

MEMORANDUM

Subject: Chapman University Specific Plan Amendment No. 7 Notice of Preparation and Initial Study Reissue
Date: September 4, 2019

The scoping period for the Chapman University Specific Plan Amendment No. 7 (SPA 7) Notice of Preparation (NOP) and Initial Study (IS) occurred from May 15, 2015 to June 15, 2015. In the time since the scoping meeting, these comments have been considered by Chapman University, which have resulted in project changes and the development of new provisions to address the public's concerns. The following memorandum discusses whether a reissue of the NOP and IS is warranted based on the proposed changes to SPA 7.

1 Scoping Comments

Comments received during the 2015 scoping period included the following:

- Concerns that the student enrollment cap is too high
- Students occupying single-family homes off-campus are creating quality of life issues for the neighbors
- Not enough on-campus housing available
- Concerns about the rezoning of single-family residential areas to a Public Facilities/Institution designation
- Concerns that campus expansion would result in Environmental Justice issues and gentrification
- Concerns about the previous Specific Plan and effects from expansion, specifically rehabilitated structures have lost historic integrity and concern that residences have been adaptively reused for other purposes and cannot revert back to single-family homes
- Concern that single-family homes that have been repurposed as rentals for students will never be on the market again for families
- Existing large structures are out of context of the surrounding neighborhood
- Desire for the shuttle buses to be redirected to main arterials instead of residential roadways
- Need for an enforcement of student parking and concerns about students parking in residential areas
- Concern about hazardous materials that were found at the Marion Knott studios and Anaconda Wire Site not properly being disclosed to the public
- Consider increasing the noticing radius for CEQA documents

2 SPA 7 Changes

While some of the comments provided in Section 1 cannot be addressed through implementation of the Specific Plan, these comments have been considered, and SPA 7 has been revised accordingly. These changes include a revision to the SPA 7 area, alterations to the anticipated SPA 7 projects, and new provisions, development parameters, and development standards. Other changes outside of the SPA 7 Area have also been considered in response to the 2015 scoping comments.

2.1 SPA 7 Area

The Panther Village project site has been removed from the SPA 7 area, as it is located outside of the main campus. A new parking structure is being considered as part of the project, but the site of the proposed structure has not yet been identified or purchased. It is assumed that the structure would be located somewhere within a ¼ and ½ mile area located northwest of the SPA 7 area, although the actual footprint of the parking structure would be much smaller. This footprint would not be incorporated into the SPA 7 area.

2.2 Anticipated Project Alterations

Projects Contemplated in 2015 IS/NOP

The following projects were considered in the 2015 IS.

- Additional student housing, including new student housing replacing the Davis Apartments, Davis Community Center, Harris Apartments, and Morlan Hall, which are located on-campus
- Construction of new parking lots/structures
- Expansion/renovation of existing parking lots/structures
- Expansion/renovation of existing academic facilities
- Construction of new academic facilities
- DeMille Hall replacement
- Expansion of Dodge College of Film and Media Arts (e.g., Millennial Studios and backlot)
- Expansion/renovation of existing sports facilities
- Construction of new student-oriented facilities and food service venues
- Bhathal Student Services Center replacement
- Expansion of existing and construction of additional administrative facilities and offices
- Additional staff/faculty housing (typically in existing homes that are renovated)
- Addition of the Panther Village site (located at 3101 West Chapman Avenue)
- Adaptive re-use of the historic Villa Park Orchards Packinghouse
- Restaurants and University Pub

Projects Eliminated

The following projects are no longer being considered as part of SPA 7.

- Addition of the Panther Village site (located at 3101 West Chapman Avenue)
- University Pub

As described above, the Panther Village project site has been removed from the SPA 7 area, as it is located outside of the main campus.

New Projects

- Altering or expanding the Davis Apartments, Davis Community Center, Harris Apartments, and Morlan Hall, which are located on-campus
- Interior build-out of the northern wing of the Center for Science and Technology building (Keck Center).
- Construction of new sports facilities
- Renovation and expansion of student-oriented facilities and food service venues

The 2015 IS considered replacement of the Davis Apartments, Davis Community Center, Harris Apartments, and Morlan Hall, which are located on-campus, but did not consider renovation or expansion of these facilities. Renovation and expansion of existing on-campus housing could be less impactful than new construction. The interior buildout of the Keck Center could be categorized as renovation and expansion of academic facilities, which was anticipated in the IS. Therefore, the Keck Center interior buildout was captured as part of the projects considered in the 2015 IS. The 2015 IS did not include the renovation and expansion of student-oriented facilities and food service venues. However, this new project could be less impactful than new construction.

2.3 Provisions

Housing

Starting in Fall 2020, Chapman University would require that a minimum of 50 percent of undergraduate students (not including undergraduates studying full-time outside of the Orange campus (e.g. overseas programs), high school dual enrollees, employees taking courses that would already be on campus, or undergraduates living at home with their parents/legal guardians) shall be required to live in Chapman University housing. This housing may be located on-campus, or at a satellite residence complex owned and/or operated by Chapman University including, but not limited to, Chapman Grand, Panther Village, etc.

Chapman University would also require that all first- and second-year undergraduate students (freshmen and sophomores) not living at home with their parents/legal guardians live in Chapman University housing. This housing may be located on-campus, or at a satellite residence complex owned and/or operated by Chapman University including, but not limited to, Chapman Grand, Panther Village, etc.

These provisions will include an exemption to allow for the percentage to dip below 50 percent should a residence hall be demolished, and a residence hall that accommodates at least as many beds as the demolished residential hall be constructed in its place.

Behavioral

SPA 7 will include new provisions that will improve the quality of life for Chapman University students and those living in the surrounding community. These provisions may include, but are not limited to: implementation of University programs to address student behavior issues, have staff and faculty live within the community, a 24-hour helpline, etc.

2.4 Development Parameters

Enrollment

Enrollment will no longer be tracked by headcount (where all enrolled students count as one student), and will instead be tracked by Full-Time Equivalent (FTE) students. In the Specific Plan, FTE will be defined as a measure for gauging the size of the educational enterprise of the University or a campus, school, department, or program. All students taking at least 12 units in undergraduate or graduate instruction (per semester) will be considered one FTE student. Students taking less than 12 units per semester are counted as a percentage of a full-time student. In the Specific Plan, part-time students shall be determined by taking the ratio of the number of units taken by the part time student, divided by 12. FTE will be the sum of the full-time headcount plus a proportion of the part-time headcount. In recent years, FTE ratios have been approximately 97 percent of total enrollment.

In addition, the maximum number of students allowed at the Orange Campus will decrease from 11,650 headcount to 10,185 FTE (which is equal to approximately 10,500 headcount).

Specifically, FTE will be defined as follows in the Specific Plan (from Section 3.5):

- To determine the student enrollment maximum for the Main Campus, the total number of students reported is reduced by the number of students who are not registered for any courses located at the main campus. Example of students who are not registered for any courses located at the main campus include:
 - Students attending the Harry and Diane Rinker Health Science Campus (Irvine), or any other institutional building outside of the Specific Plan boundary.
 - Students studying full-time outside of the Orange campus (e.g. overseas programs).
 - Employees taking courses that would already be on campus
 - High School Dual enrollees (students in high school earning credits through Chapman University, but not physically on the Orange campus).

Seating Capacity

Due to the additional housing, behavioral, and enrollment provisions and development parameters mentioned above, the maximum classroom seat capacity metric would be eliminated from Section 7.2, Phasing of the Specific Plan.

Phasing

Phasing, for the most part will be dependent on availability of funding for future improvements. However, there are some sequencing that will need to occur and are described below.

- Any major addition to an existing academic building or construction of a new academic building will likely trigger the need for additional parking. It is anticipated that an off-site parking lot/structure will be located to the northwest or west of the campus core, located outside of the historic district, and outside of the Specific Plan area. It is anticipated that shuttles will be used to service the new off-site parking lot/structure.
- With the acquisition of Chapman Grand in Anaheim (opened August 2018) and The K Apartments (opened August 2019), Chapman University can house a total of 3,827 students in on-campus housing.

2.5 Development Standards

Floor Area Ratio

The F.A.R. would not increase from 1.0 to 1.25 maximum campus-wide, as originally anticipated. The maximum 1.0 F.A.R. will be applicable to the entire Specific Plan area.

Parking

The required student resident parking would decrease to reflect observed conditions at Chapman University's Residence Block. The parking requirement would be reduced from 0.6 to 0.41 spaces per student, which is consistent with the highest observed demand in the past decade.

Partridge Dance Center

The height limit for Partridge Dance Center would increase from 32 to 35 feet to accommodate a larger floor height. This will require modifications to Sections Q, S, and 4 of the Specific Plan. The northerly and easterly setbacks for Partridge Dance Center would be reduced to zero (to reflect the existing conditions within sections Q and 4 of the Specific Plan).

2.6 Other Changes Outside of SPA 7 Area

Below is a summary of anticipated developments that will not be within the Specific Plan boundary but will have an impact on the overall circulation and operation of the campus:

- Increased the number of utilized beds in Panther Village from the existing 170/180 beds to the maximum capacity of 232 as more parking has been secured at this location. This will be served by an existing shuttle route.
- Converted the Chapman Grand (915 E. Katella Avenue) apartment complex into a 900-bed Chapman student apartment complex. This was converted in August 2018. New shuttles serve the complex and provide transportation to the main campus via Anaheim/Manchester and Chapman Avenue.
- Develop the empty parcel adjacent to Panther Village for high density student housing by which may include the demolition of the existing Panther Village to increase density and efficiency.
- Although a specific parking structure location has not been determined to accommodate future campus needs, it is anticipated the structure will be located to the northwest or west of the campus core, located outside of the historic district, and outside of the Specific Plan area. This new structure will be served by the existing shuttle system.

3 IS/NOP Reissue

The scoping period for the Chapman University Specific Plan Amendment No. 7 (SPA 7) NOP and IS occurred from May 15, 2015 to June 15, 2015. In the time since the scoping meeting, these comments have been considered by Chapman University, which have resulted in project changes and the development of new provisions to address the public's concerns. In contemplating whether a reissue of the IS is warranted, based on the revisions to the SPA, it is critical to understand the purpose of an IS. Section 15063 (a), Initial Study, of the CEQA guidelines state:

- (a) Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.*

Further, as stated in Section 15063 (c):

- (c) Purposes. The purposes of an Initial Study are to:*

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs;

(7) Determine whether a previously prepared EIR could be used with the project.

An IS is not required if it is known that an EIR will be prepared. Although SPA 7 has undergone revisions since the 2015 IS, the project would still require the preparation of an EIR. Therefore, the purpose of the 2015 IS has been fulfilled and a new IS would not be necessary to establish that an EIR should be prepared.

The Panther Village project site has been removed from the SPA 7 area, because it is located outside of the main campus. A new parking structure is being considered as part of the project, but the site of the proposed structure has not yet been identified or purchased. It is assumed that the structure would be located somewhere within a $\frac{1}{4}$ and $\frac{1}{2}$ mile area located northwest of the SPA 7 area, although the actual footprint of the parking structure would be much smaller. This footprint would not be incorporated into the SPA 7 area. Therefore the updated SPA 7 area would not significantly change when compared to the SPA 7 area contemplated in the 2015 IS.

While some of the comments provided in Section 1 cannot be addressed through implementation of the Specific Plan, these comments have been considered, and SPA 7 has been revised accordingly. These changes include a revision to the SPA 7 area, alterations to the anticipated SPA 7 projects, and new provisions, development parameters, and development standards. Most notably, the revised SPA 7 would result in a decrease in the enrollment cap from what was considered in the 2015 IS. The maximum number of students allowed at the Orange Campus would decrease from 11,650 headcount to 10,185 FTE (which is equal to approximately 10,500 headcount).

The purpose of the 2015 IS has been fulfilled and a new IS and NOP would not be necessary to establish that an EIR should be prepared. There may be concerns that by not reissuing a revised IS and NOP, this could deprive the public meaningful opportunity to review and comment on SPA 7. However, it should be noted that the preparation of an IS is not required per Section 15063 (a). The IS and NOP are not intended to be detailed documents and during the CEQA process, project changes typically occur from the IS and NOP phase to the EIR phase. In this case, the SPA 7 revisions were focused on addressing the public's concerns. The spirit of SPA 7 has not changed from what was contemplated in the 2015 IS. Therefore, the nature of public comments likely would not change significantly than those that were received on the 2015 IS. Future comments would be captured during the review of the Draft EIR.