



January 26, 2020

Ms. Kelly Ribuffo
Associate Planner - Historic Preservation
City of Orange
300 E. Chapman Ave.
Orange, CA 92866

Dear Kelly,

Please see below the Old Towne Preservations Association's comments regarding Chapman University's proposed Chapman University Specific Plan Amendment #7 (Revised September 2019):

**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 a proposed increase to 10,500 students, a 320% increase 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.

- 2019 - Revised Proposed 7th Specific Plan Amendment - increase enrollment from 8,700 to 10,500 "FTE" (Full Time Equivalents). Students should be defined as all people taking classes, not limited to undergrad, grad, employees taking courses, etc. Any housing requirements should include all people taking classes, regardless of credits taken

STUDENT IMPACTS:

The current student population has created many impacts, including:

- over-usage of taxpayer resources
- additional traffic
- lack of parking
- over-development
- noise
- litter
- impacts to infrastructure
- the erosion of our neighborhoods by the creation of a dorm atmosphere
- additional students bring additional staff, vendors, and faculty. We suggest studying these impacts
- how CU counts its students is their burden and responsibility, and should not be the burden of the community.

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.

We suggest studying the impacts/consequences of CU buying residences that will never sell again. Lack of student housing creates boarding houses, which are illegal in the City of Orange. Infrastructure issues are not limited to roads; houses were not designed for multiple vehicles per house. We want to know why the student housing burden is shifted to the community and why student housing is not wholly the responsibility of the applicant institution. impacts with decreased tax revenue. Additionally the neighborhood make-up is forever changed.

Compounding the issue is the State of California's recent takeover of local zoning, allowing the buildout of up to two additional units on a standard R1 lot. OTPA and the

citizens of Old Towne Orange have lobbied for years for the majority of Old Towne to be designated as R1 (one single family home per lot). Under the new ADU laws, homes within commuting distance to a University that is under-housed become ripe targets for developers, as they can be quickly adapted to house additional students, with no additional parking required, as the majority of these properties are within ½ mile of public transportation. Neighborhoods in and around Old Towne will be forever changed into high-density student dorms. This is a permanent impact.

This community cannot handle the potential impacts of an additional 1,800 students and any incremental 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.

Parking: Reduction of parking from .6 to .41 appears to be based on anecdotal evidence and does not seem to be supported by neighborhood feedback and reports of students/faculty parking on residential streets.

FTE: OTPA is concerned regarding the switch from measuring headcount/student cap in discrete numbers to “Full Time Equivalents”/FTEs as the ability for the City and Community to audit the actual number is limited, and relies too heavily upon Chapman University to verify. Furthermore, the impact of multiple students (2 or more) that comprise a single FTE is difficult to discern – number of cars, parking requirements, support services requirements (utilities, maintenance, trash, provisions, etc), faculty requirements (and affiliated services) again are difficult to quantify and monitor. Chapman’s need to report to various academic standards bodies in terms of FTE’s doesn’t have any bearing on its ability to provide the City and Community with hard numbers.

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.

While Chapman did respond with the recent addition of approximately 1,400 new beds (via Chapman Grand, the “K” dorm, and additional capacity at Panther Village), this most recent proposal to add 1,800 students not only negates the incremental 1,400 beds, but

leaves a total deficit of 6,150 beds, or the equivalent of 2,050 3-bedroom homes that would need to be provided by nearby residential neighborhoods. That puts the total housed on campus at approximately 41%, far below the 85% recommended by the Community, and again well below Chapman's 50% goal (which OTPA still feels is alarmingly low, and well below Chapman's peers). 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 contained 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 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.

Ms. Kelly Ribuffo
City of Orange
Page 6

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,

A handwritten signature in blue ink that reads "Sandy Quinn". The signature is written in a cursive, flowing style.

Sandy Quinn
President - Old Towne Preservation Association
sq sandyquinn@gmail.com



RespectOrange.org

January 27, 2020

Kelly Christensen Ribuffo
Associate Planner
City of Orange
Community Development
300 East Chapman Avenue
Orange, CA 92866

RE: Environmental Impact Report for the Chapman University Expansion Projects Specific Plan Amendment 7

Dear Ms. Christensen Ribuffo,

As a trustee of the community Respect Orange appreciates the applicant institution's time, energy, and effort in creating Specific Plan Amendment 7. Respect Orange has identified areas that need further explanation and study through the EIR process.

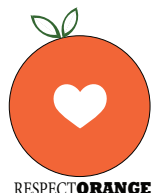
ENROLLMENT AND HOUSING

As a trustee of the community, we would like the City of Orange to study the reasons why the burden of student housing is being assigned to the community and study why the burden of student housing is not wholly the responsibility of the applicant. As a trustee of the community, we would like a compelling and justified reason for the applicant doing so. Please remember the benefits needs to be both valid and legitimate.

Additionally, Respect Orange believes Section 3.6 of the applicant institution's application needs additional explanation and study. The impacts of a 50% reduction in housing will create significant impacts to the community, character of the neighborhoods, traffic, etc. This section states,

"The required housing may be reduced by 50 percent should existing housing be demolished, provided that student housing that accommodates at least as many beds as the demolished residential hall be constructed in its place."

Respect Orange strongly believes "If you can't measure it you can't manage it". As a trustee of the community, we believe the definition of a student should include any person taking classes in Orange, CA, including but not limited to, undergraduates, graduates, and employees taking courses that would already be on campus because everyone that comes to Orange impacts the community. Respect Orange does not understand how the EIR can study impacts if it is not known how many people are creating impacts; "If you can't measure it you can't manage it." The reasons or methods of how the applicant institution counts its student community, such as full-time equivalent (FTE), is the burden and responsibility of the applicant institution and should not be the burden of the community.



Additionally, an increase in student population creates an increase in infrastructure needed for these students. Examples of the additional infrastructure includes, but is not limited to faculty, staff, vendors, etc. Respect Orange recommends studying the impacts of the additional infrastructure.

Furthermore, undergraduates living at home with their parents/legal guardians should be studied as a part of this process and housing requirements. This portion of population still generates traffic to and from the applicant institution and if they live in the SPA they should be counted and offset with an equal amount to trade into the housing requirement for students. Respect Orange recommends staff should study the impacts of counting this population against the housing requirement on a one-to-one basis.

IMPACTS

Data shows there are significant adverse impacts to the community with applicant institution's prior amended Specific Plans. An example of the significant adverse impacts includes, but are not limited to, the significant increase in Orange Police Department calls as it relates to Chapman University.

Orange Police Department Legal Affairs has provided the following information:

July 1, 2015-June 30 2016: 227 calls

July 1, 2016-June 30 2017: 198 calls (increase of -12.77% from previous year)

July 1, 2017-June 30 2018: 218 calls (increase of 10.1% from previous year)

July 1, 2018-June 30 2019: 264 calls (increase of 21.1% from previous year)

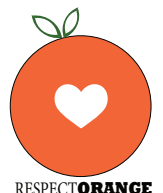
July 1, 2019-September 30, 2019: 83 calls (extrapolated to 332 calls over 12 months and an estimated increase of 25.75% from previous year)

Respect Orange suggesting studying in both dollars and time, the amount of City resources directed toward the applicant institution to ensure tax dollars are used in a proper and efficient manner. These may include, but not limited to, First Responders, meetings with City Staff, etc. This area of study directly effects the quality of life and efficiency of the community usage these resources.

As a trustee of the community we suggest staff should analyze all prior environmental impact reports ("EIR") to determine applicant compliance and to study how to mitigate the burden of these adverse effects on the community. We do not believe prior impacts have been mitigated, nor should the adverse effects of the applicant institutions impacts be the burden of the community. Please remember the benefits of doing so needs to be both valid and legitimate.

Section 3.2.6 states that the applicant institution is not providing a complete or exhaustive list of future development. As a trustee of the community, Respect Orange suggests the applicant provide a complete and exhaustive list so the EIR can properly study the impacts of proposed future development. Respect Orange also suggest studying Major Site Plan Review/Design Review be permitted by the community as a legislative action or a body of elected officials as a legislative action, rather than the decision of a single, non-elected official. Again, this area of study directly effects the quality of life and efficiency of the community usage these resources.

As a trustee of the community, Respect Orange believes the same logic should be applied by any decision by a single official . This includes, but is not limited to Traffic and Parking Management Plan.



Traffic and Parking

Respect Orange suggests studying the inconsistency in parking between Orange Municipal Code and the applicant institution's application and its impacts on the surrounding community. Respect Orange would like the applicant to offer the City a compelling and justified reason for this inconsistency to be supported. Please remember any such benefits proposed by the applicant needs to be both valid, legitimate.

The applicant institution is requiring a minimum dimension of parking spaces in section 6-32 of 8.5 feet x 17.5 feet. Section 17.34.110 of the Orange Municipal Code states the following:

“Parking Structures. Parking stalls within parking structures shall not be less than nine feet wide and 18 feet long and such spaces shall be clear of posts or walls. When spaces are adjacent to a wall, they shall be ten feet in width.”

“Open Parking Stall. Open parking stalls shall be not less than nine feet wide and eighteen (18) feet long, except when adjacent to a wall which requires a ten-foot-wide stall.”

“Parallel Parking Stall. Parallel parking stalls shall be not less than nine feet wide and 24 ft long.”

Exhibit 3.3, Circulation Plan, Respect Orange suggests studying the proposed signalized intersections and their effects and impacts to traffic and traffic flow in the Plaza District and Historic Districts. These areas currently have significant traffic issues and additional signalized intersections would exacerbate the current issues.

Table 17.34.060.A of the Orange Municipal Code states:

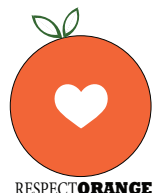
“Student housing (dormitory, fraternity, sorority) requires 0.5 space/student resident, plus 1 space/each resident staff person.”

As a trustee of the community, Respect Orange would like a compelling and justified reason for this inconsistency between the applicant institution's amended Specific Plan and OMC and effects on the surrounding community. Less parking would suggest additional impacts to the community. Please remember the benefits needs to be both valid and legitimate.

Applicant Specific Plan 7 states:

1. Off-street parking requirements shall be as follows: a. Required Number of Parking Spaces: i) 0.47 parking space per peak classroom capacity (number of seats in classrooms/ labs/Argyros Forum); ii) 0.41 parking space for each residence hall bed (not the number of resident students);

Section 6.4.1.C, Respect Orange suggest studying the shadow sensitivity study shall include properties owned by the applicant because many of the properties owned by the applicant institution are historic properties and provide defining features to the Historic District. Furthermore, Respect Orange suggests studying why the shadow sensitivity study is limited to the hours of 9am and 4pm. We believe this becomes problematic for the



properties with defining features to the Historic District during the summer solstice and hours outside of the time duration.

Respect Orange suggest studying the adverse impacts of Earth Moving and Grading. As a trustee of the community, Respect Orange would like a compelling and justified reason for a City Council Approval on a threshold in excess of 30,000 cubic yards.

As a trustee of the community, Respect Orange would suggest studying the impacts of a 16.7% reduction in open space. Open space joins the surrounding environments, including but not limited to the Historic District, and provides a sense of direction in a campus by integrating and organizing different places and elements; they also can provide an aesthetic sense by involving attractive surroundings and creating visual surprises. Please remember the benefits of doing so needs to be both valid and legitimate.

As a trustee of the community, Respect Orange looks forward to contributing to this public process and supports the fiduciary duty the City of Orange has to the community.

Respectfully,



Adam L. Duberstein
Founder, Respect Orange

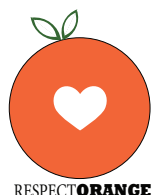
adam.duberstein@RespectOrange.org

Respectfully,



James Karras
Founder, Respect Orange

jim.karras@RespectOrange.org



FW: Comments regarding Notice of Preparation for Chapman University Specific Plan Amendment #7

1 message



brianlochrie
president
communicationsLAB
701 e chapman ave, orange ca 92866
o: 949.215.5539 ext.102 c: 949.294.8269

From: Brian Lochrie
Sent: Friday, January 17, 2020 7:46 PM
To: 'Kelly Ribuffo' <kribuffo@cityoforange.org>
Cc: Anna Pehoushek <apehoushek@cityoforange.org>
Subject: Comments regarding Notice of Preparation for Chapman University Specific Plan Amendment #7

Hi Kelly –

I want to thank the City, the applicant (Chapman University) and the EIR consulting team for holding an informative Scoping meeting Thursday, January 16. I know that I have emailed some comments previously, but most of those were related to the administrative aspects of the Scoping meeting. I do have some specific comments related to the applicant's proposal and some of the comments from tonight's presentation:

1. FULL-TIME EQUIVALENT ("FTE") vs. ACTUAL NUMBER OF STUDENTS

First and most importantly, the City should not move forward with the California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) process unless and until the applicant provides an exact maximum number of proposed students (a hard student cap). As we saw in tonight's presentation, Chapman's Full-Time Equivalent ("FTE") percentage today may be 97.9% but it has been as low as 88.3% in the past and may have been even lower previous to that. As market forces change, it is impossible to predict how that may affect the way Chapman University chooses to enroll students in the future. A cap of 10,185 "full-time equivalent" students may be a fine measurement in the academic world, but it is an impossible metric for an Environmental Impact Report (EIR), which requires specific data to provide scientifically valid metrics for environmental impacts. How can the city determine air quality impacts from the vehicles generated by the applicant's proposal if we don't know the maximum number of students? The same goes for parking, noise and other impacts that will be studied in the City's EIR. The applicant claims 10,185 FTE students is "about" 10,500 actual students via headcount. Is there a definition of "about"? If Chapman ends up with 11,000 actual students, is that acceptable to

the City? 12,000? 15,000? In order to provide the public and the city commissions and council with accurate data in terms of environmental impacts, it is necessary that the applicant provide a not-to-exceed student cap so that the City's EIR consultants can make a legally and scientifically defensible EIR document that can accurately determine whether there are impacts, whether those impacts are significant, and whether they can be mitigated.

2. DEFINITION OF A "STUDENT"

Please confirm that the definition of a "student" is both an undergraduate and a post-graduate individual enrolled at Chapman with any number of units in a semester.

3. INCREASED STAFF/ADMINISTRATION/SUPPORT MUST BE CONSIDERED

Adding students necessitates more faculty, staff, administrative support, etc. These employees, volunteers and docents have a cumulative impact and must be included as part of the CEQA study.

4. PROPOSED CHAPMAN UNIVERSITY SP BOUNDARY MAP

- a. When was the photo in the SP boundary map taken? Based on identifiable landmarks, the image seems to be at least two years old. I would suggest an updated photo be used.

- b. The orange dashed lines used for the "Proposed Parcels to be Added" on the SP Boundary Map are extremely difficult to see. I would suggest using red instead of orange and thickening the lines both for the Existing SP Parcels as well as the Proposed Parcels to be Added.

- c. Although it may not make a difference for the EIR, I am also curious if Chapman University owns all of the property within its existing and proposed Specific Plan boundary.

5. ALTERNATIVES

The Presentation noted that the EIR would consider "alternatives." Other than the applicant's proposed project and the "no project" alternative, what are the alternatives under consideration?

6. "QUALITY OF LIFE"

The applicant's representative, Mr. Raubolt, noted that "Quality of Life" would be considered as part of this public review process. I'm pleased that this will be considered, but what metrics will be used to analyze "Quality of Life." Is this one of the issues that will be considered in the EIR like traffic, biological resources and air quality?

7. REQUIRED PARKING SHOULD NOT BE REDUCED

The applicant is proposing to reduce its parking requirements from 0.6 per dorm unit to 0.41 per dorm unit arguing that they have a shuttle service for students and that on campus parking is not maximized. Yet, according to tonight's presentation, only 632 students use the shuttle to get to campus, which is only about 7% of their student population. Additionally, Mr. Raubolt noted that Panther Village had one parking space per dorm unit, which averages three students per dorm (0.33) and that the University received complaints from students that there was not enough parking, so the University has built temporary parking on the site that will eventually be another student housing development. 0.33 is very close to 0.41 and the applicant himself noted in his presentation at the Scoping Meeting that 0.33 is inadequate. I would suggest that 0.6 be maintained by the City.

8. 50% OF ALL UNDERGRADS AND ALL FRESHMEN AND SOPHOMORES MANDATED FOR STUDENT HOUSING IS INADEQUATE

The applicant's proposal of housing 50% of its undergrads, including all freshmen and sophomores is better than nothing, but the city can require them to do more.

- a. The City should set housing percentage benchmarks. For example, require 60% of all undergrads housed before the applicant enrolls its 9,500th student and 70% of all undergrads before it enrolls its 10,500th student (*this is an example and I am not necessarily endorsing an expansion of the University to a 10,500 student cap*).
- b. At a minimum, the City should not allow any more students – by headcount – to be outside of University housing than would exist today under the University’s 50% commitment with all freshmen and sophomores housed by the University.

9. PANTHER VILLAGE II

There was community support for Chapman University purchasing the city-owned property behind Panther Village because it was understood that the property would be developed for student housing. While I understand that Chapman University made the logical choice to purchase Katella Grand to provide more student housing faster, and I applaud the University for that, the University should use some of its resources to maximize the density on this property to build a second student housing facility in order to provide housing for more of their students.

10. ANALYZE PAST EIR TO DETERMINE APPLICANT COMPLIANCE

Past is prologue. The City should conduct an analysis on its prior EIR to determine whether the applicant complied with the requirements and mitigation under the previous EIR. Also, the analysis will show whether the impacts were greater or less than anticipated and whether the mitigation was adequate or inadequate. This information may help inform the benchmark for the proposed EIR that will commence shortly. This information should be obtained before the 2020 EIR studies begin.

11. ELIMINATION OF SEAT CAPACITY

The Initial Study indicated Chapman University would have a seat capacity of 7,500. This seat capacity has been proposed to be “eliminated.” Why?

12. ORANGE CAMPUS AT CAPACITY

In the spirit of community partnership, I would encourage the applicant to publicly announce as part of its application that it does not intend to ever ask for any future student increases. Dr. Struppa has already stated, *“There are physical limitations here,”* and the Orange County Register reported that *“Chapman officials say this will be the last time they ask for a campus expansion – there realistically is no more room in Old Towne.”*

Chapman University chose to build its Orange campus in a residential neighborhood. Surely, the charm of Old Towne Orange is a boon to the University as prospective students and parents come on college visits. Should Chapman push the residents and families out of Old Towne, the area would lose its charm and become just another college. Orange is a town with a college and not a college town. Chapman’s satellite campus in Irvine has plenty of non-residential space available for expansion and I would encourage the University to look to expand that campus if it is intent on adding additional students and disciplines.

We’re pleased that the applicant has acknowledged that “Quality of Life” should be considered as part of its Specific Plan application. We ask the City to help define the terms of that quality of life and that the peace of mind of knowing this will be the last and final expansion request from the applicant would be a component of that quality of life.

Thank you for considering my comments and after discussing the issue further with my family, friends and neighbors I reserve the right to submit additional comments prior to the January 27 public comment deadline.

Brian Lochrie

235 E. Maple Ave.

Orange, CA 92866

949-294-8269 (cell)