

City of San Luis Obispo Community Development Department
Attn: Shawna Scott, Senior Planner
919 Palm St.
San Luis Obispo CA 93401-3218
sscott@slocity.org

Dec. 24, 2019

Re: Draft Environmental Impact Report for the Froom Ranch Specific Plan

Dear Ms. Scott:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Froom Ranch Specific Plan. I am submitting these comments as a resident of San Luis Obispo and not as a member of the Active Transportation Committee. My opinion is that San Luis Obispo can and must do better in the face of a climate crisis than accept yet another motor vehicle-centric development with significant and unavoidable environmental impacts and more greenhouse gas emissions.

On the City's website under "Biking in San Luis Obispo," readers are informed that SLO is a Bicycle Friendly Community that encourages commuters to shift from motor vehicles to bicycles, reducing the number of vehicle trips and miles traveled in the community, reducing traffic congestion and improving air quality.

Yet the Froom Ranch DEIR finds that as proposed, transportation and traffic impacts would consist of delays and/or exceedance of intersection capacities, resulting in poor levels of service for automobiles, pedestrians and bicycle modes of transportation. Although the project would implement mitigation measures and the applicant would pay a fair share fee to offset project contributions to this impact, impacts would be significant and unavoidable. Air quality and greenhouse gas emission impacts remain significant and unavoidable even after mitigation.

The City recently completed buffered bike lanes on Los Osos Valley Road and Madonna Road west of Highway 101 to encourage more trips by bike. Even with these much-appreciated improvements, bicycling on these roads remains challenging because of multiple driveways, intersections, freeway on- and offramps and aggressive, speeding and distracted motorists.

If approved as proposed, Froom Ranch would join already approved San Luis Ranch and Avila Ranch as yet another development island with internal bicycle and pedestrian facilities but limited connectivity to the community as a whole and inadequate bicycle and pedestrian infrastructure, especially east-west connections. It's regrettable that a Level of Traffic Stress Analysis for bicycling has not been applied to the Froom Ranch project because it would clearly show why many people do not feel safe riding on Madonna, South Higuera, Los Osos Valley, Tank Farm and other major connectors.

Table 3.13-28, Project Person Trips by Mode of Travel in the DEIR's Transportation and Traffic chapter estimates 88.2 percent of overall trips associated with Froom Ranch will be by passenger vehicle, 4.6 percent by bicycle, 5 percent by pedestrian and 2.2

percent by transit. These depressing estimates show this project will hinder the City's ability to reach its climate action goals of 50 percent of trips by vehicles, 20 percent bicycles and 18 percent by walking, carpools and other forms.

Given the City Council's support and enthusiasm for reducing greenhouse gases, including policies and goals that encourage people to replace vehicle trips with bicycling, walking and transit, it is baffling and deeply disappointing that a project where 88.2 percent of trips are expected to be made by passenger vehicle is under serious consideration.

Many of the proposed mitigation measures for bicycle and pedestrian infrastructure are confusing and vague, which make it difficult to offer meaningful comments. The DEIR cites: "project is responsible for the improvement or fair-share contribution through payment of City Traffic Impact Fees if improvements are constructed sooner by others."

Which developer is responsible for what improvements and what is the timing? For example, the bicycling community was under the impression that Froom Ranch would construct the Bob Jones Trail cycle track spur along its frontage, but was surprised to learn that instead, existing buffered bike lanes will be separated from traffic by flexible barriers. When will the Bob Jones Trail cycle track spur on Los Osos Valley Road be built and who will be responsible for building it if not Froom Ranch?

I could find no reference to how Froom Ranch residents and visitors on bike and foot will access the Bob Jones Trail segment between Los Osos Valley Road and Higuera Street/Prado Road. This segment already exists and is a more direct and traffic-free option to Higuera Street than the Los Osos Valley Road and the future Froom Ranch Road/complete street and the Prado Road overcrossing option. Bicycling and walking to the Bob Jones Trail segment on Los Osos Valley Road is intimidating for people on bikes who do not feel safe riding through the LOVR/U.S. 101 interchange. Mitigations are needed to reduce conflicts with speeding, distracted and aggressive motorists and could include no right turns when lights are red for motorists entering and exiting Highway 101 and leading bicyclist/pedestrian signal intervals. According to media reports, on Dec. 4, 2019, a pedestrian was killed on Los Osos Valley Road at Calle Joaquin by a motorist in a SUV. The media reports lacked more details.

Additional comments:

-Double turn lanes proposed on South Higuera Street to improve traffic flow will limit the City's ability to impose a road diet and build Class IV bike lanes to increase trips by bike. The focus should be increasing trips by bike and foot and bicyclist/pedestrian safety, not devoting more public space to making it easier to drive a car.

-Safe routes to school must be described for school-age children of multi-family unit residents, including bicycling, walking and transit to C.L. Smith Elementary School, Laguna Middle School, Pacific Beach High School and San Luis Obispo High School.

-The lack of direct connectivity to Irish Hills Plaza except during emergencies is unfathomable. This means most residents and visitors of Froom Ranch will likely drive

their motor vehicles onto Los Osos Valley Road to access the equivalent of a next door neighbor. This makes no sense and would create adjacent development islands.

-During construction, people on bicycles should not be forced to merge into vehicle traffic unless there is no other choice. If people on bicycles are forced into traffic lanes, appropriate speed limit signs and "bikes can share the lane" signs should be posted. Ideally, temporary bike and pedestrian lanes should be coned as part of any traffic control plan.

-Optimizing signal timing to improve motor vehicle traffic flow will increase the time people on bicycles and on foot have to wait. The focus should be on bicyclist and pedestrian safety and encouraging people not to drive.

Sincerely,

Lea Brooks
San Luis Obispo