

December 20, 2019

City of San Luis Obispo
Community Development Department
Attn: Shawna Scott, Senior Planner
919 Palm Street
San Luis Obispo, CA 93401

Subject: Froom Ranch Specific Plan Draft Environmental Impact Report

State Clearinghouse #2017071033

Dear Ms. Scott:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to review the Draft Environmental Impact (DEIR) for the Froom Ranch Specific Plan (FRSP) Project. The State of California and Federal Highways Administration designate SLOCOG as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO) for the region. While SLOCOG does not have permit or regulatory authority for land use proposals, SLOCOG is responsible for planning the long-term viability of the regional surface transportation system, and for programming funds to achieve the objectives of the Regional Transportation Plan and Sustainable Communities Strategy. SLOCOG received a Notice of Availability on the DEIR for the Froom Ranch Specific Plan on November 8, 2019.

SLOCOG staff reviews EIRs and Specific Plans to ensure positive outcomes in transportation choices, mobility, circulation, efficiency, safety and connectivity within and between our communities. SLOCOG's adopted the 2019 RTP (available online at <https://slocog.org/2019RTP>) includes a forecasted development pattern and intermodal transportation investment portfolio that meet greenhouse gas emission reduction targets specified by the California Air Resources Board. The 2019 RTP includes numerous principles, goals, and policies that were used to prepare the following comments; and is our blueprint for our future transportation system. It strives to enhance our quality of life, promotes more sustainable communities, and develops a comprehensive intermodal transportation system.

The proposed FRSP consists of two main components - the Villaggio Life Plan Community and Madonna Froom Ranch, which are anticipated to be constructed in phases. The Villaggio Life Plan Community (Villaggio) consists of a 70.4-acre gated senior residential community (residents must be 60+ years of age), which would be located in the central and southern portions of the FRSP. The Madonna Froom Ranch would consist of multi-family residential, retail commercial uses, and a public park within 39.3 acres of the northern and eastern portions of the FRSP area. Specifically, the project includes:

- 404 senior housing units that would include 51 beds for memory care and skilled nursing
- 174 units of multi-family residential
- 100,000 square feet (2.3 acres) of commercial that would include approximately 70,000 sf of hotel use with up to 120 rooms and 30,000 sf of retail and office uses
- 59 acres of open space/conservation
- 2.9 acres public park

Additionally, the proposed Project includes a request for a General Plan Amendment to allow development above the 150-foot elevation, which is currently prohibited by Land Use Element Policy 6.4.7(H), Hillside Planning Areas. Improvements associated with the FRSP would include the realignment and restoration of Froom Creek, construction of a stormwater basin, widening of Los Osos Valley Road, a new transit stop, signalization of the Los Osos Valley Road and Auto Park Way intersection, sidewalk infill, class IV bike lanes, and protected bike intersections. It is estimated that the Project would require approximately 160,000 cubic yards of cut, 378,000 cubic yards of fill, and 2,300 cubic yards of rock/aggregate import.

SLOCOG supports efforts to provide additional housing in the city as this will promote a better jobs-housing balance and reduce vehicle miles traveled and related greenhouse gas emissions. Aspects of the FRSP support the implementation of SLOCOG's 2019 RTP, which strives to accommodate growth while improving quality of life for the region's residents.

SLOCOG respectfully submits the following comments in response to the Project.

General Areas of Concern

Hillside Development Policies and Planning

A strategy of SLOCOG's RTP is to support policies that protect valuable habitats and natural resources through acquisitions, setbacks, conservation easements, and environmental mitigation programs. As stated in the EIR, building above the 150-foot elevation line would result in potentially significant and unavoidable impacts to aesthetic and visual resources, biological resources, and emergency access and fire hazards. Due to these environmental constraints, SLOCOG recommends looking at alternative options to development.

Multimodal Transportation Mitigation Measures

SLOCOG's 2019 RTP encourages local jurisdictions to establish and maintain a mix of transit, bicycle, and pedestrian access choices. It also supports incorporating design features and infrastructure in new projects that promote active transportation and transit use. SLOCOG supports the proposed mitigation measures that improve the multimodal environment and promote an interconnected transportation network.

Park and Ride Lot Facilities

Park and ride lots are "change of mode facilities" where individuals meet and then group-travel to their destinations via carpool, vanpool, or transit and are a major component of SLOCOG's overall transportation demand management (TDM) efforts to reduce single-occupancy vehicle trips, vehicle miles traveled, and related greenhouse gas emissions. An existing park and ride lot facility is located at the Hampton Inn and Suites located on Calle Joaquin and SLOCOG supports mitigation measure that incorporate the use of this existing facility.

Connectivity

SLOCOG encourages the City to explore opportunities provide a secondary access point to LOVR or Calle Joaquin to improve connectivity to the external transportation network and adjacent land uses, the Irish Hills public trail network, and the existing park and ride lot facility, and to provide an additional emergency evacuation route.

Transportation Demand Management Plan

SLOCOG recommends the City of San Luis Obispo work with SLO Regional Rideshare to develop a transportation demand management plan.

This plan would:

- Recommend strategies to reduce traffic impacts generated by construction activities.

- Recommend strategies to reduce single-occupancy vehicle trips made by new residents and employees.
- Establish a measured baseline of vehicle trips from which reductions shall be determined at the time of the future trip generation analyses.
- Identify a point of contact to coordinate plan implantation.

Existing Conditions Baseline Traffic Volume Data

The February 2016 and March 2016 existing condition baseline traffic volumes used in the traffic study are outdated at 3.5 years old. Page 36 of the Multimodal Transportation Impact Analysis Report (Appendix J) confirms the use of the outdated data. Caltrans requires a baseline conditions analysis based upon traffic data that is no more than 2 years old. SLOCOG recommends the Froom Ranch Development provide an existing conditions analysis that is based upon new data.

Bicycle and Pedestrian Intersection Level of Service Methodology

Table 3.13-4 describes qualitative LOS criteria for bicycle and pedestrian facilities. Tables 3.13-5 and 3.13-6 describe quantitative pedestrian and bicycle segment LOS methodologies. No methodology is identified to determine bicycle and pedestrian intersection LOS. SLOCOG recommends the inclusion of a bicycle and pedestrian intersection LOS methodology.

Transportation Comments

Transit Improvements

The Plan requires provision and/or enhancement of existing bus stop(s) within or adjacent to the Specific Plan Area for inclusion on existing City bus Routes or future bus routes. SLOCOG suggests that the project include a new bus stop along LOVR directly in front of Madonna Froom Ranch that is a pullout bus stop. Pedestrian access should be included from the Madonna Froom Ranch residential areas to the bus stop. SLOCOG suggests this be implemented during the first phase development.

MM TRANS-1

Construction activities creating traffic impacts will include import of soil and rock via heavy haul trucks. MM TRANS-1 states that a Construction Transportation Management Plan shall be developed for all phases of the Project for review and approval by the City prior to issuance of grading or building permits to address and manage traffic during construction. The Plan will include a number of preconstruction and ongoing safety measures, including:

- Trucks shall only travel on a city-approved construction route;
- The traveling public shall be advised of impending construction activities that may substantially affect key roadways or other facilities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved construction impact mitigation plan);
- Timely notification of construction schedules shall be provided to all affected agencies (e.g., Police Department, Fire Department, Public Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 0.25 mile.

When construction activities include the use of heavy haul trucks for import of soil and rock from local quarry operations accessed by highways and roads potentially frequented by bicyclists, SLOCOG recommends import schedule be shared with local bicycle advisory committees and stakeholders.

MM AQ-6

There is no Dial-a-Ride service operating within the City of San Luis Obispo, or this portion of currently unincorporated land. MM AQ-6 states that Applicant shall provide clean fuel shuttle services or coordinate with existing shuttle service providers. In order to mitigate GHG impacts of AQ-4, and in the event that Villaggio foregoes provision of clean fuel shuttles to rely strictly on coordination with existing shuttle services, SLOCOG recommends the purchase of, or fair share contribution toward the purchase of, new clean fuel vehicles for existing shuttle service providers.

MM TRANS-5

SLOCOG supports the extension of the westbound bike lane on Tank Farm Road approaching the intersection with South Higurea Street and the installation of a bike box to facilitate left turn movements through the intersection. SLOCOG encourages consideration for upgrade to, or project fair share contribution toward, pedestrian safety enhancements at the northeast corner of the intersection, such as a pedestrian refuge island or pedestrian lead interval.

MM TRANS-9

SLOCOG supports the completion of the sidewalk connection and installation of Class IV bicycle lanes on LOVR between the Irish Hills Plaza and Calle Joaquin and encourages consideration to install a protected intersection at the northwest corner of the intersection. These mitigation measures will provide safe multimodal access to the existing park and ride lot facility.

MM AQ-3

SLOCOG supports implementation of offsite mitigation strategies to replace transit buses and the expansion of transit services, and improvements to the existing park and ride lot facility.

Housing Comments

MM HAZ-4

With a potential of 1,231 residents, one main roadway access point via Los Osos Valley Road (LOVR), and senior living focused facilities, SLOCOG suggests an evacuation plan and protocol be created and maintained so staff at the Villaggio complex and residents in Madonna Froom Ranch are aware of how to proceed in the event of an emergency.

“Given this negligible change in the jobs-to-housing ratio, the Project would maintain the City’s current jobs-to-housing ratio of 2.5 to 1, ensuring consistency with Policy LU 1.5. The Project would provide a substantial increase in the City’s housing supply, including a range of housing types and affordability as well as long-term job growth both within Villaggio and Madonna Froom Ranch.” (p.3.11-23)

Earlier in the section it was discussed that the 404 specialized senior housing units will not be counted in the City’s Housing supply. There will be 174 units added to the city’s housing supply. Please verify where the substantial increase in the City’s housing supply coming from if the ratio remains the same.

As stated in the specific plan, “Policy HE 4.2 Include both market-rate and affordable units in apartment and residential condominium projects and intermix the types of units. Affordable units should be comparable in size, appearance and basic quality to market-rate units.” SLOCOG’s RTA/SCS supports a mix of housing options in new residential developments.

It is a strategy of the SCS to “Support residential development that increases the region’s supply of deed-restricted affordable housing, and supply of rental housing.” SLOCOG supports the inclusion of deed-restricted affordable housing units within the development.

Development Outside the Urban Reserve Line

SLOCOG's 2019 RTP supports the consideration of urban service boundaries as a criterion for reviewing development projects. The proposed project is adjacent to the urban reserve line (URL) for the City. If approved, the project would annex and develop land outside of the City's URL, which can lead to an increase in air quality impacts due to longer commuting distances and increase of motor vehicle use.

However, the RTP also supports the expansion of the region's supply of housing for renters, first-time homebuyers, and the broader workforce to maintain the vitality of regional economy. If approved, this project has the potential to free up residential homes in the City as aging seniors move to the development's senior units. By increasing the available housing stock, those working in the City may have a greater opportunity to live in the City, reducing commute distances and related emissions while reducing overall transportation expenses. Reducing these expenses provides greater opportunity to invest those funds in the local economy. These potential benefits would only be achieved if existing residents of the City are granted access to the senior units first. SLOCOG supports the development of strategies that ensure residents who are already living in the City, or people that are already working in the City, are given the first opportunity to live in the senior units.

Grammatical Changes

- "Consistent with state law, the City's RHNA is reduced based on the number of dwelling units approved, under construction, or built between January 1, 2014 and June 30, ~~2014~~ 2019." (p. 3.11-10)
- Vesting Tentative Tract Map (VTTM) acronym throughout the document should be corrected as there are 167 references to VTM
- "The RTP/Sustainable Communities Strategy (SCS) outlines ~~SCAG's~~ SLOCOG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth to attain and exceed the GHG emission-reduction targets set forth by CARB." (p. 3-13-53)

Thank you again for providing SLOCOG the opportunity to review and comment on the Project and we wish you and all those involved success in moving the Project forward. There should be close coordination with Caltrans, the Air Pollution Control District, SLOCOG, SLO Regional Rideshare, and the developer to continue to refine data analysis and identify necessary solutions for the project's impacts.

Please do not hesitate to reach out to Stephen Hanamaikai for transportation issues at 805-788-2104 or via email at shanamaikai@slocog.org or to Sara Sanders for housing related issues at 805-597-8052 or via email at ssanders@slocog.org.

Sincerely,

Stephen Hanamaikai

Stephen Hanamaikai, Transportation Planner
San Luis Obispo Council of Governments



Sara Sanders, Transportation Planner
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CC: Sarah Woolsey, SLOCOG
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