

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. 22, 2019

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

Dear Ms. Scott:

The Friends of the Bob Jones Trail appreciates the opportunity to comment on the Draft Environmental Impact Report for the Froom Ranch Specific Plan. Our nonprofit group encourages a more timely completion of the City-to-the Sea multiuse trail to connect San Luis Obispo to Avila Beach and San Luis Obispo County's southern communities. We believe the Bob Jones Trail will significantly increase the number of non-motorized trips by people of all ages and abilities, improve safety, enhance public health and provide opportunities to appreciate nature and open space.

Despite the Froom Ranch's close proximity to the Bob Jones Trail, there is limited reference in the DEIR to the trail, especially access for people on bicycles and pedestrians. The references are descriptions rather than mitigations on improving access. Here's the primary reference: Within the Project vicinity, Class I bicycle paths include the current southern terminus of the Bob Jones Trail, a regional bike path that currently connects to the north side of LOVR at the intersection with the U.S. 101 NB ramps. Within the City, the trail currently extends for approximately 1.1 miles from LOVR north to Prado Road, with another segment within the County of roughly 3 miles extending from Ontario Road near the Avila Beach Drive interchange with U.S. 101 to Avila Beach. Future plans call for extending the trail from downtown San Luis Obispo to this existing Avila Beach segment.

The DEIR concludes that 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. More specifically, project-generated traffic would cause exceedance of intersection capacities at various intersections not subject to the city's authority or requiring completion of the Prado Road Overpass/Interchange project. Although the project would implement mitigation measures and the applicant would pay a fair share fee to offset project contributions to this impact, as no county or Caltrans program for improvements is currently adopted, impacts would be significant and unavoidable." It also concludes that air quality and greenhouse gas emission impacts remain significant and unavoidable even after mitigation.

Table 3.13-28, Project Person Trips by Mode of Travel, in the Transportation and Traffic chapter estimates 88.2 percent of overall trips by passenger vehicle, 4.6 percent by bicycle, 5 percent by pedestrian and 2.2 percent by transit. The estimates show this project will hamper 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.

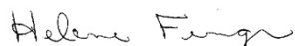
The proposed mitigation measures for people on bicycles and pedestrians are obviously inadequate given the significant and unavoidable environmental impacts. They are also poorly described, confusing and vague regarding which developer is responsible for bicycle and pedestrian improvements and the timing of the improvements, including construction of a Class IV separated bikeway along the frontage of the project site on Los Osos Valley Road and eventually both north and southbound from Calle Joaquin to Froom Ranch Road. Mitigations cite that “project is responsible for the improvement or fair-share contribution through payment of City Traffic Impact Fees if improvements are constructed sooner by others.”

The Friends of the Bob Jones Trail’s specific concern is improvements to Los Osos Valley Road between Auto Park Way and South Higuera Street so Froom Ranch residents and visitors feel safe bicycling and walking to and from the Bob Jones Trail access on LOVR both north and southbound. This segment of the trail connects Los Osos Valley Road to Higuera Street at Prado Road, an existing, more direct and vehicle-traffic-free route than via Los Osos Valley Road, Froom Ranch Road through the San Luis Ranch development and over the Prado Road overcrossing.

People who have expressed interest in living at the Villaggio Life Plan Community at public hearings and in correspondence in support of Froom Ranch have emphasized their interest in staying active, including bicycling and hiking. The Friends of the Bob Jones Trail finds the DEIR inadequate in describing mitigations that would encourage residents and visitors to bicycle and/or walk to the Bob Jones Trail access on Los Osos Valley Road and other destinations.

The Final EIR must include more details so decision-makers have the information they need to make informed decisions about the Froom Ranch project and on how best to achieve the City’s climate action goals, including more trips by bicycling and walking and less dependence on motor vehicles.

Sincerely,



Helene Finger
President, Friends of the Bob Jones Trail