

# Appendix G

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Draft EIR Comment Letters

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----- Forwarded message -----

**From:** Glen Colwell <[gcolwell@sonic.net](mailto:gcolwell@sonic.net)>

**Date:** Tue, Nov 1, 2022 at 11:18 AM

**Subject:** Public Comment re; Craftsman Mall - questions from an Arcata neighbor and HSU Alum

**To:** <[Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu)>

Hello Deidre,

Public Comment below regarding CPH Craftsman's Mall proposed Housing Project.

Begin forwarded message:

**From:** Glen Colwell <[gcolwell@sonic.net](mailto:gcolwell@sonic.net)>

**Date:** September 8, 2022 at 10:58:57 AM PDT

**To:** [michael.fisher@humboldt.edu](mailto:michael.fisher@humboldt.edu)

**Subject:** Craftsman Mall - questions from an Arcata neighbor and HSU Alum

Hi Mr. Fisher,

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we have closely followed the proposed private development that came before the City of Arcata a few years ago and was withdrawn by the developer, and now CalPoly Humboldt's plan.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 Creek field, 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.

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

I look forward to your reply.

Best regards,  
Glen Colwell  
2280 Western Ave  
Arcata CA  
707-836-6595

I1-1  
Cont.

I1-2

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----- Forwarded message -----

From: **Margaret T Kelso** <[margaret.kelso@humboldt.edu](mailto:margaret.kelso@humboldt.edu)>

Date: Tue, Nov 29, 2022 at 12:24 PM

Subject: Impact of Student Housing Report

To: <[Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu)>

Hello Deirdre,

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.

Thank you,  
Margaret Kelso  
Resident in Sunset  
Former Humboldt Professor.

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----- Forwarded message -----  
From: **Fred Johansen** <[fredjohansen28@gmail.com](mailto:fredjohansen28@gmail.com)>  
Date: Wed, Nov 30, 2022 at 12:39 PM  
Subject: Craftsman's Mall Dorm EIR  
To: <[Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu)>

To: Diedre Clem

### Craftsmans Mall EIR

On November 15th Cal Poly Humboldt held an open meeting to present their EIR plan for the Craftsmans 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](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 otherside 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.

Note:

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.

I am also forwarding this to Karen Diemer.  
Thanks, Fred Johansen

I3-1  
Cont.

I3-2

Via E-Mail

Deirdre Clem  
Facilities Management  
California Polytechnic University, Humboldt  
1 Harpst Street  
Arcata, CA 95521  
Email: [Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu)

RE: Cal Poly Humboldt Student Housing Project Draft Environmental Impact Report  
(State Clearinghouse No. 2022030008)

Dear Ms. Clem:

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.

L1-1  
Cont.

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.

L1-2

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.

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.

L1-3

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.

L1-4

The following are more specific DEIR comments as well corrections to individual DEIR sections.

### **SECTION 3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

#### **EFFECTS FOUND NOT TO BE SIGNIFICANT**

##### **Hazards and Hazardous Materials (pages 3-3 and 3-4)**

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->

L1-5

[hazard-severity-zones-maps/](https://frap.fire.ca.gov/mapping/gis-data/). 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.

### 3.9 POPULATION AND HOUSING

#### 3.9.2 Environmental Setting

##### POPULATION AND POPULATION GROWTH

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**

L1-5  
Cont.

L1-6

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.

L1-6  
Cont.

## Regional Population

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 strike through 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.

L1-7

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.

**HOUSING UNITS AND VACANCY**

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 4.4 ~~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 (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).

L1-8  
Cont.

### 3.9.3 Environmental Impacts and Mitigation Measures

#### ISSUES NOT DISCUSSED FURTHER

##### 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 HCOAG 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.

L1-9

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).

L1-9  
Cont.

### 3.10 PUBLIC SERVICES AND RECREATION

#### 3.10.1 Regulatory Setting – STATE

##### 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 brushland 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.

L1-10

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.

## FIRE PROTECTION

The following edits, addressing errors omissions 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~~ one assistant chiefs, nine captains, and ~~42~~10 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 chief 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.

### 3.10.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

#### **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**

L1-11  
Cont.

L1-12

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 ~~T~~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.

L1-12  
Cont.

## SECTION 4 CUMULATIVE IMPACTS

### 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.

L1-13

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.

L1-13  
Cont.

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.

#### 4.3.9 Population and Housing

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:

L1-14

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

contribution to cumulative population and housing impacts, and the impact would be less than significant.

L1-14  
Cont.

#### 4.3.10 Public Services and Recreation

##### PUBLIC SERVICES

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.

L1-15

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.

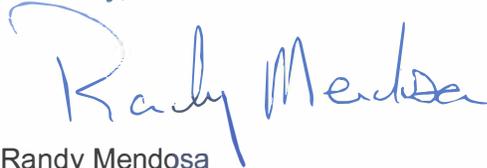
The fire protection services analysis is not adequate to make a determination of environmental impact and therefore cannot support the conclusion in the cumulative impacts section as to whether the proposed project, when considered with the full list of cumulative projects, would result in substantial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

L1-16

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.

Sincerely,



Randy Mendosa  
President, Board of Directors  
Arcata Fire District

## 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 1960'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

L1-17

**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 1710 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<sup>1</sup> 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 <sup>2</sup> (186 m <sup>2</sup> ), 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
	<b>Total</b>	<b>14</b>

L1-17  
Cont.

<sup>1</sup> 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

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 <sup>2</sup> to 196,000 ft <sup>2</sup> (1203 m <sup>2</sup> to 18,209 m <sup>2</sup> ) 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
The initial full alarm assignment to a structure fire in a typical 1200 ft <sup>2</sup> (111 m <sup>2</sup> ) apartment within a three-story, garden-style apartment building must provide for a minimum of 25 members (26 if an aerial device is used).	Ventilation (2 teams)	4
	Rapid Intervention Crew	4
	Safety	1
	<b>Total</b>	<b>25</b>

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	
<b>Total</b>	<b>38</b>	

- **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.

L1-17  
Cont.

## 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

L1-17  
Cont.

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:

L1-17  
Cont.

- **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 buildout 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.

L1-17  
Cont.



December 1, 2022

Deirdre Clem  
California State Polytechnic University, Humboldt  
Planning, Design & Construction  
Facilities Management  
1 Harpst Street  
Arcata, CA 95521

**RE: Comments on Student Housing Project Draft Environmental Impact Report (DEIR)  
(SCH Number 2022030008)**

Dear Ms. Clem:

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:

- 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).
- 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.

O1-1

O1-2

O1-3

- 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.
- 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.
- 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.

O1-4

O1-5

O1-6

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

O1-7

O1-8

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.

O1-9

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.

**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

O1-10

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)\*

O1-10  
Cont.

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.

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.

O1-11

### 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.

O1-12

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).

O1-13

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

O1-14

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 LK Wood intersection, but we are aware of no current plans for the G/H Streets intersection.

O1-14  
Cont.

### **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).

O1-15

### **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).

O1-16

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.

**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.

O1-17

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.

**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.

O1-18

Thank you for your consideration.

Sincerely,

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Fred Johansen: 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 LK 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 LK Wood and going to school, that's another, you know, maybe there's going to be a need for some traffic mitigation on LK 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?

PH1-1

Mike Fisher: I'll take a first stab at this Chris maybe you could talk a little bit more to our study, but we, thank you Fred. We absolutely have been talking to the city of Arcata, certainly in development of the of the Sunset Bridge and the future of that to make it more pedestrian friendly. I hear your comments around ingress and egress from the site itself. We talk on a biweekly basis with the city staff on just making sure that we're addressing some of these issues. Chris, let me hand it over to you to talk a little more about the study.

Chris Mundhenk: Sure, and thank you for the comment, Fred. I'll just note pretty quickly that in the transportation section we do take a look at safe routes for bike and ped to Campus from the project site and there is mitigation provided in the EIR that will provide additional facilities to the north to make sure that there is safe access for students to use to cross over US 101 to the north and get to campus. That is written into the mitigation measure of the EIR.

Mike Fisher: Thank you. Chris, can you see the Q&A?

Chris Mundhenk: Yes.

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

PH1-2

Chris Mundhenk: We did. There are several options under CEQA that allow for what is considered proper noticing. One of those is publishing in a newspaper, which we did do. We also noticed anyone who had previously expressed interest in the project, including people who had attended either of the scoping meetings, so the noticing was in accordance with California Environmental Quality Act.

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.

Other questions or comments?

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 going to where meetings are already happening. So do expect that from us in the future and thank you for relating that for us.

Other questions or comments? I see another question coming in. Has there been discussion of any added transportation plans for students living on this off-site area, such as bus or shuttle for disabilities? We have had those discussions. We feel that mobility to and from campus, from this site and others within the area is going to be critical to the success of the university. And so, beyond this project scope, if you've ever been to campus, as we grow our parking problems will continue to be there and understanding transportation demand strategies is going to be paramount to alleviating both the parking issues and increasing equity in mobility for students that are outside of the campus. I can say with certainty that bus and shuttles have been looked at in partnership with Arcata Rapid Mass Transit and then also with Humboldt Transit Authority. We're looking for solutions well in advance of the delivery of this project. So hopefully that does answer your question: we are examining that. Thank you for the comment, Anne.

Any other questions or comments out there? OK. Well, thank you once again I appreciate your time this evening. Please do stay involved. I do appreciate the input. We do appreciate the input. Much is happening at the university and we're doing our best to make sure we can create these opportunities for communication. So, thank you and we'll see each other again soon. Have a good evening.

PH1-3

PH1-4

PH1-5

# California Department of Transportation



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December 5, 2022

1-HUM-101-86.94  
Cal Poly Humboldt Student Housing  
SCH#2022030008

Ms. Dierdre Clem  
California State Polytechnic University, Humboldt  
Planning, Design, & Construction  
Facilities Management  
1 Harpst Street  
Arcata, CA 95521

Dear Ms. Dierdre Clem:

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:

S1-1

### 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.

S1-2

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

S1-3

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.

S1-3  
Cont.

### **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.

S1-4

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 LK Wood Boulevard and H Streets should be considered.

- As part of the mitigation proposal to provide a connected bicycle and pedestrian facility to LK 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 LK 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.

S1-4  
Cont.

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>.

Sincerely,

*Jesse G. Robertson*

Jesse Robertson  
Transportation Planning  
Caltrans District 1

e-copy: State Clearinghouse  
Marianne Lowenthal, Ascent Environmental  
Netra Khatri, City Engineer, City of Arcata  
Greg Pratt, General Manager, Humboldt Transit Authority

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From: **Roman, Isabella@DTSC** <[Isabella.Roman@dtsc.ca.gov](mailto:Isabella.Roman@dtsc.ca.gov)>  
Date: Wed, Dec 7, 2022 at 12:42 PM  
Subject: Student Housing Project DEIR Comment  
To: [Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu) <[Deirdre.Clem@humboldt.edu](mailto:Deirdre.Clem@humboldt.edu)>

Hello,

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:

| S2-1

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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.

| S2-2

Please feel free to reach out if you have any questions or concerns.

Sincerely,



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