

June 11, 2015

**Anna Pehoushek, AICP
Acting Assistant Community Development Director
City of Orange
300 E. Chapman Ave.
Orange, CA 92866**

Anna,

Please see below the Old Towne Preservations Association's comments regarding Chapman University's proposed Chapman University Specific Plan Amendment #7:

Chapman University Specific Plan Amendment Comments from the Old Towne Preservation Association

The Old Towne Preservation Association (OTPA) agrees with many local residents that the current student population is a big impact on the problem relating to adverse impacts to the Old Towne Historic District. The aggressive expansion proposed will further deteriorate the fabric and integrity of our historic district.

A brief history of Chapman University's expansion and proposed expansion, which represents an increase of 367% from the original "ultimate" enrollment of 2,500 students:

- Mar 14, 1989 original "ultimate" (i.e. "maximum") build out proposed and approved
- Sep 12, 1989 - 1st Specific Plan Amendment
- Dec 12, 1995 - 2nd Specific Plan Amendment - increased enrollment from 2,500 to 4,000 students
- Mar 25, 1997 - 3rd Specific Plan Amendment - increased enrollment from 4,000 to 5,391 students (interpolated from 1995 and 2003 data)
- Nov 12, 2003 - 5th Specific Plan Amendment (note: 4th Amendment was denied) increase enrollment from 5,391 to 8,700 students
- Jan 10, 2012 6th Specific Plan Amendment
- 2015 Proposed 7th Specific Plan Amendment - increase enrollment from 8,700 to 11,650 students

STUDENT IMPACTS:

The current student population has created many impacts, including:

- additional traffic
- lack of parking
- over-development
- noise
- litter
- impacts to infrastructure
- the erosion of our neighborhoods by the creation of a dorm atmosphere

The lack of housing for the current student population has resulted not only in students being pushed into the community to rent residential properties, but developers are taking advantage of this situation as well. Many developers have purchased properties, proposed and built housing developments specifically to house students (some architecturally inappropriate within the context of their Old Towne surroundings), creating additional impacts. Parents also purchase properties for student housing.

This community cannot handle the potential impacts of an additional 2,950 students and an additional 2,500 student seating capacity. We do strongly encourage the development of additional *on-campus* student housing for the *current* student population only. It appears obvious that the increase in the student cap drives most of the proposed new growth and development.

THE INITIAL STUDY:

It is the opinion of the Old Towne Preservation Association that Chapman has not lived up to its earlier commitment to mitigate negative impacts which have resulted from its rapid growth. When the school last proposed expansion in 2003, it pledged such growth was capped and the school would not expand further. We are concerned that the constant increase in admissions brings thousands of new students, yet Chapman has not addressed the corresponding need for increased campus or off campus housing. This would be unacceptable to any neighborhood, and particularly in Old Towne Orange, the largest residential Historic District in the State of California. We ask Chapman to direct its overly ambitious plans to satellite campuses outside the Historic District, as it has successfully done elsewhere in Orange County and throughout California. The multiple negative impacts are addressed in the comments we are respectfully submitting.

The initial study contains 73 out of 95 potential significant impact boxes checked and some of the categories are unrelated to the plan. This in itself is significant. We oppose the reduction of required open space as well as the proposed increase in FAR. Both will further densify areas of the historic district to unacceptable levels thus creating additional impacts.

It has come to the point where CU must take their proposed expansion elsewhere as their current adverse impacts on the Old Towne Orange National Register Historic District are significant. Chapman University must abide by their word that their last major expansion was their ultimate build out.

IMPACTS FROM THE PRIOR EXPANSION:

Impacts from the last expansion have not yet been mitigated. Environmental impacts associated with Chapman University's past expansion are unacceptable and have not been mitigated in our Historic District, which has four distinct sectors (residential, commercial, industrial and the barrio area). At some point, if not already, some sectors of the district will lose their identity, become unrecognizable, and will transform into part of the Chapman campus. The film school area (industrial area), is a prime example, especially with the proposed expansion to construct a back-lot at this location. Also, a big portion of the barrio area has been and is being purchased by the university to create staff and faculty housing. In addition, students being squeezed into residential neighborhoods due to lack of student housing degrade this sector as well.

A primary concern of The Old Towne Preservation Association is whether past identified potentially significant impacts on historic resources, outlined in the previous EIR, have been mitigated to an acceptable level, preferably "no impact". We do not believe they have. Chapman's expansion through the years has created adverse impacts that are currently at an unacceptable level. A realistic Baseline for the proposed EIR cannot be established on the current conditions of the area as it is still experiencing adverse effects from Chapman's last expansion. These impacts need to be analyzed as part of the initial study to produce a realistic EIR. Impacts to date:

- Although Chapman has rehabilitated many structures, they are lost forever as part of their expanding campus.
- Many small residential buildings have been adaptively reused for various other uses and will no longer be single-family homes.
- Properties rehabilitated and re-purposed as rentals will never be on the market again for purchase by families. In addition, larger structures have been partially demolished leaving only facades.
- Chapman has built large structures that are out of context with the character of surrounding historic development (the parking lot at Sycamore and Lemon, for example).
- Many of these impacts are cumulative. Cumulative impacts should be seriously considered in developing this EIR.
- This current proposed Specific Plan Amendment is a multifaceted plan creating many potential significant impacts, yet Chapman has not fully addressed the impacts that they have created to date.

CURRENT PROPOSAL:

If the University's current impacts have not been mitigated then how can future potential adverse impacts created by the current proposal be mitigated to an acceptable level? This latest proposal will clearly lead to many additional adverse impacts. We oppose any increase in the current specific plan area that in effect will allow additional areas of the Historic District to become part of the Chapman campus. The proposed expansion will create negative impacts that will be nearly impossible to mitigate to an acceptable level.

Please include OTPA's comments in the public record relating to the EIR currently in process. If you have any questions, please let me know. Thank you.

Sincerely,

Sandy Quinn
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Old Towne Preservation Association
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