poly Humboldt. The AFD is also supportive of Cal Poly Humboldt's plans to increase enrollment and increase the proportion of on-campus housing for students. However, the AFD feels that it is essential that plans and designs for expanded student housing, academic, and instructional buildings be implemented in a manner within with AFD's capacity to provide services under safe conditions commensurate with industry standards.

While California Environmental Quality Act (CEQA) case law clarifies that funding impacts associated with a project are not CEQA impacts, physical changes and the ability to adequately serve those changes most definitely are. The Draft Environmental Impact Report (DEIR) determination of significance must be whether new impacts, including substantial new housing construction, would significantly reduce acceptable fire service staffing ratios, response times and other life safety performance objectives. Not only will existing property tax revenues supporting fire services be lost, due to Cal Poly status as exempt from property tax, there will be a future lack of District revenues to address project related changes. The physical services impact from a constrained District, due to the applicant's actions and directly attributable to the project, must be considered significant, as noted in this comment letter.

Response L1-1

The comment provides general information about Arcata Fire District (AFD) and suggests that the Draft EIR determination of significance must be whether new impacts, including substantial new housing construction, would significantly reduce acceptable fire service staffing ratios, response times, and other life safety performance object. However, the threshold of significance, which is drawn from the State CEQA Guidelines Appendix G Environmental Checklist Form, bases potential impact significance on the need for new or physically altered governmental facilities, *the construction of which could cause significant environmental impacts*. As stated in the first bullet on page 3.10-7 of the Draft EIR:

- ▶ result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
 - fire,
 - police protection,
 - schools,
 - parks, and
 - other public facilities

Impact 3.10-1 addresses this threshold in terms of fire facilities (page 3.10-8 of the Draft EIR) appropriately and in accordance with CEQA requirements.

Comment L1-2

The DEIR does not provide an adequate fire protection services baseline or adequately analyze potential impacts of substantially increased services needs and response to multi-story buildings and approximately 1,000 new student residents. These omissions, as described below, must be addressed and the DEIR recirculated. As part of preparing a revised DEIR, Cal Poly Humboldt should coordinate closely with AFD regarding existing fire service capabilities and needed firefighting personnel, facilities, and equipment necessary to respond to the proposed project.

Population and employment together comprise the "service population" of a fire department. Together with service area building types, the service population's geographic distribution, and adequate fire response and life-saving resources are all critical factors that must be analyzed to determine significant effects on fire protection services.

The DEIR includes errors and misstatements regarding population and housing within the City of Arcata and as a result, the evaluation of population and housing related impacts is inadequate.

Response L1-2

The comment provides introductory comments related to concerns presented within the remainder of Comment Letter L1, specifically noting concerns related to the methods used to determine significant effects. The Draft EIR's analysis was prepared in accordance with CEQA requirements and appropriate thresholds related to public services and impacts were determined to be less than significant (Section 3.10 of the Draft EIR, "Public Services"). Please refer to Response L1-1, which addresses the threshold of significance related to an impact to public services; and Response L1-11, which addresses the need for new or expanded facilities related to the project.

Further, Cal Poly Humboldt has coordinated and continues to coordinate with AFD regarding fire protection services for the project site. Notably, during a July 2022 meeting between Cal Poly Humboldt and AFD, the project engineer and Cal Poly Humboldt staff met with AFD staff to discuss elements of the project including fire lanes, aerial fire apparatus access, drive aisles, hydrant locations, and fire protection water supply and ensure that adequate on-site facilities (including emergency access to, from, and through the project site) are provided as part of the project. In October 2022, Cal Poly Humboldt met with AFD to discuss project status and seek further input regarding existing service agreements between the two entities. Additionally, AFD provided "local fire authority - access approval" in October, which is a CalFire form that AFD uses to indicate approval of adequate access to the site, including elements such as general access, connection, alarms, and elevators.

Comment L1-3

Further, the DEIR cumulative impacts analysis relies upon the inadequate analysis of fire services, population and housing and also omits important probable future development projects in the vicinity of the project site that have some relation to the environmental impacts of construction and operation of the proposed project.

Response L1-3

The comment provides general statements regarding the cumulative analysis of fire services, population, and housing; however, no specific reasons were provided. Because the comment does not provide details related to the adequacy, accuracy, or completeness of the EIR is provided, no further response is necessary.

Comment L1-4

The DEIR analysis should disclose the changes to the service population and building types that would result from the proposed project and important probable future development projects in the project vicinity must be described and analyzed to determine the potential for significant environmental impacts of new or physically altered governmental facilities, and the potential effects on acceptable service ratios, response times or other performance objectives.

In comparison to national consensus-based standards, AFD has provided a summary of existing service demands and service levels (including from automatic and mutual aid partners), and expected service demands from the project. The attached Exhibit 1 should be used as the basis of analysis in the DEIR to determine the potential for significant

environmental impacts of new or physically altered governmental facilities, and the potential effects on acceptable service ratios, response times or other performance objectives. Exhibit 1 should also be used to develop mitigations to ensure that adequate fire services are available to the proposed project.

Response L1-4

The comment states that Exhibit 1, provided as part of Comment Letter L1, should be used to determine existing service demand and the effects of the project on service demand. Exhibit 1 includes background information related to AFD's operations and provides recommended actions for Cal Poly Humboldt to support adequate response levels by AFD. While Exhibit 1 notes that AFD needs a new ladder truck and may need to expand one or more existing fire stations, no new or modified station been formally proposed and it is not clear that an environmental impact may result from either action. Further, according to the most recent Humboldt Bay Regional Fire Services Municipal Services Review, the Mad River Station previously had a ladder truck, in addition to a frontline engine and reserve engine (Humboldt LAFCo 2017). Because substantial evidence that indicates the project itself directly or indirectly contributes to the need for new or expanded fire facilities, the construction of which may cause environmental impacts was not provided as part of this comment or in Exhibit 1, no changes to the document are necessary.

Please see Response L1-1 for a discussion related to the CEQA Guidelines Appendix G threshold for a significant impact related to fire facilities.

Comment L1-5

The narrative contained in the final paragraph on page 3-3, that extends to page 3-4 and is repeated on page 3-5 in a description of wildfire risk, incorrectly states that "the project site is not located within a High or Moderate Fire Hazard Severity Zone." The Office of the State Fire Marshal publishes maps of Fire Hazard Severity Zones (FHSZ) for State Responsibility Area (SRA) and recommended Fire Hazard Severity Zones for Local Responsibility Area (LRA). FHSZ maps for LRA in Humboldt County can be found at the following link <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fhsz/fire-hazard-severity-zones-maps/>. These maps indicate that the project site (specifically Assessor's Parcels 505-022-011, 503-372-002, -003, -004, -005, -006) are mapped as Moderate FHSZ and are directly adjacent to High FHSZ. In addition, the entire project site is Wildland Urban Interface (Wildland Urban Interface mapping is available from the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP) <https://frap.fire.ca.gov/mapping/gis-data/>).

The project site and the City of Arcata are within the Humboldt Bay Area Planning Unit of the Humboldt County Community Wildfire Protection Plan (CWPP), last updated in 2019, which is a comprehensive plan to inspire and guide actions to mitigate the potential for wildfire loss in all vulnerable communities in Humboldt County. The CWPP identifies only a limited wildland fire history for the Humboldt Bay Area Planning Unit, which includes the project site, but describes the October 2017 "Blue Fire" in the City of Blue Lake, igniting on the same day as the tragic fires in Sonoma County, which came very close to being the catastrophic event that local firefighters are most concerned about. The Blue Fire was caused by downed power lines and occurred in an area mapped as Moderate and High FHSZ during Red Flag Warning conditions with winds gusting to 20 miles per hour. The fire was contained relatively quickly due to the presence of air firefighting resources in the area at another fire in Humboldt County. These conditions occur on rare occasions within the Planning Area, which includes the project site, but are expected to occur with greater frequency in the future and when they are coupled with climate change and drought the consequences can be disastrous. The California's Fourth Climate Change Assessment - North Coast Regional Report states that "(f)uture wildfire projections suggest a longer fire season, an increase in wildfire frequency, and an expansion of the area susceptible to fire."

Given the presence of documented wildland fire hazards at the project site, to which approximately 1,000 students are proposed to be exposed, these hazards will likely only increase over time. The DEIR should fully evaluate the potential for the project to "expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands," per CEQA Guidelines Appendix G, VIII(h). Further, a Fire Hazard and Risk Assessment should be prepared for the project based on guidance contained in the Governor's Office of Planning and Research Fire Hazard Planning Technical Advisory. This assessment is particularly important given that the Cal Poly campus and surrounding area is

largely classified as High FHSZ, located less than 1,250 feet from the project site, and does not have a plan to lessen hazards associated with wildland fire.

Response L1-5

In response to the comment and the links provided, the Draft EIR has been modified to indicate that the project site contains small portions that are designated as moderate fire hazard severity zones that are located within the Local Responsibility Area. The text beginning in the last paragraph on page 3-3 of the Final EIR has been revised to state:

Regarding wildland fire risk, and as noted in further detail below, the eastern edge of the project site is not located designated as within a High or Moderate Fire Hazard Severity Zone within the Local Responsibility Area (CalFire 2007). The area is not located within a high or very high fire hazard severity zone. The project would involve development on an infill site that is surrounded by urban/suburban development within the City. The project would not expose people or structures to increased risks related to wildland fires. Therefore, no impacts related to risk, loss, or injury involving wildfires would occur. As demonstrated above, no potentially significant impacts (either through regulatory compliance or otherwise) would occur with respect to hazards and hazardous materials; therefore, these issues are not discussed further in this EIR.

Additionally, in late December 2022, updated fire hazard severity zone maps were released by CalFire (CalFire 2022). As shown in these maps, the nearest high fire hazard severity zone to the project site is located 4.5 miles to the southeast. While the comment notes that the project site is located within the Wildland Urban Interface or WUI, and that the Blue Fire occurred within land designated as moderate and high severity, the project would include several elements that would reduce fire risk within the site compared the existing conditions. For instance, the project would be subject to the Campus Fire Safety Right-to-Know Act in the Higher Education Opportunity Act, which requires supervised fire drills, on-campus student housing facility fire strategy systems (e.g., fire sprinkler systems), policies and rules related to electrical appliances, smoke, and open flames, and evacuation procedures. As further described in Impact 3.10-1:

All new on-site buildings would be designed to meet minimum fire and emergency safety requirements identified in the California Building Code and California Fire Code and would include appropriate fire safety measures and equipment, including the use of fire-retardant building materials, inclusion of emergency water infrastructure (fire hydrants and sprinkler systems), installation of smoke detectors and fire extinguishers, emergency response notification systems, and provision of adequate emergency access ways for emergency vehicles. Further, adequate right-of-way for emergency vehicles would be provided around the proposed on-site structure with hydrants spaced according to applicable requirements. As a result, development under the project would be adequately serviced by existing fire stations and facilities, and the project is not anticipated to result in a substantial increase in service calls that would require new or expanded fire protection employees or facilities.

Additionally, due to the improvements in on-site circulation, including the provision of dedicated emergency access from the project site to Eye Street, the ability for AFD to respond to emergency calls for service to and through the project site may improve.

While the comment provides an example of another fire in the County and indicates that it occurred within a similarly designated area (moderate and high fire hazard severity zones), it does not provide any substantial evidence to indicated that the Student Housing Project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. As discussed on page 3-3 of the Draft EIR, “[t]he project would involve development on an infill site that is surrounded by urban/suburban development within the City.” As an infill development project, it would not bring new development closer to the wildland-urban interface or increase the potential for wildfire ignition. No changes to the document are necessary.

Please note that the Draft EIR reflects the Appendix G Environmental Checklist Thresholds that were updated in 2018, while the comment references versions of the thresholds that predate the 2018 CEQA amendments.

Comment L1-6

The DEIR incorrectly states that the Humboldt County Association of Governments (HCAOG) develops regional population, employment, and housing forecasts for the county and the individual cities and communities within the county. The HCAOG Regional Housing Needs Plan (RHNP) does not include any reference to planned growth in student enrollment at Cal Poly. The following edits addressing errors and what AFD considers to be omission or inaccuracies, must be made to the population and population growth description on page 3.9-4:

As part of its regional planning functions, HCAOG is required to adopt a RHNP that allocates a share of the regional housing need to each city and county to aid in the preparation of housing elements ~~develops regional population, employment, and housing forecasts for the county and the individual cities and communities within the county~~. The housing elements of the City's and County's respective general plans each incorporate the Regional Housing Needs Allocation (RHNA) projected population and housing estimates from HCAOG into their overall planning efforts. The Department of Finance, Demographic Research Unit, prepares population projections for the state and each county. No regional population projection is prepared for cities or communities within the county. A discussion of population trends in the city and county are discussed below.

Response L1-6

Please refer to Response L1-9 regarding consideration of student enrollment at Cal Poly Humboldt by HCAOG. The recommended edits presented in this comment provide suggested clarifications to the text; however, it is incorrect to state that no regional population projections are prepared for cities or communities within the County. California Housing Element Law requires each city and county to adopt a general plan for future growth. This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, HCD estimates the relative share of California's projected population growth that would occur in each county in the state, based on DOF population projections and historic growth trends. Where there is a regional council of governments, such as HCAOG, HCD provides the regional housing need to the council. The council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares provides cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the state's projected housing need. In response to this comment, the noted paragraph on page 3.9-4 of the Draft EIR has been amended as follows:

As part of its regional planning functions, HCAOG is required to adopt a RHNP that allocates a share of the regional housing need to each city and county to aid in the preparation of housing elements ~~develops regional population, employment, and housing forecasts for the county and the individual cities and communities within the county~~. The housing elements of the City's and County's respective general plans each incorporate the Regional Housing Needs Allocation (RHNA) projected population and housing estimates from HCAOG into their overall planning efforts. The Department of Finance, Demographic Research Unit, prepares population projections for the state and each county. The Department of Housing and Community Development provides the regional housing needs to HCAOG. A discussion of population trends in the city and county are discussed is provided below.

These changes do not result in a new significant impact or impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

Comment L1-7

US Census and Department of Finance data indicate that the population in the City of Arcata has not "swelled," rather, growth in the City has been moderate and the projected future population in Humboldt County is projected to decline. The following edits - shown using strikethrough and underline, to address errors, and to address what AFD considers to be mischaracterizations - are requested to be made to the description of population and population growth on page 3.9-4:

Humboldt County (County) is a rural county with a large land area and low population density. Per California Department of Finance (DOF) statistics, the county's population in 2022, inclusive of

incorporated cities, is 135,168 residents, which represents a decrease of 1,295 compared to the County's 2020 population but an increase of 545 residents over 2010 county population (DOF 2021a, 2022). As of 2022, there are 62,771 households in Humboldt County with an average person-per-household ratio of 2.31 (DOF 2022).

The City of Arcata is one of the primary population centers in the County. In 2010, City population was 17,231, and ~~increased then swelled~~ to 18,592 in 2020 ~~at an annual average rate of less than one percent per year~~, before decreasing ~~slightly~~ in the years ~~2021 and 2022~~ to 18,059 (DOF 2021a, 2022). The city's population is largely determined by student enrollment at Cal Poly Humboldt. With 42 percent of residents being age 18-24, the City has the largest share of college-age adults in the County (City of Arcata 2019). Table 3.9-1 displays the current and historic populations of both the County and the City between 2010 and 2022. As shown in this table, the ~~rate of~~ population growth ~~experienced~~ in the City between 2010 and 2022 was almost 10 times that ~~experienced~~ in the County over that same period. **Most of the population growth in Humboldt County during that period (a total of 545 persons) likely occurred within the City of Arcata (which grew by 823 persons), while other areas of the County declined in population by a total of 283 persons.**

As indicated by the changes in population described above, very little population growth has occurred over the last twenty years in the County and only a small amount of growth has occurred in the City of Arcata. In terms of ~~Based on Department of Finance~~ population projections (2019 baseline, published in 2021), countywide population is anticipated to fluctuate somewhat ~~decline by an average of nearly 200 persons per each year~~ over the next ~~20~~ 18 years but would experience an incremental decline in overall population from its current 134,623 residents to 130,791 by 2040 (DOF 2021b). **Revised population projections based on the 2020 Census are expected in July 2023.**

Response L1-7

The comment provides suggested modifications to the Draft EIR that do not affect the analysis or data provided in the Draft EIR. The suggested edits represent speculation regarding why growth occurred or didn't occur within the County. As a result, the recommended changes have not been incorporated into the Final EIR. No changes to the Draft EIR are necessary in response to this comment.

Comment L1-8

The use of percentages or absolute values alone when describing past changes in housing or population in the DEIR, without including both together with appropriate context, can exaggerate the actual level of change. The following edits, shown using strike through and underline, to address errors, and to address what AFD considers to be omission or inaccuracies, are requested to be made to the description of housing units and vacancy on page 3.9-5 and following pages:

Regional Housing

Humboldt County

According to DOF, there were a total of 62,120 housing units in the county in 2020, which is an increase of 561 over the county's total housing units in 2010 (~~DOF 2021a~~, **a total increase of less than one percent in ten years**). The number of housing units within the county did not increase between 2020 and 2022 (DOF 2022). Over 44,000 units were single-family housing (attached and detached) whereas approximately 22,000 housing units were multi-family housing, about 35 percent of the County's housing supply (DOF 2022).

The housing vacancy rate is a measure of general housing availability and represents the percentage of all available housing units that are vacant or unoccupied at a particular time. A low vacancy rate, 5 percent or less, suggests that housing availability is low; conversely, a high vacancy rate (over 8 percent) may indicate a high number of housing units are available for occupancy, a high number of seasonal units are vacant, or there is an oversupply of housing. By maintaining a "healthy" vacancy rate between 5

percent and 8 percent, housing consumers have a wider choice of housing types and prices to choose from. As vacancy rates drop, shortages generally raise housing costs and limit choices. The county's housing vacancy rate usually exceeds the state's vacancy rate. In 2020, the vacancy rate of the county was 9.20 percent, while California's vacancy rate was 4.1 6.7 percent. The County's vacancy rate increased to 9.9 percent in 2022 (DOF 2022). It should be noted that COVID-19 pandemic may have had an effect on changes in vacancy rates, especially in areas with significant university populations, which were found to have housing disruptions or changes effecting over 20 percent of students in the far west institutional region, which includes Cal Poly Humboldt, according to the U.S. Department of Education Institute of Education Sciences 2019-2020 National Postsecondary Student Aid Study.

The County's average persons per household (pph) has been consistently lower than that of the State. In 2022, the household size of the county has averaged 2.31 persons per household compared to California's average of 2.81 persons per household in 2022 (DOF 2022).

City of Arcata

According to DOF, there were a total of 8,502 housing units in the City of Arcata in 2022~~20~~ (DOF 2022), which is an increase of ~~561~~ 79 units over the city's total in 2020 and 780 units over the city's total in 2010 (DOF 2021a). Of those, 4,077 units were single-family housing (attached and detached), and 4,425 housing units were multi-family housing, about 52 percent of the City's housing supply (DOF 2022). The City's multi-family housing units represent approximately 20 percent of the County's total housing supply.

Arcata's annual vacancy rate between 2010 and the end of 2019 was stable at 4.4 percent. Since 2020, the beginning of the COVID-19 pandemic, the City's housing vacancy rate ~~has generally been increased to~~ over 6 percent. ~~In 2020, the City had 573 vacant housing units, representing a vacancy rate of 6.8 percent.~~ The vacancy rate grew to 7.8 percent in 2022 with 667 vacant units out of the total 8,502 units within the city (DOF 2022). However, a more accurate representation of housing vacancies may be the historic rate, 4.4 percent, which excludes the anomalous COVID19 disruption and that indicates that housing availability in Arcata is low. In 2022, the average household size in the City was 2.11 persons per household (DOF 2022).

Response L1-8

The comment provides suggested editorial changes to the Draft EIR that do not affect the analysis in the Draft EIR and reflect the opinion of the commenter. In considering the comment, a typographical error was identified in the text. A modification to the text has been incorporated into the Final EIR on page 3.9-5, as shown below.

The housing vacancy rate is a measure of general housing availability and represents the percentage of all available housing units that are vacant or unoccupied at a particular time. A low vacancy rate, 5 percent or less, suggests that housing availability is low; conversely, a high vacancy rate (over 8 percent) may indicate a high number of housing units are available for occupancy, a high number of seasonal units are vacant, or there is an oversupply of housing. By maintaining a "healthy" vacancy rate between 5 percent and 8 percent, housing consumers have a wider choice of housing types and prices to choose from. As vacancy rates drop, shortages generally raise housing costs and limit choices. The county's housing vacancy rate usually exceeds the state's vacancy rate. In 2020, the vacancy rate of the county was 9.20 percent, while California's vacancy rate was 4.1 6.4 percent. The County's vacancy rate increased to 9.9 percent in 2022 (DOF 2022).

No further changes presented in this comment have been incorporated into the Final EIR. The modified text shown above does not result in a new significant impact or an impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

Comment L1-9

Displace Substantial Numbers of Existing People or Homes

The DEIR analysis of whether the project would displace substantial numbers of existing people or homes uses a vacancy rate for the City of Arcata to compute available units that is likely skewed by COVID-19 as indicated in the requested edits above. The description of housing units and vacancy must be revised to demonstrate that there are likely to be substantially fewer available units than suggested. The DEIR must fully evaluate the displacement of substantial numbers of existing people or homes.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.9-1: Directly or Indirectly Induce Substantial Unplanned Population Growth and Housing Demand

The DEIR incorrectly states that planned student enrollment increases contained in the 2004 Humboldt State University (HSU) Master Plan are considered in regional and local housing planning, including in Section 6.1.2 on page 6-2 relating Growth-Inducing Impacts of the Project. There is one reference to HSU in the HCAOG 2019 RHNA found in the Methodology section on page 8 stating that: "(t)he housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction. The City of Arcata accommodates the majority of the student housing needs based on its proximity to Humboldt State University (HSU). *No data or statistical information was provided to be incorporated into the RHNA methodology.*" Although the City of Arcata describes current enrollment levels (2019) and includes programs to coordinate with Cal Poly to promote student housing opportunities, there is no reference in the 2019 Housing Element to Cal Poly, the 2004 HSU Master Plan, or projected increases in university enrollment or instructional or administrative staff, the Housing Element does not address projected Cal Poly Humboldt growth under the 2004 Master Plan.

Given that local and regional housing and population planning does not include the 2004 HSU Master Plan, the DEIR must be revised to reflect that the HCAOG RHNA and the Arcata Housing Element do not reflect the 2004 HSU Master Plan or expected student enrollment increases.

The following edits, shown using strike through and underline, to address errors, and to address what AFD considers to be omission or inaccuracies, must be made to the housing units and vacancy description on page 3.9-5 and following pages:

In terms of operational impacts, and as noted above, Cal Poly Humboldt currently faces a shortage of student housing, both on- and off-campus, as many students have had to take up residence within available rental housing, including single-family housing units. In addition, Cal Poly Humboldt's student population is expected to double from 5,862 to 11,724 FTES within the next seven years because of Cal Poly Humboldt's recent conversion to a polytechnic institution. Of note, the 2004 Master Plan for the campus anticipated a similar increase in student enrollment (up to 12,000 FTES), which ~~was also~~ is not reflected in HCAOG growth projections, for the region upon adoption of the Master Plan by CSU. The City's most recent Housing Element also identifies that "the addition of new homes for students is needed"~~as a result of,~~ however the Housing Element does not consider the potential impacts of projected Cal Poly Humboldt growth under the 2004 Master Plan (City of Arcata 2019).

Response L1-9

Contrary to the comment and suggested edits, Appendix A of the City's Housing Element indicates that the 2004 Master Plan was considered while developing its housing needs for the City. Notably, in a bullet list on page 34 of Appendix A of the City's Housing Element, the Chancellor's Office of the California State University was cited as a source for the development of estimates of historic enrollment for Humboldt State University. and Humboldt State University was cited as a source of demographic profiles of student population and for the provision of the current campus master plan document. The City's growth projections (inclusive of Cal Poly Humboldt) are then considered as part of HCAOG's regional planning efforts, as indicated in the Draft EIR. The edits provided in this comment are inaccurate and have not been incorporated into the Final EIR.

Comment L1-10**California Department of Forestry and Fire Protection (page 3.10-2)**

The narrative description of California Department of Forestry and Fire Protection on page 3.10-2 in Section 3.10 Public Services and Recreation, 3.10.1 Regulatory Setting - State, does not properly reflect CAL FIRE's role within Humboldt County and Arcata Fire Protection District State Responsibility Area. "State responsibility Areas" (SRA) is the area of the state in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of the state and CAL FIRE's primary responsibility is preventing and suppressing wildfires in SRA. CAL FIRE's response to incidents other than wildland fires in SRA is more nuanced than suggested in the above paragraph. California Public Resources Code Section 713 states that "(t)he department is responsible for the fire protection, fire prevention, maintenance, and enhancement of the state's forest, range, and brush land resources, contract fire protection, associated emergency services, and assistance in civil disasters and other non-fire emergencies." In addition, Public Resources Code Section 4114(b), states that "(t)he department may provide, when available and to the extent that it does not require additional funds, rescue, first aid, and other emergency services to the public in SRA." Although portions of the Arcata Fire Protection District are within SRA, the project site and the City of Arcata are not within SRA.

In Humboldt County, CAL FIRE operates nine seasonal forest fire stations. Seasonal fire stations are in service during fire season and during non-fire season most stations are closed, with one exception discussed below. Some seasonal forest fire stations may be used by a very limited number of engine companies performing fuel reduction activities. The closest CAL FIRE stations to the project site are Trinidad, which is approximately 15 miles from Cal Poly Humboldt, and Fortuna approximately 26 miles from Cal Poly Humboldt. Local fire-related districts and non-district fire companies within Humboldt County operate effectively with CAL FIRE, often arriving before CAL FIRE to wildland fires in SRA and are regularly supported by CAL FIRE in responses to structure fire and other incidents in communities throughout the County. CAL FIRE has an agreement with Humboldt County to maintain one fire engine company during non-fire season at the Trinidad Fire Station to provide structural fire protection to County Service Area No. 4. This engine covers an approximately 17,000-acre district serving the communities between Westhaven and Big Lagoon. The CAL FIRE Trinidad station is operated year-round, typically staffed with two wildland engines during fire season and one engine with a minimum of two firefighters during non-fire season.

Response L1-10

Please refer to Response L1-5, which provides a discussion of the fire hazard severity zone associated with the project site.

Comment L1-11

The following edits, addressing errors omissions *[sic]* and/or inaccuracies, are provided for the AFD current service levels description on pages 3.10-3 and 3.10-4:

Arcata City Fire District Department

The project site and the City of Arcata are located within the Arcata Fire District (AFD). The AFD boundaries encompass 625 square miles and extend west to the Pacific Ocean, north to the Clam Beach area, east to Essex, south to Indianola and west to Manila. The AFD protects a population of approximately 36,000 residents, including 5,700 Cal Poly students and approximately 1,200 faculty and staff members, about 20 percent of the AFD service population. The AFD is an all-risk fire department responsible for protecting life, property, and the environment from the hazards of fire and hazardous materials incidents and providing emergency medical services.

The AFD is governed by a five-member, independently elected Board of Directors and has a paid staff that includes one chief, ~~three battalion~~ one assistant chiefs, nine captains, and ~~4210~~ 25 firefighters. In addition, the AFD ~~relies on a volunteer fire department consisting of approximately 25 firefighters maintains a Volunteer Logistics Unit whose members are trained for and assigned to a variety of critical support tasks, freeing up firefighters for more demanding and/or dangerous assignments.~~ All AFD firefighters are qualified, at a minimum, at receive training to the Firefighter I level. At a minimum, one ~~battalion~~ officer, three captains, and ~~four~~ three paid career firefighters are on duty at any given

time (Schuette, pers. comm., 2022). In addition to providing fire protection and emergency services, the AFD works to educate the public about fire hazards and disseminate information on public safety.

The AFD responded to ~~more than 2,500~~ approximately 3,300 calls for service in 2021 from three fire stations within its district (Schuette, pers. comm., 2022). Two of the stations are located in Arcata, and one is located in McKinleyville. The project site is located within ~~in~~ the response area for the Mad River Station, located at 3235 Janes Road in the City of Arcata, and the Arcata Station Main Fire Hall, located at 631 9th Street in the City of Arcata, provides backup/support to the project site. The Mad River Station is approximately 1.5 miles northwest of the project site, and the Arcata Station Main Fire Hall is approximately 1.25 miles south of the project site. AFD fire stations have up to three bedrooms, which is necessary to house the minimum desired staffing level of three personnel per station. The Mad River Fire Station is at capacity for housing fire equipment. Any new engine or ladder truck housed there would require a complete remodel of the apparatus bays.

AFD staffing is not sufficient to respond to structure fire-related incidents without automatic and mutual aid assistance from neighboring fire departments. National consensus-based standards (National Fire Protection Association (NFPA) 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments) indicates that 14 firefighters arriving within eight minutes are necessary to staff the essential roles to safely carry suppression operations for a fire in a single-family dwelling. For a garden-style apartment or high-rise building, between 25 and 38 firefighters would be required (these building types represent the level of staffing required for a fire in a seven-story dormitory). With a daily staffing of seven firefighters, AFD relies on mutual aid for all fires. Due to distance, and the fact that most of AFDs mutual aid partners are volunteers (with the exception of career firefighters at Humboldt Bay Fire in Eureka and CAL Fire in Trinidad), a total of sixteen firefighters may be available at scene within 13 minutes and 38 firefighters may be available at scene in over 40 minutes.

AFD has stated that even with the automatic and mutual aid resources that would augment District response to a fire in the building type proposed in this DEIR, there is not enough available firefighting resources on-duty and immediately available to evacuate and rescue occupants and contain a fire.

Response L1-11

The comment provides suggested text changes to pages 3.10-3 and 3.10-4 of the Draft EIR. While some of the changes are editorial, the general point made is that AFD does not have adequate, trained firefighters on-duty and immediately available to evacuate and rescue occupants and contain a fire if were to occur within the building type proposed in the Draft EIR. As noted above in Response L1-1, the threshold for significance related to adequate fire protection pertains to the need for new or physically altered facilities, the construction of which would result in environmental impacts. As discussed under Impact 3.10-1 in the Draft EIR, "the project site is located within the current service area of the AFD and would be designed and constructed in accordance with applicable requirements, including the California Fire Code. Therefore, no additional fire protection facilities are anticipated to be necessary for AFD to adequately serve the project site, and no significant decrease in response time is expected" (refer to Impact 3.10-1 on page 3.10-8 of the Draft EIR.) Although the comment indicates that more staff would be necessary to accommodate firefighting services for the project, the provision of additional firefighters or vehicles would not result in, and is not considered, a significant physical environmental impact under CEQA.

With respect to the Mad River Fire Station, according to the most recent Humboldt Bay Regional Fire Services Municipal Services Review, the Mad River Station had a ladder truck, in addition to a frontline engine and reserve engine (Humboldt LAFCo 2017). According to a quote by Randy Mendonsa, president of the Arcata Fire District Board of Directors in the North Coast Journal, the Mad River Station no longer has a ladder truck because it was sold because funding was not available to properly train staff (Weinreb 2022). A shortage of funding for staff or staff training needs is not an environmental impact; moreover, because a ladder truck had been housed at the station, it is reasonable to assume that modifications or expansion of facilities would not be required as the result of the sale, although equipment may be shifted to other stations or other actions available to AFD. Regardless, there is not a

clear connection between the operation of the Student Housing Project and the need for a new apparatus at the Mad River Station, the acquisition or ownership of which would require construction that could cause significant environmental impacts. No changes to the document are required in response to this comment.

Comment L1-12

Impact 3.10-1: Result in Substantial Adverse Physical Construction-Related Impacts Associated with the Provision of or the Need for New or Physically Altered Fire Facilities to Maintain Acceptable Service Ratios

The analysis of impacts to fire services is cursory and appears to suggest that adequacy of fire service for any infill development is a simple binary question: if fire service is present, it must therefore be adequate. As is made clear by the edits below, AFD relies on mutual and automatic aid from neighboring fire departments for all fire-related incidents and the addition of tall and densely occupied housing units will require significant increases in staffing and require even greater levels of outside assistance. Given the need for additional personnel to maintain acceptable service ratios, the potential environmental effects of expanding AFD fire stations needs to be fully evaluated.

The following edits, shown using strike through and underline, to address errors, and to address what AFD considers to be omission or inaccuracies, are requested to be made to the analysis of the need for new or physically altered fire facilities to maintain acceptable service ratios on page 3.10-8:

The project would result in an increase in on-site population and ~~the density of development on-site, from a limited number of daytime employees and residents to approximate 1,000 residents and daytime employees~~, which ~~could~~ ~~would~~ result in additional calls for service to the project site. ~~However, The project site is located within the current service area of the AFD and would be designed and constructed in accordance with applicable requirements, including the California Fire Code. The Arcata Fire District Mad River Station is located approximately 1.5 miles from the project site.~~ Therefore, no additional fire protection facilities are anticipated to be necessary for ~~As indicated in the introduction above, AFD does not have sufficient staffing to respond to fires in large structures such as those proposed for the project. AFD does not have sufficient personnel to adequately serve the proposed project site, and no significant decrease in response time is expected. Impacts would be less than significant.~~

As noted above, fire protection and emergency medical services are currently provided to the project site by ~~AFD, in a manner commensurate with the demand for service (the project site contains one single family residence and low intensity commercial operations)~~. Under the project, the project site would be redeveloped with a new student housing community composed of approximately 240 units with up to 964 student beds in two multi-story buildings in the central portion of the project site, ~~an approximately 2.8 percent increase in AFD service population. Changes in population are directly related to changes in service calls for fire departments. Based on historic population growth and incident data (AFD records show that as population rises over time, call for services rise in a generally proportionate manner)~~. This ~~the proposed significant~~ increase in population ~~at the project site would~~ could result in an increase in the number of calls for service, to which the AFD would ~~respond, initially~~ from the Mad River Station, approximately ~~1.5 miles~~ northwest of the project site. Although the project would increase the on-site population, an increase in population by itself would not increase demand for fire protection services. ~~The project involves an approximately 65-fold increase in service population at the project site and the introduction of building types different than existing buildings in the service area, which require special fire suppression training and substantially more firefighters than almost all other buildings served by AFD. Fire level of service is commonly evaluated using the Commission on Fire Accreditation, International Template for Standards of Response Coverage, which considers both service population (residents plus employees) and the geographic distribution of structures and fire stations.~~ Typically, an expansion of geographic distribution, not simply an increase in population, impairs emergency response times and therefore potentially requires additional services and facilities. ~~Significant increases in service population or the introduction of new building types that require special operations or levels of response that exceed current staffing, and changes in the distribution of development can impair response requiring additional services and facilities. The proposed project does not change the distribution of~~

development, but substantially increases the service population for the AFD and introduces building types for which structure fires would far exceed current staffing levels, equipment, and training. As noted above, the project would not result in an expansion of the current service area of the AFD.

All new on-site buildings would be designed to meet minimum fire and emergency safety requirements identified in the California Building Code and California Fire Code and would include appropriate fire safety measures and equipment, including the use of fire-retardant building materials, inclusion of emergency water infrastructure (fire hydrants and sprinkler systems), installation of smoke detectors and fire extinguishers, emergency response notification systems, and provision of adequate emergency access ways for emergency vehicles. Further, adequate right-of-way for emergency vehicles would be provided around the proposed on-site structure with hydrants spaced according to applicable requirements. ~~As a result, development under the project would be adequately serviced by existing fire stations and facilities, and the project is not anticipated to result in a substantial increase in service calls that would require new or expanded fire protection employees or facilities.~~ Additionally, due to the improvements in on-site circulation, including the provision of dedicated emergency access from the project site to Eye Street, the ability for AFD to respond to emergency calls for service to and through the project site may improve.

~~Therefore, although the project may would increase AFD service population by 2.8 percent increase and increase service population at the project site 65-fold and would likely result in a incremental proportional increase in the number of service calls and place a greater demand on fire protection services, Potential fires in project-related buildings require approximately six times the fire suppression staff than the AFD can support, and automatic and mutual aid assistance from neighboring departments would take approximately 40 minutes to arrive. it would not result in Given these circumstances, the need for the expansion or construction of new fire protection facilities may be needed to house additional firefighters to maintain current acceptable service ratios or to provide acceptable service ratios. AFD currently has sufficient facilities must be expanded and maintained to adequately serve the project site and the population within its service area, for Impacts to be less than significant.~~

Response L1-12

The comment points to the Commission on Fire Accreditation, International Template for Standards of Response Coverage as the basis for why a population level increase is associated with new staffing needs; however, the comment does not provide substantial evidence regarding a potentially significant environmental effect related to a need for expanded facilities. As stated in Response L1-1, above, the CEQA threshold of significance related to fire protection refers to the potential for significant environment impacts due to the need for new or physically altered governmental facilities. While the comment indicates a potential need for additional staff, the recommended text modifications presented in this comment have not been incorporated into the EIR because they are not supported by substantial evidence relate to the potential need for expanded facilities that could result in significant physical environmental impacts. Please refer to Response L1-1 regarding the threshold of significance pertinent to fire protection services.

Comment L1-13

4.2 CUMULATIVE SETTING

Table 4-2, Cumulative Projects List, does not include important probable future development projects in the vicinity of the project site that have some relation to the environmental impacts of construction and operation of the proposed project. The City of Arcata has devoted significant resources, time, and energy to the preparation of the Arcata Gateway Area Plan, where a second draft plan was released to the public in October 2022. The Gateway Area Plan is anticipated to be adopted in 2023, with development occurring between 2023 and 2045. The Arcata Gateway Area Plan implementation is reasonably foreseeable and therefore should be included in Table 4-2 and included in the cumulative impacts analysis.

The DEIR analysis states that "Cal Poly Humboldt's student population is expected to double from 5,862 to 11,724 FTES within the next seven years because of Cal Poly Humboldt's recent conversion to a polytechnic institution. Of note, the 2004 Master Plan for the campus anticipated a similar increase in student enrollment (up to 12,000 FTES)." This indicates that, consistent with the 2004 Master Plan, Cal Poly Humboldt is committed to provide housing and academic/administrative facilities to accommodate up to 12,000 students in the next seven years, or by 2029. While the project description cites the current (2004) Master Plan many times, the DEIR limits the cumulative project list to only those Cal Poly Humboldt development projects that are "approved and pending," without clearly defining what constitutes approved or pending.

In what appears to be a clear step towards implementing the 2004 Master Plan, Cal Poly Humboldt announced the purchase of the Creek Side Mixed Occupancy Residential Annexation Project site ("Creek Side Project") on July 5, 2022 "to support any of a number of institutional priorities aligned with our polytechnic transformation" (<https://now.humboldt.edu/news/property-acquisition-polytechnic-transformation>). The Creek Side Project was approved by the City of Arcata in 2017 and subsequently annexed. It includes planned lots for 57 residential and 100 residential care units. The acquisition of the Creek Side Project site by Cal Poly to implement projects consistent with the 2004 Master Plan appears reasonably foreseeable, and/or a project consistent with City of Arcata planned land uses is reasonably foreseeable. As a result, the Creek Side Project must be included in Table 4-2 and evaluated as part of the cumulative impacts analysis.

In addition, due to the rapid timeline for implementation of the housing and academic/administrative facilities to accommodate up to 12,000 students consistent with the 2004 Master Plan, Cal Poly must include any project listed in Table 4.1, Master Plan Proposed Facilities and Phasing, not just approved or pending, in the cumulative projects list and evaluate the cumulative effects of such projects in the DEIR.

Response L1-13

Chapter 4 of the Draft EIR contains an analysis of the potential cumulative impacts of the Student Housing Project considered together with other past, present, and probable future projects resulting in related impacts. The analysis is consistent with the goal of the analysis, as defined in the first paragraph on page 4-1:

first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant, and second, to determine whether the incremental contribution to any such cumulatively significant impacts by the project would be "cumulatively considerable" and thus significant. (See State CEQA Guidelines Sections 15130[a]–[b], Section 15355[b], Section 15064[h], and Section 15065[c] and *Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal. App. 4th 98, 120.)

As noted in the last paragraph on page 4-2 of the Draft EIR, "Table 4-2 [of the Draft EIR] lists past, present, and probable future development projects in the vicinity of the project site. This list is not intended to be an all-inclusive list of projects in the region but rather an identification of projects constructed, approved, or under review in the vicinity of the project area that have some relation to the environmental impacts of construction and operation of the proposed project." The comment states that the City's Gateway Area Plan and expectations for increased enrollment should be included in Table 4-2 of the Draft EIR. However, no specific projects for which environmental impacts could be discussed with specificity are known in connection with either the City's Gateway Area Plan or increased enrollment potential at Cal Poly Humboldt.

Regarding the Creek Side project, this property is not owned by the university outright. It is owned by the Cal Poly Humboldt Foundation, a non-profit corporation that is affiliated with the university. Neither the Foundation nor Cal Poly Humboldt has determined what facilities or level of development may be constructed on the site as of yet. Thus, assumptions related to how 2000 Foster Avenue may be used are considered speculative, and any plans for the Creek Side project site are appropriately not included in the list of cumulative projects.

Humboldt will be initiating a Master Plan process to reflect the physical development as a result of the campus's conversion to a California State Polytechnic University. This process will likely affect future development and may dramatically change plans included in the 2004 Master Plan. The currently planned and in process projects are

appropriately reflected as the currently anticipated level of development within the campus. No changes to the document are necessary.

Comment L1-14

The cumulative population and housing impacts analysis states that the project would not "increase student enrollment at Cal Poly Humboldt" by artificially separating this project from the other projects on the cumulative project list and the 2004 Master Plan's objective to increase student enrollment. This statement must be clarified, the project alone may not increase student enrollment, however, other projects on the cumulative project list and other Master Plan elements are intended to encourage and accommodate planned student enrollment increases in the next seven years.

The DEIR conclusions in Section 4.3.9, Population and Housing, relate only to the student housing component of the proposed project and not to any on-site employees or additional Cal Poly or contract staff who may not be located on-site but will be needed to operate and maintain the proposed student housing project. The conclusion must consider all population and housing related impacts of the project, including student housing, direct increases in employment to operate and maintain the project, and projects from the cumulative list, as amended. The conclusion must acknowledge that increased student enrollment is not included in local or regional plans.

The following edits, address errors omission and/or inaccuracies, must be made to the cumulative impacts to population and housing analysis on pages 4-10:

As described in Section 3.9, "Population and Housing," population within the City has increased by 4.79 percent since 2010 (refer to Table 3.9-1). In addition, the County's housing vacancy rate has been consistently higher than the State's vacancy rate, while the City's housing vacancy rate has generally remained at just over 6 approximately 3.4 percentage points below the State vacancy rate. The City's normal vacancy rate was 3.6 percentage points below the State vacancy rate from 2010 to the beginning of 2020, prior to COVID-19 Cal Poly student disruptions, and 2.4 percentage points below the statewide average between 2020 and 2022. Implementation of the project would not ~~increase student enrollment at Cal Poly Humboldt, nor would it exceed growth projections for the campus as established in the current Master Plan for Cal Poly Humboldt.~~ Rather, the project would provide additional student housing on Cal Poly Humboldt property and accommodate ~~an~~ planned anticipated increase in student enrollment within campus housing. The project would not represent a substantial contribution to potential housing demand or consume a substantial portion of the available housing stock; rather, it would reduce stresses on the local and regional housing market related to students living off-campus. For these reasons, the population and housing impacts related to implementation of the project would not result in a considerable L1-13Cont.L1-14 contribution to cumulative population and housing impacts, and the impact would be less than significant.

Response L1-14

The comment suggests that the Draft EIR ignores the impacts related to increased student enrollment at Cal Poly Humboldt. Increases in enrollment are not related to individual projects; rather, they reflect the changes in academic programming and the associated space requirements, along with current technologies and educational practices. As a point of clarification, the Master Plan for any CSU campus does not encourage increases in student enrollment. Rather, it is intended to accommodate anticipated enrollment growth at the university and provide the physical facilities necessary to accommodate such growth. Actual enrollment, and enrollment increases, are due to various factors such as demand from graduating high school seniors and transfer students, legislative efforts to increase access to higher education in California, and direction from the Chancellor's office. In addition, current student population at Cal Poly Humboldt (as stated on page 3.9-7 of the Draft EIR) is 5,862 full time equivalent (FTE) students, which is 1,230 FTE students less than 2004 conditions evaluated under the Campus Master Plan. Section 6.1, "Growth Inducement," of the Draft EIR provides a discussion of the potential growth-inducing impacts of the project and generally determines that the project has the potential to stimulate the economy both directly (by providing jobs and housing) and indirectly (by creating a demand for local goods and services) in the region; however, the project would address anticipated housing needs and would not contribute to population growth beyond that anticipated as a direct result of the project (last paragraph on page 6-2 of the Draft EIR). It is important to note that on-site employment opportunities for retail and other on-site services are

anticipated to be absorbed by student residents and existing campus staff and are considered unlikely to be fulfilled by residents outside of the City (second paragraph on page 6-2 of the Draft EIR). Please also refer to Response L1-13 for a discussion related to requirements for cumulative impacts.

Furthermore, it is important to note that recent legislation addresses the potential for impacts related to student enrollment increases. In Spring 2022, SB 118 was passed to remedy a ruling by the California Supreme Court that found that student enrollment, in and of itself, is subject to CEQA. Under SB 118, California's public college and university campuses will still be required to conduct CEQA review of long-range development plans and the impacts of a campus' planned overall population increase, including for its faculty, administrators, students and staff; however, CEQA review would not be required solely because of increases to student enrollment. Consistent with the requirements under SB 118, student enrollment increases do not, by default, indicate that there would be a significant environmental impact.

The recommended changes, which reflect a comparison to the State of California's vacancy rate, are immaterial to the assessment of the physical environmental impacts of the project with respect to population and housing. Because the changes do not inform the analysis, these changes have not been incorporated into the Final EIR. No changes to the document are necessary in response to the suggested edits.

Comment L1-15

The analysis in Section 3.10 and Section 4.3.10 relating to fire protection services does not acknowledge that, aside from the proposed project and other projects consistent with the 2004 Master Plan, increasing demands for fire-related services in Humboldt County are primarily related to economic and demographic changes and to housing subdivisions or housing development projects, which typically occur over an extended period of time.

The proposed project, unlike typical private housing subdivisions, will not build-out over time based on demand and other local factors but instead will be occupied all at once, likely with new Cal Poly students, most of whom are not already part of the AFD service population.

The DEIR Section 3.10 direct fire-related impacts analysis must be revised to reflect existing service levels and adequate fire service levels required for a seven-story student housing project.

Response L1-15

AFD identifies current staffing needs and indicates that automatic and mutual aid assistance from neighboring fire departments allows for a sufficient response (see Comment L1-11). Comment L1-11 also indicates that the Mad River Fire Station is at capacity, but a facility currently being at capacity does not necessitate expansion of the facility due to construction of the proposed project. While a ladder truck may be necessary to serve the project, the Mad River Fire Station was able to house one in the past and could therefore accommodate one in the future (see Response L1-11). Although the Comment L1-11 indicates that the Mad River Fire Station is at capacity, that does not mean that acquisition of a ladder truck would require a remodel. Rather, it could be that an existing apparatus is replaced with the ladder truck. For these reasons, impact discussions presented in the Draft EIR remain valid, because, "although the project may result in an incremental increase in the number of service calls and place a greater demand on fire protection services, it would not result in the need for the construction of new fire protection facilities to maintain acceptable service ratios. AFD currently has sufficient facilities to adequately serve the population within its service area. Impacts would be **less than significant**," as stated in the second to last paragraph on page 3.10-2 of the Draft EIR. This analysis is based on the fact that the project site is within the existing service area and would be designed and constructed in accordance with applicable requirements, including the California Fire Code. In contrast and as clarified in the responses above, no additional fire protection facilities are anticipated to be necessary for AFD to adequately serve the project site, and no significant decrease in response time is expected (see Impact 3.10-1). Because no substantial evidence has been provided to support the need for new or modified facilities, the construction of which could result in significant environmental impacts, no changes to the document are necessary.

Comment L1-16

The fire protection services analysis is not adequate to make a determination of environmental impact and therefore cannot support the conclusion in the cumulative impacts section as to whether the proposed project, when considered

with the full list of cumulative projects, would result in substantial adverse physical construction-related impacts associated with the provision of or the need for new or physically altered fire facilities to maintain acceptable service ratios. In addition, the cumulative analysis must incorporate the additional probable foreseeable project identified above and their contribution to potential impacts to fire services. This will result in a significant cumulative impact.

As stated earlier, this DEIR does not provide an adequate fire protection services baseline or adequately analyze potential impacts of substantially increased services needs and response to multi-story buildings and approximately 1,000 new student residents and must also be revised to correct the errors, inaccuracies, and omission described above.

The AFD has provided significant new information not contained in the DEIR, without which the public and decision makers cannot assess the project's impacts or feasibility. To address these issues, Cal Poly Humboldt, in close coordination with the AFD, must prepare and recirculate a revised EIR.

Response L1-16

The comment states that the project would result in a significant cumulative impact. However, this comment and previous comments do not provide substantial evidence of a need for new or expanded fire facilities, the construction of which would result in significant environmental impacts. Please refer to Responses L1-1 through L1-15 for further discussion of this issue.

In accordance with Public Resources Code (PRC) Section 21092.1 and Title 14 California Code of Regulations (CCR) Section 15088.5, when "significant new information is added to an environmental impact report (EIR) after notice has been given pursuant to Section 21092" and the draft EIR has undergone public review, a lead agency must renotice and recirculate the environmental document for public review of the new information. "Significant new information" can include substantial changes to the project description. Recirculation is not required unless the EIR is changed in a way that would deprive the public of the opportunity to comment on significant new information, including a new significant impact for which no feasible mitigation is available to fully mitigate the impact (thus resulting in a significant and unavoidable impact), a substantial increase in the severity of a disclosed significant environmental impact, or development of a new feasible alternative or mitigation measures that would clearly lessen environmental impacts but that the project proponent declines to adopt (Title 14 CCR Section 15088.5[a]). Recirculation is not required when the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (Title 14 CCR Section 15088.5[b]). Because significant new information has not been provided in this comment letter that indicates any of these circumstances has occurred, recirculation of the EIR is not required.

Comment L1-17

EXHIBIT 1

Required Staffing for Fire Suppression Operations

Evaluating the adequacy of staffing, equipment, and facilities, for fire protection, emergency medical, and hazard response for projects, such as the proposed Cal Poly Humboldt Student Housing is not simply a matter of concluding that if a fire department (district) is present, then it must therefore be adequate. To evaluate the adequacy of fire suppression staffing, the number of on-duty firefighters and available equipment and apparatus must be considered together with their geographic distribution. As described in detail below, most fire departments, including AFD, rely on mutual and automatic aid from neighboring departments for all fire-related incidents. The proposed Cal Poly project will require significant increases in AFD staffing and also greater levels of outside assistance to provide adequate service.

AFD Historical Fire Suppression Staffing

AFD was formed in 1944 and is staffed primarily by career firefighters, with support from a Volunteer Logistics Unit whose members are trained for critical support tasks, freeing up firefighters for specialized assignments, and very limited volunteer firefighting personnel. The District's ability to rely on volunteers for fire suppression operations has diminished over time from being an exclusive volunteer department prior to the 1%O's, to hiring limited career staff with 30 to 40 volunteers in the 1970's through early 2000's, to a career department with less than a handful of non-suppression volunteers today. The following is a summary of AFD's historical firefighting staffing:

1976 to 2006:

- 3 Chief Officers; 7 paid firefighters, & 40 volunteer firefighters
 - Arcata Fire Station - Chief Officers during business hours
 - Mad River Fire Station - 1 firefighter on duty
 - McKinleyville Fire Station - 1 firefighter on duty

2006 to 2013:

- 4 Chief Officers; 15 paid firefighters, & 20 volunteer firefighters
 - Arcata Fire Station - Chief Officers during business hours
 - Mad River Fire Station - 2 firefighters on duty
 - McKinleyville Fire Station - 2 firefighters on duty

2013 to 2016:

- 3 Chief Officer; 18 firefighters, & 20 volunteer firefighters
 - Arcata Fire Station - Chief Officers during business hours, 2 firefighters on duty
 - Mad River Fire Station - 2 firefighters on duty
 - McKinleyville Fire Station - 2 firefighters on duty

2016 to 2020:

- 4 Chief Officers; 18 firefighters, & 10 volunteer firefighters
 - Arcata Fire Station - 2 firefighters on duty
 - Mad River Fire Station - 2 firefighters on duty
 - McKinleyville Fire Station - 2 firefighters & 1 Shift Chief officer on duty

2020 to 2022

- 2 Chief Officers; 15 firefighters, & 4 volunteer firefighters available
 - Arcata Fire Station - 2 firefighters on duty
 - Mad River Fire Station – Unstaffed
 - McKinleyville Fire Station - Chief Officers during business hours, 2 firefighters on duty

2022 to present

- 2 Chief Officers; 18 firefighters, & 1 volunteer firefighter
 - Arcata Fire Station - 2 firefighters on duty
 - Mad River Fire Station - 2 firefighters on duty
 - McKinleyville Fire Station - Chief Officers during business hours, 2 firefighters on duty

Consensus-Based Fire Response Standards

National consensus-based standards for fire suppression operations are established by the National Fire Protection Association (NFPA, 2020), and NFPA 1710¹ is applicable to AFD. AFD strives to meet NFPA standards, but budget constraints limit AFD's staffing options and regional mutual- and auto-aid is limited.

The following table lists the NFPA 1710 recommended number of appropriately trained personnel arriving within a specific period of time to perform critical tasks to suppress fires in different types of structures.

| Single Family Dwelling Minimum of 14 firefighters | Critical Task | Needed Personnel |
|--|-------------------------|------------------|
| The initial full alarm assignment to a structure fire in a typical 2000 ft ² (186 m ²), two-story, single-family dwelling without a basement and with no exposures must provide for a minimum of 14 members in 8 minutes (15 if an aerial device is used) | Command | 1 |
| | Pump Operator | 1 |
| | Fire Attack | 2 |
| | Backup | 2 |
| | Search | 2 |
| | Ventilation | 2 |
| | Rapid Intervention Crew | 4 |
| | Total | 14 |

| Strip Mall/Garden Style Apartment Minimum of 25 firefighters | Critical Task | Needed Personnel |
|--|-------------------------|------------------|
| The initial full alarm assignment to a structure fire in a typical open-air strip shopping center ranging from 13,000 ft ² to 196,000 ft ² (1203 m ² to 18,209 m ²) in size must provide for a minimum of 25 members in 8 minutes (26 if an aerial device is used). | Command | 1 |
| | Fire Attack (3 teams) | 6 |
| | Backup | 3 |
| | Pump Operator (2 pumps) | 2 |
| | Search (2 teams) | 4 |
| | Ventilation (2 teams) | 4 |
| The initial full alarm assignment to a structure fire in a typical 1200 ft ² (111 m ²) apartment within a three-story, garden-style apartment building must provide for a minimum of 25 members (26 if an aerial device is used). | Rapid Intervention Crew | 4 |
| | Safety | 1 |
| | Total | 25 |

| High-Rise Minimum of 38 firefighters | Critical Task | Needed Personnel |
|---|--------------------------|------------------|
| The initial full alarm assignment to a fire in a building with the highest floor greater than 75 ft (23 m) above the lowest level of fire department vehicle access must provide for a minimum of 38 members in 10 minutes (39 if the building is equipped with a fire pump). | Command | 2 |
| | Pump (FDC) | 1 |
| | Fire Attack (2 Teams) | 4 |
| | Hose team Floor above | 2 |
| | Rapid Intervention Crew | 4 |
| | Search (2 teams) | 4 |
| | Fire Floor Supervisor | 2 |
| | Floor above Supervisor | 2 |
| | Evacuation (2 teams) | 4 |
| | Elevator Control | 1 |
| | Safety | 1 |
| | Interior Staging Officer | 1 |
| | Rehab | 2 |
| | Ventilation | 4 |
| | Lobby Control | 1 |
| | Equipment Transport | 2 |
| | External Staging | 1 |
| | Total | 38 |

- **Single-Family Residential Structure.** NFPA 1710 recommends that 14 firefighters, arriving within eight minutes, are necessary to staff the essential roles to safely carry suppression operations for fires in single-family dwellings.
- **Low-Rise Apartments and Commercial Structures.** For more complicated structure fires (multi-family residential buildings and commercial buildings), NFPA 1710 recommends 25 firefighters to fill essential roles, arriving within eight minutes, are required.
- **High-Rise Structures.** NFPA does not establish staffing standards for fires in what may be referred to as "mid-rise" buildings, or buildings roughly four to seven stories. However, firefighting in mid-rise buildings

presents most, if not all, of the same challenges as high-rise buildings (defined as by the International Building Code as a "building with an occupied floor located more than 75 feet above the lowest level of fire department vehicle access"). While there are no explicit NFPA response standards for mid-rise buildings, AFD concludes that it would be prudent to treat operations for fires in the proposed student housing buildings, mid-rise residential structures, like fires in high-rise buildings. NFPA 1710 recommends that 38 firefighters to fill essential roles arriving within ten minutes are required for a high-rise fire.

Mutual and Automatic Aid is Essential

AFD alone does not have adequate staffing for structure fires and relies on automatic and mutual aid from neighboring fire departments for all fires. All on-duty AFD firefighters (six firefighters and one chief officer) would be expected to arrive on scene for any structure fire on campus. The first two engines would arrive within approximately 5 minutes, the third engine and chief officer arriving 5 minutes later. Since AFD does not have sufficient staffing, mutual or automatic aid partners are required. Because neighboring fire stations are remote and staffed by volunteers, it typically takes an additional thirteen or more minutes for sufficient staffing (-15 firefighters) from up to four aid partners to respond to a single-family residential structure fire in the City of Arcata. For a commercial or multi-family structure fires, it takes 19 or more minutes for sufficient staffing (-25 firefighters) from up to six aid partners. For a mid-rise fire for buildings between four to seven stories, it would take over 40 minutes for recommended staffing levels (-38 firefighters) from up to eleven response partners.

Whether an aid partner can arrive in a timely manner depends upon their staff availability at the time of the incident. Apart from Humboldt Bay Fire, AFD's aid partners are almost entirely staffed by volunteers. In any given circumstance it is uncertain whether the aid partners will be appropriately staffed at the time of the automatic or mutual aid request. Volunteers often work in Eureka or Arcata and may not be available to report to their respective rural station during work hours. This effects response times and whether or not the aid partner can respond. Also important in evaluating aid partner capacity is staffing, apparatus, equipment, and training. Career departments assure essential qualifications and training levels of all firefighters. Volunteer departments, however, have differing minimum qualifications and training and experience levels. Whereas career firefighters are likely able to perform any task required at scene, volunteer firefighters may not be able to. Further, although all firefighters may be exposed to mid-rise fire suppression operations in their basic firefighter certification training, volunteer departments may never drill on the required skills for operating within mid-rise or high-rise buildings. As is the case across the nation, volunteer firefighter recruitment and retention are in decline and AFDs aid partners struggle to maintain staffing levels.

AFD Current Responses to Cal Poly Humboldt

The AFD covers a geographic area of approximately 62 square miles, protecting a population of approximately 36,000 residents, including 5,700 Cal Poly Humboldt students and approximately 1,200 faculty and staff members, about 20 percent of the AFD service population. Calls for service at the Cal Poly Humboldt campus usually are to student housing, and AFD effectively responds with a joint response from University Police and Facilities staff. On average, approximately 4 percent of incidents for the District are to the Cal Poly Humboldt campus. Actual responses to the Cal Poly campus range from 2 to 5 percent per year. Although the percentage of total responses is lower than the percentage of total service population, the campus contains the largest buildings that pose the greatest hazard to the most people (student housing and large classroom/lab buildings) within the district and the highest potential fire operations risk for AFD firefighters.

AFD Fire Service Funding

AFD is authorized to operate as a Limited Purpose California Special District, the focus being fire protection and emergency response services. State law provides only limited authority for FPDs to establish new funding sources. AFD is funded through an allocation of ad valorem

property taxes (based on the assessed value of land, buildings, and fixtures), a special tax approved by voters, and a special assessment on property approved by landowners (both based on the use of property and together referred to hereafter as the AFD fire service direct charges). In comparison to most career fire departments in California that serve California State University campuses, the AFD receives a very small proportion of the property tax revenue

collected within the District. Pursuant to the regulations for the implementation of Proposition 13, the proportion of property tax revenue that AFD receives was permanently fixed based on the amount of property tax revenue received by the district in 1977, when there were only 10 paid employees. The special assessment was most recently reauthorized and increased by District property owners in 2006. The special tax was approved in November 2020 and has allowed AFD to re-open a third station which had been closed due to inadequate funding. There are no other on-going revenue sources available to AFD. The AFD fire service direct charges are the largest of any in Humboldt County. As a result, there is little chance that the property owners/voters of the AFD would approve a higher fire service direct charge to support increased Cal Poly Humboldt fire protection services.

Although actual assessed value information is not available for Cal Poly Humboldt land, buildings, and fixtures, AFD has prepared a rough estimate of total assessed value. Based on this estimate, if Cal Poly Humboldt were subject to property tax, the allocation of annual property tax revenue received by AFD would be approximately \$267,127 per year. AFD does not suggest that the total annual funding for fire service direct charges and estimated property tax revenue would be sufficient to fund the recommended staffing levels for buildings on the Cal Poly Humboldt campus or the proposed student housing project. This information is only provided to show that the staffing levels needed to respond to structure fires at Cal Poly Humboldt are high and the revenue that is currently available from the University through fire service direct charges and the special services agreement is insufficient to support such services and inequitable.

Unique Characteristics of Cal Poly Humboldt's Location

There are 23 CSU campuses in California. Except for Cal Poly Humboldt and Sonoma State University, fire services to CSUs are provided by city fire departments or countywide fire departments/districts. City fire departments are typically funded through the city general funds, which may be supported by property tax, sales tax, real property transfer tax, transient occupancy tax, vehicle license in-lieu revenue, business license tax, utility user tax, etc., and in addition the city may have special funds available as well such as a special tax or assessment for fire service. Depending upon how the countywide fire department or district was formed, it may have access to a similar range of general revenue sources as a city fire department or the district may have substantially more revenue than a smaller fire district due to its geographic size and urban density. City fire departments and countywide fire departments/districts are much more likely to have the funding necessary to support NFPA response standards than individual fire districts, especially those in rural areas. **AFD HAS THE LOWEST LEVEL OF FUNDING OF ANY FIRE DEPARTMENT PROTECTING A CSU CAMPUS.**

Recommendations Actions to be Evaluated by Cal Poly

The following are recommended actions by Cal Poly Humboldt to support adequate response levels by AFD to the Cal Poly campus and should be evaluated as part of close coordination between Cal Poly Humboldt and AFD. Actions are not ranked in priority order, the list of actions is not exhaustive, and in some instances actions may or may not be mutually exclusive:

- **Evaluate Existing and Needed Future Service Levels.** Fund a Commission on Fire Accreditation, International Template for Standards of Response Coverage analysis of AFD fire service capabilities and needed capabilities for buildup of Cal Poly Humboldt.
- **Building Design.** Design buildings and parking structures to be of a size and configuration (height, occupancy levels, building density, materials, fire protection infrastructure, access and egress) commensurate with AFD capacity.
- **Funding to Support Adequate Response Levels.** Cal Poly Humboldt should commit to providing regular annual funding to support the level of staffing necessary to support adequate response levels for the entire student population and faculty, including mid-rise fire suppression operations if this building configuration is adopted by CPH.
- **High-Rise Firefighting Training.** If CPH ultimately decides that mid-rise buildings are an unavoidable option, then extensive and ongoing training will be required. AFD and its aid partners perform only limited high-rise

firefighting training. Additional funding and coordination are needed to adequately train and prepare firefighters.

- Ongoing regional high-rise specific training is essential for AFD and its aid partners to allow AFD firefighters to carry out training and be available to respond to incidents.
- Special facilities are required to allow realistic training. A 5-7 story training drill tower for ladder and rope work and advancing hose lines is needed. In this training building firefighters can fight live fires providing enough area to allow firefighters to conduct drills.

- **Equipment and Facilities Improvements.**

- Due to firefighter staffing requirements, apparatus purchase costs, and maintenance requirements, AFD has not retained a ladder truck. The proposed project would trigger the need for a truck equipped with a long aerial device (length to be determined based on the final building design and configuration). Funding for firefighting staff, training, apparatus, and maintenance will be required to purchase and operate a truck with an adequate length aerial.
- One or more existing fire stations may need to be expanded to accommodate additional duty staff and new firefighting apparatus.

¹ NFPA, 2020. NFPA 1710. Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments

Response L1-17

Please refer to Response L1-4 regarding the content of Exhibit 1 to Letter L1.

Organization

LETTER O1 COALITION FOR RESPONSIBLE TRANSPORTATION PRIORITIES; ENVIRONMENTAL PROTECTION INFORMATION CENTER; NORTHCOAST ENVIRONMENTAL CENTER

Colin Fiske, Executive Director; Tom Wheeler, Executive Director; Caroline Griffith, Executive Director
December 1, 2022

Comment O1-1

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the Student Housing Project Draft Environmental Impact Report (DEIR) (SCH Number 2022030008). We recognize the urgent need for student housing and the appropriateness of the location near both the Cal Poly Humboldt campus and downtown Arcata. Therefore, we support this project in concept. However, we have identified certain deficiencies in the DEIR, and we therefore submit these comments so that the document can be amended and the project improved before final adoption.

Impact on Vehicle Miles Traveled

The DEIR concludes that the project will not have a significant impact on vehicle miles traveled (VMT) under CEQA Guidelines Section 15064.3(b), but does not provide sufficient information to support the per capita VMT estimate for future project residents nor to justify the selected significance threshold.

The DEIR uses the Humboldt County Association of Governments (HCAOG) Travel Model to estimate the project's per capita VMT. However, the document nowhere reveals what inputs were used to generate the estimate. Appendix E, the Transportation Impact Study, merely says that "the proposed project was input into the HCAOG Travel Model." However, the DEIR is unclear about key details which would affect VMT, including:

Response O1-1

The comment provides a general introduction and a general summary of concerns related to the VMT analysis presented in the Draft EIR. Please refer to specific responses to the detailed comments provided below, which address specific concerns associated with the analysis.

Comment O1-2

At p.2-17, the DEIR says that there will be an on-site "bus/shuttle stop." Yet at p.3.11-10, it says "existing transit services would adequately accommodate any increase in demand" and "the project would not alter any existing transit stops." Whether there will be an on-site transit stop, and what kind (bus or shuttle), on what route, and with what connections, are all key details influencing the likelihood of transit ridership that the DEIR does not provide. We further note that the project cannot commit to an on-site bus stop without prior consultation with the relevant transit agency (Arcata & Mad River Transit Service or Humboldt Transit Authority).

Response O1-2

Impacts to transit services are discussed under Impact 3.11-1, as reproduced below:

As discussed above in the Environmental Setting section, A&MRTS provides fixed route bus service in the project area, served by the Gold and Red Route which both have stops on L.K. Wood Boulevard and Ridge Road. Local and regional plans do not identify any future planned or programmed transit improvements in the vicinity of the project site. Although the project would be expected to generate an increase in demand for transit ridership in the area, it is anticipated that the existing transit services would adequately accommodate any increase in demand. Additionally, as detailed in the Regulatory Setting section, above, the OPR Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact because infill development improves proximity and accessibility as well as improves regional vehicle flow by adding less vehicle travel onto the regional network.

Cal Poly Humboldt would continue to work with the Humboldt Transit Authority to address its transit needs (Fehr & Peers 2022: 8). Furthermore, the project would not conflict with existing transit stops east of the project.

Local and regional plans do not include transit improvements in the project area, and the project is not expected to generate a substantial increase in transit ridership. Additionally, the project would not alter any existing transit stops in the vicinity of the project site. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing transit services. Thus, the impact on transit services would be less than significant.

As noted in the text above, the addition of the proposed transit stop is not an indication of inadequate transit service to the project site under existing conditions. Further, the project would not modify/alter/remove existing transit stops, and transit providers, CEQA, and CEQA lead agencies generally do not treat increases in transit ridership as an adverse impact because infill development improves proximity and accessibility as well as improves regional vehicle flow by reducing vehicle travel across the regional network. Adequate right-of-way around and through the site is provided for regional transit and emergency vehicles. Cal Poly Humboldt will continue to partner with Humboldt Transit Authority to adaptively manage the transit needs of the campus and students, faculty, and staff located in the area. Further, contrary to statements made in the comment, the Draft EIR notes that the Gold and Red Routes serve the project area.

Comment 01-3

In various places, the DEIR says that the project will provide "indoor" bike parking (e.g., pp.1-1,2-13), while in others it does not specify that the parking will be indoors (e.g., p.2-8). This may seem like a minor discrepancy, but in fact, the availability of specifically indoor (i.e., weather-protected and secure) bike parking is critical to facilitating resident bike ownership and use.

Response 01-3

Consistent with the third paragraph on page 2-13, indoor bicycle parking would be provided and would be located adjacent to the proposed café within the southeastern portion of the project site. Additional bike parking/racks would also be provided along the exterior of on-site structures.

Comment 01-4

At p.2-18, the DEIR states that reducing peak-hour traffic by providing flexible work schedules is a VMT reduction measure. In fact, changing the timing of trips may reduce congestion, but it has no effect on VMT.

Response 01-4

The comment correctly states that congestion is not related to VMT. The text of the Draft EIR has been modified as follows, beginning in the second paragraph on page 2-18:

The circulation framework for the project would integrate various transportation demand management strategies that reduce vehicle miles traveled from single-occupant automobile trips, such as:

- ▶ provide safe, covered bicycle parking areas near building entrances for visitors and inside buildings for residents and employees;
- ▶ design and incorporate traffic-calming features within the development; and
- ▶ encourage ~~flexible work scheduling and~~ on-site employment for proposed support services ~~to minimize peak-hour traffic.~~

With respect to alternative transportation facilities, and in addition to the aforementioned Annie & Mary Rail Trail that would be located along the eastern boundary of the site, student residents would have access to campus via St. Louis Road and the US 101 overcrossing, which would provide secondary pedestrian/bicycle access to the Cal Poly Humboldt main campus. As previously stated, a central concourse/promenade would be provided within the proposed student housing development, connecting residences to support facilities and primary bicycle/pedestrian connections to campus. Within the southern end of the proposed development, indoor bicycle parking would be provided, in addition to on-site, exterior bicycle storage facilities.

These changes do not affect the discussion regarding VMT under Impact 3.11-2, or result in new environmental impacts in addition to those disclosed in the Draft EIR. No further changes to the document are necessary.

Comment O1-5

Scoping comments submitted by us as well as those submitted by Caltrans point out the key influence of free residential parking on VMT. However, the DEIR makes no mention of the relationship between parking and VMT. Although the project is not subject to the City of Arcata's land use regulations, it is notable that the project provides substantially more parking than required by those regulations, suggesting it may result in higher per capita VMT.

Response O1-5

Within Appendix E of the Draft EIR, the Transportation Impact Study (TIS) for the project evaluates the potential transportation impacts of the project, including consideration of the proposed amount of on-site parking, in accordance with the CSU Transportation Impact Study Manual (TISM). Within the Draft EIR, Impact 3.11-2 discusses operational VMT impacts and concludes that impacts would be less than significant. The comment does not indicate any flaws in the analysis or suggestions for how free residential parking could affect VMT that would materially change what is presented in the EIR. No changes to the document are necessary.

Comment O1-6

The DEIR suggests that the project's design will encourage bicycle and pedestrian transportation, but also admits that "based on the conceptual nature of the site plan, it is not possible to conclude that pedestrian and bicycle safety in the vicinity of the project site would be sufficient" (p.3.11-12). Unsafe, uncomfortable, or merely inconvenient conditions for walking or biking make these modes much less likely to be used, and the DEIR does not provide sufficient information to judge likely mode choice. See below for additional discussion of this issue.

Response O1-6

The comment correctly quotes text from the Draft EIR, which goes on to state that, "The project would increase vehicular, bicycle, and pedestrian travel in the surrounding area which could potentially increase the risk of pedestrian- and bicycle-vehicle conflicts. For this reason, the project's impact related to transportation hazards during operations would be potentially significant (fifth paragraph on page 3.11-13)." As discussed in the first paragraph of page 3.11-12 of the Draft EIR, "The Transportation Analysis Memo used the HCAOG Travel Model to calculate the VMT per resident anticipated to be generated by the project. The trip patterns in the HCAOG Travel Model were checked against location-based services "Big Data" to confirm that the model is reasonably replicating existing travel patterns related to Cal Poly Humboldt." Further and as noted above, the TIS was prepared consistent with CSU TISM (Fehr & Peers 2019). Mitigation measures are provided in the Draft EIR related to specific on-site and off-site features that are considered necessary to promote the pedestrian and bicycle activity to and from the project site. Contrary to statements made in this comment, adequate information is considered to be provided, and no changes to the Draft EIR are necessary in response to this comment.

Comment O1-7

The DEIR notes that VMT modeling results were also used in the assessment of air quality, greenhouse gas, and energy impacts, heightening the importance of providing sufficient justification for the results. The EIR must specify the inputs used to obtain the VMT estimate for the project, and must provide enough detail about transit service and the site plan to judge the appropriateness of those inputs.

Response O1-7

Appendix E of the Draft EIR contains the TIS, which provides a description of the analysis methodology, a discussion of impacts, and conclusions. The analysis relies on the project description provided in Appendix E of the Draft EIR, which states that the project would construct a student housing community with approximately 240 units, up to 964 student beds, 340 single-occupancy parking spaces, and other amenities (see page 1 of Appendix E of the Draft EIR). Page 7 of Appendix E of the Draft EIR provides details related to the methodology used to calculate VMT:

As noted previously in the discussion regarding the CEQA significance criteria for VMT impacts, the Humboldt County Association of Governments Travel Model (HCAOG Travel Model) has been selected as the tool to calculate VMT per capita metrics for the proposed project. The use of a travel demand model to calculate VMT and related metrics is recommended by OPR in the Technical

Advisory, and the CSU TISM notes that the travel demand model is applicable for the project area and VMT calculation context. The HCAOG Travel Model covers the entirety of Humboldt County, including the proposed project area. Caltrans District 1 maintains the HCAOG Travel Model and periodically updates the model to reflect changing travel conditions and approved land use projects and programs. This analysis used the latest HCAOG Travel Model as received from Caltrans District 1 in early 2022. The trip patterns in the HCAOG Travel Model were checked against location-based services "Big Data" to confirm that the model is reasonably replicating existing travel patterns related to the University.

No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Comment 01-8

We further strongly urge Cal Poly Humboldt to reduce the number of parking spaces provided and increase housing proportionately.

Response 01-8

The comment provides a suggestion related to design of the project and does not address the adequacy, accuracy, or completeness of the EIR analysis; therefore, no further response is necessary. The suggested design change to the project is part of the record and will be considered by the Board of Trustees during their deliberation concerning the project merits.

Comment 01-9

Additionally, the baseline per capita VMT calculation used in the DEIR to calculate the significance threshold is not appropriate. The DEIR uses countywide per capita VMT as the baseline. As we pointed out in our scoping comments, the baseline should include only the Arcata-Eureka-McKinleyville area, which "encompasses both the vast majority of the university's student and employee residential catchment area as well as all areas potentially feasible for the development of future student housing." HCAOG, whose Travel Demand Model the DEIR employed, made exactly the same request. Yet the DEIR ignored both comments and used countywide VMT as a baseline instead.

The attempted justification for this choice is misleading at best. The DEIR points out that the limits of the analysis area "should not be arbitrarily truncated at political boundaries" (p.3.11-9). This is not what we nor HCAOG suggested, but exactly what the DEIR itself does by using county boundaries. The DEIR also points out that many students live outside the city limits of Arcata, which is exactly why we and HCAOG suggested using the greater Humboldt Bay region. Very few students live in remote eastern and southern Humboldt, where per capita VMT is very high. Using the county boundaries for the baseline VMT calculation is almost as arbitrary as using the entire state.

In addition to providing justification for its project VMT calculation, the EIR must adjust its threshold calculation to a more reasonable and restricted geography.

Response 01-9

The comment disagrees with the VMT methodology and suggests that a smaller area should be considered when analyzing changes to VMT related to the project. It is important to note that, as required under CEQA, the NOP comments were considered during preparation of the Draft EIR. Formal responses to NOP comments are not required. During consideration of the NOP comments, as well as OPR guidance it was determined that because a substantial number of students and staff at Cal Poly Humboldt live off-campus and outside of the City of Arcata and Humboldt Bay, evaluation of the entire county was appropriate as the baseline for the Draft EIR's VMT analysis. As noted on page 3.11-9 of the Draft EIR:

The recommended VMT significance criteria included in the OPR Technical Advisory are based on statewide GHG reduction targets, which are defined at the Metropolitan Planning Organization (MPO) level. Although the Humboldt County Association of Governments is a Regional Transportation Planning Agency, and not an MPO, the entirety of Humboldt County represents a logical boundary for the evaluation of VMT impacts based on the methodology used by OPR to

develop the thresholds identified in the OPR Technical Advisory. The OPR Technical Advisory also notes that the VMT calculation itself should not be arbitrarily truncated at political boundaries (i.e., an arbitrarily defined sub-area boundary), and thus using a Humboldt County-wide geography represents a good faith effort at the full accounting of the VMT effects of the project. This County-wide analysis also represents the extents of the Humboldt County travel demand model.

In addition to the methodological reasoning for the selection of a Humboldt County-wide benchmark for VMT, student housing location data from Cal Poly Humboldt, location-based services "Big Data" regarding Cal Poly Humboldt-related trips, and data from the Humboldt County Association of Governments Travel Model (HCAOG Travel Model) indicate that there is a substantial regional student housing component consisting of students living off-campus and outside of the City of Arcata. Because the project does not propose to increase student enrollment, it is reasonable to assume that the net effect of the project would be that students who would otherwise be living outside of the City of Arcata would move closer to campus. Therefore, a regional basis (i.e., a Humboldt County-wide basis) is the most reasonable for evaluating the effect of the project. Therefore, the Humboldt County-wide average was used as the basis for the assessment of project-generated VMT impacts.

The Draft EIR's analysis represents a good-faith attempt at a full accounting of the VMT effects of the project and is considered consistent with OPR guidance. The discussions provided in Section 3.11, "Transportation," are supported by the TIS (Appendix E of the Draft EIR), which was prepared by qualified traffic engineers who are experts in the field of transportation analyses. Suggestions for a smaller area of analysis presented in this comment were considered but due to the regional nature of the university, the countywide analysis was considered more appropriate and in accordance with applicable guidance from OPR and CSU. No information is presented in this comment to suggest that the project would result in a significant impact that was not disclosed in the Draft EIR. No changes to the Draft EIR's analysis are considered necessary.

Comment O1-10

Consistency with Transportation Plans and Policies

The DEIR notes that the California State University (CSU) system has adopted policies promoting low-carbon transportation modes such as walking, biking and public transit, and committing to transportation demand management (TDM) and VMT reductions (pp.3.6-6, 3.11-3). These are also identified in the DEIR as purposes of the student housing project (p.2-20). However, the DEIR provides no analysis to justify how or whether the project will be consistent with several of the adopted policies, including:

- CSU TDM Manual Objective 1A (developing TDM policies)
- CSU TDM Manual Objective 1B (monitor to ensure TDM effectiveness)
- CSU TDM Manual Objective 3B (use financial incentives for non-single occupancy vehicle modes)
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.1 (establish a TDM plan)
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.2 (adjust parking policies, programs and infrastructure) *
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.4 (alternative transportation programs) *
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.5 (public transportation) *

The measures marked with an asterisk (*) are not even mentioned in the DEIR. The DEIR concludes correctly that without mitigation, the project would conflict with policies promoting active transportation due to potential safety conflicts in the surrounding area. However, the DEIR fails to address consistency with policies related to parking, financial incentives, improvement of public transportation, and implementation and monitoring of TDM plans. On its face, the project's abundant parking would seem to conflict with CSU TDM and Cal Poly Humboldt Climate Action Plan parking policies.

Furthermore, the DEIR states at p.4-8 that the project is only "likely" to include TDM strategies. Without a firm commitment to TDM strategies as required by the above-referenced policies, the project would not pass the consistency step.

Response O1-10

The comment states that the Draft EIR does not address consistency with the CSU TDM Manual nor Cal Poly Climate Action Plan policies. The CSU Transportation Demand Management (TDM) Manual (Nelson Nygaard 2012) addresses the unique transportation needs of different campuses and provide a systemwide framework for implementing sustainable transportation programs. The manual contains a set of goals, criteria, and best practices that encourage students, faculty, and staff to commute to and from campus via bus/rail transit, carpools, vanpools, bicycling, and walking to lessen reliance upon single-occupant vehicle (SOV) travel and reduce vehicle trips to campuses. The project would be located near to campus (approximately 1 mile via bike or pedestrian route) and would contain features that would support alternative modes of transportation (e.g., indoor bicycle parking, proximity to the Annie & Mary Bike Trail). TDM strategies are adaptively managed by the campus, and the project, in and of itself, would not hinder the campus' ability to implement, monitor, and adaptively manage its TDM efforts. As such, the project is considered generally consistent with the CSU TDM's goals related to sustainability.

With respect to the Cal Poly Humboldt Climate Action Plan, it is addressed in Chapter 3.6, "Greenhouse Gas Emissions" and consistency with these strategies is evaluated and addressed under Impact 3.6-2. More specifically, the Draft EIR states on page 3.6-16:

Consistency with Cal Poly Humboldt Climate Action Plan 2.0

The Cal Poly Humboldt CAP 2.0 aims to exceed the CSU Sustainability Policy by setting a carbon neutral goal by 2050. As part of that commitment, locating a higher percentage of students closer to the main campus is considered necessary and would be partially fulfilled by the project. For the same reasons that the project would be consistent with Climate Leadership Commitment, the project would implement sustainable design features that would put Cal Poly Humboldt on track toward meeting emission reduction goals. These features include no natural gas use, energy and water efficiency systems, and EV-ready parking spaces. Thus, the project would be consistent with the CAP.

Further, the commenter's statement regarding statements made on page 4-8 of the Draft EIR is incorrect. The statement to which the commenter refers is describing how projects listed within Chapter 4, "Cumulative Impacts," would also likely include consideration of TDM strategies in accordance with City and Cal Poly Humboldt goals and objectives. No changes to the document are necessary.

Comment O1-11

When considering the adopted Regional Transportation Plan (RTP), the DEIR also fails to assess the project's consistency with that plan's Safe and Sustainable Transportation Targets, despite those targets being central to the RTP and being specifically called out in HCAOG's scoping comment letter.

Response O1-11

Impact 3.11-1 addresses conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. While the comment notes that the adopted RTP's Safe and Sustainable Transportation Targets are not included, as explained in the "California State University Autonomy" section in Chapter 3 of the Draft EIR, the CSU is not subject to local government planning and land use plans, policies, or regulations. The RTP establishes several goals, including a reduction of regional VMT, an increase in transit ridership, a transition to zero-emission fleets, accessibility improvements through better land use, increased safety for pedestrians and cyclists, and increased active transportation education. Through on-site design and mitigation measures, the project includes features that are consistent with and support sustainable transportation as provided in the adopted RTP. More specifically, the project would include 1) the provision of EV-ready spaces, 2) housing close to campus, 3) on-site transit considerations, 4) adequate pedestrian and bicycle facilities that provide two appropriate routes to campus. Because the comment does not indicate any environmental impact related to the project that were not disclosed in the Draft EIR, no changes to the document are necessary.

Comment O1-12**Transportation Safety**

The “conceptual site plan” (DEIR Figure 2-9) presents an island of buildings and landscaping surrounded by streets and parking lots, and does not make clear how people walking, biking or rolling will have safe, comfortable and convenient access to and from the buildings through these vehicle-dominated spaces. The DEIR repeatedly describes “interconnected pedestrian and bicycle paths” on-site (e.g., pp.2-17, 3.11-10, 3.11-13), which we appreciate, but does not explain how these paths will connect to off-site facilities. The text also claims that there will be a “central concourse/promenade” that connects to off-site facilities (pp.2-13, 2-18, 3.11-13), and asserts that on-site paths will “direct student residents north to the L.K. Wood Boulevard-US 101 overcrossing or east to the future extension of the Annie & Mary Rail Trail project” (p.2-17), but the conceptual site plan does not show any such connections.

Response O1-12

The Draft EIR provides a good-faith effort at presenting the project through both a narrative discussion and through the use of figures. Renderings of the project, showing pathways and access through the site are presented in Chapter 2, “Project Description;” and, a description of the on-site circulation is provided in Section 2.4.3 of the Draft EIR, “On-Site Circulation.” Additionally, Mitigation Measures 3.11-3 includes requirements for appropriate signage and crossings to reduce impacts to safety (discussed under Impact 3.11-3). Because the comment does not indicate any environmental impact related to the project that were not disclosed in the Draft EIR, no changes to the document are necessary.

Comment O1-13

Additionally, the DEIR claims that the project will provide “signage” to prevent people walking and biking from using the planned southern emergency entrance to access Eye and Jay Streets (p.2-18). However, this will be one of the most direct paths of travel from the project to campus, downtown Arcata, and other major destinations, and signage will be unlikely to deter usage. As noted in the DEIR, Eye Street has no bicycle or pedestrian facilities (pp.3.11-7, 3.11-8).

Response O1-13

As discussed in the first paragraph under Section 2.4.3 of the Draft EIR, “[t]he proposed circulation network for the project site is intended to limit changes to the existing circulation patterns in the area and minimize the potential for project-related vehicular traffic to affect local residential streets, including Eye Street, Maple Lane, and Stromberg Avenue.” Pedestrian and bicycle access would not be provided to and from the project site via Eye Street. Access would be prevented through a combination of barriers and signage, including gates, bollards, signs at the project site and likely at access points along the Annie & Mary Rail Trail. Students would be required to use the Annie & Mary Rail Trail or travel to and from the site via St. Louis Road. No changes to the document are necessary.

Comment O1-14

We appreciate the DEIR’s acknowledgement that there will be significant impacts to bicycle and pedestrian safety (Impacts 3.11-1 and 3.11-3). We also appreciate the proposed mitigation measures, including providing sidewalks along St. Louis Road and high visibility crosswalks and signage at other locations. However, these measures are insufficient to fully mitigate the impact. First, St. Louis Road must also be provided with bicycle facilities between the project site and the Highway 101 overpass, as suggested by Caltrans in their scoping comments.

Second, despite the DEIR’s claims, it is unlikely that most project residents will walk or bike north from the site. As noted above, the most important destinations, including campus, are south and east. Thus, the project should also anticipate pedestrian and bicycle use of Eye Street and provide bicycle and pedestrian facilities and traffic calming improvements there. The project must also include mitigation measures to address the intersections at Sunset Ave/G Street/H Street/Highway 101 ramps, and Sunset Ave/LK Wood Blvd/Highway 101 ramps, which are widely recognized as the most dangerous in the city for people walking, biking and rolling. Project residents using Eye Street or the future Annie & Mary trail to travel between the project site and campus—the most direct routes available—will be forced to navigate these intersections. We acknowledge that plans are under way at the City of Arcata to improve safety at the L.K. Wood intersection, but we are aware of no current plans for the G/H Streets intersection.

Response O1-14

Generally, and as noted in the second paragraph on page 3.11-13 of the Draft EIR, “[o]n-site circulation would provide interconnected pedestrian and bicycle paths throughout the development to promote multimodal transportation choices, all of which are intended to direct student residents to the US 101 overcrossing or the City’s Annie & Mary Rail Trail project which would be located along the eastern project site boundary.” The project was evaluated in a manner consistent with CEQA requirements and the CSU TISM for potential physical environmental impacts pertaining to transportation and where necessary, based on appropriate thresholds, mitigation measures were identified. With respect to pedestrian and bicycle improvements north of the project site, Mitigation Measure 3.11-1 would ensure the provision of safe passage north from the project site for both student pedestrians and bicyclists, and has been clarified as follows:

Mitigation Measure 3.11-1: Provide Pedestrian and Bicycle Facilities along St. Louis Road

Cal Poly Humboldt, in cooperation with the City of Arcata, shall provide a sidewalk and adequate striping for bicycles that connects the northern access road for the project to the US 101 overcrossing and the rest of the pedestrian circulation system. The sidewalk and bicycle connections shall be built on the east side of St. Louis Road with appropriate pedestrian crossing provided along St. Louis Road. There is adequate right-of-way available to complete the sidewalk gaps along the roadway. The design of the off-site pedestrian and bicycle improvements shall be consistent with City design standards. The sidewalk and bicycle improvements shall be completed prior to occupancy of the project.

Based on the analysis conducted and provided in the Draft EIR, the project would not conflict with plans, policies, or programs related to the provision of adequate bicycle and pedestrian facilities. Please also refer to Response O1-13. With respect to the potential need for improvements along Sunset Avenue, it is important to note that these are already considered within the cumulative context, as they are part of the City’s Annie and Mary Rail Trail project and planned/funded. Please refer to pages 4-5 and Figure 2A of the City’s Annie & Mary Rail Trail IS/MND available at: <https://cityofarcata.org/DocumentCenter/View/12488/Arcata-Annie-Mary-Trail-ISMND-Public-Circulation?bidId=>.

Comment O1-15

Alternatives Analysis

Although the DEIR analyzes a project alternative identified as “on-campus student housing,” the only on-campus location considered is a sports field. The DEIR should analyze the alternative of building student housing on an on-campus parking lot. These cover large areas of campus and would help achieve project objectives related to transportation, energy, and greenhouse gases by managing vehicle parking.

The alternatives analysis concludes that the environmentally superior alternative is the no-project alternative, and excluding that, the lower density project alternative. Part of the basis for this conclusion, however, is flawed. The DEIR concludes that the no-project alternative would “result in reduced transportation and circulation impacts” (p.5-8), and that the lower-density alternative “may also reduce vehicle trips and VMT” (p.5-10). This is inconsistent with the rest of the DEIR and very likely incorrect. Even after correcting for the VMT analysis deficiencies identified above, it is likely that the project will still produce lower VMT per capita than the area average. Therefore, a no-project or lower-density project alternative would result in higher VMT per capita, and thus a greater transportation impact under CEQA Guidelines Section 15064.3(b).

Response O1-15

The comment suggests an on-campus alternative that would be located on a parking lot; however, it does not indicate a specific parking lot that could accommodate the project nor the types of environmental impacts that would be reduced, relative to the project. Without further indication of an appropriate location that could meet the objectives of the project while also reducing the significant environmental effects of the project, no further discussion can be provided. Further, the Draft EIR considers a reasonable range of alternatives to the project, consistent with CEQA requirements. The off-site location was determined based on an assessment of campus facilities and the potential for densification/intensification of use that would not necessitate construction of a facility to replace the one removed on campus.

Consistent with the State CEQA Guidelines Section 15126.6(d), the Chapter 5 of the Draft EIR contains information about each alternative to the project sufficient to allow meaningful evaluation, analysis, and comparison with the proposed project, which includes a discussion of VMT related to Alternative 1: No Project-No Development Alternative and Alternative 2: Lower-Density Student Housing Development. As noted on page 5-8, "Under the No Project-No Development Alternative, no vehicular trips would be generated as a result of on-site construction or operation of new facilities, and there would be no change to local vehicular trips because the project site would remain vacant and unused. In comparison, the project would add new trips to the local roadway network; however, vehicle miles traveled (VMT) as a result of project implementation would not exceed appropriate standard." In the second paragraph on page 5-11, the discussion states that, "[b]ecause Alternative 2 would accommodate fewer site occupants than the project, overall VMT associated with on-site uses would also be reduced. However, as noted in Section 3.11, "Transportation," no significant and unavoidable transportation impacts are anticipated." For these reasons, as indicated in the Draft EIR, there would be less VMT under the No Project-No Development Alternative and the Lower Density Alternative than the proposed project. It is generally understood that locating students closer to campus would reduce VMT and that by not doing so would not decrease VMT. However, the level to which VMT would decrease would depend on the location of students that would otherwise live at the project site in relation to the campus. On its face, Alternative 1 would result in new uses at an underutilized project site that would increase the population of the site. Some of its population (up to 340 residents) may drive on a daily/weekly basis and would thus increase the level of VMT associated with the project site, as stated correctly in the Draft EIR.

Comment 01-16

Aesthetics

The majority of impacts identified in the DEIR as both significant and unavoidable fall under the category of aesthetics. Aesthetic impacts are highly subjective, and we object to the DEIR's characterization of the aesthetic impacts of the project.

The DEIR admits that Highway 101 is not a designated scenic highway in this location, yet still concludes that the project will "damage scenic resources within a state scenic highway" (p.3.1-14). Similarly, the DEIR concludes that the project will "substantially degrade the existing visual character or quality of public views of the site and its surroundings" (p.3.1-14).

The project will replace a dilapidated industrial structure, vastly improving views of the site. And from the highway, the project will not block or impede any natural vistas at all. It strains credulity to imagine these as significant aesthetic impacts. The conclusion of significant impacts seems to rely largely on the assumption that larger buildings and denser development are inherently less aesthetically appealing than low-density development. We object strongly to this subjective characterization.

Response 01-16

The comment states that the project would not present a significant and unavoidable impact on aesthetics. Impact 3.1-1 states that, "[t]he project would... represent a change from a more natural, forested condition to a more urbanized (i.e., densely developed) quality of the project site (fourth paragraph on page 3.1-13 of the Draft EIR); "and Impact 3.1-2 states that, "the project would introduce urban/suburban, human-made elements that would alter the current condition of the project site" (first paragraph on page 3.1-14 of the Draft EIR). These impacts were nonetheless considered significant and unavoidable because they would represent the introduction of a mid-rise building in a setting characterized almost exclusively by low-rise (single-story) residences. In addition, while the project would replace dilapidated structures at the project site, it would briefly block views of the wooded hillside located to the east of the project site from vantagepoints within the neighborhood west of the project site (see pages 3.1-15 through 3.1-18 and Figure 3.1-3 of the Draft EIR). It should also be noted that the State CEQA Guidelines Appendix G Environmental Checklist Form's significance threshold against which aesthetic impacts are measured is phrased in somewhat inflexible language, asking whether a project would "substantially degrade the existing visual character or quality of the site and its surroundings," where a more nuanced threshold might ask whether the project represents or introduces a high degree of contrast with its setting, allowing for a determination of whether that is a beneficial or adverse change. The comment provides opinions related to the appreciation of denser development, but does not provide substantiation to indicate that conclusions related to

significant aesthetic impacts are incorrect. The commenter's concerns as well as support for the aesthetics of the project are noted, but no changes to the document are necessary.

Comment O1-17

Solar Photovoltaics and Electric Vehicle Charging

The DEIR describes the project as "PV-ready," meaning it will not have solar panels installed, but theoretically could in the future. Solar panels are already required on most multifamily housing by state building codes, and CSU policies cited in the DEIR call for dramatically increasing both on-site renewable energy generation and renewable electricity procurement. Consistency with adopted renewable energy plans therefore requires the project to actually include photovoltaic panels when constructed.

Similarly, the DEIR states that 10% of project parking spaces will be "EV ready" (p.2-13). We strongly urge that the project actually construct the electric vehicle charging infrastructure, rather than waiting until some unidentified future date.

Response O1-17

Comments related to electric vehicle charging infrastructure are noted. As noted on page 3.5-10 of the Draft EIR, Cal Poly Humboldt is in the process of developing a larger microgrid and various other sustainability initiatives, in line with CSU Sustainability Policy goals and Cal Poly Humboldt's Climate Action Plan or CAP 2.0. Due to feasibility concerns, the degree to which the project may connect to the broader Cal Poly Humboldt Campus, including consideration of expansion of electric vehicle charging opportunities throughout campus and where such charging facilities would be most effective, has yet to be determined. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Comment O1-18

Conclusion

In sum, while we support this project in concept, the following changes to the project/DEIR are required:

1. Address deficiencies in the VMT analysis and adopt a more appropriate threshold of significance.
2. Reduce on-site parking and commit to TDM strategies to ensure compliance with adopted plans and policies.
3. Provide additional off-site safety improvements for bicyclists and pedestrians to mitigate for reasonably foreseeable impacts.
4. Address deficiencies in the alternatives analysis which bias the final conclusion.
5. Reconsider conclusions of significant aesthetic impacts.
6. Include PV panels and EV charging equipment in the project.

Response O1-18

The comment represents a restatement and summary of the letter's previously presented comments. Please refer to Responses O1-1 through O1-17, where the suggested changes are addressed.

Individual

LETTER I1 GLEN COLWELL

November 1, 2022

Comment I1-1

I am a resident and property owner in north Arcata, and a 1982 grad of HSU(IA&T). As such, I am cautiously optimistic about the conversion of HSU to CPH, and the potential "town and gown" benefits that may result.

Because we live close to the Craftsman's Mall property, and will be affected by any development that happens on that site, we have closely followed the proposed private development that came before the City of Arcata a few years ago and was withdrawn by the developer, and now Cal Poly Humboldt's plan.

I'm contacting you to better understand why and how CSU planners arrived at the current design. After the build-out of new student housing near the College Creekfield, which is visually attractive, the design of the Craftsman's Mall student housing buildings seems like an homage to Soviet era East German public housing.

Sadly, I'm sure it's too late at this point for a redesign, and I am aware that Arcata community residents and the City of Arcata have no say in projects built on State property. Nevertheless, for whatever it may be worth, I'm adding my two cents; Please do better!

And PLEASE don't do the same thing on the property recently purchased near Foster Avenue!

If you can help me understand how the Craftsman's Mall "Institutional Style" building design came to pass, I'd greatly appreciate it.

Response I1-1

Section 2.4.1 of the Draft EIR, "Building and Site Design," provides an overview of the layout of the project and consideration of building features. As noted in the first paragraph on page 2-12:

As proposed, on-site buildings would generally be taller at the center of the site and step down along the perimeter of the project site, to reduce building mass and scale in proximity to the surrounding single-family residential neighborhoods. The western building, as shown in Figure 2-9, would be oriented in an L-shape with the east-west wing being five stories in height and the north-south wing being six stories in height. The eastern building would be generally seven stories in height; however, the easternmost section of the building would be limited to five stories. Overall, no on-site buildings would exceed approximately 75 feet in height. The intent of the taller building height is to maximize the available space for open space and recreational opportunities on the project site...

As further discussed in Chapter 2 of the Draft EIR, "Project Description," the project would include open-air courtyards, green spaces, and would maintain the 1.2 acres of existing natural open space lining Janes Creek in the western portion of the site (last paragraph, page 2-12). The potential aesthetic impacts of the project are addressed in Section 3.1 of the Draft EIR, "Aesthetics." Comments provided in this letter related to the appearance of the project will be considered during detailed design development and by decisions makers during consideration of project approval. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Comment I1-2

Also, is there any avenue for public comment on this project or for the Foster Avenue?

Response I1-2

The comment requests information for how to submit public comments on the proposed project and a future project on Foster Avenue. The public review period for the Draft EIR ended on December 5, 2022, consistent with CEQA requirements. A future project on Foster Avenue is not within the scope of the EIR or considered part of the proposed project. No further response is necessary.

LETTER I2 MARGARET KELSO

November 29, 2022

Comment I2-1

Thank you for taking public comments about the proposed Student Housing on the Craftsman site.

I have to admit that I feel hopeless that anything I say or anyone says will make any difference in the university's plans. After a lengthy negotiation with neighbors and the developers that were formerly involved in creating the Village, all agreements were thrown out when the University bought the property. The sheer size of the currently proposed structure is overwhelming. From the drawings, it looks like this building might be the largest in Humboldt county.

But I wish to reiterate my primary concern: safety. The traffic circle that unites Foster, Sunset and Jay Street is already dangerous and the addition of even more pedestrians, bicyclists, skateboarders and cars from both the new Wellness Center and at least some traffic from the dormitory will be even more so. (I realize the plan tries to direct traffic over St. Louis Road.). If there is any way that construction of this dorm can be moved to the current campus grounds, then I urge you to do so. It would solve so many issues.

Response I2-1

The comment provides opinions related to the design of the project. Please refer to Section 3.1, "Aesthetics," in the Draft EIR for evaluation of the aesthetic impacts associated with implementation of the project.

The comment also expresses concerns related to safety, particularly at the traffic circle that unites Foster, Sunset, and Jay Streets. As discussed under impact 3.11-1 in the Draft EIR, the potential for bicycle- and pedestrian-vehicles conflicts is considered to be a significant impact. Mitigation Measure 3.11-1 is provided to reduce these impacts to a less than significant level by providing pedestrian facilities connecting the project site to the area circulation system.

The comment's suggestion that the university consider an on-campus project site is reflected in Chapter 5, "Alternatives," of the Draft EIR (see Alternative 3). As noted by the comment, this alternative would result in reduced impacts to traffic, including bicycle and pedestrian modes of transportation, compared to the project (see the fourth paragraph on page 5-14 of the Draft EIR). However, as stated in the last paragraph on page 5-14, the upper playfield is considered an essential recreational amenity to the Cal Poly Humboldt main campus and the students, faculty, and staff and development of it would not optimize an underutilized site and would detract from overall campus life/experience by removing an essential recreational amenity of the existing campus. It is important to note that development of on- and off-campus housing would likely be necessary to meet long-term campus-related housing demand. Further the Draft EIR evaluated the potential impacts related to bicycle and pedestrian routes from the project site to the campus and provided mitigation to ensure two routes (one north and one south of the site) to allow for safe passage of student residents to and from Cal Poly Humboldt.

LETTER I3 FRED JOHANSEN

November 30, 2022

Comment I1-1

On November 15th Cal Poly Humboldt held an open meeting to present their EIR plan for the Craftsman Mall Dorms. There were three presenters and four attendees from the public. The EIR is published online at the Cal Poly website.

I was very interested in the proposed project to see how it was laid out, transportation to and from the Dorms, and how it will affect our neighborhood. Myself and one of my neighbors have emailed comments to Diedre and they are included in the Appendices to the EIR.

The Project

https://facilitymgmt.humboldt.edu/sites/default/files/combined_deir_with_appendices_1.pdf is the location of the EIR

The new dorms as planned will house 964 students and have parking for 340 cars. No outdoor decks are included in the seven story buildings. The two housing units are separate with the north one facing north and south and the other east and west with supporting services located between them.

The main entrance to the Dorm Complex will be a new road exiting St. Louis Rd. midway along Mad River Lumber. St. Louis Rd. then continues to the southern end of the Mad River Lumber Property. This is a major positive step to provide a safe entrance for students and services to the Dorms. It provides a stop sign where the new road enters St. Louis Rd. That slows the traffic entering St. Louis Rd. which during the day has 30 plus semi trucks entering and leaving Mad River Lumber giving the students leaving the dorms time to look down St. Louis Rd. and then to proceed safely. Today those semi's sometimes stop in St. Louis Rd. to wait to load or unload at the mill. Those semi's will now wait in a safe location in the road but out of the traffic coming into and out of the Dorm complex. Map at pg. 2-14 and it is the Conceptual Site Plan

Transportation Problems

The Plan is for students who walk, bicycle and e-transportation to travel to the separate, main campus on the new Trails by Rails path to Foster Ave. This will include pedestrian, bicycle, e-bikes and e-scooters the most direct access to the University. This will be the most risky path for students to travel due to the three intersections, the circle where Sunset Ave and Foster Ave converge, the major intersection where Foster Ave. crosses the bridge over U. S. 101, and the new Foster Ave. and L. K. Wood circle intersection. All three of these intersections have received improvements for traffic and pedestrian safety due to the 2017 Central Arcata Traffic Study.

Since that study based on an 800 bed proposal for dorms at the time of the study several additions have taken place. They are the addition of the new Opendoor facility, the always open drive way to the newly developed Arcata High School Athletic Fields, parking on the 101 bridge and of course the new circle at L.K. Wood. The circle entrance at Foster Ave. and Sunset Ave. is dangerous because of sight lines at the entrance of Foster that doesn't allow traffic entering from Foster Ave. to see the entrance of Sunset Ave. to the circle. Note: a stop sign is needed at this juncture.

If students feel that the danger and delay on this main route is due to vehicular traffic at the three intersections they will then reverse their path to St. Louis Rd. and then to L.K. Wood.

The Coalition for Responsible Transportation Priorities (CRTP), Humboldt Bay Keeper, and the Northcoast Environmental Center responded to the EIR with a letter. The third bullet in the letter is this:

We also appreciate the NOP's acknowledgement that the project could result in impacts related to "potential traffic hazards on local roadways." We request that the EIR acknowledge that a significant increase in vehicular traffic can result in traffic hazards as well as what CEQA Guidelines refer to as "incompatible uses." In other words, if 2 vehicular traffic increases significantly on a particular roadway which lacks adequate and sufficient bicycle and pedestrian facilities (including closely spaced safe crossings), the overall level of vehicular use could become incompatible with walking, biking and rolling, resulting in a significant impact under CEQA.

The increase of traffic is causing concern from my neighbors. My wife and another professor walked daily to the University over the 101 overpass and both had near misses with inattentive drivers before and after the traffic modifications were completed from the 2017 Central Arcata Traffic Study.

Each of these intersections is complex with as few as four car and four pedestrian routes coming into them and as many as six entering and leaving the intersection in the middle. Compound this with e-bikes traveling at up to 30 mph, bicycles, e-scooter and pedestrians with earbuds in and it will be very exciting.

My concern here is that the additional traffic in these three busy intersections to Cal Poly Humboldt will be seen by students as a less desirable route to the university. The alternative will be for them to travel to the university by way of L.K. Wood.

In the plan as it exists today that will put the students walking and biking walking along the front of Mad River Lumber. Again this is an Industrial site with 30 or my logging, lumber and Chip trucks entering and exiting every working day. Since the Rails by Trails will pass behind Mad River Lumber it would be convenient for it to have a path from the Rails by Trails route to the Bridge over L.K. Wood

Then the route should be via the Rails by Trails under the L.K. Wood overpass to the other side of L.K. Wood so that they wouldn't have to walk along Mad River Lumber and the, in and outgoing semi-trucks. It is important that this addition be included in the Rails by Trails project. It would secure a safe access to the University that would be usable by pedestrians, bicycles, e-bikes and e-scooters.

I'm hoping that this additional project can be included. I am really excited to see that the new entrance was included and it will make this a safer project for everyone who enters and leaves the new dorms.

Response I1-1

The comment expresses concerns related to safety, particularly at the traffic circle that unites Foster, Sunset, and Jay Streets. As discussed under impact 3.11-1 in the Draft EIR, the potential for bicycle- and pedestrian-vehicles conflicts is considered a significant impact. Mitigation Measure 3.11-1 is provided to reduce these impacts to a less than significant level by providing pedestrian facilities connecting the project site to the area's circulation system.

With respect to the Annie & Mary Rail Trail connections suggested by the comment, the project would connect directly to the planned Annie & Mary Rail Trail, which will be located along the project site's eastern boundary and is anticipated to be completed in 2024.

Please see Responses O1-1 through O1-18, which address the comment letter submitted by the Coalition for Responsible Transportation Priorities (CRTP), Humboldt Bay Keeper, and the Northcoast Environmental Center. Please refer to Response O1-14 regarding the text quoted from their letter.

Comment I1-2

I am very pleased with the proposed dorms. I hope that as the project progresses the charging stations will have the solar included. This is a time of great change and e-bikes, e-scooters are showing up in many cities in California. Seeing a young person, texting, going on an e-scooter and e-bike took my breath away. It really looks like fun but when I do I won't be texting or have earbuds in.

Response I1-1

The comment expresses general support for the project. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

Public Hearing

TRANSCRIPT PH1-1 FRED JOHANSEN

Comment PH1-1

Thanks for having this meeting and thanks for including my e-mail in the comments that I sent earlier. I've been looking at the transportation and I so hope that this is going to be a successful project for the university. I really would not like to hear that someone had run into a logging truck or someone was killed crossing the freeway on the bridge. And I still am very concerned with that. Here's how I kind of see this is going: the students will initially walk and bicycle, most of the students, I'm hoping, will cross using the rails to trail to the main intersection at the circle where it leads to the bridge. The problem is there that the, where the trails to rails comes out is above the circle. So, getting students to cross at the circle is going to be kind of interesting because I know when I'm in a hurry I'm more liable to go across the road there. I know my wife when she was working at the university, it's always an issue crossing over to the bridge from Sunset. And she had several close calls with people just driving rather than looking for pedestrians. And we know that that's going to be an impacted intersection with the 2017 traffic study. Has there been any? So what I'm looking at is, OK, that becomes impacted. Students decide that that's so impacted for going to school that they're going to go back over St. Louis Road and to L.K. Wood. And I want to commend you, thank you for putting in the road to the center of the North End of your project. I think that's going to make it a lot safer. But it looks to me that the sidewalk that the city is putting in is on the eastern side. It would make a lot more sense if it's on the western side. There is an entrance that's going to come out of the lumber mill there that is going to be

dangerous for them to cross. And then crossing across L.K. Wood and going to school, that's another, you know, maybe there's going to be a need for some traffic mitigation on L.K. Wood. So, I am concerned about the traffic. And have you discussed this? Are there more discussions ongoing with the city of Arcata? About these issues?

Response PH1-1

As noted during the hearing, Cal Poly Humboldt and the City have been in communication regarding development of the Sunset Bridge. Please see Section 3.11 of the Draft EIR, "Transportation," which addresses safety issues associated with pedestrian and bicycle ingress and egress from the project site. Please refer to Response O1-14 for more information related to traffic safety improvements associated with the project.

TRANSCRIPT PH1-2 ANNE CARLISLE

Comment PH1-2

Why haven't you notified nearby property owners of this meeting by mail? I live on Madrone and my neighbors haven't been notified.

Response PH1-2

Consistent with CEQA Guidelines Section 1087, a public notice of the availability of a draft EIR was circulated in the Eureka-Times Standard when the Draft EIR became available. The noticed included a description of the project and the dates for the public meeting on the Draft EIR. In addition, notices were mailed to people who had attended either of the scoping meetings or had previously expressed interest in the project.

TRANSCRIPT PH1-3 NATALIE CALDERON

Comment PH1-3

Mike Fisher: Natalie Calderon, I see your question here. I apologize, we've been chatting in the Q&A portion. Let me see if you can still see the screen. I'm just going to roll back to this part that captures your question best. What you see on the top part of the image is Granite Ave or that really the housing area on campus, this is Sunset Ave that goes from campus to the Sunset community. We are northwest of our campus, so it is off site by about 1/2 a mile. And we're located just on the adjacent side of the highway. Hopefully that orients you a little bit on what we're looking at. Thank you, Natalie.

Response PH-3

This comments requests a better understanding of the project site in relation to the main campus. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.

TRANSCRIPT PH1-4 ANNE CARLISLE

Comment PH1-4

Mike Fisher: Anne Carlisle, I see your comment here. When your neighbors are in the dark, understood. I appreciate that comment. We'll have to look at our strategies and make sure that we're doing better outreach. I will also say that we do have intention on being part of a future Planning Commission meeting. We are looking for a spot on the agenda with the City of Arcata. We'll be talking about this project and others. We also intend to go to other meetings, partnered with City Council, go to where meetings are already happening. So do expect that from us in the future and thank you for relating that for us.

Response PH1-4

Please refer to Response PH1-2.

TRANSCRIPT PH1-5 ANNE CARLISLE**Comment PH1-5**

Has there been discussion of any added transportation plans for students living on this off-site area, such as bus or shuttle for disabilities?

Response PH1-5

The comment suggests that access to a bus or shuttle for disabilities should be integrated into the project site. No specific comment on the adequacy, accuracy, or completeness of the EIR is provided; therefore, no further response is necessary.