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December 20, 2019

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City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE
FROOM RANCH SPECIFIC PLAN PROJECT

Dear Ms. Scott:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the Froom Ranch Specific Plan Project. This project includes a Specific Plan, General Plan Amendment, annexation of land by the City, and related actions to allow for the proposed addition of 578 residential units (174 multi-family, 404 senior housing), 70,000 sf hotel, 30,000 sf commercial retail, 61.9 acres of conservation/open space, and other public facilities and road improvements.

General/Background:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our

mission, vision, and goals. To this point, the Froom Ranch project has an opportunity to enhance multi-modal use by improving its internal and external pedestrian and bicycle circulation through completion of the pedestrian linkage/sidewalk and bicycle lane along the south side of Los Osos Valley Road (LOVR) adjacent to the project site. Further, a pedestrian connection to the adjacent commercial/visitor uses to the south along Calle Joaquin and the project site should be considered as part of the development.

We appreciate the project working to provide senior and multifamily housing to promote a jobs-housing balance which can help to reduce Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions. This will aid in accomplishing local and State goals and is consistent with the Caltrans' *Strategic Management Plan 2015-2020* and State planning priorities. While the City continues to approve development projects, some of considerable size, it is imperative that we continue to work together to help ensure a thriving community by appropriately analyzing impacts and working to reduce VMT & GHG emissions.

As background, some of the City's large development projects include (in varying stages of the development process): San Luis Ranch (500+ homes), Avila Ranch (700+ homes), Orcutt Expansion Area Specific Plan (900+ homes), and 650 Tank Farm Rd (249 units, commercial space). San Luis Ranch and Avila Ranch specifically have already been determined to have sizable impacts, and many at the same intersection locations as impacts predicted for Froom Ranch. For these and other projects, Caltrans is committed to working with the City to focus on plan consistency and mitigation for both project-specific and cumulative impacts.

That being said, Caltrans has concerns about the analysis and mitigations put forth in the DEIR and Traffic Study prepared for the Froom Ranch Specific Plan. Caltrans believes the DEIR has significant deficiencies in its analysis of impacts and subsequently in describing necessary mitigation measures. The insufficient analysis understates the true project-specific and cumulative impacts generated by the Froom Ranch Development and the need for traffic control and geometric improvements. If allowed to proceed without appropriate mitigations, congestion, inconvenience, and additional expense to the City of San Luis Obispo will result. We urge a revised traffic study to be prepared for the project that discloses the full breadth and depth of impacts. The following are areas specific concern.

Traffic Operations:

- The trip generation rates depicted in Table 3.1-43 (Baseline Trip Generation Forecast) on pages 122-123 of the Multimodal Transportation Impact Analysis Report (Appendix J) are inconsistent with the trip generation rates adopted for this project by the City on July 16, 2019 with the passage of City Ordinance Number 1663, the AB 1600 Impact Fee Program for the Los Osos Valley Road Subarea. The Transportation Impact Fee Nexus Study states the Froom Ranch Development will generate 567 PM Peak Hour Trips. The traffic study prepared by TJKM estimates the Froom Ranch Development will generate only 420 PM Peak Hour Trips. This is a reduction of 147 PM Peak Hour Trips that will not be paying into the Impact Fee Program or studied within the environmental document.

The DEIR should be based upon the same trip generation rates as established by the City of San Luis Obispo. It is inappropriate to use trip rates that are lower than what has been established by the AB 1600 Program. We request a revised traffic study to be prepared for this project using the trip generation rates adopted by the City in the fee program.

- The AB 1600 Impact Fee Program is based on 130 multi-family residential (MFR) units being constructed within the Froom Ranch Development. However, the DEIR for the Froom Ranch Development is proposing up to 174 MFR Units. This is 44 MFR units (30 PM Peak Hour Trips) more than was identified in the fee program. We request additional analysis to determine any additional project specific impacts these unaccounted for 30 PM Peak Hour Trips may have on the State Highway System and local street network. There could very well be impacts to the State and local infrastructure not identified in the impact fee program as a result of this further intensification of land use.
- If the City approves the additional 44 MFR Units (above the 130 MFR units approved in AB 1600 Impact Fee Program) other developments such as Avila Ranch and San Luis Ranch will be paying more than their fair share. The fair share fee determination for the current fee program is calculated by taking the cost of infrastructure improvements and dividing it by the total number of new trips. These additional 44 MFR Units will be adding 30 more new PM peak hour trips, thus the cost per trip generated by a development would be reduced. Essentially, the Froom Ranch Development would get 44 additional MFR Units and all other developments within the Los Osos Valley Road

Subarea would pay for their transportation related impacts to the state highway system and local street network. The City should address this in a revised DEIR or revise the impact fee program.

- The DEIR does not provide evidence or analysis that the signal timing optimization recommended under the Transportation Mitigation Measures section would be sufficient in reducing the project's impact to less than significant. The DEIR needs to disclose this information and be based on the actual signal timing plans (default values are not appropriate) that are available from the City of San Luis Obispo and Caltrans. Caltrans can then verify that the optimization plan is compliant with Federal and State requirements. If it is determined that signal timing optimization is not sufficient in reducing the project's impact to less than significant, then an alternate mitigation measure should be developed.
- The DEIR does not provide evidence or analysis that the physical improvements recommended under the Transportation Mitigation Measures section would be sufficient in reducing the project's impact to less than significant. The DEIR needs to disclose this information as well. If it is determined that the physical improvements recommended are not sufficient in reducing the project's impact to less than significant, then an alternate mitigation measure should be developed. For example, Mitigation Measure MM TRANS-2 listed on page 3.13-82 of the Froom Ranch Specific Plan Draft EIR provides for the following mitigation measure:

"The Project Applicant shall design and construct the extension of the westbound left-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 320 feet, and design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 140 feet. In coordination with the Applicant, the City and Caltrans shall also optimize traffic signal timings and coordination between LOVR/Calle Joaquin and LOVR/U.S. 101 southbound ramps. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs. This mitigation measure requires Caltrans approval and coordination."

The Multimodal Transportation Impact Analysis Report (Appendix J) does not provide an operational analysis that the improvements identified under MM

TRANS-2 would be sufficient in reducing the project's impact to less than significant. Providing this information is not only important for our ability to concur with findings, but for the purpose of full disclosure of project impacts in the CEQA process.

- There is a demonstrated need for improvement at the southbound LOVR on/off ramps. This has been identified by both the San Luis Ranch and Avila Ranch projects. San Luis Ranch is conditioned to add a small amount of storage capacity to the off ramp; however, something more significant is seemingly needed once Froom Ranch is completed. We believe the Froom Ranch Multimodal Transportation Impact Analysis Report should reevaluate the project's impact on the SB off ramp and analyze the feasibility of creating a two-lane off ramp.
- The February 2016 and March 2016 existing condition baseline traffic volumes used in the traffic study are outdated at 3.5 years old and inconsistent with the City of San Luis Obispo March 2015 Multimodal Transportation Impact Study Guidelines. Page 36 of the Multimodal Transportation Impact Analysis Report (Appendix J) confirms TJKM is using the outdated data. The City and Caltrans require a baseline conditions analysis based upon traffic data that is no more than 2 years old.

Caltrans requests the Froom Ranch Development provide an existing conditions analysis that is based upon new and relevant data. We request the traffic analysis use a 2019 data set as the growth within the City has increased significantly since the early Spring of 2016. Page 6 of the City's March 2015 Transportation Impact Study Guidelines states the following under Baseline Conditions:

"The City of San Luis Obispo's Transportation Division maintains a master Synchro Network of existing AM, MID, and NOON peak hour conditions for most existing intersections within the City. This network is generally updated for geometric, signal timing and multimodal volumes every two years. This master network is the primary source of peak hour transportation data to be used for impact studies. The City also collects 48-hour segment counts on most roadways within the City. Data at specific locations not already collected by the City will need to be collected as part of individual impact studies, consultants should inventory what data is already available and scope any necessary data collection."

- The transportation mitigation measures listed in the DEIR are not presented in a manner consistent with the City's March 2015 Transportation Impact Study Guidelines. Noticeably absent is the scoped planning level cost estimation of each mitigation measure, timing/phasing of each mitigation measure, and the actual equitable share calculation of each mitigation measure. Some of this information can be derived from the July 16, 2019 approved AB 1600 Program. Page 14 of the City's March 2015 Transportation Impact Study Guidelines states the following under Mitigation Measures:

"When significant impacts are identified as part of the traffic impact analysis mitigation measures shall be included to address those impacts. The impact study should establish the legal nexus between the project and the mitigation measures. The traffic study's description of each mitigation measure should include the following:

- 1. Comparison table of impacted locations listing conditions (i.e. LOS, VMT, etc..) with and without mitigation.*
- 2. Figure schematically depicting location and nature of each mitigation measure and description of implementation feasibility (i.e. ROW requirements, constructability, etc..).*
- 3. If specifically scoped planning level cost estimation of each mitigation measure, timing/phasing of measures, and equitable share calculation."*

For example, the July 16, 2019 approved AB 1600 Program for the LOVR Subarea includes the LOVR southbound on-ramp metering project and identifies the cost of this project to be \$1,750,000. Determining the equitable share calculation of this improvement and disclosing it in the DEIR is an essential element and should be part of the revision of the document.

Permits:

- Any work within, over, or under the State's ROW will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at

the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/caltrans-near-me/district-5/district-5-programs/d5-encroachment-permits>.

- The project process for all work associated with this project on US 101 is subject to Caltrans Project Development Procedures Manual, the Encroachment Permits Manual, the Highway Design Manual, and the California Manual on Uniform Traffic Control Devices. Considering the type of projects being proposed on the State highway system as mitigations, a preliminary project development meeting between the Owner/Developer, City, the District Permit Engineer, and Caltrans Planning will need to occur.

Hydraulics:

- Caltrans Hydraulics unit will be looking closely at the drainage analysis as this area is part of the 100-year floodplain. There may be a need to upgrade State cross drainage facilities if development related drainage is not proven to be retained on site. Caltrans will need to concur with the findings in the report.
- Caltrans requests to review the FEMA Conditional Letter of Map Revision (CLOMR) application since the change in the floodplain mapping may impact the Caltrans drainage facilities.
- During the NOP, Caltrans requested that no additional storm run-off from the project be added to the drainage facilities at Prefumo and Froom Creeks due to the history of flooding and location within the FEMA floodplain. Page 1-6 of the Preliminary Hydrologic and Hydraulic Calculations, dated July 14, 2017, states the proposed basin near the Mountainbrook Church property will provide enough storage to allow the 25-year event to pass through the culverts at Highway 101. During the design phase, Caltrans requests a more detailed hydraulics report showing no additional storm run-off enters the Caltrans cross culverts including a culvert analysis comparing existing and proposed conditions.
- During design, Caltrans requests details of the overflow structure from the Mountainbrook Church detention basin to Froom Creek.

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Conclusion:

At any time during the environmental review and approval process, Caltrans retains the statutory right to request a formal scoping meeting to resolve any issues of concern. Such formal scoping meeting requests are allowed per the provisions of the California Public Resources Code Section 21083.9 [a] [1].

Caltrans requests to be included in any future public noticing regarding this project to allow us to prepare for and participate in the public process.

We look forward to continued coordination with the City on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 542-4751 or John.Olejnik@dot.ca.gov or Jenna Schudson at (805) 549-3432 or Jenna.Schudson@dot.ca.gov.

Sincerely,



JOHN J. OLEJNIK, Senior Transportation Planner
Planning Management Liaison
Caltrans District 5, LD-IGR

cc: SLOCOG
APCD