2 Comments and Responses to Comments

During the 45-day comment period on the Draft EIR, comment letters were received from the following agencies and individuals:

- State of California, Regional Water Quality Control Board
- State of California, Department of Transportation
- City of Davis
- William Kopper
- Reed Youmans
- Yolo-Solano Air Quality Management District (YSAQMD)
- State of California, Public Utilities Commission
- Department of Conservation

The individual comments in the comment letters are reproduced in this Final EIR and each comment has been numbered. Following each comment letter, the responses to comments provide numbered responses corresponding to the numbering of the particular issue raised in each comment.
### Master Comment Responses

<table>
<thead>
<tr>
<th>Master Response</th>
<th>Topic</th>
<th>Response</th>
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<tbody>
<tr>
<td>1</td>
<td>Organization of EIR With Regard to Analysis of Blight/Urban Decay Impacts</td>
<td>Many of the comments pertain to the placement of the analysis of physical blight, sometimes referred to as “urban decay,” in Section 4.3, Aesthetics and Visual Resources, of the Draft EIR. First, with regard to the organization of the EIR, analyzing blight/urban decay impacts in the Aesthetics and Visual Resources section is irrelevant to the legal adequacy of the analysis under CEQA, which requires only that the analysis of a proposed project that “may” have a significant adverse physical effect on the environment must be supported by substantial evidence. (Pub. Resources Code § 21080(d).) As discussed below in Master Response 2, the blight/urban decay impacts were fully analyzed based on substantial evidence. Second, analyzing blight/urban decay in the Aesthetics and Visual Resources section of the EIR is consistent with the organization of the environmental checklist in Appendix G of the CEQA Guidelines. The checklist question that most closely fits this analysis is found in Appendix G, Section I.c) under the heading “Aesthetics.” This checklist question asks the lead agency to consider whether the proposed project would “substantially degrade the existing visual character or quality of the site and its surroundings?” The checklist question in Appendix G, Section XIV.a), Public Services, asks whether the project would “result in substantial adverse physical impacts associated with provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services . . .” There is no substantial evidence that the proposed project would result in the need to construct new facilities (police, fire, schools, or parks) the construction of which would have a significant adverse effect on the environment.</td>
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<td>2</td>
<td>Application of CEQA to Economic Impacts</td>
<td>CEQA requires preparation of an EIR when “there is substantial evidence, in light of the whole record before the lead agency, that a project may have a significant effect on the environment.” (Pub. Resources Code §§ 21080(d).) “[S]ubstantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact.” (§ 21080(e)(1); CEQA Guidelines § 15384(b).) “‘Significant effect on the environment’ means a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project.” (CEQA Guidelines § 15382.) “Substantial evidence” is specifically defined to exclude “evidence of social or economic impacts that do not contribute to, or are not caused</td>
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Final EIR Responses to Comments
Master Responses to Comments

by, physical impacts on the environment.” (Pub. Resources Code § 21080(e)(2); CEQA Guidelines § 15384(a).) “Economic and social effects of a project shall not be treated as significant effects on the environment.” (CEQA Guidelines § 15131(a).) Hence, a reduction in the amount of Transient Occupancy Tax collected by the City of Davis would not constitute a significant effect on the environment.

While economic changes are not significant effects on the environment (“significant impacts”) for purposes of CEQA, where a physical change is caused by economic effects, it may be analyzed and may be determined to be significant based on substantial evidence. According to CEQA Guidelines section 15064(e), “[w]here a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project.” Further, “[t]he intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.” (CEQA Guidelines § 15131(a).) As presented in the Draft EIR, the University analyzed the hotel market to determine the potential for economic changes that could then result in physical changes.

### Significance Threshold for Analysis of Blight/Urban Decay Impacts

The following significance threshold, which was used in the Draft EIR, is entirely consistent with the CEQA and the CEQA Guidelines, as summarized in Master Response #2, with regard to analysis of the significance of physical impacts due to economic changes:

…the project would result in significant adverse physical deterioration or blight if it would: Result in significant physical deterioration of properties or structures, or urban decay, affecting the general area due to economic impacts on existing businesses and the inability of property owners to lease existing vacant buildings and buildings that may be vacated as a consequence of economic impacts resulting from the proposed project (Draft EIR, p. 32).

By comparison, this significance threshold is also consistent with the City’s EIR for the Second Street (Target Store) Project (State Clearinghouse #2005062142), Draft EIR, p. 4.8-13 (“Socio-economic impacts from the implementation of the proposed project would be considered significant under the following circumstances: The development of the proposed project would directly or indirectly result in physical deterioration to properties or structures that is so prevalent and substantial, it impairs the proper utilization of the properties or structures, and the health, safety and welfare of the business vacancies, abandoned buildings, boarded doors and windows, parked trucks and long-term unauthorized use of properties and parking lots, extensive or offensive graffiti painted on buildings, dumping of refuse or overturned
### Final EIR Responses to Comments

#### Master Responses to Comments

**HOTEL EXPANSION AND ROAD EXTENSION**

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<th>4</th>
<th><strong>Substantial Evidence Supporting Significance Conclusion</strong></th>
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| | The analysis in the EIR of potentially significant blight/urban decay impacts due to economic changes caused by the proposed project is based on an expert report prepared by HVS Consulting and Valuation Services (“HVS”), *Impact Study: Hyatt Place UC Davis Hotel* (June 7, 2011) as updated by a June 8, 2011 memorandum containing additional market data (together, the “HVS Impact Study”). These items are described in Section 4.3 of the DEIR and referenced as “HVS 2011a” and “HVS 2011b” on page 35 of the DEIR. HVS specializes in hotel consulting and appraisal worldwide ([http://www.hvs.com/Services/Consulting/](http://www.hvs.com/Services/Consulting/)). The credentials of the preparers of the HVS Study constitute the last 46 pages of the report.

The HVS Impact Study analyzes the market area in terms of population, per-capita income, wealth index, food and beverage sales, and total retail sales for the County compared to the entire metropolitan statistical area (MSA),¹ the State of California and the United States; workforce characteristics; commercial space occupancy; campus events; Sacramento airport passenger traffic; Transient Occupancy Tax collected by the City of Davis; and hotel supply, demand and occupancy trends for all of the hotels in Davis (including downtown hotels). This analysis is based on demographic and economic information from Woods & Poole Economics, Inc. (an economic forecasting service), Cassidy Turley BT Commercial (a major commercial real estate firm in Northern California providing office lease data), Smith Travel Research (an independent research firm that compiles and publishes data on the lodging industry, which is further described in Master Response #8), and other highly regarded sources such as the Bureau of Labor Statistics (unemployment data), the City of Davis (major employer data), UC Davis (student enrollment data), and the Sacramento International Airport (passenger data). Because the University is the largest driver of hotel lodging demand in Yolo County and is adjacent to the City of Davis, the Davis geographic region is the primary focus of the analysis of impacts. HVS Impact Study, p. 23.²

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¹ A metropolitan statistical area is a geographic entity, defined for use by federal statistical agencies in collecting, tabulating, and publishing federal statistics, with a core urban area of 50,000 population or more population, and consists of one or more counties and includes the counties containing the core urban area, as well as any adjacent counties that have a high degree of social and economic integration (as measured by commuting to work) with the urban core. ([http://www.census.gov/population/www/metroareas/metroarea.html](http://www.census.gov/population/www/metroareas/metroarea.html) (accessed 8-16-11)).

² The market area analysis also includes Woodland, which is part of the MSA. (See HVS Impact Study, p. 27 [Map of Davis, CA and Greater Sacramento Metropolitan Area]; Figure 4-6 [Commercial Office Space Statistics – Greater Sacramento Metro Area].)
The HVS Impact Study and the EIR conclude that the proposed project will result in a net benefit to the Davis hotel market, which includes downtown hotels. That is because the market currently suffers from obsolescence, and the demand for higher quality hotels currently is being accommodated in the Sacramento area. The HVS Study found that the proposed project will generate new and additional demand for hotel lodging in Davis due to the creation of a new market for first-class, brand name hotels, which will induce new lodging demand in the Davis market and may create pressure and provide an incentive (i.e., a strong hotel market with increasing demand) for older facilities to upgrade. The proposed project will also generate demand for the newly-opened UC Davis Conference Center, which will increase the number and size of events and, thereby, create demand for lodging. This will benefit the Davis lodging market, and will not lead to blight/urban decay. (HVS 2011a. pp. 74-76. and EIR pages 34-35)

The HVS Impact Study and the EIR also analyzed the cumulative impacts of the proposed project in combination with the City of Davis Community Development Agency’s proposed hotel/conference center. The HVS Study and the EIR conclude that the City’s proposed University Park Inn, in combination with the proposed Hyatt Place Expansion, would not lead to blight/urban decay. Rather, the proposed University Park Inn would provide a net benefit by inducing sufficient demand to fill the proposed additional rooms and would also benefit the overall market’s performance. (Draft EIR, p. 35 (Impact AES-2); HVS Study, pp. 77-80.)

### Relationship of Proposed Project to Forecasts in 2001 Economic Study and Prior Approval of the Existing Hyatt Place Hotel at UC Davis

In September 2000, UC Davis published a Tiered Initial Study (TIS) for the UC Davis Conference Center and Hotel, and University Relations Building project. In response to comments on that TIS, the campus elected to prepare an Environmental Impact Report (EIR) for the project.

A Draft Revised TIS for the UC Davis Conference Center and Hotel, and University Relations Building project was published and circulated for public and agency comment in November 2000. The proposed project described in the November 2000 Draft Revised EIR included a hotel with 150 rooms. The economic analysis prepared for the then-proposed 150-room hotel indicated that if the new facility had opened in 2004, it would have caused an initial 8% decline in local hotel revenues, and that this decline would have recovered in 3 years. In response to comments received on the Revised Draft TIS and after review of the project by the campus, the proposed project was reduced in size.

A new Initial Study for the UC Davis Conference Center, Hotel, and Graduate School of Management Building Project was published in August 2001 (State Clearinghouse No. 2001082067). The revised project analyzed in the Initial Study included several physical changes to the site plan, such as reconfiguring the University Relations Building to become the Graduate School of Management Building, providing space
for University Relations in the conference center, and reducing the size of the hotel to 75 rooms. The proposed project did not at any time include a waiting period of any sort pertaining to future hotel development or expansion. See also Response to Comment D-2.

In December 2001, the campus published the Draft Focused Tiered EIR for the UC Davis Conference Center, Hotel, and Graduate School of Management Building project. The economic analysis performed as part of the 2001 Draft EIR evaluated three potential economic scenarios: best, worst, and most likely in terms of the proportion of leisure and commercial business attracted by the project that would otherwise have gone to other facilities in Davis. The conclusion of the economic analysis in 2001 for the 75-room hotel which was eventually built in 2010 was that, under the worst case scenario, the effect would have been to slow the rate of increase in hotel revenues compared to the rate that would have occurred without the project. Under the best and most likely scenarios, the hotel revenues were expected to increase. The analysis in the EIR concluded that the 75-room hotel would not result in physical deterioration in the City of Davis. Using this information, the University prepared the Final EIR.

The University published the Final Focused Tiered EIR for the UC Davis Conference Center, Hotel, and Graduate School of Management Building project in March 2002. The EIR was certified, and the project was approved in March 2002. In November 2003 the Regents approved business terms of a ground lease, and in September 2007 the Regents amended the business terms of the ground lease. The 75-room hotel was built and opened for business in spring 2010.

In March 2011, the University completed the Tiered Initial Study and issued a Notice of Preparation for the proposed Hyatt Place Hotel Expansion and Old Davis Road Extension project. In June 2011, the University published the Draft EIR for this project.

**Relationship of This EIR to the EIR for the 2003 Long Range Development Plan (“2003 LRDP EIR”) and Previously Adopted LRDP Mitigation Measures**

This EIR is a tiered, focused EIR, as authorized by CEQA Guidelines sections 15152 and 15186. This EIR is tiered from the 2003 LRDP EIR, as described in Section 1 of the Draft EIR. As explained in Section 1.4, the mitigation measures identified in the 2003 LRDP EIR were adopted by the University and incorporated into the approved 2003 LRDP, and are already being carried out. Hence, they do not need to be readopted. Any project implementing the LRDP, including the proposed project, includes (as part of the project description) all previously adopted LRDP mitigation measures that are designed to reduce project impacts. The campus monitors implementation of adopted mitigation measures through its 2003 LRDP Mitigation Monitoring and Reporting Program.

**Methodology for Analyzing**

**Market-based Analysis:** Certain comments question the methodology for the analysis of the economic impacts of hotels, and ask whether the
Existing Conditions for the Davis area Hotels and Projections for Future Conditions.

EIR should evaluate impacts on specific hotels in the City, instead of analyzing the market as a whole. The application of CEQA to the effects of economic impacts requires evidence of substantial adverse changes in the physical environment. If there is substantial evidence that economic impacts would cause physical changes in the environment, the significance threshold for determining whether any such changes would be significant and adverse is whether the proposed project would create blight/urban decay in the general area, not on specific properties (see Master Responses 1, 2, and 3). Thus, the appropriate geographic area of analysis of economic impacts for the proposed project consists of the hotels in the Davis market. Accordingly, the analysis in this EIR is based on the best available market data from Smith Travel Research for the overall Davis market (see below). The conclusion of the analysis is that the proposed hotel expansion will improve the Davis hotel market. (See Master Response 4) In addition, it would not be practical to evaluate the potential impacts of the project on each and every hotel in the City separately. To do so, it would be necessary to collect and evaluate specific operational and financial data for each lodging facility, most of which are regarded by owners as highly confidential. An assessment of individual financial operations at hotels is not warranted given the extreme difficulty of gathering financial data from each hotel and the overall finding in the HVS Impact Study that the Davis hotel market is strong and able to continue with expansion of the Hyatt Place Hotel. Any assessment and attempted projection of financial conditions at individual hotels would be a pointless exercise because the input data (confidential financial information for each hotel operator) would be regarded as unreliable.

Smith Travel Research: Certain comments question the hotel lodging data from Smith Travel Research (STR). STR collects and compiles lodging data for lodging properties across the country, and is regarded as the definitive source for studying lodging trends. STR data was relied upon to analyze and evaluate lodging trends because it provides composite lodging performance for 10 of the 11 hotels in the Davis market, including the Hyatt Place. Hoteliers voluntarily provide lodging information to STR, which is compiled from multiple sources for a study area, because they typically do not report individual property lodging information, which is considered confidential, and they also routinely utilize STR data to gauge their own performance against their selected overall market.

Transient Occupancy Tax: Transient Occupancy Tax (TOT) is levied by cities and counties based on a percentage of the cost of hotel rooms and certain vacation rentals. Figure 4-9 of the HVS Impact Study for the Hyatt Place UC Davis Hotel, Transient Occupancy Tax (TOT) Collected – Davis, CA, contains the data provided by the City of Davis to the campus’s economic expert for 2006 through 2010. The data reported in Figure 4-9 consists of taxes actually collected, but does not include taxes that are due but not collected. Figure 4-9 also does not include TOT
collected in 2010 for the UC Davis Hyatt Hotel, because that hotel is located in unincorporated Yolo County and the TOT payments to the County are not reported to the City.

UC Davis acknowledges the importance of TOT revenues to city programs. However, while TOT revenues for the City of Davis have declined since 2008, TOT revenues do not indicate whether or not the proposed Hyatt Place Hotel Expansion would create a significant impact regarding blight/urban decay, and cannot be relied on solely to make this determination. Moreover, as the evidence indicates, the proposed hotel expansion is expected to improve the Davis hotel market. Please see Master Response 2 regarding Application of CEQA to Economic Impacts.

**Effect of the Existing Hyatt Place Hotel on the Local Market:**
Regarding the effect of the existing Hyatt Place Hotel on the local market, the Hyatt Place UC Davis hotel opened in March 2010. The STR data provided in the HVS study in Figure 5-1 presents Davis lodging trends inclusive and exclusive of the Hyatt Place. For the without-Hyatt Place information in Figure 5-1, the Hyatt Place UC Davis’ lodging performance was provided by the Hyatt Place property ownership to the campus’s economic expert, and manually extracted from the STR data. The shaded data in Figure 5-1, denoted by a dual asterisk, shows the collective performance of the city of Davis hotels, exclusive of the Hyatt Place performance.

Based on the lodging data presented in Figure 5-1, the decline in occupied room nights in 2008 and 2009 prior to the opening of the Hyatt Place is most likely attributable to the effects of the recent national recession. This trend is similar to what HVS has witnessed in other hotel markets across the nation. Through year-end 2010, the data excluding the Hyatt Place hotel indicates that the decline in lodging demand has stabilized, as evidenced by the 0.8% increase in occupied room nights. Through January 2011, the data shows an 8.2% increase in occupied room nights, indicating a recovery in the market. Similarly, the data show that room revenue declined by 5.3% in 2009, but began stabilizing in 2010 with a 2.4% increase, and continued to recover through January 2011 as evidenced by the 1.1% increase.

Subsequent to completion of the HVS Impact Study, the consultants updated the data presented in Figure 5-1 with more current STR lodging data through April 2011, which is presented in Figure 1 to HVS’s June 8, 2011 supplemental memo which was reference in the DEIR as “HVS 2011b”. The data is presented in similar fashion to Figure 5-1, in that it is both inclusive and exclusive of the Hyatt Place. The lodging data provided by STR evidences the continued recovery in lodging performance for the city of Davis hotel market through April 2011, as indicated by the 20% increase in occupied room nights, and the 18.6% increase in rooms revenue. The same data including the Hyatt Place
(non-shaded) shows that occupied room nights increased in 2010 by 13.9%, and total room revenue increased by 21.7%. Through January 2011, occupied room nights increased by 26.6%, while total rooms revenue increased by 25.1%. Lastly, through the more recent year-to-date period ending April 2011, total occupied room nights increased by 35.5%, while total rooms revenue increased by 38.4%. When studied in conjunction with the previous analysis, excluding the Hyatt Place lodging data, these trends indicate that the Hyatt Place UC Davis’ opening did not “cannibalize” lodging demand. Rather, these trends show that the Hyatt Place UC Davis’ opening coincided with the market’s overall recovery and induced lodging demand by providing a new quality lodging facility to the market.

Also, it is important to note that the 13.9%, 26.6%, and 35.5% increases in occupied room nights in 2010 and in the year-to-date periods through January and April, respectively, consistently exceeded the 10.9%, 12.7%, and 5.7% increases in available room nights through the same periods, respectively, which evidences the market’s ability to rapidly absorb the new supply growth into the market, and generate higher overall occupancy levels.
California Regional Water Quality Control Board  
Central Valley Region  
Katherine Hart, Chair  
11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114  
(916) 464-3291 • FAX (916) 464-4645  
http://www.waterboards.ca.gov/centralvalley

15 July 2011

Sid England, Assistant Vice chancellor  
Environmental Stewardship and Sustainability  
University of California, One Shields Avenue  
Davis, CA 95616

CERTIFIED MAIL  
7010 3090 0001 4843 2947

COMMENTS TO DRAFT ENVIRONMENTAL IMPACT REPORT, UC DAVIS HYATT PLACE EXPANSION AND OLD DAVIS ROAD EXTENSION PROJECT, SCH NO. 2011032051, YOLO COUNTY

Pursuant to the State Clearinghouse’s 15 June 2011 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Draft Environmental Impact Report for the UC Davis Hyatt Place Expansion and Old Davis Road Extension Project, located in Yolo County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the

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1 Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

California Environmental Protection Agency

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maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

**Industrial Storm Water General Permit**
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

**Clean Water Act Section 404 Permit**
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed for the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916)557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**
If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. Water Quality Certification must be obtained prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

**Waste Discharge Requirements**
If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.
For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

If you have questions regarding these comments, please contact me at (916) 464-4745 or gsparks@waterboards.ca.gov.

Genevieve (Gen) Sparks
Environmental Scientist
401 Water Quality Certification Program

cc: State Clearinghouse Unit, Governor’s Office of Planning and Research, Sacramento
### Comment Responses

**Comment Letter from California Regional Water Quality Control Board**

<table>
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<th>Comment Number</th>
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| A-1 | The Old Davis Road Extension project would result in a land disturbance greater than one acre and the campus is required to apply for coverage under the Construction General Permit (Order No. 2009-009-DWQ). This will require electronic submittal of Permit Registration Documents (PRDs) to the SWRCB Stormwater Multiple Application and Report Tracking System (SMARTS) on-line reporting system. Projects that meet this criterion currently apply for coverage under the Construction General Permit.  

The hotel expansion would result in a land disturbance less than one acre, and will be covered under the Phase II Small Municipal Separate Storm Sewer System (MS4) Permit (Order No. 2003-0005-DWQ) for the campus. To comply with its MS4 permit, the campus was required to develop a Storm Water Management Plan (SWMP). The campus SWMP was approved on July 24, 2010 by Regional Water Quality Control Board (RWQCB), which issued permit number WDID# 5A57NP00014. Construction projects covered under the campus SWMP are required to implement Best Management Practices (BMPs) to prevent pollutants from entering the campus storm drain conveyance system.  

Construction projects covered by either the Construction General Permit or the MS4 Permit are required to include post-construction BMPs in their design to meet the following performance standard: post-construction runoff equals pre-construction runoff for the 85th percentile storm event. This can be achieved by incorporating Low Impact Development (LID) and Hydromodification into the design of the project. For all projects, including the proposed projects, UC Davis complies with post-construction stormwater runoff reduction requirements in effect at the time of construction. Construction General Permit post-construction stormwater standards will become effective as a requirement on September 2, 2012, unless the project is within an area subject to post-construction standards of an active Phase I or Phase II MS4 permit that has an approved SWMP. UC Davis, with an approved SWMP must require long-term post-construction BMPs that protect water quality and control runoff flow, to be incorporated into development and significant redevelopment projects to comply with the Phase II MS4 permit. Additional post-construction stormwater runoff reduction requirements may be necessary to comply with the new Phase II MS4 permit scheduled for adoption by the State Water Resources Control Board in early 2012.  

These requirements stormwater runoff are part of the currently approved campus standards for construction projects and will be completed for the proposed projects. |
<p>| A-3 | The proposed project would not be subject to an Industrial Storm Water General Permit. |
| A-4 | The project would not be subject to a Clean Water Act Section 404 permit or to a Streambed Alteration Permit because it would not disturb waters of the United States. |</p>
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<th>A-5</th>
<th>The project would not require a Water Quality Certification because it would not disturb waters of the United States.</th>
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<td>A-6</td>
<td>To meet the requirements of the MS4 permit and the campus SWMP, the university is required to update campus stormwater maps and include the information in the SWMP Annual Report. The campus continues to meet these requirements and the proposed project would not alter the requirements. Therefore, a new stormwater outfall to the Arboretum Waterway would not require a Waste Discharge Requirement permit.</td>
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July 29, 2011

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Hyatt Place Hotel Expansion and Old Davis Road Extension
Focus Tiered Draft Environmental Impact Report
SCH# 2011032051

Mr. Sid England
University of California
One Shields Avenue
Davis, CA 95616

Dear Mr. England,

Thank you for the opportunity to review and comment on the Focus Tiered Draft Environmental Impact Report (DEIR) for the Hyatt Place Hotel Expansion and Old Davis Road Extension. The University of California, Davis (UCD) is proposing two projects on the central campus in Davis. The first project proposes expansion of the existing Hyatt Place Hotel by adding 52 rooms to the existing 75 rooms—an additional 30,000 square feet of building area. The second proposed project is the extension of the Old Davis Road from its existing terminus east of Hyatt Place Hotel to the southern terminus of A Street. The proposed road extension constructs approximately 1,100 feet of new roadway and would connect to the existing southerly terminus of A Street—allowing through access on the connected roadway and attracting more traffic to the Richards Boulevard (Blvd.) / Interstate 80 (I-80) off-ramps to access A Street and the southeastern portion of UCD. The proposed extension of Old Davis Road has been identified as a component in the long-term UCD roadway plans. Both projects are located on the southeast side of the UCD campus adjacent to Old Davis Road. The Old Davis Road / I-80 Interchange is located in Solano County and is under the jurisdiction of Caltrans District 4. The following are the combined comments of Caltrans District 3 and District 4:

Mitigation Measures:

- Section 4.8.6 (LRDP Mitigation Measures Included in the Proposed Project) includes best practices and monitoring activities that are in fact NOT mitigation measures with quantifiable/measurable results to analyze whether the adverse impacts to transportation and traffic are significantly reduced per CEQA. The Department understands that "these previously adopted mitigation measures are already being carried out as part of implementation of the 2003 LRDP... and will not be readopted," yet the Department strongly urges the lead agency to reconsider and include mitigation measures that address specific impacts to traffic and that produce quantifiable/measurable results.
Regarding Impact TRA-3 and its associated mitigation measure, please discuss what efforts were made by UCD to engage with the jurisdictional agencies responsible for the off-campus facilities "that may elect to not implement the recommended mitigation measures." Making fair-share contributions to another entity is an established method of mitigating impacts to resources outside the lead agency's jurisdiction. Alternatively, UCD can apply for an encroachment permit and implement the mitigation measures with Caltrans' oversight. These are viable methods for UCD to mitigate its impacts to the State Highway System (SHS). Therefore, UCD's determination that such mitigation is infeasible because the SHS is within Caltrans' jurisdiction is erroneous. UCD must adopt measures that mitigate its significant impacts to the SHS or articulate an appropriate basis for finding the mitigation infeasible.

Regarding Impact TRA-7, the Department strongly recommends implementation of the associated mitigation measures prior to rather than after "the Traffic and Circulation Mitigation Monitoring Program identifies unacceptable intersection operations," as the document identifies potentially significant cumulative impacts to traveler safety on the SHS. Please submit transportation reporting or monitoring information to the Department per the Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the California Department of Transportation. Further information is available on the following website:

Transportation/Circulation:

The project is expected to increase the average daily trip generation of the Hyatt Place Hotel (at full occupancy) from 48 weekday a.m. peak hour trips to 82 a.m. peak hour trips, and 55 p.m. peak hour trips to 94 p.m. peak hour trips. The average Saturday peak hour trips will increase from 65 peak hour trips to 111 peak hour trips at full occupancy. The Traffic Impact Study (TIS) analyzed 9 intersections and 1 roadway segment, including signal operations at the existing Richards Blvd. / Olive Drivc intersection near the terminus of the I-80 westbound off-ramp to northbound Richards Blvd., and the Richards Blvd. / 1st Street intersection. Caltrans previously commented that the Level of Service (LOS) of signal operations and the queue length at the Richards Blvd. / Olive

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Drive intersection should be analyzed with and without project data for existing and future conditions. However, a queuing analysis was not performed as per the statement on page 102 of the DEIR, “The HCM 2000 methodology used to analyze these intersections does not consider the effects of queuing that extends into adjacent intersections.”

Due to the close proximity (700 feet) of the Olive Drive/Richards Blvd. intersection and the Olive Drive/1st Street intersection, along with the immediate merge/weave condition that occurs 300 feet south of the Olive Drive/Richards Blvd. intersection, the two intersections have special circumstances and “often operate unacceptably during the peak hours.” Therefore, the LOS shown in the DEIR Transportation and Circulation section tables are inaccurate. As indicated in Figure 1 on page 104 and in Figure 6 on page 117 of the DEIR, more than a 5.5% increase in traffic is shown for the northbound through movement at the Richards Blvd./Olive Drive intersection. This increase in traffic has the potential to result in significant queue length increases at both the Olive Drive/Richards Blvd. intersection and the westbound I-80/Richards Blvd. off ramp to northbound Richards Blvd.

The traffic analysis, as presented in the DEIR, is not sufficient enough to reveal potential project impacts. Caltrans recommends that a queuing analysis with and without project data be performed for the two intersections discussed above. The analysis should also include recommended mitigation to improve intersections. Possible mitigation could include a fair share funding commitment toward the planned reconstruction of the Richards Blvd. interchange.

- Fehr and Peers’ June 2011 TIS for the UCD Hyatt Place Hotel Expansion and Old Road Extension is referenced however not included as an appendix in the Focus Tiered DEIR. Caltrans requests that UCD include the TIS in the DEIR for comprehensive review of the DEIR.

Traffic Management Plans:

- In reiteration of the comment provided in the April 22, 2011 letter, Caltrans recommends that a Traffic Management Plan (TMP) be prepared by UC Davis for special campus events. We recommend that the plan routes I-80 westbound and I-80 eastbound traffic to the I-80 Old Davis Road/Mondavi Center exit instead of the Richards Blvd. exit to access the southern part of campus, including the hotel. For TMP assistance in District 3, contact John Holzhauser at (916) 859-7978.

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Please provide our office with copies of any further actions regarding this development. If you have any questions regarding these comments please contact Arthur Murray, Yolo County IGR Coordinator, at (916) 274-0616.

Sincerely,

ERIC FREDERICKS, Chief
Office of Transportation Planning - South

c: Gary Arnold, Local Development/Intergovernmental Review Branch Chief, Caltrans District 4 Office of Transit & Community Planning

"Caltrans improves mobility across California"
Comment Responses

Comment Letter from California Department of Transportation

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<th>Comment Number</th>
<th>Response to Comment</th>
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<tr>
<td>B-1</td>
<td>See Master Response 6.</td>
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Section 4.8.6 of the Draft EIR identifies all of the previously adopted 2003 LRDP EIR mitigation measures that are part of the project. The monitoring measures commented on by Caltrans not only require periodic monitoring but also require identification of improvements in the event of unacceptable changes in level of service, construction of any required on-campus improvements by UC Davis, and payment of fair share contributions to the responsible entity (City, Counties or Caltrans) for off-campus improvements. (2003 LRDP Mitigation Measures 4.14-1(b), 4.14-1(c), 4.14-2(b) and 4.14-2(c).) Whether or not the monitoring indicates an unacceptable change in level of service is based on the responsible entity’s significance thresholds which are quantified measures.

UC Davis respectfully disagrees with Caltrans’s request to have improvements implemented in advance of the occurrence of an impact to which implementation of the 2003 LRDP may contribute. This would not be consistent with good traffic management or sound financial management, and is not required by CEQA. For example, as the Draft EIR states on page 141, monitoring conducted in 2008 showed a decrease in traffic at some locations from 2005. As 2003 LRDP Mitigation Measures 4.14-1(b), 4.14-1(c), 4.14-2(b) and 4.14-2(c) require, however, if intersections degrade to unacceptable levels, UC Davis will construct on-campus improvements and/or make fair share contributions to off-campus improvements.

In addition, UC Davis is required by 2003 LRDP Mitigation Measures 4.14-1(a) and 4.14-2(a), 4.14-4 and 4.14-5 to pursue Transportation Demand Strategies, work with transit providers to improve transit capacity, and improve bicycle and pedestrian facilities. For example, the proposed project includes several improvements for bicycle and pedestrian circulation, which are described in Section 3.5.2 of the Draft EIR on page 23. In addition, as discussed on page 139 of the Draft EIR, UC Davis adopted a Bikeway and Transit Network Study which contains plans for expanding and improving the pedestrian and bicycle network. Recent campus transit improvements have included a major new bus terminal in the core campus, numerous new and upgraded bus stops, new transit service for campus developments, and improved routing information for transit passengers.

| B-2            | The commenter incorrectly assumes that finding certain off-campus transportation impacts to be significant and unavoidable and making a statement of overriding considerations means that the University has not adopted the fair share mitigation measure. That is not accurate. In all cases, UC Davis will contribute its fair share toward the cost of improving significantly affected intersections in the City and Counties and on State facilities pursuant to 2003 LRDP Mitigation Measure 4.14-2(c), which was adopted and incorporated into the |
2003 LRDP and is part of the proposed project.

Despite having adopted this mitigation measure, which is a feasible way of reducing impacts to off-campus intersections and freeway ramps to less-than-significant levels, Public Resources Code section 21081(b) required the University to find that they “are within the responsibility and jurisdiction of another public agency.” Because the University cannot guarantee that these other public agencies will implement the identified improvements, notwithstanding the commitment of UC Davis to make its fair share contributions when warranted/triggered, the University conservatively determined that the impacts were significant and unavoidable and adopted a statement of overriding considerations.

B-3 Facilities on the State Highway System (SHS) studied as a part of this EIR are the Old Davis Road / I-80 Eastbound and Old Davis Road / I-80 Westbound intersections. According to the Interstate 80 and Capital City Freeway Corridor System Management Plan (Caltrans, 2009), the Concept Level of Service for I-80 in Solano County is LOS D. According to Table R3 of the Technical Analysis for Responses to Comments Technical Memorandum, those intersections are operating acceptably in existing conditions and in each of the existing plus project scenarios.

Future unacceptable levels of service may be caused the Hyatt Place Expansion or Old Davis Road extension, in combination with growth due to other UC Davis Long Range Development Plan (UC Davis LRDP) projects, and other growth in the area. Because the actual implementation year of each of the UC Davis LRDP projects is not known at this time, no specific year for improvements can be identified. The LRDP EIR identified mitigation measures for impacts at these intersections; the purpose of the UC Davis LRDP Traffic and Circulation Mitigation Monitoring Program is to determine when specific mitigation measures of the UC Davis LRDP should be implemented. See Response to Comment B-1.

Future reports on the UC Davis Traffic and Circulation Mitigation Monitoring Program will be submitted to Caltrans according to the Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the California Department of Transportation.

B-4 The Hyatt Place Expansion and Old Davis Road Extension projects would not contribute to significant cumulative impacts to the State Highway System. The 2003 LRDP EIR concluded that impacts to the Old Davis Road / I-80 Eastbound and Old Davis Road / I-80 Westbound intersections could be reduced to a less-than-significant level by installing traffic signals at each intersection.

B-5 The Technical Analysis for Responses to Comments Technical Memorandum (Section 3.0 of the Final EIR) contains new analysis at the 1st Street / Richards Boulevard and Olive Drive / Richards Boulevard intersections prepared in response to comments. This analysis was performed using SimTraffic, which accounts for queuing effects on adjacent intersection operations. The Technical Analysis for Responses to Comments Technical Memorandum concludes that there are no new impacts or substantially more severe impacts that were not previously identified in the Draft EIR.

B-6 The Transportation Impact Study: Hyatt Place Hotel Expansion and Old Davis Road Extension (Fehr & Peers, 2011) which is a reference document for this EIR can be accessed at: http://sustainability.ucdavis.edu/progress/commitment/environmental_review/current_projec
| B-7 | Traffic Management Plans have been developed for certain campus event centers and events, including the Mondavi Center, football games, commencement, and picnic day. Neither the Hyatt Place expansion nor Old Davis Road extension projects will change the nature of campus events; therefore, no Traffic Management Plan is necessary for either of these projects. To ensure a high-quality experience for visitors to the UC Davis campus, the University will continue to implement traffic management strategies during the planning and implementation of large events. |
July 29, 2011

Sid England
Assistant Vice Chancellor – Environmental Stewardship and Sustainability
University of California
346 Mrak Hall
One Shields Avenue
Davis CA 95616

RE: Hyatt Place Hotel Expansion and Old Davis Road Extension

Dear Mr. England:

The City of Davis has reviewed the Draft EIR for the proposed expansion of the Hyatt Place Hotel and the extension of Old Davis Road on the UC Davis campus, and we appreciate the opportunity to provide comments.

As a prefatory matter, the City deeply values the University. The current City Council is dedicated to collaborating with the Campus to maintain and strengthen our shared community. In this vein, the City is looking forward to doing what it can to help with Chancellor Katehi’s recent call to “fulfill our aspirations.”

While the City certainly understands the University’s desire to expand the Hyatt Place Hotel and how it fits in with the Campus’s larger effort to sustain and grow, such an action, as you know, has the potential to significantly impact the City. Such impacts include a reduction in the City’s Transient Occupancy Tax revenue, negative impacts to the Downtown’s vitality, including the continued health of the Downtown hotels, added automobile traffic to an already busy downtown, and harm to the City’s economic development efforts, including its anticipated hotel/conference center. Such impacts should concern the University, as a vibrant city is equally beneficial to the University, as it enhances the attractiveness of the campus and aids in the recruitment and retention of faculty, staff, and students.

As explained below, we do not believe that the Draft EIR adequately analyzes such economic and blighting impacts. It is our hope that the University will collaborate with the City on addressing these concerns prior to any action on an expansion of the Hyatt Place facility.
The EIR Does Not Adequately Analyze the Impacts of the Expanded Hotel on the City’s Hotels, Restaurants, and Visitor Serving Retail

In the City’s comments on the Tiered Initial Study, the City shared its concerns that the Hyatt Place Expansion, by adding rooms to the Davis-area hotel market that are not adjacent to, or in, the Downtown, will have negative impacts on the existing Davis hotels, the Downtown economy, the restaurants and retail in the Downtown, and Transient Occupancy Tax (TOT) revenue for the City of Davis. This is especially true because the hotel expansion will support the ability to “bundle” conference reservations with rooms at Hyatt Place. That bundling, combined with the fact that the Campus’s conference center is physically removed from downtown Davis, would result in additional loss of room nights for Davis hotels, as conference attendees would be steered toward Hyatt Place and away from Davis hotels. This bundling also has a significant adverse impact on the restaurants and visitor serving retail in the Downtown because conference attendees will not venture beyond the proposed project for lodging, food, or other services. The impact of the project, therefore, has the potential to cause blight as hotels and restaurants lose a significant share of the current and future visitor market.

The DEIR and the background analysis and technical reports upon which the DEIR relies do not analyze the issue of potential impacts on hotels in the City or in the downtown area in particular. Analysis of impacts on the hotels in the City and the downtown and the potential that adverse economic impacts will cause blight is the analysis necessary for CFQA purposes for the EIR. However, the DEIR does not provide this analysis. Instead, the DEIR discusses the potential impacts of the proposed hotel expansion on the Davis lodging market as a whole and includes the Hyatt Place as a part of the generalized Davis market. This does not address the relevant issue, which is the impact of the Hyatt Place expansion on the Downtown.

Further, the impact study prepared by HVS for the EIR concludes that the UC Davis conference center generated new and additional demand for hotel lodging, which has been facilitated by the Hyatt Place hotel. But neither the DEIR nor the HVS study analyze whether the existing properties in the City experienced a negative economic impact as a result of the UC Davis hotel. Neither the DEIR nor the impact study distinguishes between impacts on City hotels versus impacts on Hyatt Place. Rather, the study makes the unexplained assumption that the Davis hotels and the Hyatt Place together form a “Davis market.” This does not address the issue of whether the Hyatt Place project has had a significant adverse impact on the Davis hotels or whether the expansion of Hyatt Place will significantly and adversely further impact the Davis hotels and the downtown. The HVS study also does not address and provide substantive evidence regarding the impact of Hyatt Place on the significant decline in TOT (which is likely due to a corresponding significant decline in room nights), as set forth in the City’s letter on the Tiered Initial Study, whether the economic predictions made in the FEIR for Hyatt Place were accurate or were in error, or whether the proposed expansion will have a significant adverse impact on room nights in the City hotels.

Neither the DEIR nor the HVS study analyze the impact of the expanded Hyatt Place attracting existing users who would otherwise stay in a Davis hotel or the impact on the Davis hotels of an increase to the base availability of hotel rooms during non-peak times. Such a study would have considered whether the expanded Hyatt Place will cause the number of room nights in Davis
hotels to decline and a hotel or hotels to close. A decline in Davis room nights and/or a closure of Davis hotels will have a negative economic impact on the businesses that rely on room nights, such as local restaurants in the downtown core.

Rather, the analysis discusses the unaccommodated demand for room nights during certain peak times of the year (such as graduation). Any increase in unaccommodated demand will not benefit the Davis hotels because such increase would be captured by Hyatt Place. While such effect would have a positive impact on the “Davis market,” it would have no effect on the Davis hotels. By looking at the few nights where rooms are fully booked, the study does not address the non-peak occupancy and the impacts on the Davis hotels during non-peak periods. It is during these non-peak periods that the impact of the expansion on the City hotels should be determined and analyzed.

The DEIR also notes that while the Hyatt Place will “continue to accelerate hotel obsolescence and while existing hotels may experience economic pressure from this effect, the phenomenon is part of a typical cycle for aging facilities and provides new and refreshed lodging products” (DEIR p. 34). The DEIR then states that the Hyatt Place would improve the overall condition of the hotels in the market since the other property owners may decide to renovate their hotels. It is insufficient to merely conclude, with no evidence or analysis, that a new, unidentified lodging product would replace a Davis hotel that closes or that an existing hotel would have the financial resources to improve the overall conditions of the hotel. Rather, the likely effect of such a negative economic effect would be the closure of a hotel and a negative economic impact on local businesses and restaurants. The DEIR, however, does not analyze any of these scenarios nor does it provide for any proposed mitigation.

The City also stated in its comment letter on the Tiered Initial Study that it does not believe that blighting impacts are merely an aesthetic issue. The DEIR, though, treats the economic impacts that could lead to blight as purely aesthetic impacts and ignores the fact that blight also contributes to increased public safety services, decreases in property values, and potential incompatibility of land uses. The City believes that these potential impacts must be analyzed and that mitigation must be proposed for all significant impacts. All of these potential impacts are of utmost importance to the City and are also important to the Campus as each entity depends on the other for their combined continued success.

The City requests that the economic analysis and the associated blight analysis be revised to analyze the impact on the Davis Downtown, and the DEIR recirculated for public review and comment once that analysis has been completed.

A New Economic Analysis Should be Performed that Evaluates and Updates the Impact of the Existing Hotel and Projects Impacts of Expanded Hotel on Existing Davis Hotels and the Downtown.

As the City stated in its letter on the Tiered Initial Study, the University should do a new full economic study to analyze the current economy and further reductions in economic activity resulting from changes at the UCD campus such as layoffs and reduced budgets. That is the only
way to have an adequate baseline for an analysis of fiscal impacts of the expansion project and the attendant adverse physical impacts and potential blight that the expansion project will have on downtown Davis. For example, the original economic study prepared for the Campus’s hotel/conference center found that the facility would provide economic benefits to the City (see Keyser Marston Associates Study, December 12, 2001). The City has not seen such economic benefit or increases in room nights. The City actually believes the opposite is true and that many visitors to Davis, particularly those affiliated with the Campus, are now staying at the Hyatt Place, to the detriment of the Davis hotels and the Downtown businesses and restaurants. The City believes that the EIR should provide evidence regarding whether the economic assumptions in the original FEIR for the Hyatt Place project have materialized and then revise and analyze the current circumstances with revised assumptions, as appropriate, to determine the impact of the Hyatt Place expansion of the City and its Downtown.

The City’s TOT currently contributes an average of one million dollars a year to the City’s operations. However, TOT reported in 2010 was almost twenty percent less than the amount reported for 2008. The City uses the TOT funds to, among other things, maintain the downtown area. The continued loss of funds could result in the physical deterioration of the downtown. Two hotels located in the City have shown signs of severe financial distress. And in particular, for the two quarters after the Hyatt Place opened last year, the reported TOT dropped by over nine percent from the previous year. While some of these declines may be attributed to the economy, some of the declines must be caused by the opening of the Hyatt Place. The expansion of the Hyatt Place hotel will exacerbate the existing hotels’ financial distress. The economic analysis should review whether a decision on the expansion should be delayed until there is sufficient time to determine the actual impact of Hyatt Place on the Downtown.

The EIR’s Traffic Analysis Suggests the Potential For Additional Economic Impacts

As noted in the DEIR, the hotel and Old Davis Road extension projects will result in increased vehicle delays at: First Street intersections. The vehicle delays noted in the DEIR will further affect the downtown as visitors to downtown will be deterred from visiting the downtown. This will have a further economic impact and contribute to potential blighting influences. Further, it is unclear whether the traffic study adequately analyzed the impact of changes in traffic patterns if drivers elect to use the realigned Old Davis Road for access to the City. The University should consider a timed study to determine the amount of increased traffic, and its impact, by reason of the increased “convenience” of the realignment of Old Davis Road.

The vehicle delays will be even worse on days and evenings when events occur in the south campus area (such as at the Mondavi Center and/or the wine and food science facility). These events do not appear to have been studied in the DEIR. These events should be studied and the traffic study revised as necessary and re-circulated. As the City stated in its comments on the Tiered Initial Study, the City recommends that, at a minimum, the Campus adopt a traffic management plan for special events that will eliminate operational impacts on City roadways and that the University implement alternatives to car travel.
The combined impacts of the Hyatt Place Hotel Expansion and the extension of Old Davis Road Highlight the Need for the City and Campus to Work Collaboratively

The impacts associated with the hotel expansion and the road extension bring additional focus to the need for the City and the University to work together to strengthen the local business environment and improve connections between the city and campus.

To facilitate the partnership that is vital to the success of both the City and the campus, the City requests that the University conduct a new economic analysis, revise and recirculate the blight analysis in the DEIR, and develop feasible mitigation measures that, should the University determine to approve the expansion, will reduce any impact of the Downtown, including its hotels, restaurants and visitor serving retail, to a less than significant level, prior to any consideration of the Hyatt Place expansion.

In addition, and regardless of the final decision on the Hyatt Place expansion, the City requests that the University commit to working with the City on the following shared effort to increase the vibrancy and viability of the Campus and the community:

- Joint marketing and visitor attraction activities, focusing on the strengths of both the campus and the community as a destination;
- Systems to ensure that room nights from on-campus activities or overflow from Hyatt Place are referred to Davis hotels, rather than regional partner hotels;
- Improved vehicle and bicycle connections from Hyatt Place and the Mondavi Center for the Performing Arts to downtown Davis, to encourage campus visitors to visit Davis restaurants, shops, and hotels; and
- Coordination of planning and implementation of projects of mutual benefit or potential impact such as development of the Nishi property and adjacent area as a dynamic mixed use innovation district incorporating University-related research uses complemented by high density urban housing.

By engaging in these efforts, the City and the University can work together to strengthen our physical connections and our economic development efforts. Ken Hiatt, Director of Community Development and Sustainability, will be contacting you to begin this process.

Sincerely,

[Signature]

Paul Navazio
Interim City Manager
Comment Responses

Comment Letter from City of Davis

<table>
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<tr>
<th>Comment Number</th>
<th>Response</th>
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<tbody>
<tr>
<td>C-1</td>
<td>The University appreciates the City of Davis long-standing efforts toward collaboration and achievement of mutually beneficial objectives.</td>
</tr>
<tr>
<td>C-2</td>
<td>See Master Responses 1, 2, 4, 5, and 7. See Response B-5.</td>
</tr>
<tr>
<td>C-3</td>
<td>See Master Responses 1, 2, 4, 5, and 7.</td>
</tr>
<tr>
<td>C-4</td>
<td>The HVS Study concludes that additional room nights from the proposed hotel expansion will benefit both the Hyatt Place Hotel and hotels in the Davis area (HVS 2011a, page 75). The HVS Impact Study included the UC Davis Conference Center as part of the analysis of existing conditions and future impacts.</td>
</tr>
<tr>
<td>C-5</td>
<td>The HVS Impact Study prepared for the project and documented in the EIR concludes that beneficial effects to local hotels and businesses are expected from the project (HVS 2011a, page 75). See Master Response 4 and 7.</td>
</tr>
<tr>
<td>C-6</td>
<td>See Master Response 4, 7, and 8. The methodology for the HVS Study is described in Sections 4 and 5 (HVS 2011a). See also D-7, D-24, and D-25.</td>
</tr>
<tr>
<td>C-7</td>
<td>See Master Responses 1, 2, 3, and 7. Figure 5-1 on page 44 of the HVS Study describes the existing conditions with and without the Hyatt Place Hotel, and shows that conditions in 2010 and into 2011 improved even with the additional hotel room supply created by the Hyatt Place. The HVS Study concludes that the Hyatt Place Hotel Expansion would improve the Davis hotel market (HVS 2011a, page 75).</td>
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<tr>
<td>C-8</td>
<td>See Master Responses 4 and #7.</td>
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<tr>
<td>C-9</td>
<td>The HVS Impact Study and the EIR conclude that declines in hotels or closures of hotels are not expected (HVS 2011a, page 44 and 75). See Master Responses 1, 2, 3, and 7.</td>
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<tr>
<td>C-10</td>
<td>The HVS Impact Study analyzes demand from multiple sources and on an annual basis, which includes non-peak periods. See Response C-9.</td>
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| C-11           | See Master Response 7. The HVS Impact Study and the EIR conclude that the Davis hotel market is relatively strong and that continued investment in hotel properties would be appropriate given the existing and projected occupancies and revenues (HVS 2011a, page 44).

As expected, local competitive hotels have taken actions to improve their properties in response to the opening of the Hyatt Place Hotel (Shawn Hong, Assistant Vice President, HVS, email dated August 12, 2011.) |
| C-12           | See Master Responses 1, 2, 3. The DEIR appropriately considered potential impacts related to potential blight. The HVS Study concluded that the overall strength of the Davis hotel market is sufficient to absorb future projected economic activities from the hotel expansion (HVS 2011a, page 75 and DEIR, page 34). See Master Response 7. |
| C-13           | As described the economic analysis does consider the impacts to hotels in the Davis Downtown. Because there would be no negative effects on hotels, there also would be no negative effects on businesses that rely on hotel activity. See Master Response 1, 2, 3, and 7. |
C-14 See Master Response 7 and Response to Comment C-15.

C-15 The baseline for the project is the time of the publication for the NOP pursuant to CEQA Guidelines Section 15125(a). The 2010 and 2011 data show that the economic decline due to recession has stabilized, and that the opening of the Hyatt Place Hotel did not cause a decline either in number of occupied rooms or room revenues. Because the Hyatt Place Hotel and the UC Davis Conference Center opened in 2010, the economic benefits have not been fully realized but are expected to continue increasing as occupancy and conference bookings increase. See Master Response 7.

C-16 See Master Responses 1, 2 and 7.

C-17 The Technical Analysis for Responses to Comments Technical Memorandum includes an expanded assessment of the time difference between using the existing Arboretum Drive alignment and using the proposed Old Davis Road extension alignment. The Technical Analysis for Responses to Comments Technical Memorandum concludes that there would not be an appreciable time difference between the two routes and that the Old Davis Road extension is not expected to induce traffic from parallel facilities.

As required by the UC Davis 2003 Long Range Development Plan Final Environmental Impact Report (LRDP EIR), Mitigation Measure 4.14-2(b), the University updates the LRDP Traffic and Circulation Mitigation Monitoring program (conducted every three years). The First Street intersections of A Street, B Street, and E Street are analyzed as a part of the Transportation Mitigation Monitoring Update. Continuing Transportation Mitigations Monitoring Update efforts will assess any increased traffic after construction of the Old Davis Road Extension and assist with proper timing of other mitigation measures identified in the LRDP EIR, as needed.

C-18 Vehicle counts collected for the TIS show that the AM and PM vehicle peak hours occur from 8:00 AM to 9:00 AM and 4:30 PM to 5:30 PM, respectively. Most events in the south campus area are scheduled outside of the vehicle peak hours. All events currently scheduled at the Mondavi Center between September 2011 and May 2012 begin at 8:00 PM. Events at the Robert Mondavi Institute for Wine and Food Science are typically small and do not warrant inclusion in impact analysis.

Traffic Management Plans have been developed for certain campus event centers and events, including the Mondavi Center, football games, commencement, and Picnic Day. Also, proposed campus growth and levels of activity under the current LRDP were analyzed in the 2003 LRDP EIR. Neither the Hyatt Place expansion or Old Davis Road extension projects will change the nature of these campus events; therefore, no Traffic Management Plan is necessary for either of these projects. The University will continue to implement traffic management strategies that are appropriate for each event in order to maintain a high-level of user satisfaction.

C-19 The economic technical report prepared for the project and documented in the EIR concludes that beneficial effects to local hotels and businesses are expected from the project (HVS 2011a, page 75). See Master Responses 4 and 8. Nonetheless, the campus agrees that working together to strengthen visitor outreach programs will benefit both local businesses including hotels and restaurants in the City of Davis and the Hyatt Place Hotel on the campus. Towards that end, the campus continues to make a voluntary contribution to the Yolo County Visitors Bureau.

C-20 The comment assumes that a decline in economic activity is expected in the Davis area due to the project. The economic technical report prepared for the project and documented in the EIR does not support this assumption, and concludes that beneficial effects to local
hotels and businesses are expected from the project (HVS 2011.a, page 75). See Master Responses 1, 2, 4 and 7. Therefore, there is no need to perform additional analyses or recirculate the EIR.

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<td>The campus agrees that working together with the City to strengthen visitor outreach programs will benefit both local businesses including hotels and restaurants in the City of Davis and the Hyatt Place Hotel on the campus. Towards that end, the campus continues to make a voluntary contribution to the Yolo County Visitors Bureau. The campus looks forward to working with the city on these issues. However, none of these are relevant to conclusions of the EIR.</td>
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