



## City Administration

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To: The Grand Jury of San Luis Obispo County  
Via: Foreperson, Bonnie McKrill  
From: The City of San Luis Obispo  
Date: June 20, 2025  
Re: **Clarification of Factual Inconsistencies in Report,**  
Round & Round with Town & Gown

The City of San Luis Obispo (City) team appreciates the opportunity afforded by the Grand Jury to review the report entitled “Round & Round with Town & Gown” ahead of publication. We believe this opportunity will help ensure that the community has the best available information related to this important issue. With that in mind, the City has reviewed the report contents and is offering clarifications of fact in the table below to help correct what we believe may be inaccuracies in the draft report.

Text in the “Quote from Report” column is copy-pasted from the draft Grand Jury report the City reviewed. The City’s concerns as to the accuracy of each quote are in the far-right column.

Page #	Quote from Report	Factual Problem
1	Many students now reside in single-family homes, often exceeding their intended occupancy.	The phrase “intended occupancy” is unclear and not reflective of a defined legal term. Legal occupancy is a concrete, discernable number derived from the California Building Code. Please provide citation to relevant occupancy data supporting the conclusion stated.
1	Over the past two decades, SLO has experienced significant growth, driven	The population of the City of SLO has not increased significantly over the last two decades and remains under 50,000 at the last census (2020).

	in part by the expansion of its university, California Polytechnic State University (Cal Poly), and the increasing student population.	The enrollment of Cal Poly is a separate number and is not captured in the census for the City, as Cal Poly is not located in the City and the campus houses significant portions of its student body on its campus. Even as to students who reside in housing within the City of San Luis Obispo, those students may have been counted as living at a City address, or at their permanent residence address somewhere outside City limits. It would be more accurate to say that Cal Poly's student population has had significant growth.
1	SLO has experienced steady population growth, mirroring broader urban expansion trends across California. In 2005, the city's population stood at approximately 44,380, and, by 2025, it had risen to 50,612, reflecting a 14% increase.	The 2025 population number appears to be a projection and is not a verified current number. Please accurately reflect the City's population based on a statistically valid and verified source (i.e., U.S. Census Bureau's Population Estimates Program (PEP) or the American Community Survey).
1-2	As a result, university students now comprise nearly 46% of the city's total population...	This is incorrect. Not all university students live in the City and, at the time of each census, not all students who do reside in the City during the school year would necessarily be counted as City residents for census purposes. Cal Poly's student enrollment is not a de facto subset of census numbers or City population estimates. Again, Cal Poly's campus, and therefore campus housing, is not within the City limits.
2	... significantly influencing housing availability both on and off campus, infrastructure demands, and neighboring residential community dynamics.	Provide factual details to support these general conclusions. The statement lacks clarity.
2	Many long-term residents, particularly families, cherish the stability and tranquility of their neighborhoods but now face the challenge of residing in	The term "Family(ies)" is used more than once in the report but is undefined. If it refers to a household with school-aged children, by definition those children did not exist 20 years ago (the look-back period that is referred to by the population numbers).

	an increasingly student-centered neighborhood.	
2	...large, unsanctioned street parties that escalate into public disturbances, injuries, and property damage.	This use of “unsanctioned street parties” seems focused on the St. Patrick’s Day related event (“St. Fratty’s Day”), which is a singular, annual occurrence. If there are other instances of such street parties being referenced, clarification is requested as to where and when those took place.
2	The complaints alleged that the City of SLO and Cal Poly officials were failing to enforce existing rules and municipal ordinances, that citizen complaints were ignored, and neither took sufficient action to restore order.	All official citizen complaints received by the Police Department and the Code Enforcement Division are fully investigated. If the report is defining “complaint” in a specific way, that definition should be included in the glossary.
2	The San Luis Obispo County Grand Jury (SLOCGJ) sought to objectively assess the extent of these issues and determine whether city officials were implementing timely and sufficient countermeasures to address them effectively.	The report’s focus on the City leaves out the role of Cal Poly and property owners in addressing issues. Looking solely at the City’s role misses significant pieces of the picture, most notably Cal Poly and their much more comprehensive access to student information and greater ability to regulate student conduct, and property owners/landlords/property managers responsible for management of their rental properties in the City and their tenants’ use of their properties in a manner that facilitates neighborhood nuisances.
3	conducted fifteen interviews with San Luis Obispo city residents, city leadership (including City Council members, Community Development and Police Department officials), city personnel (such as Code Enforcement), and leadership from Cal Poly	Implies that no interview was held with the City Manager and leaves out the interview with the non-sworn Police staff member who is one of the persons most knowledgeable on town-gown topics.

4	conducted analyses of policies and laws, including... Cal Poly's General Plan	Clarify what document this is referring to as Cal Poly does not have a general plan.
4	conducted comparative research, including an investigation of cities with overlay zones to understand their implementation and impact. Explored various policing models, such as the "Do No Harm" approach, examined strategies used by other cities addressing similar university-related challenges, and analyzed party ordinances from other municipalities.	More specificity as to what materials are being referenced would be helpful context for readers. The attached bibliography contains general links to website home pages, rather than pinpoint resources seemingly being referenced, and there are no citations within the report connecting statements to sources.
5	The "Do No Harm" approach was adopted not only due to concern for officer safety but because a more aggressive officer presence could incite a riot.	Though quoted in the report as an official term, "Do No Harm" is not a phrase used by the City Police department. However, the technique described is indeed one SLOPD planned and implemented (to not use aggression should students occupy a street, with a focus on de-escalation, community safety, closing affected streets, and other tactics due to the high risk of crowds turning violent, the prevalence of alcohol impaired judgment, and past experiences in SLO with riots).
5	In 2024 the SLO City Chief of Police deemed their efforts a success as no harm was done to officers or attendees. However, the residents in the area experienced property damage to their residences and personal property.	It is an accurate data point that there were minimal arrests and citations in 2024 given the crowd size, and property damage was minimal overall. The comparison within this statement, however, implies a disregard for property damage, which is false.
5	The SLOCGJ wanted to determine the validity of the alleged citizen complaints against the SLOPD as well	A citizen complaint against a police officer or department has a specific meaning and triggers a formal process for investigation. The reported dissatisfaction with prioritization of police resources that was investigated by the Grand Jury should be distinguished from the formal

	as verify statements received from others during our investigation.	complaint investigation process, which is diligently followed by the City/SLOPD. (See California Penal Code Section 832.5.)
5	We were blocked in this effort by two senior police official's <i>[sic]</i> unwillingness to grant an interview.	The Grand Jury interviewed the City Chief of Police and its Public Affairs Manager, both providing extensive and sworn testimony. These two staff members are the City's most knowledgeable on the strategic, operational, prioritization and historical perspectives of law enforcement and community relations related to the student impacts on City residents and activities. The Grand Jury chose not to subpoena any witnesses and there was no need for additional City staff to divert scarce operational resources toward likely incomplete and/or duplicative appearances that would have been inefficient and operationally unsupportable based on the City's understanding of the scope of inquiry. In addition, the police department provided hundreds of requested records and communications, and responded to multiple sets of subsequent and follow-up questions to accurately clarify and verify any and all information requested by or testimony provided to the Grand Jury, which reflects the most complete and accurate source of information.
5-6	In 2024 fireworks were set off in the Alta Vista neighborhood between 3:00 a.m. and 4:00 a.m., jolting some residents and their families awake.	This incident is unverified. On March 16, 2024, the City received approximately 30 noise/party calls for service between 02:15am and 08:00am. None of those calls indicated fireworks were heard.
6	The damage was so extensive that Cal Poly had to close some dorms for two days to repair the damage.	This statement is incorrect. Muir residence hall closed for a few hours and was reopened the same day to residents.
6	No representatives from the surrounding neighborhoods were invited to participate in the task force.	The City, Cal Poly, and representatives of the community, including representatives of the Residents for Quality Neighborhoods (RQN) group, and members of the public, participate in monthly Student Community Liaison Committee (SCLC) meetings where town-gown issues are discussed. Following the 2024 St. Patrick's Day event and at the request of the San Luis Obispo City Manager, all SCLC agendas had a standing item for reports to be provided by both the City and Cal Poly regarding

		<p>their preparations and work to address St. Patrick’s Day. To the extent that outcomes from the task force meetings could be shared with the group, they were at that time, on a monthly basis. During these monthly meetings, SCLC members and the public were provided opportunities to ask questions and provide feedback. Additionally, several City officials met with RQN representatives well in advance of the 2025 St. Patrick’s Day event to discuss detailed information regarding the City’s preparations.</p>
7	<p>The City of SLO, concerned about the safety of their neighborhoods, the disruptions to the residents, and the negative image of the City of SLO, developed their own task force headed up by the SLO City Police Department.</p>	<p>Although work was done throughout the year to prepare for the 2025 St. Fratty’s Day event, there was no SLOPD “Task Force” officially formed. SLOPD engaged in the same planning and preparation process as in prior years, but with a larger response planned for 2025, which included coordination with other law enforcement agencies, Cal Poly, and other City departments such as Fire, Public Works, and Parks &amp; Recreation.</p>
7	<p>The messaging developed by the City of SLO was “Do Not Come, the party is over.”</p>	<p>The \$125,000 cost estimate listed at the end of this paragraph in the report includes the marketing costs for 2025. The communication plan was extensive with staff spending approximately 40 hours in the months leading up to St. Patrick’s Day speaking to student groups on campus about the Safety Enhancement Zone and communicating to them what to expect. TV ads, radio ads, “every door direct mail” postcards to 8000 addresses, additional postcards handed out by patrol, paid social ads, message boards, three radio station in-person interviews, and Adam Montiel's podcast were all completed to inform students prior to the day of the event. It should also be noted that the City participates annually in Cal Poly Day Week of Welcome to inform and set conduct expectations with each successive year of new students to Cal Poly, and has done so for many, many years.</p>
7	<p>In 2025, the SLO Police Department activated the Emergency Operations Center (EOC)...</p>	<p>Cal Poly activated their EOC. The City activated a Department Operations Center (DOC) at the Police Department, which is different from the City’s Emergency Operations Center, so this is an inaccurate statement as to the City.</p>

7	<p>Due to the increased law enforcement presence, the neighborhood of Alta Vista did not experience damage to property and there was no unsanctioned street party.</p>	<p>The phrasing here suggests that the number of officers was the only factor in the reduction of disturbances, leaving out important details about the work and effort SLOPD did to prepare a plan, broadly communicate, and execute it with coordination and support from multiple other City departments as well as many other agencies.</p> <p>Multiple patrol methods were used including foot patrols, bicycle patrols, motorcycle patrols and mounted horse patrols. Walkways and access routes to and from campus were manned with officers and signs/barriers, directing revelers back out of the area. In addition, rental lighting and electronic street signage were deployed in the area to improve safety and inform visitors of the enforcement activities. A nearby Law Enforcement field campus included support services, a mobile booking station staffed by the San Luis Obispo Sheriff's Office, as well as Fire Department personnel for medical support, and City Public Works personnel for any road closure needs. The Police department used extensive mobile surveillance cameras mounted on street poles, and multiple drones to provide live video feeds back to the DOC. SLOPD also leveraged relationships with AT&amp;T and Verizon to provide increased bandwidth and network monitoring to ensure communications capabilities during the event. The National Guard also assisted by providing technology support used to track officers in the field for situational awareness as to their locations. The CHP also assisted on the night prior to the event by conducting a DUI checkpoint and screened over 1000 vehicles to deter partying in the hours leading up to the event.</p>
7	<p>The SLO Chief of Police Department estimated costs to the city will be approximately \$125,000.</p>	<p>This estimate does not include any costs borne by other Law Enforcement agencies who assisted and did not charge the City for their time. The \$125,000 number also does not include any City personnel who were already scheduled to work, as it was calculated on overtime and equipment/logistics needed for the event.</p>

7	The concert at Cal Poly was deemed a success as over 6,000 students attended the event. The event was limited to 5,000 students; however, unticketed students pushed through the temporary fencing so they could get into the event. Though this is concerning, no one was seriously injured.	When the fence around the event was breached, Cal Poly EOC requested help from the SLOPD DOC as they needed more officers to manage the crowd. Two 12-Officer teams were immediately sent to respond to the concert venue and help restore order.
7	The alternative activity on campus ended around 10:30 a.m.	The report does not include an estimate of Cal Poly's costs to host the concert/alternative activity, which have been made publicly available. This data would seem to be important to facilitate fully informed community-wide assessment of the relative costs and benefits of the comprehensive prevention and response effort.
8	SLO Municipal Code 9.12 (see Bibliography) provides that "...it shall be unlawful for any person to willfully or negligently make or continue to make or continue, or cause to be made or continued, or permit or allow to be made or continued any noise which disturbs the peace and quiet of any neighborhood or which causes any discomfort or annoyance to any reasonable person of normal sensitivity in the area."	This quote is from section 9.12.040 of the SLO Municipal Code.
8	The specific code violation encompassed in the above-mentioned Code states that the hours between 10 p.m. and 7 a.m. the following morning are to remain quiet.	The reference to the 10 p.m. until 7 a.m. timeframe is in SLO Municipal Code section 9.12.050 and technically only applies to: "Radios, Television Sets, Musical Instruments and Similar Devices. Operating, playing or permitting the operation or playing of any radio, television set, phonograph, drum, musical instrument, or similar device which

		produces or reproduces sound.” There is a similar provision in a separate section that restricts construction noise during the same timeframe.
8	It should also be noted that the Noise Control Officer may grant exceptions to this restriction.	SLO Municipal Code section 9.12.100 provides for an exception process that requires a permit application and establishing criteria by which either the SLOPD Chief or the Community Development Director may grant exceptions. The sentence quoted here does not reflect the correct permitting and approval process required for the exception.
8-9	...noise citations in neighborhoods near the campus were issued an average of more than 3 times per week during the school session. This totaled 139 citations in the Alta Vista neighborhood, with one house alone receiving 17 citations. Unfortunately, there is reason to believe that this situation remains - to this date - unabated. Such is the irritation of area residents, that many have fled the area.	<p>There has been a 50% reduction in noise calls received by SLOPD over the past 10 years. It is important for the report to acknowledge that the problem was much worse, and great effort has been made to achieve this reduction in calls for service. Use of phrases like “fully enforced” and “unabated” implies an expectation that there should be no noise complaint calls from any neighborhood, which is unreasonable and unattainable.</p> <p>There is also ambiguity as to the timeframe of these citation numbers and to what property the 17 citations were issued. Please clarify what data points are being cited here as our data does not support this conclusion.</p> <p>In contradiction to the statement that noise violations are being allowed to continue “unabated,” the City’s Planning Commission revoked two CUPs for fraternities near campus (1236 Monte Vista Place and 1304 Foothill Blvd) on June 11, 2025, in part due to noise violations. The Planning Commission is reviewing a third fraternity CUP for modification or revocation on June 25, 2025. The City has also cited multiple houses for illegal fraternity operations in R-1 zones as result of noise complaints, and dozens of citations are issued each year.</p>
9	To aid in noise ordinance enforcement the SLOPD employs the assistance of Cal Poly students who are enrolled in a	SNAP Officers are City employees, not enrolled in any school program, and are a mix of Cal Poly, Cuesta College, and Hancock College students.

	program called the Student Neighborhood Assistance Program (SNAP).	
9	These students interface with groups of partiers in residences in the affected area who are violating the noise ordinance.	SNAP Officers respond to noise complaints city-wide, not just adjacent to campus.
9	These unarmed SNAP students speak to the offending parties and attempt to get them to comply with the city's noise standards. There are, however, only a handful of SNAP students. They wear civilian uniforms and work in pairs. They also have radios so that they may contact the police when required.	SNAP are student civilian employees of the Police Department who operate as a first response to noise calls. Their primary objective is to educate residents about the City's noise ordinance, issue a written warning where appropriate, and gain compliance to end the noise disturbance, thus keeping sworn officers free to handle other public safety calls for service. SNAP employees do not carry weapons, and they wear polo shirts and pants. If residents are uncooperative or the situation appears dangerous, they are trained to request officers to respond.
9	These students may, at their discretion, issue Disturbance Advisement Cards (DACs).	SNAP and patrol both issue DACs, with SNAP alone issuing 588 DACs in 2024. Officer discretion is guided by <a href="#">Lexipol policy 430</a> and other training (see SNAP manual Section V: Noise Complaint Enforcement & Safety Expectations).
9	Complainants indicated that weekend parties can mean up to 100 or more students at one address and often continue after visits by police. SNAP students do not go to lettered fraternity houses; such visits are reserved for sworn officers.	Responding officers can issue a citation for a party as either multiple citations at the same time or as additional citations if the problem persists. There was one unruly gathering citation during the St. Fratty's Day 2025 event, and 22 Unruly Gathering citations issued in 2024. Unruly Gathering citations are used for very large parties that meet defined criteria in the municipal code that cause significant disturbance to the neighborhood.
9	SLO Municipal Code 9.12.050 is specific about excessive noise. It provides a detailed list of prohibited acts between the hours of 10 p.m. and	Various City Municipal Code sections are being conflated in these sentences. Sections 9.12.040, 9.12.050.A, and 9.12.050.B regulate different types of sound sources and are applied in different contexts, not all relevant to party noise situations.

	7 a.m. While it does not specifically prohibit noise from parties, it does speak to the use of loudspeakers and other electronic devices, including: “radio, television set, phonograph, drum, musical instrument, or similar device which produces or reproduces sound...”	
10	If found to be out of compliance, SLOPD may issue a warning or citation.	Citations can be either criminal or administrative, but most often noise violations are cited administratively.
10	In 2023, using extensive citizen-generated data from a Cal Poly-generated report required by AB524, code enforcement started an investigation into the illegal fraternities. Based on the investigation, 30-40 Advisory Notices, and 22 Notice of Violations (NOVs) were sent to property owners.	In addition, there have been 22 NOVs and 6 administrative citations issued since the 2023 investigation related to unpermitted fraternities or use permit violations.
10	At the time, Cal Poly and code enforcement were working together on the illegal fraternity issue. However, due to changes in policies, Cal Poly stopped assisting the city, stating privacy concerns, and revised their AB 524 report to remove some of the addresses that were previously provided in the document.	Cal Poly has removed information about the location of parties from its public reports, which previously facilitated the City’s enforcement of its regulations. Outside of the AB 524 report, the City has requested the information directly from Cal Poly, but those requests have been denied.

11	Based on the SLOGJ investigation, the number of illegal fraternities may be more than 40 locations currently operating in the city. In addition, citizens have reported that several Cal Poly recognized fraternities listed in AB524 have multiple illegal fraternity locations operating within the city: some with as many as 7 separate locations.	Please clarify from what sources these numbers are derived and on what verified evidence they are based, keeping in mind the constitutional considerations/limitations noted below in response to report finding #3.
11-12	Code enforcement complaints are often received after business hours or the following day. The result is that they are limited in their ability to verify the code violation, as it is after the fact or violators are not easily identified.	Party activities reported to police are documented and provided to code enforcement, and there is no barrier to the City using all of the information in the possession of either the Police Department or the Community Development Department to pursue enforcement. It is inaccurate to state the City cannot verify violations without sending code enforcement staff out on weekends or after hours; noise complaints received by emergency or non-emergency dispatch after hours are responded to by SLOPD and call logs and citations issued by the Police Department are evidence of that response.
13	The report also provides the address of each “affiliated chapter house” which AB 524 defines as those located on-campus or on land owned or leased by the fraternity or sorority.	Education Code Section 66312 defines “chapter house” as “any residence located on or off campus that is owned by the institution of higher education but occupied by a campus-recognized sorority or fraternity, or any residence located on or off campus that is owned and occupied by the campus-recognized sorority or fraternity.” There is no definition of an “affiliated chapter house” in the Education Code. The Education Code’s definition of chapter house is confined to properties owned <u>and</u> occupied by a campus-recognized sorority or fraternity, or occupied by a campus-recognized sorority or fraternity <u>and</u> owned by the university.

13	Evidently, this means that of the 36 recognized fraternities and sororities, 20 either do not have a chapter house or are in chapter houses that are off-campus and not owned or leased by the fraternity or sorority and therefore do not meet the definition of an affiliated chapter house.	Clarify whether “chapter house” as used here is meant to refer to “unaffiliated chapter houses,” and by what definition this is being applied.
13	Any of these chapter houses that hold fraternity activities such as meetings, rush events, or parties, are still required by the SLO municipal code to have a CUP.	Clarify if a distinction is being made between affiliated and unaffiliated chapter houses.
13-14	Since Cal Poly is not required to provide the addresses of these recognized fraternities, the city has no easy way to verify the location to determine the reason that the fraternity does not have a CUP. This makes it difficult for the city to enforce the code.	It is legally debatable whether the addresses should be published and/or disclosed or not, but it is true that since Cal Poly now declines to provide specific address information regarding locations of all fraternity/sorority sponsored events, this does impede the City’s enforcement efforts.
14	These CUPs were approved over an extended period of time by planning commissions with different members; the earliest is dated in 1971 and the latest in 2024. That may explain why additional conditions were imposed on some fraternities and sororities and not others. It may also have to do with specific characteristics of the individual parcel.	The differences in the CUPs also reflect regulatory changes to the City Municipal Code that have been made to address issues that have arisen with the fraternities and sororities over time. This is the nature of any CUP and CUP process; it allows for adjustments over time to address emergent needs through the exercise of discretion, individual review, and application of conditions of approval that are tailored to the unique potential impacts of each location as it is reviewed.

14	The planning commission has the authority to enforce these conditions, add new conditions if the existing conditions are not met, and ultimately revoke a fraternity's CUP.	It is within the authority of the City's Planning Commission to take the steps described, but these are part of a process that also includes notice and due process to the permit holder and property owner. CUPs cannot be revoked without due process to the permit holder, which holds a property right to the permit.
14	Citizens can also appeal for a use permit to be revoked or request that a permit not be approved. The current cost to make such an appeal is \$2,583.46, (in 2017 the appeal fee was \$281.00). A complainant noted that the cost to appeal discourages this practice.	The cost described here is what a citizen would pay to appeal any decision of the Planning Commission immediately after a CUP is approved or denied. There is also a process that costs no money through which a member of the public can report potential CUP or zoning violations to the Community Development Director. Once investigated, City staff can bring substantiated violations before the Planning Commission for consideration without any cost incurred by the citizen. This process has led to the revocation of two CUPs this year, and several other CUPs are either scheduled proactively by the City for a future hearing or are being investigated based on violations of conditions.
14-15	While these appeal fees may be justifiable for major development projects that demand substantial city resources like legal reviews, public hearings, or environmental impact assessments, they place an undue burden on ordinary citizens.	As stated above, a member of the public does not need to pay a fee to make the Community Development Department aware of a potential violation of a CUP, which, if verified, can lead to re-review of the permit by the Planning Commission, and potential revocation. The appeal fees apply to the granting (or denial) of a CUP.  The setting of fees, including the appeal fees referred to here, follows an extensive study process, reporting by staff, and deliberation by City Council, with fees based specifically on a fraction of the cost of processing an appeal.
15, F1	Prior to 2025, the city failed to effectively provide a multi-pronged, cohesive approach to manage or shut down large unsanctioned, costly and unruly events such as St. Fratty's Day. This created an unsafe environment,	SLOPD had a robust plan in 2024, based on the size and actions of the 2023 event. The City must balance police response vs. expected crowd size, danger to the community and financial constraints. It is not operationally or financially feasible to call in officers from all over the state every year out because something might happen. The need must be articulated based on intelligence and past experience, and the 2023

<p>with increasing size of unruly crowds, property damage, injuries and public disturbances.</p>	<p>event did not rise to the level of problems to create a state-wide staffing aid request in 2024. Each year's staffing and tactical plan is prudent and appropriate based on previous events and current expected attendance.</p> <p>The San Luis Obispo Police Department has effectively planned for and staffed numerous large-scale, unpermitted events dating back decades, including the end of Mardi Gras and Poly Royal events. Those events were distinctly different as they were permitted, official events that turned problematic. St. Fratty's day started organically, has never been permitted, and has slowly grown over the years, with the exception of the COVID-19 pandemic years, where participation sharply declined. Each year, the Police Department engaged in significant community outreach, including print material, directed communication through Cal Poly and Cuesta Colleges, radio ads, door to door knock and talks, met with community organizations including RQN, and authored several media releases, ahead of the unpermitted St. Fratty's Day event. The City changed the Municipal Code multiple times to increase fines as a means to deter problematic behavior (the Safety Enhancement Zone was amended in 2010 to include Halloween and St. Patrick's Day, then amended again in February 2024, expanding the Safety Enhancement Zone to include two weekends prior to St. Patrick's Day to cover the likely dates for St. Fratty's Day). Robust operational plans were developed each year, in collaboration with Cal Poly, to staff public safety personnel in a meaningful and effective way. St. Fratty's Day is a particularly difficult event to police, as it consists of revelers walking up and down the sidewalk, with no destination in mind. Short of completely shutting down a neighborhood to all traffic, both foot and vehicular, there are few options police have for preventing what would normally be constitutionally protected activity: walking down a sidewalk in a neighborhood. To further complicate enforcement, many of the revelers</p>
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		<p>actually live in the very neighborhoods that would be closed and would have to be provided access to their homes.</p> <p>As the event grew in scale, so did the public safety response. 2020-2021 saw minimal St. Fratty's Day activity due to the COVID-19 pandemic. It was not until 2023 that any extended street closure occurred due to the size of the crowd in the neighborhood. As a result of the increased crowds, the Safety Enhancement Zone was expanded, along with other tactical operational planning to prevent another occurrence. As the crowds in 2024 grew even larger, the departmental staffing became no longer sufficient to safely keep the crowds out of the streets and neighborhoods, resulting in extensive planning for 2025.</p> <p>2025 planning included working with Cal Poly on a task force that met for almost one full year prior to March 2025. Extensive outreach was conducted, and a request for mutual aid was sent to many agencies across the state. There were over 300 law enforcement personnel in town working the 2025 St. Fratty's Day event, along with additional personnel at Cal Poly Campus to provide security for the campus dorms and the alternative concert event planned on campus. Officers assisted from as far away as San Francisco and Ventura to ensure enough law enforcement presence in the neighborhood. As a result, although some revelers attempted to go into the street in 2025, no intersections or streets were closed to traffic due to revelers, and the party was effectively shut down, before it started and without incident. For many years, the department has also utilized advanced technology such as drones, and mobile surveillance cameras, along with print materials, street signage and targeted outreach to problem houses in an effort to deter the event. Department leadership worked in collaboration with SCLC monthly and met with the IFC (Intra-Fraternity Council) to engage in productive conversation to gain compliance and warn of the fines and</p>
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		<p>administrative sanctions that could come with illegal behavior. SLOPD Leadership were guests on several radio shows in an effort to distribute the message of zero tolerance ahead of the unplanned, unpermitted event, and participated in town-hall style meetings on campus with Cal Poly leadership and other City officials.</p> <p>In summation, the department conducted an outreach campaign as extensive as possible, and employed law enforcement officers from across the state, including horse-mounted patrols, motorcycle patrols, bicycle patrols, foot patrols and mobile teams to effectively end any problems early and quickly. The department fully staffed an Operations Center to function as a command post, and in conjunction with the San Luis Obispo Sheriff's Office, created a Law Enforcement Campus near the event, for mobile booking and processing of arrestees. The combination of operational planning, use of technology and infrastructure, and the assistance from law enforcement partners from around the state, resulted in an extremely safe and trouble-free event. The crowd was not able to develop at any one location in the neighborhoods, and there were no reported cases of property damage or injuries. In short, 2025 was an extreme success in quelling the event, which was the culmination of years of iteration and planning.</p> <p>The City spent over \$100,000 in overtime and equipment related to the event. This amount does not include all of the staff time of everyone who was working their normal shift, or all of the other agencies, who supplied their personnel as no-cost mutual-aid. The total cost of the St. Fratty's Day response was likely in the \$700,000-\$800,000 range when accounting for all staff time associated with anyone working the event. 2025 was the result of process evolution built upon years of previous plans, lessons learned, and extensive personal relationships built with student, law enforcement, and neighborhood community members</p>
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		<p>resulting in a least-harm approach to preventing what could have been a highly dangerous event.</p> <p>Additionally, for many years, the City has engaged in extensive outreach and education each year with Cal Poly to elevate awareness of City codes and conduct expectations, as well as engaging in robust enforcement against individuals engaging in misconduct, as well as landlords whose tenants engage in repeat violations at the landlords' rental premises. The City notes that it has continued enforcement of its landlord responsibility provisions for properties that host repeat code violations, notwithstanding ongoing landlord and tenant opposition and even in the face of threats of legal challenges.</p>
15, F2	<p>The city has not effectively engaged in working together with community stakeholders to find solutions for ongoing off-campus issues that negatively impact neighborhoods such as code enforcement, noise issues, trespassing, property damage, and unruly events.</p>	<p>Neighborhood Wellness was a Major City Goal (MCG) from 2011-2017 and then an Other Important Objective (OIO) from 2017-2019. During that time, the Neighborhood Wellness Community Civility Working Group was established and the 90-page report produced. Working groups included neighbors from areas directly off campus, students, City staff and Cal Poly staff. SLOPD, City Administration, and elected representatives of the City Council frequently meet with RQN and participate in SCLC.</p> <p>The Neighborhood Wellness Community Civility Working Group report contained recommendations, many of which were adopted by the City. Prior to adoption of the MCG, the social host ordinance was adopted in 2009, stating that party hosts can be held responsible for underage drinking at their parties. In 2010, the City Council adopted amendments to the noise ordinance. Instead of multiple warnings, one warning is provided, then the house goes on the premise list for 9 months and if more complaints are received, and violations verified, citations are issued. The fine structure was changed to \$350 - \$1000 and landlord</p>

		<p>citations were added for repeat offenders. A Cal Poly - City MOU was adopted giving Cal Poly Police administrative citation powers a mile off campus. Party registration was piloted in 2017 and has been going strong since. Stakeholder walking meetings were implemented in the neighborhoods led by Cal Poly to provide residents the opportunity to give feedback on problem locations, though the walking meetings were not revived after COVID. The unruly gathering (UG) ordinance was amended, improving the definition of what a UG is, and Start of School safety enhancement was added in 2015. The City did not implement the keg registration recommendation contained in the Working Group Report because students no longer use kegs like they did in the 90s, nor did the City implement SNAP ride-alongs because SNAP employees are not sworn police officers. Even after the MCG and OIO expired, extensive amendments were made in 2024 to the safety enhancement zones for Halloween and St. Patrick's Day to include additional weekends of enforcement. Partnerships between the police department and Cal Poly expanded to include focused outreach to incoming students during SLO Days, presentations and outreach to Fraternity and Sorority Life (FSL) chapters, outreach to sports teams and coaching staff and participation in off-campus housing fairs. Annually, the Public Affairs Manager presents to all 5000+ incoming new students and about half of all FSL individual chapters covering city ordinances that most effect students living on and off campus. In 2017, Council approved a pilot party registration program which has since proven to be very successful in reducing noisy parties and improving student-age City resident understanding of how to socialize without being disruptive. In 2024, the St. Patrick's Day and Halloween safety enhancement zones were amended by Council to include additional dates which provide the police department a longer span of enforcement to better address negative</p>
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		<p>behaviors in the neighborhoods. Extensive communications plans are created and implemented to provide information to the community about neighborhood related ordinances, with the plans including postcard mailings, radio commercials and PSAs, TV commercials, on and off campus presentations to student groups, noise violations notifications to property owners, posters and flyers throughout the community and electronic communication via police department social media channels including paid ads targeted to college-age residents of the City. Additionally, noise and unruly gathering information is provided weekly to Cal Poly to be addressed via the Office of Student Rights and Responsibilities (OSRR). OSRR is also provided information on students who have been arrested for crimes in San Luis Obispo, such as suspected DUI, domestic violence, theft and assault.</p> <p>In addition, the City works extensively with Cal Poly on finding solutions for these issues. The SCLC is an additional venue for discussion, dialogue, and collaboration.</p> <p>The City is committed to ongoing engagement with a variety of community stakeholders related to neighborhood issues.</p> <p>More recently, City staff have participated in the following collaborative efforts:</p> <ul style="list-style-type: none"><li>▪ <b>January 10, 2024:</b> City staff with Cal Poly Greek Life staff to discuss the complaints received regarding Fraternities and Sororities.</li></ul>
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- **April 10, 2024:** Follow up meeting with Assistant Director of Fraternity & Sorority Life regarding City’s response to unpermitted fraternities.
- **April 16, 2024:** Presentation to Greek Organization Leadership regarding City regulations and enforcement methods for Fraternities/Sororities
- **August 2024:** Community Development Director met with Cal Poly leadership to discuss the issue of Fraternities/Sororities and land use requirements for houses.
- **January 12, 2025:** Presentation to Greek Organization Leadership regarding City regulations and enforcement methods for Fraternities/Sororities
- **March 4, 2025:** Meeting with City staff and Cal Poly Greek Life staff to discuss the ongoing issues regarding Fraternities and Sororities and upcoming “St. Fratty’s Day” event.

In addition to these scheduled meetings, code enforcement staff have met with numerous fraternity members as part of several investigations into alleged unpermitted events. During field inspections and hand delivery of violation notices, residents were verbally provided information regarding applicable regulations. City staff have clearly stated to Cal Poly that staff are available to attend events to educate students on compliance with City regulations.

The Police Department specifically has worked tirelessly over the past decade to address these issues, supported by dedicated staff, new City ordinances, and proven programs that have delivered undeniable positive results. Noise complaints in particular have steadily declined to their lowest recorded levels, while voluntary compliance continues to

		<p>increase. In 2010, Council adopted revisions to the City’s noise ordinance, improving the definitions, raising the fines for violations, and adding a provision to include landlord penalties for repeat violations at individual properties. Since the change in the ordinance, there has been a 50% reduction in noise complaints. Prior to 2010, the police department would receive on average 3000 noisy party complaints each year and the average is now around 1450.</p>
15, F3	<p>The city has failed to effectively enforce municipal codes that prohibit fraternity and sorority activity in R-1/R-2 zones in part due to the difficulty in identifying houses that are hosting fraternity-type events, such as rush events and repeated parties. This inaction has resulted in an increase of illegal fraternities holding events in residential neighborhoods making these areas almost unlivable for most residents.</p>	<p>Along with the Cal Poly general enrollment numbers, participation in Greek life has also increased; with an increase in membership would understandably follow an increase in activity.</p> <p>The City enforces municipal code regulations that prohibit fraternity and sorority activity in R-1 and R-2 zones and behaviors that create neighborhood nuisances or otherwise violate City code, while balancing constitutionally protected rights of privacy and free association (specifically, keeping in mind that there are legal limits on a governmental entity’s ability to inquire into the personal relationships of persons living together in their private residences and to regulate the rights of such individuals to associate freely in their homes). The enforcement of these regulations is carried out on a complaint basis, consistent with most code enforcement issues. Since November 2023, the City has investigated over 103 complaints and opened 40 code enforcement cases related to fraternities without permits and violations of conditional use permits. In addition, the City proactively notified 33 suspected fraternity/sorority houses in R-1/R-2 zones that it is illegal to be a fraternity/sorority house in an R1/R2 zone through a courtesy notice. The City has proactively met with Cal Poly staff and students to provide education about compliance with zoning regulations so that Greek organizations can plan living arrangements accordingly, and so that students are aware that they will receive violations if they establish</p>

		<p>fraternity/sorority houses in these zones. The City has also been attempting to obtain Greek event registration address information from Cal Poly in order to support enforcement efforts. There is no cited evidence to support what appears to be an individualized opinion that these neighborhoods are “almost unlivable” for residents and such value judgments presented as factual investigation or inquiry undermine the objectivity and credibility of the report’s analytical approach and conclusions.</p> <p>Cal Poly could substantially aid and enhance the effectiveness of the City’s prevention and enforcement efforts in addressing repeat or habitual misconduct by campus affiliated individuals and groups that occupy properties within the city through increased exchange of information regarding Greek event locations and through enhanced enforcement of its own student conduct measures.</p>
15, F4	<p>The city has failed to consistently enforce CUPs such as the requirements for an annual list of parties and events, notification to neighbors, and parking plans. Strict enforcement of these conditions would contribute to a reduction of the disturbances in the neighborhoods.</p>	<p>The City enforces the provisions of CUPs as violations are reported and verified. In the last year, the City verified that 5 fraternities have violations of existing CUPs. This resulted in 3 hearings before the Planning Commission for revocation/revision of the CUPs in question, with additional hearings scheduled in upcoming months. In May 2025, the Planning Commission voted to revoke the CUPs for two fraternity houses due to violations of conditions of approval.</p>
16, F5	<p>The current planning appeal fee structure in SLO disproportionately impacts ordinary citizens, as the high costs create barriers for those raising concerns about community issues such as noise or safety. While these fees may be justifiable for large-scale</p>	<p>As stated previously, the planning appeal fee described in the report is what a citizen would pay to appeal any decision of the Planning Commission. It costs nothing to report potential CUP or zoning violations to the Community Development Director. Once investigated, City staff would bring substantiated violations before the Planning Commission for consideration without any cost incurred by the citizen. This exact process has resulted in the re-review of several CUPs this year.</p>

	<p>development appeals requiring additional city resources, they hinder equitable participation in local decision-making processes.</p>	<p>It is an incredibly important distinction to make that citizens raising concerns about noise or safety is free. The appeal fee only applies to a decision on a CUP before the PC.</p> <p>In addition, the appeal fee structure was adopted by the City Council in 2024 after robust review of cost-of-service data presented in the associated fee study and report and following significant deliberation by the City Council regarding the fee amount. The Council carefully considered how much the fee should be subsidized in order to not discourage the involvement of ordinary citizens in the decision-making process. The fee is the same regardless of the status of the appealing party (whether a developer, city resident, non-city resident, etc.) and therefore does not disproportionately impact any specific party. The appeal fee is based on an analysis of the amount of time required to process an appeal, and, per City Council direction, the fee was set at a percentage of the full cost of processing an appeal in order to ensure it is not overly burdensome.</p>
16, F6	<p>The Grand Jury encountered a lack of cooperation from the San Luis Obispo City Police Department. While one sworn officer did participate in an interview, efforts to interview two additional sworn officers were unsuccessful. This unwillingness to engage hindered the Grand Jury’s ability to corroborate statements, obtain essential information, and maintain transparency in its oversight role.</p>	<p>One of the City’s most knowledgeable persons on these topics is a non-sworn staff member and was interviewed for 90 minutes. The City provided its two most knowledgeable people (with the “one sworn Officer” being the Chief of Police) to be interviewed. No subpoenas were issued to Police staff.</p> <p>This is a false statement – The police department provided unimpeded and direct access to both the Chief of Police and the Public Affairs Manager, as well as written responses to multiple iterative series of questions, as well as providing documents with thousands of current and historical data points requested by the Grand Jury. Neither the City nor any particular City police department personnel was ever served with a subpoena for additional witnesses, documents, or data. The department</p>

		<p>did decline further voluntary requests for additional interviews of department staff by the Grand Jury after complete access was already provided to the department’s Chief, the City Manager who supervises the Chief, and the civilian police department staff person who were best informed as to all relevant operations to speak most comprehensively about the issues the City understood were being investigated. Both agency representatives and the City Manager engaged thoroughly and exhaustively, responding to all questions submitted in person and in writing from the Grand Jury, on multiple occasions. The police department did not elect to “voluntarily” provide access to other shift working staff who have limited scopes of operational responsibility or, at best, incomplete historical information or who were themselves unable to speak with completeness or accuracy about current planning efforts for what was at the time the upcoming 2025 St. Patrick’s Day Celebration.</p> <p>The finding misrepresents the transparency and cooperation the police department and the City as a whole extended to the Grand Jury to complete the most accurate and comprehensive report possible on this dangerous and nuisance event for our community. The department has been extremely proactive in combatting this event and in providing critical information to the Grand Jury, Cal Poly, the City Council, and our community to reduce and ultimately prevent the dangerous street party, which was in fact accomplished this year, exceeding all expectations.</p>
17, R6	The SLO City Manager and the Planning Commission should move toward adopting more uniform conditions for CUP’s [sic] and enforcement of existing requirements.	As CUPs come in for re-review staff are ensuring that they are as consistent as possible with the new set of standard conditions the City has created, with uniform conditions being updated as needed. Setting constraints like a uniform set of conditions on the exercise of discretion diminishes the usefulness of the review process to address specific needs over time or for unique circumstances that may exist at specific properties or with particular groups or organizations.

17, R7	The SLOCGJ recommends that the SLO City Manager create formal guidelines and provide training outlining how the SLO City Police Department will respond to requests from the SLOCGJ and other oversight bodies.	Grand jury requests vary in nature and scope and, by their nature, do not lend themselves to a uniform approach in each instance. The Police Chief is supervised by and accountable to the City Manager and the City Manager has and will continue to review and provide appropriate oversight and direction to her staff in providing staff responses, consulting with the City Attorney as needed. In the event a particular request directed to the police department demanded confidentiality from the City Manager, the City Attorney’s Office would review and advise the Department’s response and support communication to the City Council.
24-26	Bibliography	Links are to general websites and not specific reference materials. No specific citations exist in the report. Some of the links do not appear to actually contain the information that they are being relied upon to support in the report.

In addition to these specific factual corrections offered in the table above, we believe the overall tone of the report could be improved by removing language (e.g. comparing City zoning to the Twilight Zone television show) which trivializes both the serious issues for the neighborhoods and the tremendous ongoing resource investments made (past and present) by the City to address those concerns.

The report also suffers from the recurring use of ambiguous phrases and references stated as facts, which do not seem to be connected to factual support or contextual or temporal data points, thereby diminishing the objectivity, credibility, and impact of the conclusions in the report. Some examples are:

- “a quaint town with a rich history”
- “once-quiet residential areas”
- “residents—students, families, and long-time locals”
- “a range of challenges for the surrounding neighborhoods”
- “neighborhood integrity”

- “fully enforced”
- “this situation remains - to this date - unabated”
- “the affected area”
- “warrant a police citation”
- “a real time solution”

The City recommends replacing those phrases with more precise language or providing the noted factual, temporal, or contextual support for the statements.

Thank you for the opportunity to provide these clarifications, recommendations, and suggestions for the report before it is released to the public. We fully support the effort to provide the public with a complete and accurate picture of the issues raised in the complaints that gave rise to this report, and we hope our recommendations assist in that effort.