

**LATE COMMENT LETTERS FOR NORTH RIVER FARMS
ENVIRONMENTAL IMPACT REPORT
Volume I, Comment Letters**

Prepared by:

DUDEK

605 Third Street
Encinitas, California 92024
Contact: Brian Grover, AICP

MAY 2019

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L1 CALTRANS, JACOB ARMSTRONG

Comment Letter L1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDWIN S. BRIDENL, Director

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4055 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 658-4560
FAX (619) 608-4299
TTY: 711
www.dot.ca.gov



Making Connections
a California Way of Life

October 24, 2018

11-SD-76
PM 6:21
RTC

Mr. Rob Dmohowski
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Dmohowski:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the responses to our letter dated September 10, 2018 for the North River Farms Project Draft EIR. The development takes access at North River Road and will access State Route 76 (SR-76) via College Boulevard. Caltrans would like to make the following comments:

1. Please provide updated traffic impact analysis, appendices, and Synchro files.
2. Response A3-12 – Caltrans does not agree with this response and other corresponding references to this response. Caltrans is in the process of updating our traffic impact guidance as it relates to state facilities. Vehicle queuing has the potential to create significant speed differentials and increase the number of conflicts. CEQA does not exempt these types of operational concerns from evaluation. CEQA findings are ultimately to be based on "substantial evidence" when determining potential impacts and conclusions of significance. Attached is a "Queue Lengths Summary" that shows the significant increases in queuing attributable to this project. However, it should be noted that queuing is already exceeding storage capacity at all intersection locations identified in the existing conditions scenario of the traffic impact analysis for the North River Farms Project.
3. Provide Adaptive Traffic Signal Controls documents, supporting data, and Synchro files. Adaptive Traffic Signal Controls will need to be reviewed by appropriate Caltrans divisions before it can be supported as a project mitigation feature. In order to properly determine the effectiveness of Adaptive Traffic Signal Controls they must be installed and analyzed under an existing and post-operating condition and demonstrate an achieved performance measure for mitigating the project's impacts. Therefore, Caltrans recommends the installation and cost be Conditioned as part of the North River Farms Project EIR Certification and be implemented within a timeframe documented through the execution of a Development Agreement under Resolution Conditions.
4. Caltrans also recommends consideration as a project benefit feature the development of a "Corridor Study" to identify a comprehensive strategy by which future potential transportation improvements can be funded and implemented by others. Therefore, Caltrans recommends a "Corridor Study" be Conditioned as part of the North River Farms Project EIR Certification and be implemented within a timeframe documented through the execution of a Development Agreement under Resolution Conditions.

*"Provide a safe, accessible, integrated and efficient transportation system
to enhance California's economy and livability"*

Late Comment Letters for North River Farms Environmental Impact Report

Mr. Rob Drobowski
October 24, 2018
Page 2

If you have any questions, please contact Trent Clark of the Caltrans Development Review Branch at (619) 688-3140.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

"Provide a safe, reliable, integrated and efficient transportation system
to advance California's economy and mobility."

Late Comment Letters for North River Farms Environmental Impact Report

L2 NYGAARD, DIANE

Comment Letter L2

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Monday, October 15, 2018 9:47 AM
To: Jonathan Borrego <JBorrego@ci.oceanside.ca.us>
Cc: Sally Prendergast <sallyp123@mac.com>; George Courser <gcourser@hotmail.com>
Subject: Re: Injunction on County Use of GHG Offsets

Hi Jonathon

Also of note- the Newland Sierra bond requirement demanded by the County was \$1,250,000 - presumably for the county to be able to cover their legal costs if this issue went to litigation- which it did.

Diane

On Mon, Oct 15, 2018 at 8:46 AM Jonathan Borrego <JBorrego@ci.oceanside.ca.us> wrote:

Hi Diane, thanks for the information. We are aware of this case and are reviewing its applicability to the NRF DIR. –
Jonathan

Jonathan E. Borrego, AICP
Development Services Director
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054
760-435-3918
jborego@ci.oceanside.ca.us

Late Comment Letters for North River Farms Environmental Impact Report

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Friday, October 12, 2018 12:50 AM
To: Jonathan Borrego <jb@borrego@ci.oceanside.ca.us>
Cc: Sally Prendergast <sallyp123@mac.com>; George Courser <gcourser@hotmail.com>
Subject: Injunction on County Use of GHG Offsets

Hi Jonathan

Please see the att letter enjoining the County's proposed use of carbon offsets to mitigate GHG. We would urge you to fully address this issue prior to proceeding with the FEIR for the North River Farms Project.

Diane

Late Comment Letters for North River Farms Environmental Impact Report

WINTER KING
SHUTE, MIHALY & WEINBERGER LLP
396 HAYES STREET SAN FRANCISCO, CA 94102

ABIGAIL A. SMITH
LAW OFFICES OF ABIGAIL SMITH
1455 FRAZEE ROAD, SUITE 500, SAN DIEGO, CA 92108

September 21, 2018

Via Electronic Mail Only

San Diego County Board of Supervisors
Clerk of the Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, CA 92101
David.Hall@sdcountry.ca.gov

Re: Superior Court Order Enjoining Reliance on GHG Offsets (CAP Mitigation Measure M-GHG-1)

Dear Honorable Supervisors:

It has come to our attention that the San Diego Superior Court recently issued a stay and preliminary injunction concerning the County's consideration of greenhouse gas emissions for any project requiring a general plan amendment. See *Sierra Club v. County of San Diego* (San Diego Sup. Ct. No. 37-2012-101054-CU-TT-CTL); see also related cases *Golden Door Properties LLC v. County of San Diego* Nos. 37-2018-00013324-CU-TT-CTL and 37-2016-037402-CU-TT-CTL. Specifically, the Court's ruling provides that "the County is stayed and/or enjoined . . . from relying on Mitigation Measure M-GHG-1, as contained within the County of San Diego Supplement to the 2011 General Plan Update Program Environmental Impact Report, dated January 2018," at least until the Court issues a final judgment in the Sierra Club's and Golden Door's challenge to the County's 2018 Climate Action Plan ("CAP"). The basis for this injunction was, in part, the court's conclusion that the petitioners in those cases were likely to succeed on the merits of their claim that Mitigation Measure M-GHG-1 conflicts with the County's General Plan and thus is invalid. (Court's Minute Order at p. 7.)

Given this injunction, our client, Elfin Forest Harmony Grove Town Council ("Town Council"), joins the Sierra Club, Golden Door Properties LLC, and others in urging the County to postpone consideration of any future development projects that rely on Measure M-GHG-1—or any substantially similar measure—as mitigation. The County has already relied on a nearly identical mitigation measure in approving the Valiano and Harmony Grove Village South projects. The Town Council and others have

Late Comment Letters for North River Farms Environmental Impact Report

Board of Supervisors
September 21, 2018
Page 2

challenged these approvals. The County must not waste taxpayer dollars, or risk court sanction, by repeating this mistake with other proposed projects, including Newland Sierra.

For all of these reasons, the County must not approve any more projects, including Newland Sierra, that require a general plan amendment and rely upon out-of-County offsets as mitigation until the court issues a final ruling in the Sierra Club and Golden Door Properties LLP cases, cited above.

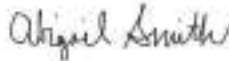
Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Winter King

LAW OFFICES OF ABIGAIL SMITH



Abigail Smith

cc: Joshua Heinlein, Office of County Counsel

1040702

Late Comment Letters for North River Farms Environmental Impact Report

L3 CERF, LIVIA BEAUDIN

Comment Letter L3



January 28, 2019

City of Oceanside Planning Commission
Attn: Robert Dmohowski
300 N. Coast Highway
Oceanside, CA 92054

Via Electronic Mail
rdmohowski@ci.oceanside.ca.us

RE: Public Comment on North River Farms Project

Dear Mr. Dmohowski:

The Coastal Environmental Rights Foundation (CERF) is strongly opposed to the potential amendment to the General Plan that would accommodate the North River Farms Project. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. Our organization is dedicated to the enforcement of environmental laws and raising public awareness about coastal environmental issues. CERF asks that you favor the concerns of citizens and Oceanside residents, and to reject any amendment to the General Plan that will accommodate the North River Farms Project.

While the North River Farms Project purports that it will reimagine Oceanside's "quality of life by building a multigenerational neighborhood that honors traditions, protects and grows natural resources, fosters imagination, and enhances the beauty and purpose of Oceanside," the Environmental Impact Report evidences the untenability of the Project's goals, and illuminates the myriad negative impacts North River Farms will have on the City of Oceanside.

Notably, the EIR shows that the Project would cause "significant and unavoidable impacts" to traffic congestion. Oceanside's leaders should promote projects that improve the city's transit infrastructure, not projects that will conflict with Smart Growth development and result in unnecessary increases in greenhouse gas emissions and air pollution. Additionally, the NRF Project conflicts with the City's existing General Plan, which encourages a balance of land uses. It would also set a precedent for other housing developments in Oceanside's agricultural area.

Oceanside residents and visitors alike deserve improvements that align with the City's existing General Plan, not amendments that threaten the City's fragile infrastructure, ecosystem, and agricultural land. We implore the City to keep the interests of its constituents – not developers – at the forefront of its decision-making process.

Sincerely,

Coastal Environmental Rights Foundation

Livia B. Beaudin
Legal Advisor

1140 South Coast Hwy 101 Encinitas, CA 92024 760.942.8505 www.cerf.org



Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L4 CAMP PENDLETON, SAM JAMMAL

Comment Letter L4

From: Jammal CIV Osamah A <osamah.jammal@usmc.mil>
Sent: Wednesday, January 09, 2019 12:08 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Cc: Caughlan CIV Thomas A <tom.caughlan@usmc.mil>
Subject: North River Farms Planned Development - Final Environmental Impact Report Marine Corps Base Camp Pendleton Comment

Good morning Mr. Dmohowski,

Please accept this email as an official submission from MCB Camp Pendleton regarding subject EIR/development.

For over 75 years, Camp Pendleton has and continues to enjoy the partnership and support from Oceanside residence and leadership. We work closely with the City and adjacent communities to mitigate any impacts we can that do not impair our ability to maintain the training readiness of our Marines. Camp Pendleton is neutral as to the needs for additional housing development in the City of Oceanside, however as with any development close to the base we are concerned of developments that may result in added traffic and noise complaints. We recognize that overtime complaints tend to negatively impact on relations so we are sensitive to population growth and its potential encroachment on Camp Pendleton's mission.

North River Road is one of the roads used by base military and civilian personnel who live inland or in Riverside County to commute to work; while 76 has seen significant improvements, traffic remains an issue on both River Road and College Blvd. When commuters use alternate routes, through neighborhoods, to avoid traffic congestion we receive complaints from local communities.

While California Civil Code 1102 requires the use of disclosure informing buyers of properties near military installations of potential noise generation, very few ever remember signing the disclosure or accept that noise generation is part of base operations.

In closing Camp Pendleton appreciates the opportunity to comment on the EIR. If the project is approved, we trust the City of Oceanside will ensure mitigation measures are taken to lessen the impacts of the development on existing traffic issues. We also ask that the City ensures the developer complies with CA Civil Code 1102 so that the potential buyers are aware they will be living next to a noise producing military base.

Please let me know if you need additional information or have any questions.

R/S,
Sam Jammal
Deputy, Community Plans and Liaison (DPL), Camp Pendleton
G-7
Box 559010
MCB Camp Pendleton, CA 92055-5010
Direct: 760-725-6445
osamah.jammal@usmc.mil

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L5 JOHNSTON, PHIL (1)

Comment Letter L5

From: Phil Johnston <pjohnston@runbox.com>
Sent: Thursday, January 24, 2019 6:26 AM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: Dam Failure Risk - North River Farms EIR

Mr. Dmohowski-

Please find attached a letter regarding the risks to the proposed North River Farms development, in the case of the failure of an upstream Dam. I believe these risks are seriously underrepresented in the EIR.

Please note my specific request for actions, (page 3 paragraph 3).

Please let me know if I can be of further assistance.

Best Regards, Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report

23 January, 2019

Dear Mr. Omohowski-

This is in regards to the Final Environmental Impact Report (FEIR) for the proposed North River Farms Development, specifically Section 4.10 – Hydrology and Water Quality. This section of the EIR addresses risks due to the failure of a dam.

Under no circumstances should the North River Farms project be approved without a proper evaluation of the inundation risk due to the failure of a dam. Henshaw dam is located upstream from the project location and is considered to be an extremely high hazard by the Division of Safety of Dams. Additionally, the evaluation of inundation risk provided in the FEIR is insufficient - it is based on data which is very out of date and no longer available. A new Dam Failure Inundation Map for the Henshaw Dam is currently under review by the Division of Safety of Dams which should be appropriate for this evaluation, and should be used. Detailed information follows.

FEIR Section 4.10, page 17 includes the following statement: "The project site would not be located within a dam inundation zone (SanGIS 2009). Therefore, the proposed project would not expose people or structures to hazards associated with the failure of a levee or dam. No impact would occur".

I have made investigations which indicate this statement is not based on reliable data. I contacted SanGIS on January 9, 2019 with a request for access to the data referenced in the FEIR. The response from SanGIS included the following statements: "HYD_DAM_INUNDATION kmz (Is) very out of date, not well maintained, and has been removed from the SanGIS database at the request of the Office of Emergency Services". SanGIS further states "CA Department of Water Resources and Cal OES does not provide a way to retrieve this data, at this time, without submitting a Public Records Act request for data".

I also contacted the Division of Safety of Dams on January 8, 2019 regarding San Luis Rey River Dam failure inundation risks. I was told "Henshaw Dam is considered extremely high hazard".

Because the data used in the FEIR is very of date, and has been removed from the SanGIS database, and because Henshaw dam is considered extremely high hazard, the risks associated with a dam failure need to be readdressed. It should be possible to accomplish this in part by simply waiting for the release of a new Dam Failure Inundation Map. I have been informed by the Division of Safety of Dams that a new Henshaw Dam Inundation Map has already been prepared and submitted to the Division of Safety of Dams (on 10/8/18), and is currently under review.

The following comparison should illustrate how critical it is to take Dam failure seriously.

Late Comment Letters for North River Farms Environmental Impact Report

HENSHAW DAM – ST. FRANCIS DAM COMPARISON:

The proposed North River Farms Development is 36 miles downstream from Lake Henshaw, and 2620 feet lower in elevation. Lake Henshaw holds 55,000 acre feet of water, the dam was built in 1923.

The city of Santa Paula is 38 miles downstream from St. Francis Dam, and 1556 lower in elevation. St. Francis Dam held 36,000 acre feet of water, and was finished in 1928.

If a dam fails, it is bad to be close, it's bad to have the water high above you, it's bad if the dam holds lots of water, it's bad if the dam is old.

In each of these categories, Lake Henshaw Dam has more severe risk elements than St. Francis Dam.

St. Francis Dam failed catastrophically in 1928, killing between 431 and 600 people including many in Santa Paula. It is the greatest loss of life from a manmade disaster in California History.

Every dam is different, and there are many other differences between the two dams. I don't know if the risk from Henshaw Dam would be less than, comparable to, or greater than St. Francis. But the facts I've listed above are basic elements of dam safety and this comparison should be valid to show the critical need for careful evaluation.

FLOW RATE THOUGHT EXPERIMENT:

Consider the following hypothetical scenario.

An extensive rainy period has filled Lake Henshaw to capacity, 55,000 acre ft.

The damkeeper notices water flowing from a damaged area at the base of the dam, which appears to be getting worse. He asks his supervisor for permission to release all water from the dam as a precaution.

The supervisor agrees, but tells the damkeeper "just don't release it faster than the 100 year flood flow rate. That's what housing developments downstream are designed for. We don't want to sweep children off playgrounds and out to sea. The 100 year flood flow rate is 51,000 c.f. per second, or 1.2 acre ft. per second. Hold it to that".

The damkeeper says "ok boss, at that rate we can empty the dam in 13 hours. I'll start now".

Just as he says that, the dam fails catastrophically, releasing all the water in one hour (similar to the St. Francis Dam Collapse).

Late Comment Letters for North River Farms Environmental Impact Report

This is very simplistic, but it illustrates the scale of the problem. Based on this, I have real difficulty believing that the flow rates at the North River Farms location from a catastrophic failure of Henshaw Dam would never exceed the 100 year flood. This risk needs to be evaluated with a careful, modern, modeling effort. It needs to be clearly presented in the EIR so it can be considered by the City of Oceanside Planning Department and other interested parties.

The NRF FEIR says nothing more about dam failure risk than "The project site would not be located within a dam inundation zone (SanGIS 2009). Therefore, the proposed project would not expose people or structures to hazards associated with the failure of a levee or dam. No impact would occur". This conclusion seems very dubious to me. The only referenced dataset is very out of date and no longer available. This is totally unacceptable.

I am hereby requesting that the risk due to dam failure be evaluated with a careful, modern modeling study. The modeling study should be supported by up-to-date publicly available data, and it should be sufficiently documented to allow evaluation by reviewers. It is possible much of this can be satisfied with the new Henshaw Dam inundation Map which is currently under review at the Division of Safety of Dams.

Thank you for your time and effort helping to make sure dam failure risks are properly presented and evaluated.

Regards,

Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report

L6 MRAZ, JASON

Comment Letter L6

From: Jason Mraz <jasonmraz@mac.com>
Sent: Monday, January 28, 2019 10:36 AM
To: Planning-Planning Commission <PlanningCommission@ci.oceanside.ca.us>
Cc: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: I am against the NRF Planned Development.

Dear Members of the Oceanside Planning Commission,

I am a resident of South Morro Hills. I own three properties, each with an emphasis on agriculture. A total of 18 acres. I am against The North River Farms Planned Development, the General Plan Amendment, Zone Amendment, Vesting Tentative Map and the Development Plan before you.

Please do not allow the North River Farms project to proceed. Please consider the Oceanside City Staff report and the voices of concerned Oceanside citizens against this project.

Please give Oceansiders and the lifelong community members of South Morro Hills the chance to shape their visions of smart development and agriculture to lead the way. Please help in preserving farming for generations to come.

Do not be greedy. Be patient. Do not support North River Farms.

Respectfully,

Jason Mraz

Owner, Mraz Family Farms

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L7 COMBS, MONIQUE

Comment Letter L7

From: Monique L-C <laracher10316@gmail.com>
Sent: Friday, January 25, 2019 5:22 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Cc: Planning-Planning Commission <PlanningCommission@ci.oceanside.ca.us>
Subject: North River Farms

Dear Planning Commission Board Members

I am writing to express my opposition to the North River Farms development project in its current form. The project will have many negative impacts for Oceanside and its residents, including:

- *Increased traffic congestion
- *Oceanside only has 12% of its land which is open space and this project would take 177 acres of it
- *The project would potentially set a precedent for changing other zoning in the city
- *The project poses safety risks from both floods, as it is in a flood plane, as well as limited fire evacuation routes

My neighbor's and I enjoy the rural feel of Oceanside and it is the reason why we have moved here. Please do not allow our General Plan to be amended in order to sell our beautiful city off to the highest bidder.

Thank you in advance for your time and thank you for your service.

Regards,
Monique Combs
Oceanside Resident

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L8 OCHS, MARK

Comment Letter L8

From: MARK OCHS <ochs.m@sbcglobal.net>
Sent: Sunday, January 27, 2019 12:09 PM
To: Robert Dmochowski <RDmochowski@co.oceanside.ca.us>
Cc: Larry Balma <lb1122@hotmail.com>
Subject: Re: North River Farms Comments for Denial

Mr. Dmochowski,
Please find attached my response and comments for the 1/28/2019 North River Farms Proposal.
Thank you for forwarding this to the Planning Commission and your city staff.
Mark Ochs

Late Comment Letters for North River Farms Environmental Impact Report

Honorable Planning Commission,

The proposed North river farms project being considered should be denied. The project continues to be non-conforming and lacks any attributes overriding the original concerns brought forth by the City Planning Commission in their recommendation to deny the original application to the city of Oceanside. This request for an approval as submitted, provides no additional offer or benefit to the City of Oceanside and its residents beyond the mitigation efforts that will be part of the findings and requirement disclosed based on the F.E.I.R.!

The unsurmountable conflict, negative resulting impacts (infrastructure, traffic and precedential effects) and lack of need for this project, clearly provides the Council obvious direction and responsibility to deny this premature development agreement request.

Areas within the D.E.I.R. still requiring attention and revision are, but not limited to, the listing below.

1.The Air Quality Baseline for the Project is Not Set Out Accurately.

2.The EIR's Air Quality Thresholds Were Set for Industrial Projects, and Do Not Provide Substantial Evidence that the Project's Pollutant Emissions Are Not Significant.

3 Provide Substantial Evidence that the Project's Pollutant Emissions Are Not Significant.

4.Mitigation for Exposure to Carcinogens During Project Construction is Not Assured.

5.Greenhouse Gas Emissions Have Not Been Shown to Be Not Significant by a Valid Significance Threshold, and Have Not Been Shown to be Adequately Mitigated, in That Mitigation Proposed by the EIR Has Not Been Shown to Be Real, Enforceable, Permanent, Additional, Verifiable, and Feasible.

6.The underlying root cause for many of the project's impacts is Increased VMT caused by its location and design.

7.The DEIR failed to identify if the project will meet the edge effect standards for lights near to the protected SLR River corridor.

8.Failure to evaluate or comply with requirements related to conversion of agricultural lands in the draft Oceanside Sub Area Plan (SAP)

Late Comment Letters for North River Farms Environmental Impact Report

9. Figure 4.4-1 fails to show the regional wildlife corridor links between the San Luis Rey River and "other habitat areas inside or outside of the city."

10. Failure to evaluate potential impacts on migratory birds associated with the San Luis Rey (SLR) River.

11. Inadequate testing of soil and water for hazardous materials.

12. Emergency evacuation plan arbitrarily limited the analysis to focus on the project site and within the site on the HOA.

13. Evaluation required for the Evacuation impacts of piecemeal roadway widening.

14. Cost of required additional flood control systems not identified or evaluated.

15. Analysis fails to evaluate compliance with Regional Housing Needs Assessment (RHNA) allocations by income level.

16. Evacuation impacts of piecemeal roadway widening.

17. Failure to mitigate for projected water supply shortfall.

18. Oceanside Unified School District will not have sufficient staff and facilities to serve the proposed project if it were approved.

I would think that Integral Management would bring the City of Oceanside a much more compelling proposal that would offer much more.

- A. Traffic impacts heading east from the project have been completely ignored. North river road should be improved, widened until reaching Highway 76. "Cal Trans endeavors that any direct and cumulative impacts to the state highway system be eliminated or reduced to a level of insignificance pursuant to CEQA and NEPA standards" As identified in the Department of Transportation response to the Draft E.I.R. "21 additional intersections are impacted and not disclosed and 20 existing Draft E.I.R. impact findings that require correction, revision, substantiation or justification.
- B. Infrastructure improvements (Sewer, reclaimed water, storm drain and offsite improvements) should be solely the burden of the developer without the suggested repayment by future downstream development.
- C. The "Community Facility District" and "Temporary Fire facilities" should be solely the burden of the Developer. Insurance and management of these concessions should remain in place much longer than proposed and never become the burden of the City of Oceanside.
- D. Affordable housing should be included in the project. No consideration should be given to alternative options.
- E. Green House Gases should be mitigated by design and reduced by building limitations, not solely by purchase of carbon off sets.

Late Comment Letters for North River Farms Environmental Impact Report

- F. Agricultural mitigation should not be achieved through purchase of agricultural conservation easements in other county locations. Mitigation should replace the 176.64 acres within the Oceanside city limits.
- G. Vested rights duration. If and when a Development agreement is considered viable, it should be limited to a maximum term of five years, as projected by the developer in the estimated timeline to complete the phasing. Going beyond this duration restricts the City of Oceanside of its right to review all projects completely with unrestricted discretion.

Again, please deny the request for any movement forward on the proposed North River Farms development. To do otherwise would be premature and may/will have negative long-term consequences regarding this project as well as similar submittals to City staff and Council.

Respectfully,

Mark Ochs

Sleeping Indian Road

Late Comment Letters for North River Farms Environmental Impact Report

L9 JOHNSTON, PHIL (2)

Comment Letter L9

From: Phil Johnston <pjohnston@nribox.com>
Sent: Friday, January 25, 2019 2:08 PM
To: Robert Dmohowski <RDmohowski@coastside.ca.us>
Subject: North River Farms Planned Development - Final EIR Appendix L2 comments

Mr. Dmohowski:

Attached please find a review of FEIR Appendix L2 for the proposed North River Farms (NRF) project. This Appendix concerns the position of the San Luis Rey River Floodway relative to the proposed NRF project. This topic needs to be handled properly. It is important for evaluating public safety concerns, specifically flood risk probability and severity.

For emphasis, I have pasted below my comments regarding two key sections of Appendix L2. Please also read in full my attached comments.

Please let me know if I can do anything further to be of assistance.

Best Regards, Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report

SECTION 5.0 HYDRAULIC MODELS

This section is being used to support some very critical conclusions related to public safety.

As written, this section requires detailed familiarity of the FEMA workflow to be understandable. This section needs to be rewritten and expanded so there is clarity about the methodology, model assumptions, the model inputs provided, and the model outputs. It needs to be understandable to the City of Oceanside Planning Department and to knowledgeable citizens, in addition to FEMA specialists.

References to publicly available support documentation should be provided as appropriate.

SECTION 6.0 CONCLUSION

Sentence 5 of the Conclusion states "The Effective Floodway was not revised, as shown in the HEC-RAS output table in Attachments 4 and 5." However...

The Annotated FIRM Map (page 83 of Appendix L2) shows the **Existing Floodway** (indicated by a white diagonal line pattern).

The same Annotated FIRM Map (page 83 of Appendix L2) also shows the **Proposed Floodway** (shown on this same map with heavy blue shading). The Proposed Floodway is mapped in a different position than the Existing Floodway in the proposed project area.

The blue shaded Proposed Fairway area is shifted considerably away from the FIRM map Existing Floodway shading, to a new position that is outside the proposed project development area.

The key conclusion of Section 6 ("The Effective Floodway was not revised...") is contradicted by the maps referred to as documentation of the mapping done in this study.

Late Comment Letters for North River Farms Environmental Impact Report

25 January, 2019

Dear Mr Dmohowski-

After receiving a response to my 11 January 2018 letter in the FEIR, I have been studying Appendix L2, per the response to my letter.

Appendix L2 is incomplete, some of it is confusing, and I believe there are important errors as well. The report conclusion is contradicted by the very maps it provides as documentation of the results. My observations are below. If any of these are in error, please let me know.

SECTION 1.0 INTRODUCTION

The first sentence of the report (1.0 INTRODUCTION p.1, paragraph 1) includes: "...the proposed project, North River Farms, located west of the intersection of Vandergrift Boulevard and North River Road..." This statement is incorrect. The proposed North River Farms project is east of the stated intersection, not west. Please correct the report.

The last sentence of 1.0 INTRODUCTION says "Copies of the Effective Firms are included in Attachment 7". This sentence lacks clarity and should be corrected as follows:

The abbreviation "Firms" should be in all-caps (FIRMs), otherwise it doesn't have the correct meaning.

Appendix 7 contains Proposed Condition Maps hand sketched onto FIRMs. The overlain proposed project details and the heavy coloring make these unusable as FIRM maps. They should be referred to as "Proposed Condition Maps" not as "Copies of the Effective Firms".

The report should have a "Table of Abbreviations". Many abbreviations are used in this report without being defined, leaving the reader to guess what they mean. Without a Table of Abbreviations, it is not possible to fully understand the report. As an example, "FEMA" is used in the third sentence of this report (Section 1.0 INTRODUCTION), without being defined. "Federal Emergency Management Administration" might be a good guess (or is it "...Agency"? Or something else entirely?)

SECTION 2.0 APPLICABILITY AND PROJECT TYPE

The first sentence of this section includes "...enclosed are the following items:" This should be revised, the items are included as attachments, not enclosures.

Late Comment Letters for North River Farms Environmental Impact Report

SECTION 3.0 PROJECT OVERVIEW

The first sentence of Section 3.1 Project Location (p. 2 paragraph 1) states "The North River Farms Project is located west of the intersection of Vandergrift Boulevard and North River Road..."

This is incorrect, the proposed project is east of the referenced intersection.

Secondly, the sentence should say "proposed project" (as was correctly done in the introduction) rather than "project" (which might imply there is already approval).

SECTION 4.0 HYDROLOGY

There is no Table 2. The report has a Table 1 and a Table 3, but no Table 2. Why? What was Table 2 intended to show?

No other comments, this section seems clear.

SECTION 5.0 HYDRAULIC MODELS

This section is being used to support some very critical conclusions related to public safety.

As written, this section requires detailed familiarity of the FEMA workflow to be understandable. This section needs to be rewritten and expanded so there is clarity about the methodology, model assumptions, the model inputs provided, and the model outputs. It needs to be understandable to the City of Oceanside Planning Department and to knowledgeable citizens, in addition to FEMA specialists.

References to publicly available support documentation should be provided as appropriate.

SECTION 6.0 CONCLUSION

Sentence 5 of the Conclusion states "The Effective Floodway was not revised, as shown in the HEC-RAS output table in Attachments 4 and 5." However...

The Annotated FIRM Map (page 83 of Appendix L2) shows the **Existing Floodway** (indicated by a white diagonal line pattern).

Late Comment Letters for North River Farms Environmental Impact Report

The same Annotated FIRM Map [page 83 of Appendix L2] also shows the **Proposed Floodway** [shown on this same map with heavy blue shading]. The Proposed Floodway is mapped in a different position than the Existing Floodway in the proposed project area.

The blue shaded Proposed Fairway area is shifted considerably away from the FIRM map Existing Floodway shading, to a new position that is outside the proposed project development area.

The key conclusion of Section 6 ("The Effective Floodway was not revised...") is contradicted by the maps referred to as documentation of the mapping done in this study.

The conclusion also refers to work maps submitted in Attachment 6. But this attachment is empty, it does not contain any maps.

There may be some additional considerations in the HEC-RAS output tables, but there is not enough detail in the report for these tables to be understood.

ATTACHMENTS

Attachment 4 Effective/Existing Conditions HEC-RAS Model Profile

The legend on the first figure does not indicate what the solid blue shading represents. The blue shading is the most prominent feature on this figure, it needs to be labeled so readers can understand what they are looking at. (p.40 of the posted Appendix, L2 axes are Elevation (ft) and Main Channel Distance (ft).)

The comment above is true for all the cross sections which follow (p. 41-53 of Appendix L2)

For all the cross sections, there is a heavy line in the legend labeled "Encroachment". Is this mean to show areas of the original channel which will be filled in by grading work if the proposed project is executed? This is not explained in the report, it needs to be.

The "Encroachment" line appears on both sides of the river channel on many cross-sections (e.g. RS=12201, RS=11787, etc.). This needs to be explained, since the south side of the river channel is outside the proposed project area.

Why is "Encroachment" shown at all on the Existing Conditions model? It seems like that should be shown only on the "Proposed Conditions" model Cross Sections.

All cross sections in a technical report need to have directions labeled at top-left and top-right. For example "East" or "North" or "S", or "W".

Late Comment Letters for North River Farms Environmental Impact Report

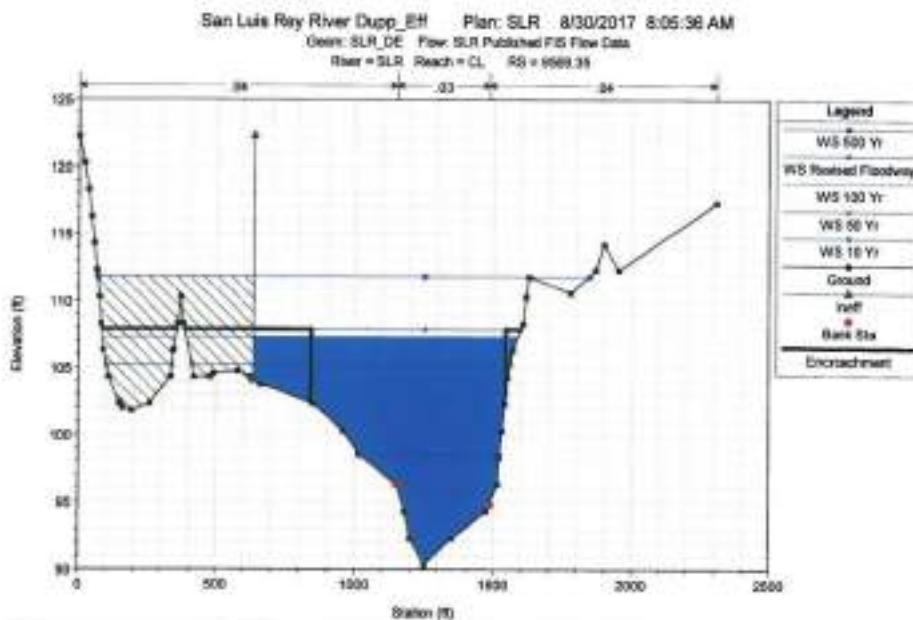
There needs to be an index map or location in the report which shows the location of the cross sections spatially.

Each Figure should have a figure number at the bottom of the page ("Figure 1").

Each cross section has three arrows above the plot area with numbers for each. What does this mean? It looks like distance annotation at first, but looking more closely it can't be that. What is it? It looks like it might be important. This needs to be explained in the report.

All abbreviations which appear on the diagram need to be defined "Reach = CL"? *RS= 11353 350.1"? what do these mean?

Many cross sections have an area annotated with a diagonal line pattern. What does this pattern indicate? It looks like it might be important. This needs to be defined in the legend, and explained in the body of the text. For instance, see RS = 9596.35 below.



Does this mean the diagonal striped area North (left) of the Vertical line is not considered as part of the channel for a 100 year flood? Even though the ground level is 5 feet below the flood level? That would be pretty amazing!

Late Comment Letters for North River Farms Environmental Impact Report

Attachment 5. Proposed Condition HEC-RAS Model Profile

None of the Proposed Condition Cross Sections have an "Encroachment" line, either on the diagram or labeled in the Legend. The existing conditions Cross Sections do have Encroachment Lines. Have the Attachment 4 and Attachment 5 Cross Sections all been put in the wrong attachment? (All Attachment 4 Cross sections should actually be in Attachment 5, and visa-versa)?

Labeling comments from the Attachment 4 figures apply to all the Attachment 5 figures as well.

Attachment 6 HEC-RAS Work Maps for Existing and Proposed Conditions

The maps are missing. No maps are attached in this section. Page 81 is the cover sheet for ATTACHMENT 6, page 82 is the cover sheet for ATTACHMENT 7. There are no maps in between. (Are these maps misplaced in ATTACHMENT 7?).

Attachment 7. Annotated FIRMs

These maps are very difficult to read, and key information is obscured. In addition to the FIRMs (already very busy maps), the annotated FIRMs have a complex layer showing proposed NRF project details. Floodway and other Hydrologic data is then overlaid in very heavy colored shading. It is way too much information to put on one display.

These maps are important and contain key relationships. But the presentation is way too busy to be understandable. These maps need to be redone for clarity.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L10 STADTLANDER, DOREEN

Comment Letter L10

From: Robert Dmohowski [mailto:RDmohowski@ci.oceanside.ca.us]
Sent: Monday, January 28, 2019 12:00 PM
To: Ninia Hammond <nhammond@integralcommunities.com>
Subject: FW: North River Farms Planning Commission Hearing

-----Original Message-----

From: Doreen Stadlander <doreens@cox.net>
Sent: Monday, January 28, 2019 11:58 AM
To: Planning-Planning Commission <PlanningCommission@ci.oceanside.ca.us>
Cc: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: North River Farms Planning Commission Hearing

Dear Oceanside Planning Commission,

For the public record, I am writing to support the City's staff recommendation (dated January 28, 2019 posted on the City's website) to deny the proposed North River Farms (NRF) development project. As a resident of Oceanside I am respectfully requesting that the Planning Commission move to reject the applicants conditions of approval and recommend denial of the proposed project to the City Council, and that no action be taken on certifying the Final Environmental Impact Report.

My concerns include but are not limited to:

- the project is not consistent with a number of general plan policies.
- conversion of agricultural lands and the precedence this project would create in facilitating high density developments within other agricultural lands in the South Mtno Hills community.
- impending updates to the City's Housing Element and Land Use Element -incompatible housing densities with surrounding land uses and zoning -the 31.6 acres that would be scattered throughout the residential development does not replace the loss of agricultural lands nor represents viable agritourism -significant increases to traffic -the proposed project would amend the land use designation consistency matrix provided in Article 2 of the Zoning Ordinance to include the PD District as being consistent with both Agricultural and Single Family Detached land use designations of the general plan -reliance on HOA to implement the community farm program -reliance on a Community Facilities District to fund and maintain agriculture and landscape facilities within the project.

Sincerely

Doreen Stadlander
Oceanside, CA

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L11 JOHNSON, ROBERT

Comment Letter L11

From: Bob Johnson <bjjsbob450@hotmail.com>
Sent: Saturday, January 26, 2019 12:39 PM
To: Robert Dimohowski <RDmohowski@cLoceanside.ca.us>
Subject: North River Farms Project

To Whom It may Concern:

We moved to this area due to its rural nature.

The North River Farms Project will exacerbate the already terrible traffic congestion and poor air quality by adding over 25 million new vehicle miles traveled per year with an increase of 100,00 metric tons of greenhouse gases.

I maintain that this project will impact the health, safety and well being of everyone in this area. By putting dense housing where it was not planned there will be increased traffic, additional noise and air pollution, heightened demand on our limited water supply and natural resources, stress to our fragile environment, and an extra burden to emergency services and utilities (which are not prepared for this type of increase).

Sincerely,

Robert H. Johnson
4635 Allende Avenue
Oceanside, CA 9205

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L12 BALMA, LARRY

Comment Letter L12

From: Larry Balma <lbj122@hotmail.com>
Sent: Monday, January 28, 2019 2:34 PM
To: Kyle Krahe <kkrahe@gmail.com>; Curtis Busk <ctbusk@gmail.com>; michel214@gmail.com; Tom Rosales <trosey79@gmail.com>
Cc: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>; Jeff Hunt <jlhunt@ci.oceanside.ca.us>; Jonathan Borrego <J.Borrego@ci.oceanside.ca.us>; Russ Cunningham <RCunningham@ci.oceanside.ca.us>
Subject: North River Farms

City of Oceanside Planning Commissioners

I am Larry Balma, President of the South Morro Hills Association. A recent poll of our neighborhood strongly indicates that we should continue to oppose the North River Farms Planned Development project as designed.

We agree with Staff that the Planning Commission should vote to recommend denial of the North River Farms project to the City Council.

Last March the Council allowed Integral to continue to work with Staff and to work with South Morro Hills Association in an effort to design a project that would be acceptable to the City and be compatible to our SMHs 3500 agricultural zone rural atmosphere and estate home overlay.

We had countless meetings with Integral, however they would never speak of density. They merely picked our AgriVision ideas to add into their project to further their marketing effort to the Council Members. They discount all of our concerns and claim they are not significant.

- The NRFs project is not located in a Smart Growth Area. It is not located on a transit corridor or in proximity to significant concentrations of employment opportunities.
- The NRFs project is premature. The SMHA has been working on the AgriVision plan for over five years and has the support of City Council and City Staff. The Council recently adopted Agritourism activities for SMHs into the General Plan and Zoning Ordinance.
- A Vision Plan for the entire 3500 acres of agricultural land must be adopted before any piecemeal development such as NRFs uses all the current infrastructure available without paying into any future development.
- The NRFs project is inconsistent with anti-sprawl policies in the General Plan, the cumulative effects will be costly.
- The NRFs project is not necessary to provide housing for the City's Regional Housing Needs Assessment.
- The NRFs project is not consistent with the Land Use Element of the General Plan.
- The NRFs project significantly impacts Traffic and Circulation that cannot be mitigated. Traffic Engineers have stated that our current 2.5-acre agricultural zoning of SMHs 3500 acres already needs the Melrose Bridge before maximum buildout.
- The NRFs FEIR did not even study the traffic east of their project. Sleeping Indian Road and North River Road are designated Evacuation Routes from Bonsall and Fallbrook.
- The NRFs project will convert agricultural land, that has been leased to commercial farmers by the current owner consistently for the last 50 years, into high density housing that is inconsistent with the visual appearance and rural character of SMHs.
- South Morro Hills 3500 acres is the largest area of agricultural land West of the 15 freeway.

Late Comment Letters for North River Farms Environmental Impact Report

- The NRFs project does not address a biological flyway for animal access or migrating birds from the north and Camp Pendleton, south to the San Luis Rey River.
- The NRFs project FEIR wants to mitigate significant impacts to agricultural resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials by purchasing credits elsewhere in the County or other States or even other Countries. We cannot allow this to happen.
- The NRFs project touts 30 acres of agriculture in their plan, however, that land is split into small plots and the farming is to be paid for by the homeowners using a Community Facilities District, Mello Roos, payable on the property tax bill. Mello Roos should only fund proposed public facilities, roads and public safety for the project, it cannot fund the agriculture proposed and landscape. The City also cannot afford to subsidize the farming proposal. The project builder will ultimately want to develop more units in place of a failed farm plot.
- The Village Core area development is not guaranteed in the EIR. The Education Center and Boutique Hotel could be changed by the future builder to become as many as 21 dwelling units per acre.
- The NRFs proposal to mitigate the fire response time they would build a "Temporary Fire Station" in the project... How temporary?

The SMHA agrees with Staff that the Planning Commission should vote to recommend denial of the North River Farms project to the City Council.

Thank you for donating your time and energy to the Planning Commission.

Larry Balma
President
South Morro Hills Association
760-419-2211

Late Comment Letters for North River Farms Environmental Impact Report

City of Oceanside Planning Commissioners

I am Larry Balma, President of the South Morro Hills Association. A recent poll of our neighborhood strongly indicates that we should continue to oppose the North River Farms Planned Development project as designed.

We agree with Staff that the Planning Commission should vote to recommend denial of the North River Farms project to the City Council.

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- The NRFs project is premature. The SMHA has been working on the AgriVision plan for over five years and has the support of City Council and City Staff. The Council recently adopted Agritourism activities for SMHs into the General Plan and Zoning Ordinance.
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Late Comment Letters for North River Farms Environmental Impact Report

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- The NRFs proposal to mitigate the fire response time they would build a "Temporary Fire Station" in the project... How temporary?

The SMHA agrees with Staff that the Planning Commission should vote to recommend denial of the North River Farms project to the City Council.

Thank you for donating your time and energy to the Planning Commission.

Late Comment Letters for North River Farms Environmental Impact Report

L13 DISHAROON, DALE & LOFFTUS, MARIA

Comment Letter L13

From: drdisharoon <drdisharoon@gmail.com>
Sent: Friday, January 25, 2019 3:42 PM
To: Robert Dmohowski <RDmohowski@cityoceanside.ca.us>
Subject: Response To The North River Farms Planned Development Project - January 28th Planning Commission Hearing

January 25, 2019

City of Oceanside Planning Commission
300 North Coast Hwy
Oceanside, CA 92054

Re: Public Hearing on the North River Farms Planned Development Project Monday January 28, 2019.

Dear Planning Commission Members:

First we would like to take this opportunity to thank you for your time and efforts while serving on our city's Planning Commission.

This coming Monday you'll be reviewing one of Oceanside's more important development projects to date. Not only will the North River Farms Planned Development Project (NRFDP) have immediate near term impacts in and around adjacent local Oceanside communities it will also have far reaching long-term development impacts for the City of Oceanside as a whole. If you haven't already I invite each of you to review the attached NRFDP EIR review.

We'll be focusing on significant current and future traffic, transit, and infrastructure impacts this project will have in and around our local and surrounding Oceanside communities.

In the fall of 2012 my wife and I moved to the Arrowood Homeowners Association from the La Jolla area. We then routinely experienced daily commutes times of 15 minutes to access the I-5, and I-15 freeways, and downtown Oceanside Transit Station. Today we regularly experience those same commutes that can take, or exceed, 30 minutes. Just since 2013 State Route 76 (SR-76) has become significantly impacted by further developments along its route and increased traffic loads related to the completion of the SR-76 highway improvements to the I-15. It not

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amusing that SR-76 is being dubbed the "76 Crawlway," "Crawlway!", during peak-time traffic loads. During these frequent traffic loads it can routinely take two, and sometimes three, signal light changes to advance to the next signalized intersection.

The NRRFDP will directly impose further traffic and transit impacts while straining the already deficient roadway infrastructure that's currently in place to support this project. We are already experiencing level "C-F" intersection and roadway impacts at the required access routes to this proposed project. Even with the proposed developer "Fair Share" project infrastructure funds, minor traffic mitigation measures including lane restriping, signal light readjustments, etc., will not be sufficient to resolve these and future traffic and transit issues. This project will only hasten the proposed level "D-E" intersections and roadways to become level "E-F" sooner than later. These increased roadway traffic and transit impacts will directly impact "decreased" levels in emergency services response times while increasing wild fire and other major disaster evacuation times.

We are asking the Planning Commission to carefully review these and the many other related NRRFDP impacts that it will bring to Oceanside. Your rejection of this plan amendment will hopefully send a message to our City Council. That it's vitally important for future developments proposals to make sure that supporting transit and infrastructure development has to come first as a priority and a policy. Perpetuating a policy of density first only leads to a decreased quality of life.

Thank you for your time in reviewing this response.

Regards,

Dale Disharoon Maria Lofftus
1105 Village Drive
Oceanside, CA 92057

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September 7, 2018

Robert Dmohowski
Planning Department
City of Oceanside
Sent via email

Subject: Comments on DEIR for North River Farms

Dear Mr. Dmohowski:

These comments are made on behalf of Preserve Calavera. Preserve Calavera is a grassroots conservation organization whose mission is to preserve, protect and enhance the natural resources of coastal north San Diego County.

This project is one of the most egregious ones we have seen in this area for some time. It epitomizes the kind of old thinking about sprawl development and is exactly the opposite of what our region needs to be doing to protect our natural resources, preserve community character and help move our world toward climate stabilization.

The following are our specific issues of concern:

Executive Summary

- Failure to include the second public scoping meeting on January 16, 2018 or a summary of the verbal comments made at the two public scoping meetings.

At the initial public scoping meeting on December 13, 2017 it was announced that because of the fire and disruption it caused for so many local residents, a second meeting would be held to allow input to the EIR scoping. That second meeting was held on January 16, 2018, was recorded, and is included as part of the public input on the city's webpage for the project. All comments received from the second meeting, both verbal and written should also be included as part of the public record. The Executive Summary fails to mention this second meeting so it is unknown if any of this input has been considered. Plus, it needs to be clarified if the analysis included consideration of all verbal input from both of these public meetings in addition to the written comments that are identified in Appendix A. We see that many people offered verbal comments that were not included in Appendix A. All such comments need to be summarized and included as part of the record of the meeting and to insure they were considered as part of the analysis of input to the EIR. Other places provide a written summary of such verbal comments so they are properly documented.

Environmental Setting

- Existing residential uses

The description states there is a single-family home used as office space and "several vacant

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dilapidated single-family structures are located in the northern and central portions of the project site." Such dilapidated residential housing is often used for intermittent farm labor housing- either for the existing farm or those in the vicinity. Loss of such housing could have an adverse impact on continuing farm operations in the area- adding to the cumulative impacts from this project adversely impacting continued farming in the area. Furthermore, this area along the San Luis Rey River has a long history of transient encampments. Occupants of such areas often move around in a project vicinity as they are removed from one site, they take up occupancy nearby. Such abandoned residences might serve such intermittent uses with resultant impacts on water quality, fire risk, etc. The potential impact from transient, intermittent use should also be evaluated. Failure to do so results in a potential unmitigated cumulative impact.

Project Description

- False characterization of "Agritourism"

Agritourism is being developed in the city of Oceanside, and throughout the agricultural areas in California, the rest of the country, and many parts of the world. It is not putting a few acres of agricultural land in the middle of a new housing project. It is, according to the Agritourism Strategic Plan of the City of Oceanside (incorporated by reference), "Any business conducted by a farmer for the enjoyment of the public to promote the products of the farm and to generate additional farm income. It includes a variety of facilities and activities that are increasingly available in San Diego County, such as agricultural festivals, farm visits, farm tours, demonstration farms, farm stays, wineries, bursary trails, and agricultural museums." Having land in agriculture use by itself is not agritourism. Nor are 689 housing units.

- What the heck is "eco-tourism"?

Page 3-2 says... "the proposed project would aid in the development of an eco-tourism zone by developing a community farm that enhances the rich history of the region and supports the existing agricultural efforts." There is nothing in the project objectives related to "eco" or "tourism." There is no such zone described. There is no analysis of such land uses. This appears to just be gratuitous language that sounds good and means nothing. Please put some meat on the bones or get rid of it. This is of concern because other economic studies would question the viability of a hotel in this location. This appears to be an attempt to legitimize the hotel and imply it is part of some bigger plan for attracting tourists which is not described in the DEIR, project objectives, land use plan or anywhere in the document that we could find.

Furthermore, there is no support for the conclusion that "this agricultural hub would be the central point for North County to obtain freshly harvested produce and other locally made goods, learn about growing foods, create bonds with their families and neighbors, and form strong connections with their home." Cyclops Farms is such a hub in Fire Mountain and it doesn't include 689 homes. There are farmers' markets in every north county community that provide the majority of this same experience without adding thousands of miles of VMT. There are numerous other places in Oceanside and North County that provide exactly the same experiences.

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- Clarify "windrow" shown on Figure 3-3

Merriam on line definition of windrows is as follows:

- 1a: a row of hay raked up to dry before being baled or stored
- b: a similar row of cut vegetation (such as grain) for drying
- 2: a row heaped up by or as if by the wind
- 3a: a long low ridge of road-making material scraped to the side of a road
- b: BANK, RIDGE, HEAP

As a farmer's granddaughter I am familiar with windrows being rows of trees planted between fields to block the wind and reduce the loss of topsoil. That certainly is not the purpose of a row of trees planted along an interior road in a housing project. Furthermore, Figure 3-7 seems to show a trail on each side of the road, exactly where the "windrow" is located.

- Concerns with project phasing

The description of project phasing on page 3-17 provides no assurances that there is any of the public amenities or commercial uses that are essential to get any benefits from having a mixed-use project. Other projects have included requirements that x amount of commercial is built with a specified number of residential units. The phasing plan must describe how public amenities are incorporated into the phasing plan. Failure to do so could result in completion of housing and commercial land uses long before there are the parks and other facilities essential to support such development.

Visual Resources

- Potential impact on scenic vistas

The DEIR correctly notes that the "relatively low elevation of the project site compared to surrounding topography creates opportunities in which the project site would be visible from surrounding higher elevations." It then notes that these potential impacts are of particular concern for areas along the San Luis Rey River and Guajome Park. None of the Key Observation Points (KOP) that were selected in fact can evaluate the particular concerns noted in the text. The issue is really the panoramic nature of the scenic view of which this parcel is just one portion. It is a particularly important portion as it is between the scenic San Luis Rey River valley and Morro Hills, an area of 3,400 acres of rolling, primarily agricultural hills that from many vantage points extend as far as the eye can see and that connect to adjacent rolling hills outside the city of Oceanside giving the entire area an even greater scenic vista. It was noted that the project site can be seen from many higher elevations and there are numerous locations on all four sides of the project where the project site is part of a scenic vista from public streets and parks. It is impossible to adequately assess these impacts on the panoramic views without extending out into the broader landscape, assessing topography in the region and then determining from what public vantage points would the site be seen and how will the project impact the character of that view. Three of the 5 KOPs are on the immediate edges of the

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project - [1,2, and 3] at the same elevation - where the text says view impacts would be expected when looking from higher elevations at the relatively low elevation project site. KOPs 4 and 5 again appear to be at approximately the same elevation as the project site, but from a greater distance and on the south side of the SLR River. What about views from higher elevations on other public roads, parks at a distance where the panoramic vista is visible? You can't evaluate the view from higher elevations if the only KOPs are essentially all at the same elevation as the project. You can't assess the impacts on panoramic views if the only KOPs are so near the project you have no panoramic view. The DEIR concluded that while there are numerous areas along nearby public roads with panoramic views towards the project site that the impacts are intermittent, partially blocked by vegetation, would blend with other nearby development or for other reasons the impacts are less than significant. The limited analysis of KOPs that are at the same elevation and too close to provide any panoramic vista fail to adequately assess numerous areas where there is a high potential for adverse impacts.

You can't assess the impacts on sense of place - a river adjacent to rolling hillsides if you do not even attempt to evaluate the existing view of this area, from higher elevations, and greater distances.

- Potential for cumulative view impacts

A major concern is that once this project proceeds there is nothing to stop continued conversion of these agricultural lands to more such dense development degrading the entire visual character of the 3,400-acre Morro hills area. The Population and growth inducing analyses concluded this is a likely outcome. That growth will certainly also impact views of this area.

- Potential new source of light or glare on protected biological resources

The draft Oceanside Sub Area Plan (SAP) includes specific lighting standards to protect hardline protected open space from adjacent land uses (edge effects). Light impact is one area of particular concern. The DEIR failed to identify if the project will meet the edge effect standards for lights near to the protected SLR River corridor.

Failure to adequately address all of these issues results in potential unmitigated significant impacts to visual resources.

Agricultural Resources

- Failure to adequately assess direct, indirect, and cumulative impacts to agricultural resources

The letter of December 21, 2017 from the State of California Division of Land Resource Protection specified four specific areas of analysis needed to assess and mitigate for the potential impacts of this project to agricultural resources. These included:

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- Direct and indirect impacts from conversion of farmland - including type, amount and location

Only direct impacts were considered. There was no discussion of the indirect impacts associated with beginning the conversion of these agricultural lands, e.g., how one project could lead to others and what the potential cumulative impacts such things as higher traffic volumes/speeds effecting the ability of other farms in the area from continuing with agriculture.

- Impacts on current and future agricultural operations

The letter identified specific factors that should be considered including impact on land use, land values and taxes, loss of ag infrastructure, etc. The DEIR included no such analysis on either current or future agricultural operations. In the adjacent city of Carlsbad owners of the Robertson Ranch farm stated that the extension of College Blvd across their farm holdings was the death knell for their farming operations. They could not move farm equipment around the area, and had to compete with higher volume, fast moving traffic. Once residential neighborhoods are built next to farmland there are often additional conflicts from things like odor, pests, and the use of chemicals, particularly aerial spraying. All of those factors historically cause conflicts with agriculture and adjacent residential neighborhoods.

- Inadequate mitigation for conversion of agricultural lands

The single mitigation measure (MM) proposed provides no assurance that local agriculture is protected as credits can be purchased through the PACE program anywhere in the county. Failure to protect ag land in the project area of Oceanside will have indirect land use impacts in this city that have not been considered.

- Failure to identify cumulative impacts to agricultural resources

The LESA Model Instructions allocate 50% of the score from the land evaluation (land capability classification and Storie Index) and 50% from site assessment (size, water, surrounding agricultural land and protected land). The DEIR concludes that impacts are significant as each subscore is greater than 20 and the total score is between 40 and 59 points. This very structured analysis methodology means that the next project will get a lower site assessment score, and each succeeding project an even lower score as there is less surrounding land in agriculture. This ensures the dominoes will continue to fall as approving one project lowers the score and makes it easier for others to follow, with less or no mitigation required. The DEIR failed to identify this as a cumulative impact.

- The identified Mitigation Measure (MM) fails to address local impacts

The DEIR identifies a MM and then says that if such a program is adopted prior to filing first grading permit then it would be obligated to purchase mitigation credits. However, there is no such program in effect and the timing to create such a program is not specified and is not

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mandated. This remains an unmitigated significant impact unless the project is conditioned to do this.

Air Quality

- Erroneous conclusion that population increase with the project is already included in population estimates in the RAQS.

Page 4.3.22 states that "The addition of 689 residential units (approximately 1,971 new residents), to the SRA as a result of the proposed project would be accommodated in the population forecast used to prepare the 2016 RAQS." This statement is only true if all other growth remains as assumed in the 2016 RAQS which was based on the adopted General Plan and amendments made to date. What that fails to include is other increases in growth that have already been approved since the RAQS was adopted. For example, Park Villas at El Corazon was planned for 32 units but 70 were permitted and are under construction. The Villa Storia site planned for far fewer units than the 420 that were approved in the General Plan amendment. While this project is included on Table 5-1 Cumulative Projects, that does not mean that all growth is within the projected growth assumed in the RAQS, which must also allow for every other parcel that has not yet been built to the allowed number of units included in the General Plan or Housing Element. If not, then this analysis is assuming that some future project is the one that will exceed the assumed population growth and it will trigger non-compliance with the RAQS growth projections. Some other landowner will pay the price for allowing this one to exceed its zoning. Please provide the actual numbers for population growth that support the conclusion in the DEIR that these 689 units are within the population assumption of the RAQS.

- Cumulative operational VMT emissions are underestimated

Page 4.3-29 states "The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and the County as part of the development of their General Plans." However, a key element of this analysis is that SANDAG assumes that the majority of growth in the region occurs at 200 smart growth sites. Achieving smart growth is critical to the assumptions for VMT and GHG reductions. But neither the region nor Oceanside have demonstrated any capacity to have "the majority" of growth near the smart growth sites. A quick review of Table 5-1 would say that none of these 1638 units¹ are located within ½ mile of a designated smart growth site. In fact, very few of the units built since adoption of the 2012 Sustainable Community Strategy have in fact been built within ½ mile of a smart growth site. Failure to locate units as assumed will substantially increase the number of trips (reduced access to alternative transportation) and increase trip length as sprawl development is built further from jobs and services. Both factors will result in a substantial increase in VMT above what was assumed in the SQS and the resulting transportation plan modeling. These errors in underestimating the increase in VMT affect both the air quality and GHG impacts. The DEIR has improperly computed air quality impacts and as a result these impacts remain potentially significant.

¹ Counting 70 units for El Corazon

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- Insufficient mitigation for construction diesel exhaust

MM-AQ-1 specifies Tier 4 for some types of diesel powered equipment and Tier 3 for others. But it allows this requirement to be waived if the applicant demonstrates that such equipment is not available. That is not a valid exception. This is a cost factor for the applicant that is part of the cost of doing business. Either they can pay a higher rate for the specified level of certification, or they can adjust the construction schedule so fewer pieces of equipment are operating at once and reduce the diesel pollutants that way. Exceeding the cancer risk to build faster is not an acceptable tradeoff for the health of the children and seniors of this community.

- Insufficient consideration of the poor air quality in the San Diego region

The American Lung Association's *State of the Air* report for 2018 (<http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html>), (incorporated by reference) shows that the San Diego-Carlsbad urban area is the sixth-worst area for ozone pollution in the United States and is classified by the federal EPA and the California Air Resources Board as a nonattainment area for ozone. The DEIR states that the San Diego Air Basin does not meet either the federal 8-hour ozone standard, the California 8-hour ozone standard, or the California standard for either coarse particulate matter PM 10 or fine particulate matter PM 2.5. (DEIR Table 4.3-1).

The State of the Air report provides a full description of the health impacts from this poor air quality which can include worsened asthma, increased hospital visits for respiratory distress, worsened COPD, decreased lung damage, increased risk of heart attack in people with cardiovascular disease, and low birth weight and decreased lung function in newborns. The DEIR failed to adequately consider these significant health impacts, and the significance of adding even more air pollutants to this area that already has health impacts from poor air quality.

Biological Resources

- Failure to evaluate or comply with requirements related to conversion of agricultural lands in the draft Oceanside Sub Area Plan (SAP)

Section 4.3.1.3 Agricultural Exclusion Zone for the Oceanside SAP says "discretionary actions or conversions to nonagricultural uses will invoke additional conservation guidelines, which include preserving, restoring or enhancing 50- or 100-foot upland buffers of natural vegetation adjacent to existing wetland vegetation communities." It goes on to add requirements for "assessment of wildlife movement and habitat linkages across the property and the project shall be designed and maintained to enhance such movement corridors and habitat linkages." It further states that the focus is on "maintaining or creating wetlands and/or upland buffers along the San Luis Rey River" and "functional linkages from the San Luis Rey River from other habitat areas inside or outside of the City." These provisions were specifically called out in the State of California Department of Fish and Wildlife letter of January 22, 2018 included in App A. The proposed project proposes to convert the majority of the 176.6 acres to non-agricultural

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uses. The majority of the agriculture that would be reestablished on site would provide greatly reduced biological function as it would consist of small, isolated patches surrounded by development.

The DEIR includes a figure marking the boundaries of a 100-foot buffer but provides no discussion about what will be allowed in this buffer, how it will be managed in perpetuity to mitigate for the impacts of this development. Since much of this buffer is outside of the project boundaries there needs to be a mechanism to ensure that this will occur.

In addition, Figure 4.4-3a does not map any buffer along the offsite impacts from widening of the North River Road to the east of the project boundaries or for the two drainages pipes that will extend from the project, through the buffer to the sensitive habitat along the SLR.

Agricultural lands provide substantial secondary benefits for both wildlife and native plants. Agricultural land can easily be enhanced to create native habitat, wetlands/buffers and improve wildlife corridors and linkages. There is little potential to create such functional improvements in land once it is developed. That is why the SAP specifies additional conservation actions if such land was to be converted to other uses.

Figure 4.4-1 fails to show the regional wildlife corridor links between the San Luis Rey River and "other habitat areas inside or outside of the city." It shows existing housing development to the east and west of the project site which means only the project site has the potential to provide such linkages. The conditions associated with agricultural land conversion are intended to address these issues as development occurs so that what remains has protected the long-term biological function of the Agricultural Exclusion Zone. This area was excluded from the more specific requirements of the rest of the city with the condition that if such land was converted the biological value had to be protected by complying with these conditions.

The DEIR has failed to comply with these key provisions of the SAP. This remains a significant unmitigated impact both to Land Use and to Biological Resources.

- No evaluation of wetlands avoidance

The DEIR provided no discussion of wetlands avoidance or minimization. It appears that North River Road could be realigned slightly to the north and avoid all of the wetlands impacts along that road. Since wetlands impacts require first considering avoidance, then reducing the impacts and only as a last resort mitigation, this fails to comply with the requirements for analysis and protection of wetlands.

- Failure to evaluate potential impacts on migratory birds associated with the San Luis Rey (SLR) River.

The limited number of surveys would not have captured the full range of avian species associated with our very few local fresh water wetlands of which the SLR River is key. A few years ago, dredging of the SLR resulted in the largest take of an endangered species in the state of California (Least Bell's Vireo). While there is no such vireo habitat on site, the requirement to

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enhance river buffers could potentially support increased migratory bird use.

- Failure to evaluate/mitigate for potential impacts from invasive shot hole borers (SHBs)

This was specifically identified as an issue of concern in the letter from DFW and again was ignored. This invasive species has been found nearby and can be easily spread. Proper evaluation and mitigation are essential to protect further damage in this region from this invasive pest.

Land Use

- Failure to identify inconsistency with Agritourism Strategic Plan (ASP)

This plan was recently completed as part of a several-year effort to identify how agritourism might help make continued agriculture more economically viable. One of the key objectives of the plan is "A. The Countryside Experience of South Morro Hills offers one of the last places along the San Diego County coast that has agricultural open space with quiet country roads, vistas of rolling hills leading to the mountains, orchards, and farm life. Today's urban resident wants to find that setting, and immerse themselves in it to escape."

The ASP has provided the foundation for new ordinances that recently were adopted to specifically support agritourism. The DEIR failed to evaluate the project's consistency with this on-going effort in the city of Oceanside. Failure to do so results in a potential conflict with this plan that has not been identified, evaluated or mitigated.

Transportation

- Unclear impacts of amending the Circulation Element to reclassify North River Road from Stallion Drive to Sleeping Indian Road from a Major Arterial to a Four Lane Collector.

Please clarify exactly what changes would result from this and if there are any direct or indirect impacts.

- False characterization of accessibility of public transit

The San Luis Rey Transit Center is 1 mile from the Village Core, and an even greater distance from the northern and eastern parts of the project site. Studies of public transit use rates indicate the importance of land uses within a ¼ mile and a ½ mile radius. At a distance of a mile, with no transit service to the site, this project can be expected to have minimal use of public transit. Furthermore, the transit service is bus. The housing is well below the density thresholds needed to support high frequency transit use. The housing mix, primarily single-family homes well above the median income level of current NCTD transit users, historically has minimal transit use. NCTD bus users, except for a few direct shuttles to Coaster or Sprinter stations, are primarily transit dependent. The housing mix, location and limited access to jobs and services will not result in this area serving a transit dependent, low-income population.

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- Inconsistencies in roadway figures/descriptions

There are numerous inconsistencies between roadway figures and between figures and text in the project description making it impossible to fully understand the distinctions between roads and how the circulation plan will actually operate. For Example: 1) Pvt Street A is shown in 2 colors on Figure 3-5, but only one color is on the legend. The cross sections on Figure 3-6a for the two portions show no difference above ground and neither indicates the windrow shown on Figure 3-3. 2) The Wishire Road segment between K and North River Rd shows as the same as K street on Figure 3-5 but on but on Figure 3-6b it is shown as 35' ROW half width with a 2' drainage swale whereas street K on Figure 3-6a is a 60' ROW with no drainage swale (this connector is of particular concern as it is associated with a roundabout). 3) Street G is shown as a loop between two points on street G whereas on Figures 3-6a and 3-6b it ends at a cul-de-sac with only one connection to street G.

Please correct these figures for internal consistency and ensure that the analysis is based on correct information.

- Apparent error on Figure 3-7

The colors on the legend do not match the colors/labels on the map. (for example, see street G,H,I and J) on the map

- Windrow is not shown on cross section of Pvt St A Figure 3-6a

The cross section does not indicate what the 9' sections are between the gutters and natural paved natural paved walks are. Is this where the "windrow" is located?

- Gaps in bicycle network shown on Figure 3-8

Section 3.3.2.4 says "the proposed project includes an integrated system of bicycle facilities and allows for future linkages and improvements." However, Figure 3.8 as shown has gaps in the links for both Class I and Class II bike trails. For example, how does a bike get around the roundabout - the figures show right turns only? There is no connection shown between the Class I and Class II trails - is that intentional? Many of the Class II trails do not show a connection to a street - for example, the stub near street L. Furthermore, the figure does not show where bicycle racks/facilities are located. If the intent is to facilitate movement around the project site by bicycle, key bicycle destinations where facilities are provided must be accurately shown.

- Alternative transportation connections to the San Luis Rey Transit center

Figure 3-11c shows a section of Off-Site Street and Trail Improvements, west of the project site. However, the key connectivity issue is connection to the transit center and that is not shown. Both texts and figure need to clearly indicate how full pedestrian and bicycle access is provided between the project site and the transit center.

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Greenhouse Gas

- Inaccurate characterization of project level GHG threshold

Page 4.8-28 states "... the city has established efficiency metric thresholds, which projects are to use to evaluate impacts from GHG emissions." It states these thresholds as 4.0 MT of CO₂e per service population per year (MT CO₂e/SP/yr) for year 2020 and 3.0 for 2030. We are aware of no such efficiency metrics being established in the city of Oceanside. In fact, we have seen multiple thresholds used for evaluating GHG impacts at a project level in this city. Please provide documentation that confirms the City has established these metrics which were used as the threshold in the analysis of impacts.

- Inaccurate computation of per capita GHG efficiency

Using only per capita GHG efficiency provides no assurances that Oceanside will be able to achieve the actual reductions in GHG that are required by state law. They only work if there is a limit on population and there is no such limit in place. For example, a service population of 100 people with 4 MT/capita has 400 MT emissions. A service population of 150 people with 3 MT/capita has 450 MT emissions. The actual amount of GHG emissions needs to be declining—not just the per capita amount. The draft Climate Action Plan (CAP) has identified a gap in emission reductions for the city that the CAP actions will be designed to address. All of the emissions from this project are above what was assumed in the inventory as they are not consistent with the existing General Plan. All of the project emissions will increase the community-wide GHG emission for the city and all will require mitigation. It is not sufficient to say the project will achieve the per capita thresholds because the population increase has not been accounted for. Achieving the per capita reductions for this single project—when all of these emissions are being added to the baseline community wide emissions per year is a significant adverse impact that has not been properly identified or mitigated.

- Project is not consistent with SANDAG's San Diego Forward (SDF): The Regional Plan

Table 4.8-10 Regional Plan Consistency Analysis is presumably intended to support the conclusion that the project is consistent with SDF. In fact, the letter from SANDAG dated December 20, 2017 included in Appendix A specifically says it is not a Smart Growth site. Since the SDF assumes that the majority of growth is at the designated smart growth sites and this is not such a site, the entire project itself conflicts with smart growth as assumed in SDF. While the letter recognizes the project for including some mixed-use development it identifies numerous conditions that need to be included, based on their analysis of what the SDF policies would require as applied to this project. Many of those have been ignored while others are only partially addressed. For example, it says there need to be connections to the SLR transit center, bicycle, pedestrian, and even shuttles. The bicycle and pedestrian maps do not address connections all the way to the transit center and no shuttles are being proposed. It lists a number of recommended TDM strategies, but none of them are described in sufficient detail, if at all, to ensure they will result in what the SDF is trying to achieve - fewer auto trips and reduced VMT. It also recommends a Park and Ride lot because of proximity to I-15; this was ignored.

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Furthermore, the consistency analysis on Table 4.8-10 shows 11 categories are Not Applicable and 7 as Consistent. Those found to be consistent include "Focus growth in areas that are already urbanized." This project is not in an urbanized area, it is farmland. "Protect and restore our region's urban canyons, coastline beaches and water resources." The project does nothing to protect and restore such resources; yet it is found consistent. "Address the housing needs of all economic segments of the population." This project is not included as part of the city of Oceanside Housing Element (HE) so it has not been integrated with the plan to address housing needs. Simply providing housing does not make it consistent. The DEIR fails to identify housing units at each of the identified income levels, as required for compliance with the HE. The HE identifies how the city will provide the additional housing units specified for each income level per the regional Housing Needs Assessment (RHNA). The DEIR has failed to provide this essential information necessary to determine that the project is in compliance with these key provisions.

Furthermore, its location far from jobs and not convenient for public transit will make it very unlikely this would serve any low income housing needs. Section 5.4.14 concludes it would be growth inducing which is also not consistent with SDF – particularly since it is not addressing sufficient affordable housing needs for the region and the city of Oceanside.

- GHG impacts have not been mitigated by the proposed MM-GHG-2

The DEIR must mitigate all of the adverse GHG impacts from this project ie all of the GHG emissions, not just a portion of them. The city of Oceanside is obligated to address its GHG emissions. Baseline emissions have been determined by a community wide inventory. This inventory assumed this land was consistent with the adopted General Plan for the purposes of estimating emissions. That identifies the project land as zoned agricultural with essentially no GHG emissions. The emissions from this project are all in addition to what was assumed in the baseline community inventory. Consequently all of the project emissions are above what was included in the baseline inventory, must be added to community wide emissions and therefore 100% must be mitigated, not just "approximately 30%" as identified in MM-GHG-2. Furthermore, these emissions need to be mitigated within the jurisdiction where they occur, and not through carbon off sets outside of the city of Oceanside. See Sierra Club comment letter on the County of San Diego CAP on this issue hereby incorporated by reference.

Hazardous Materials

- Inadequate testing of soil and water for hazardous materials

We are frankly shocked that no soil testing was done and that the only interview as shown on page 4.9-4 was the project applicants representative Nina Hammond - not an unbiased source. We do not recall any project in this area that had been in agricultural use that did not find hazardous materials on site requiring remediation. It really is irrelevant what the law says about the handling of toxic chemicals; there is no reason to assume the law is complied with 100% of the time. The laws changed about what chemicals can be used and many remain in the

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soil for generations. Soil disturbance from mass grading of a large site like this can and does result in release of these substances. Page 4.9-17 indicates the last HMMD inspection was done in 2011 although this site has remained in continuous use since that time. It further notes there were reports of disposal of "unspecified waste in 2011 and 2012." No recent site inspections, two reports of unspecified waste disposal, pattern of pesticide use throughout this region, proximity to the SLR river and inadequate interviews to assess site conditions all leave this analysis grossly inadequate. Failure to adequately assess site conditions leaves this a potential unmitigated impact from on-site hazardous materials

- Fire Protection Plan (FPP) failed to account for effects of climate change

Technical analysis by the San Diego Foundation summarized in "San Diego's Changing Climate: A Regional Wake-up Call" (included by reference) concludes that by 2050 "wildfires will be more frequent and intense". They found that the fire season will be longer, droughts will increase fire risk, Santa Ana winds may occur for longer periods of time prolonging extreme fire conditions, and the number of days each year with ideal conditions for large-scale fires will increase by as much as 20%. This and other fire risk studies have determined that past history of fire frequency and intensity is not a good predictor of future conditions. The DEIR has used past history to project conditions thereby underestimating the actual fire risks.

The DEIR concluded the risk from failure to meet response time standards was a "significant and unavoidable" impact. However, the magnitude of this impact is substantially greater than was identified.

- FPP Analysis fails to consider several key risk factors

The DEIR notes the presence of *Arundo donax* in the SLR riparian corridor, and the large volume of dead material that adds to the fire risk. This habitat along the river was evaluated as "extremely flammable" on page 13 and as a "moderate to high" fire threat on page 17 of Appendix J1. This area is not just a fire risk. There has been a long-term problem with fires along the SLR from transient encampments with some intentionally set. That human activity in the riparian corridor further increases this fire risk.

- Response time analysis underestimates the number of calls that fail to meet the 5 minute response time goal

Table 7 in Appendix J1 summarizes Fire Station 5 call volumes that were used as the basis of the analysis. However, Table 7 ends in 2015 and has shown consistent increases in call volumes every year without the project. There is no reason to assume this historic pattern will decline. Furthermore, it is highly likely that increasing call volumes from other stations will continue to increase the call volume at FS 5. The DEIR projects daily average calls as 5.4 and then assumes with annual calls from the project as 265 the new average daily calls of 6.1 can be absorbed by Fire Station 5. The number of existing calls is based on data almost 3 years old. If the 2015 data is adjusted by a conservative increase of 2%/year the baseline number of calls without the project would be 6.3 by buildout in 2024. Adding another .7 calls per day would be 7 calls/day- not 6.4- and that is without any spillover from nearby stations that would also experience

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Increases and further add to average daily calls.

- No mitigation is proposed to address the significant impact of failure to meet response time goals

The FPP identified failure to meet the performance goal of 90% of calls responded to within 5 minutes as a "significance and unavoidable impact." They concluded a new fire station may be needed. But the alternative per page 23 is for the project applicant to pay fire impact mitigation fees that would constitute their fair share of the cost of such a station. This was identified as a significant impact in Appendix J1 Fire Protection Plan, but was not properly carried forward into the DEIR as a significant impact, nor was any mitigation proposed.

We disagree that even if the proposed MM was carried forward this is adequate mitigation as there is no basis upon which to determine a "fair-share" contribution as there is no plan for such a new fire station, no land or location specified, no funding in place and no assurance such a facility would be built in time to address the response time impacts by buildout in 2024. It is worth noting that when the city of Carlsbad proposed to build the Quarry Creek project near the Oceanside boundary that would result in response time failures they modified the MM to require a new fire station to be built and operational by the time 500 units had been built. Similar mitigation must be provided for this project or this remains a significant unmitigated impact.

- Prohibited plants list fails to include those prohibited by ordinance

Appendix D Prohibited Plants of Appendix J1 fails to include the specific species named in the analysis as contributing to the high fire threat in the SLR riparian corridor- giant reed (*Arundo donax*). This is one of the invasive species in the city of Oceanside that are specifically restricted as part of fire safety conditions, yet they are not included. Please add this and the other invasive species specifically prohibited by ordinance because of their fire risk.

Also of note the Appendix title is "Prohibited" plants but the actional chart in the appendix is labelled as "undesirable" and seems to leave some discretion about the use of the listed species. Please clarify this discrepancy.

- Appendix J2 pages 27-34 blank

It appears these blank pages may have been intended for insertion of figures that are missing. Please clarify and provide missing information.

- Key conditions identified in Appendix J2 are not carried forward into the DEIR

Page 36 states "It shall be binding on the HOA to actively participate as a partner with the OFD to assist with coordination and distribution of fire safety information they develop." Earlier this educational component is described as including encouragement to participate in CERT training, for the HOA to do annual evacuation public outreach and provide links on their webpage. Page 41 states "identification of potential safety zones will require additional

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focused study of OFD and the fire and law enforcement agencies.” The DEIR concludes there is no significant impact yet none of these conditions have been properly carried forward into the DEIR as conditions of approval or MM. Failure to address these issues leaves this a potentially significant impact.

- Emergency evacuation plan arbitrarily limited the analysis to focus on the project site and within the site on the HOA

Numerous residents raised concerns about fire evacuation both verbally and in written comments on the NOP and they did not live on the project site. The analysis of project impacts on evacuation arbitrarily focused just on the project site instead of considering the broader impacts on evacuation from all of Mirro Hills that could be impeded by hundreds of additional autos on the three designated evacuation routes. All three identified evacuation routes rely on the use of North River Farms Road and the project is located on both sides of the road. The analysis needs to consider broader impacts on evacuation and not just the residents of the project site. Furthermore, the project is supposedly designed to attract lots of visitors - at the hotel, commercial areas, classes, farms and community gardens. The analysis focused almost entirely on the responsibility of the HOA to inform the residents of evacuation plans and failed to describe how all of the other users of the site would be included.

The DEIR needs to assess broader implications of evacuation on the entire area and how all area residents, employees and visitors would be incorporated. Furthermore, there is no funding for the activities specified and the role is much larger than a volunteer HOA is expected to perform. In other places the DEIR mentions potential fire impact fees (for fair share costs of new fire station). All of these other ongoing costs also need to be provided for along with a mechanism for ensuring conditions are met in perpetuity. Failure to address this remains a significant unmitigated impact.

Hydrology

- Unclear how farming operations have been incorporated into the SWQMP

Farming within a residential neighborhood is not a common practice and is not specifically addressed in the City's BMP Design Manual. The DEIR concludes that since the proposed BMPs were designed in accordance with the City's BMP Design Manual as identified in the SWQMP (Appendix K) there are no significant impacts. This discussion includes nothing about potential impacts from this unusual condition of farming in a residential neighborhood and how this has been specifically addressed in the SWQMP. Please add some discussion of this issue so it is possible to determine if this has been properly considered and mitigated.

- Unclear floodplain map with project

The DEIR text says flooding impacts as shown on Figure 4.10-1 have all been addressed by basically raising the building pads out of the flood zone. The technical appendices still show the with-project conditions as having substantial portions of the project site within the 100-year flood level and that only delineated the project site. We could not find a figure that addressed

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the entire area with project conditions that demonstrate there is no remaining flood risk. Please add project maps into the DEIR and demonstrate that flooding conditions have been addressed, on the project site and upstream and downstream.

- Cost of required additional flood control systems

Figure 4.10-1 shows large areas both within and upstream and downstream of the project that are within the 0.2% Annual Chance Flood Hazard area. The text says the buildings will be above the 100-year flood limits, a new LOMR will be provided and BMPs will address all significant flooding impacts. Project objectives on page 3-2 include "11. Provide sufficient number of residential units to support the necessary improvements to public facilities ..." and "12. Include a mix of land uses and facilities that will maintain a positive fiscal impact on the City of Oceanside General fund." There is no clear identification of what structural BMPs are included and their associated long-term O and M and replacement costs. In the absence of this information it is impossible to determine if the project meets objectives 11 and 12. Please provide a detailed list of these improvements and long-term O and M costs and incorporate in an overall cost assessment to verify compliance with these two project conditions.

Land Use and Planning

- Project is not consistent with numerous SANDAG RCP Smart Growth principles

Table 4.11-3 falsely concludes the project is consistent by ignoring key requirements and focusing on minor ones. For example, Land use and Urban Design. The critical criterion is to concentrate development in core areas and through infill. The project does the opposite by including dense housing far from core areas. On another item, Jobs/Housing Mix, the key is to locate housing near or within major employment areas. The project worsens the city's job/housing ratio by adding 689 homes and few jobs. It is unlikely that the employees in a hotel or farm workers will be able to afford living on site; there has been no analysis of income levels and affordability of the new units. Furthermore, just saying the project allows for hotel and commercial uses does not mean there will be such uses on site. In fact, often such mixed-use projects in non-core areas like this end up with unused commercial spaces. Even in more urbanized areas like downtown Oceanside this has been problematic with numerous vacant/underutilized commercial spaces on the ground floor of mixed use residential projects or as portions of horizontal mixed use like the project on Vista Way. The principle says to locate housing "near or within major employment areas." The analysis assumes that means anywhere in downtown Oceanside, southern Oceanside and anywhere in the city of Vista. Where actually are the major employment centers in these two cities and what is the proximity of the project site to what is a major employment center? In fact, this project is located in the far northeastern corner of Oceanside - about as far from downtown and southern oceanside as you can get.

- Project is not consistent with the Agritourism Strategic Plan and related Zoning ordinance currently being considered

The definition of agritourism as stated in the Agritourism Strategic Plan is as follows: "A form of

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commercial enterprise that links agricultural production and/or processing with tourism in order to attract visitors onto a farm, ranch, or other agricultural business for the purposes of entertaining and/or educating the visitors and generating income for the farm, ranch, or business owner." No where does it describe 689 housing units, or any housing units as part of that definition or of the zoning being considered. Agritourism is intended as a way to support agriculture by allowing related commercial operations, not by drastically reducing the number of acres of land that is used for agriculture and replacing it with housing.

- Project conflicts with the Draft SAP

This was discussed previously.

- Project conflicts with numerous General Plan provisions

Table 4.11-2 concludes that in every case the project is consistent with the stated, policy, objective or goal. These conclusions are directly contradicted by numerous other documents and statements made by staff at public meetings on the project. In fact, there are numerous conflicts with the city of Oceanside's General Plan and land use provisions. For example, the staff report for Planning Commission hearing on this issue of February 27, 2017 Item 5 (incorporated by reference) discussed the project compliance with eight critical criteria. As stated in the staff report it also evaluated the project against the agricultural policies outlined in Section 2.5 of the Land Use Element to "assure the integrity and viability of remaining agriculturally zoned properties in South Morro Hills and prevent land use conflicts between agricultural and non-agricultural uses." The staff report then concluded the project failed to meet 5 of the 8 criteria, one was not applicable one required further analysis and only one was found in compliance.

The criteria where it was found not consistent are fundamental to assess actual GP/Land use compliance. It was found not consistent with provisions for (1) smart growth, (2) the housing element, (4) Jobs/housing ratio (5) infrastructure, and (6) provided no public benefits beyond what would be required. The only area it was found consistent was (8) it will generate additional tax revenue. If it is not consistent with things like the Housing Element then compliance with detailed provisions - designed for housing in other parts of the city that are consistent with the GP HE - are really irrelevant.

On the evaluation of impacts on the remaining agricultural land it found there were four potentially significant impacts. This single project represented about 7% of the agriculturally zoned land and was one of very few large parcels and consequently its impact would be greater than might otherwise be expected. The staff report concluded it "would have a significant impact on the agricultural productivity on the rest of Morro Hills." It further stated that further evaluation would be needed to assess buffers for this land use conflict. These General Plan/Land use consistency concerns were also supported by the Planning Commission and public comment at this hearing.

Following that hearing, the March 8 2017 City Council workshop staff report (incorporated by reference) again concluded the project was not consistent with numerous provisions of the

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General Plan. It further said it was "premature" to make judgements about the impact in light of current efforts to boost agritourism.

The following are just three examples to document the failure of the consistency analysis to include relevant information and make defensible conclusions about consistency. The DEIR has essentially ignored all of this input, failed to address the conflicts that have been raised and provides no substantive basis for its own conflicting conclusions.

Example 1. Policy 1.1B Land Use Element

Policy test: Land uses shall not significantly distract from nor negatively impact surrounding conforming land uses.

Consistency Analysis: The project site would be in a transitional area and serve as a transition point between the more urbanized areas to the west and agricultural areas of Morro Hills.

Conformance/Non-Conformance - Consistent

In fact, the project will result in substantial impacts to the neighboring agricultural lands and as the DEIR concludes In Housing/growth will likely lead to further conversions beginning a domino effect of converting agricultural lands to other uses. This issue was called out in the February 27, 2017 staff report and remains both a significant impact and a conflict with the existing provisions of the GP - It is not consistent.

Example 2. Goal Public Safety Element (Goal: Public Safety Element

Policy test: Take the action necessary to ensure an acceptable level of public safety for prevention and reduction of loss of life and personal property of the citizens of Oceanside.

Consistency Analysis: The project would improve roadways, provide adequate lighting, provide signs, comply with geo-technical requirements, include fuel modification zones and provide building pads above the 100-year floodplain.

Conformance/Non-Conformance - Consistent

In fact, while the city of Oceanside has a goal for 90% of emergency responses to be made within 5 minutes, on the project site 90% are projected to exceed five minutes. Furthermore, response will be delayed in much of the land beyond the project limits because of the "significant and unavoidable" traffic congestion that will be a result of the project. These minor design issues are irrelevant when it is response time that is the critical factor in determining the loss of life and personal property. The project is not consistent.

Example 3: Goal 1 Transportation Demand Management

Policy test: Support programs that encourage increased vehicle occupancies and trip reduction in order for residents to enjoy the quality of life that currently exists in Oceanside.

Consistency Analysis: The project would provide on and off-site improvements to the circulation element and NCTD provides public transit services in the site's "vicinity."

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Conformance/Non-Conformance - Consistent

In fact, the DEIR concludes that the project will result in "significant and unavoidable" traffic impacts. Traffic congestion is a key contributor to residents' quality of life as documented in several surveys. Traffic congestion will be worse with the project and is an adverse impact that will affect the quality of life for many residents. The project is not consistent with this goal.

The DEIR has essentially ignored all of this input, failed to address the conflicts that have been raised and provides no substantive basis for its own conflicting conclusions.

Mineral Resources

In addition to the discussion in the DEIR the city has provided a separate document "Statement of Reasons to Permit the Proposed Use and Eliminate Access to Mineral Resources of Regional Significance (MRZ-2)". The DEIR concludes there are no significant impacts, yet state law requires processing of this statement which implies it is of sufficient impact to require state review/noticing. This should be identified as a potentially significant impact subject to being conditioned that this state notification is properly processed.

Noise

In many areas where residential units have been built adjacent to agricultural uses noise is often one of the areas of concern. Farm operations include kinds and pattern of noise not usually associated with homes. The project proposes to integrate agricultural uses throughout the site, often in close proximity to new residences. There is nothing in the DEIR that describes how the agricultural operations will be conditioned to ensure this will not be a problem. In the case of construction noise this has limited hours and days of operation, limits use of bells, etc., to warnings when needed, etc. The DEIR has failed to adequately evaluate the potential noise impact from farming operations. Such potential impacts need to be identified, analyzed and appropriate project conditions/mitigation included.

Population and Housing

- Analysis fails to evaluate compliance with RHNA allocations by income level

Table 4.14-2 identifies the City of Oceanside Regional Housing Needs Assessment (RHNA) by income level. The ability to achieve housing at each level is a key part of compliance with the Housing Element. The DEIR fails to evaluate how the proposed project potentially impacts achievement of housing by income levels. City ordinances allow payment of in lieu fees rather than actually building affordable units on site. The project is unclear about how it will meet this obligation. If payment of fees, then this is an additional indirect impact wherever those affordable units are constructed. This potential impact needs to be analyzed and mitigated.

- Failure to address adverse impacts to jobs/housing ratio

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Achievement of a jobs housing ratio of 1:1 is a key factor in achieving the economic sustainability of the city, and being able to provide quality affordable housing where the residents have access to transit, services and jobs. Oceanside's poor jobs/housing ratio has long been identified as an issue of concern. Policies to improve this have been adopted by the City Council and by resolutions of the Chamber of Commerce (incorporated by reference). Recently, there has been substantial analysis of this issue and recommendations to address it in the preparation of the draft Economic Development Element (EDE) planned to be included in the City's General Plan. (See PowerPoint presentation https://www.ci.oceanside.ca.us/documents/Planning/Oceanside_EDE_Workshop_11-27-17_KMA.pdf and the associated technical papers by KMA (incorporated by reference)

Per page 4.14-10 of the DEIR for the purpose of determining the projects service population, an average household size of 2.86 persons per dwelling unit was used. That results in a projected service population of 1,971 residents plus 190 employees or 2,161 people total. With 689 residential units that is a jobs/housing ratio of 190/689 is 0.28/1. This, of course, requires further analysis as the project proposes a boutique hotel and some commercial uses and farming. But at least a portion of those jobs would be included in the 190. It is clear this project will make it harder for the city to improve its job/housing ratio and in fact, it will make it worse. The actions necessary to compensate for this disparate impact will result in further indirect impacts that have not been identified or analyzed. Furthermore, this is in conflict with the project objective 12 to maintain a positive fiscal impact on the city of Oceanside's general fund.

Public Safety

- Increases in fire/emergency response times

See discussion under hazardous materials.

- Evacuation impacts of piecemeal roadway widening

The proposed project would complete widening of North River Road only along its frontage. This will create two bottlenecks at each end of the widening that would impact evacuations. Figure 3-6a fails to show where these lane/roadway width changes will occur - presumably at each end of the frontage road. The analysis fails to consider the impact on roadway operations from two sets of road width changes along a major evacuation route.

- Cumulative fire risk

The increasing rate and severity of wildfires in California is well documented. This August 6, 2018 story in the Sacramento Bee discusses a study by Verisk Analytics about the number of housing units in high severity fire risk areas. They found overall that about 15% of the housing units in the state are at high risk. But San Diego County was among those with the highest actual number of units at risk, before building even more projects like this.

<https://www.sacbee.com/news/state/california/fires/article216076920.html>

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Parks and Recreation

- Clarification of who is responsible for the 16 acres of parks

Section 3.3.1.3 Describes six categories of parks and open space and says "detailed programming and design for the initial installation would be developed in collaboration with the City's Recreation and Parks Department." Are these private parks or city parks or a combination of both? Does the city have approval authority? Are city funds being used for any part of the design, construction, operations and maintenance of these facilities?

- Location/size of proposed park acres

The City of Oceanside has a park master plan and is in the process of updating it. The DEIR concludes that because the General Plan would require 9.86 acres of parkland for the anticipated 1,971 new residents with the project and that it has provided 10.2 acres that exceeds the standard. So there is no impact. However, that analysis fails to consider the ability of several small parks in this single area to meet a full range of recreational needs. That is why cities typically specify several types of recreational facilities and their distribution so that all residents have access to a full range of recreational services - for example soccer fields and baseball diamonds. This project proposes 100% of the park need will be provided by several small parks within the planned development. There is no discussion of adequacy beyond total acres which is insufficient to evaluate if there could be an adverse impact on "existing neighborhood and regional parks or other recreational facilities."

Transportation

- Failure to include comprehensive mitigation consistent with Circulation Element Section 3.8.3

The DEIR analysis identifies three roadway segments with direct and/or cumulative impacts that are "Partially reduced, significant and unavoidable" (Table 4.17-19).

The City of Oceanside Circulation Element (CE) adopted September 2012 and incorporated by reference includes detailed discussion of mitigation measures required for a project that will result in a street segment or intersection that operates worse than LOS D. It clarifies the obligation of the developer to "propose, prepare and provide feasible mitigation measure(s) for the City to review that would improve the impacted location(s) to an acceptable LOS." It goes on to describe several ways this might be addressed through on and off-site improvements, right-of-way and improvements to pedestrian and/or bicycle facilities. It then adds in underlined text "If there are no feasible mitigation measures that would fully mitigate traffic impacts, the developer shall propose, prepare and provide various mitigation measures, such as Traffic Management Center tools and resources, which may not include physical improvements to the impacted facility."

The DEIR fails to adequately evaluate what mitigation has been proposed and considered.

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Table 4.17-19 lists mitigation for each of the identified significant impacts that were determined not to be feasible but then fails to include any that would lessen the impacts or to address the mitigation measures specified in the CE to be applied when there are no feasible mitigation measures that would fully mitigate the impacts.

- Failure to adequately consider alternative transportation

Not one of the transportation mitigation measures addresses alternative transportation, nor does the DEIR indicate that there has been any analysis of this. It describes bicycle and transit services as part of the description of existing conditions but then fails to evaluate the adequacy of alternative transportation measures provided by the project or to consider whether any additional improvements to these could help reduce the significant traffic impacts caused by the project. This shortcoming is even more egregious because this is specifically called out in the CE section 3.8.3 but still was ignored.

Transportation accounts for about 40% of the community wide GHG in Oceanside and this project will add 10,453 metric tons of GHG/year per Table 4.8-8. There is no discussion of mode split and how VMT has been considered in the transportation analysis. New state guidance on how the change in CEQA traffic impact analysis from LOS to VMT is still pending final approval. But other jurisdictions routinely include VMT as part of transportation system analysis. Furthermore, state guidance on CEQA review requires consideration of alternative transportation. This should all be considered as part of the analysis of traffic impacts.

- Failure to adequately evaluate cumulative traffic impacts

How much impact a single project has on overall cumulative impacts at least partially depends upon whether the city is following its own guidelines to address cumulative impacts. These guidelines described in section 3.9 of the CE are really a framework for broad city action. If these are not being followed, then each project will have even greater cumulative impacts. There are costs associated with these actions and some presumption that they would move forward in proportion to traffic increases. Furthermore, they include imposing fees to fund transportation system improvements and to update the City's Thoroughfare Fee and Traffic Signal Fee ordinances "periodically." The DEIR should consider whether there has been any good faith effort to improve the overall system as one way to minimize the cumulative impacts of each future project. The DEIR failed to include any such analysis. Unfortunately, we believe the city has failed to comply with its own guidelines and the result is that cumulative impacts continue to get worse with no real plan to address them.

- Failure to evaluate full compliance of roadway changes on noise, views and biological resources

Section 3.9 of the CE, items 8, 9, and 10 identify specific roadway design mitigation measures to address noise, preservation of natural features, views and wetlands. The DEIR has failed to evaluate if the proposed roadway changes are consistent with these guidelines. Failure to do so leaves this a potential significant impact that has not been addressed.

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Water Supply

- Failure to mitigate for projected water supply shortfall

Page 4.19-17 states "under multiple-dry year conditions the project will increase supply shortfalls to 3.9% and 8.4% for the third year of 2035 and 2040, respectively. Therefore, the project creates an incremental shortfall of approximately .6% in 2040. These deficits would be addressed through implementation of extraordinary conservation measures and/or through the conversion of additional customers to recycled water. In addition, the city has developed a Water Shortage Contingency Plan that identifies ways in which the City can reduce water consumption during catastrophic events and in drought years." This is a clear statement of significant potential impacts with no mitigation proposed. Climate projections make it clear that our region will be experiencing more frequent and severe droughts in coming years. To say that everyone in the city will have to take extraordinary conservation measures to make up for the 245 AFY of this project is appalling. At a minimum mitigation should include additional water conservation measures required of the project, and extraordinary measures during drought so everyone in the city does not pay for the failures of one project to address its own impacts.

Cumulative Impacts

- Inadequate analysis of cumulative impacts on biological resources

The DEIR analysis is inconsistent in determining that it is growth-inducing but has no cumulative impacts on biological resources. Throughout San Diego growth puts increasing strains on remaining habitat. Increased population results in more and more people using fewer and fewer acres of land – especially for outdoor recreation. The Agricultural Exclusion Zone had very specific requirements for additional evaluation if these lands were to be converted to other uses. That is not just the buffer along the SUR River. Agricultural lands themselves, whether they include actual habitat or not have substantial secondary benefits for wildlife – from forage in fields by small mammals to birds of prey. These 3400 hundred acres of land provide substantial opportunities for forage, cover and migration of birds, mammals, amphibians and seed dispersal for native plants. Of course, it is not the same as high quality habitat. But converting it to hundreds of more homes removes all of that secondary value while also adding additional impacts to the little remaining habitat.

Alternatives Analysis

The DEIR did a credible job of considering a range of alternatives to the project. The DEIR analysis documents that every alternative considered dramatically reduces the adverse impacts as compared to the proposed project. But it is not clear if any of these alternatives, other than "No Build", reduce all of the significant impacts to below a level of significance. It is good to know the impacts are reduced as shown on Table 7-2, but are they reduced sufficiently to eliminate the identified significant impacts?

In spite of having alternatives to reduce the project impacts, the applicants still propose their

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project with numerous significant "unavoidable" impacts. Of course, the impacts can be avoided - with a project properly designed to comply with the available infrastructure, the adjacent land uses and the wishes of the people of this community.

Conclusion

The Project and the associated DEIR have documented that this is a seriously flawed project that does not fit with existing city, or regional plans. Sprawl development like that proposed with this project will have lasting impacts to the city of Oceanside, and our entire region as we try to address climate change. The DEIR has failed to address numerous significant environmental impacts identified in this letter, and many other comment letters that you will be receiving. There remain significant impacts that have not been adequately evaluated or mitigated. We urge you to reject this project as proposed and require massive modifications and improved mitigation before proceeding with any further project approval.

Thank you for your consideration of our comments.

Sincerely,

Diane Nygaard, President
Preserve Calavera
760-724-3887

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L14 JOHNSON, JOAN

Comment Letter L14

From: Joan Johnson <joanjohnson@mac.com>
Sent: Monday, January 28, 2019 3:19 PM
To: PlanningCommission@ci.oceanside.ca
Cc: Robert Dmchowski <RDmchowski@ci.oceanside.ca.us>
Subject: Fwd: 1/28/2019 Planning Commission Hearing Comments on North River Farms

Dear Planning Commission Chairperson and Planning Commission Members,

I am opposed to this project . I support first undertaking a complete study and update of the Oceanside General Plan including residential densities/ land uses suitable for the South Morro Hills in order to protect the areas prime AG land and the Oceanside community as a whole from the assorted fire dangers presented by wildland fires, residential/ commercial/ industrial fuel threats when near wildland, and the "Blow Torch-like Effect" (CALFIRE term for the river's severe fire threat during Lilac Fire) inherent in the fire mechanics of the San Louis Rey River which lies along its southern border and through northern Oceanside all the way to the Pacific Ocean.

Doing the above would allow you to make sure all that could be learned from the 1,000,000 California Acres burned in 2018 could be used to develop appropriate land uses, defensible space policies, a Fire Protection Engineering Plan, etc. into your new General Plan to safely protect all of Oceanside's citizens and property. And there is much to be learned by the studies made of Santa Rosa area and all of Paradise's vast residential and commercial areas that burned to the ground. These were non-wildlandfire fuels that were totally destroyed... Nothing left standing, but they exacerbated the fire's intensity. Why is this important... because Dudek's Conceptual Wildland Fire Evacuation Plan for the North River Farms Community in the DEIR only assesses Wildland fire Exposure Rating as LOW to MODERATE along the fire evacuation routes. This is a major assessment fault based on the fact that residential and commercial uses along them are not

Late Comment Letters for North River Farms Environmental Impact Report

classified as contributing wildland fuels; if they were assessments would need to be much higher than:

MODERATE for NORTH RIVER ROAD (which just happens to run along the "Blow Torch-Like Effect" San Louis Rey River, choked bank to bank by vegetation in most sections);

LOW (?) for COLLEGE BOULEVARD (which just happens to cross over the "Blow Torch-Like Effect" San Louis Rey River) and is bordered by many residential and commercial uses that we discovered burn in wildfires like Santa Rosa/Paradise of the NEW NORMAL California, but, according to Dudek, one could find temporary roadside refuge in the Walmart Superstore at RTe.76;

and LOW for N River Road -Douglas Drive which lies in close proximity to the "Blow Torch-like Effect" because it has residential and commercial uses lining the route. Seems like there needs to be a new WildLand Fire Exposure Rating System: One that includes residential and commercial/industrial uses as fuel for wildland fires... For your proof of that, look no farther than the Santa Rosa and Paradise fires.

In addition, these evacuation routes are only available where fire is not in the immediate area or encroaching the roadways. If one or more roads are not considered safe for evacuation, contingency options were said to be available but were not included in this DEIR section. As an area neighbor who sat in a vehicle for 4 hours on Douglas during the Lilac Fire mandatory evacuation, I can tell you from frightening experience it is all too clear that there are no contingency options available. We need to do better as a community. We were saved because a field was plowed and the Santa Anas came to a blessed sudden halt. We need to grow FIRE SMART.

If we did a new General Plan Update including the South Morro Hills, we could develop a Fire Protection Engineering Plan for Oceanside to protect people, property, and the environment. According to fire protection specialists and scientists part of the Problem is how houses have been built. **TO BUILD IN A WAY THAT REDUCES FIRE DAMAGE, EXPERTS SAY WE SHOULD BUILD HOUSES FARTHER APART***** (AG density of 2.5 acre lots or larger would accomplish that in this project, but prime AG use is much preferable as it's the current goal), keep vegetation from touching houses, prune dry vegetation, leave a fire break, consider the flammability of housing materials, and screen the venting areas in attics, eaves and walls so burning embers can't blow inside homes, etc.

We have not been smart in the past about putting homes, commerce, and industry in areas prone to wildfire. Wildfires do not need to be so devastating to human life and property. We can minimize the damage through the application of science and the ability for publicly elected officials to just say **NO** to projects like this one and then go on to develop a **LAND USES/ DENSITY/ Protect Prime AG, etc. General Plan that is FIRE SMART.**

Late Comment Letters for North River Farms Environmental Impact Report

***Albert Simeon, Professor at Worcester Polytechnic
Institute, as written by Kristin Hugo in Newsweek article, " Fires in
California: how to stop the destruction and create better neighborhoods"

Thank you.

Sincerely,
Joan Johnson
1057 Village Drive
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L15 JONTE, RACHEL

Comment Letter L15

From: Rachel Jonte <rachel@mrstambyfarms.org>
Sent: Monday, January 28, 2019 9:01 AM
To: Planning-Planning Commission <PlanningCommission@ci.oceanside.ca.us>
Cc: Robert Dmochowski <RDmochowski@ci.oceanside.ca.us>
Subject: Letter of Concern about North River Farms from SMH resident

January 26, 2019

Dear Members of the Oceanside Planning Commission,

I am a resident of South Morro Hills residing at 6329 La Paloma Lane in Oceanside. I am writing to express my concerns and opposition to the project proposed by the developer Integral called North River Farms.

My first concern is safety for my family and community. Many residents, including myself, have expressed grave concerns about the impact of this proposed development on our safety in the event of an evacuation from wildfire, such as we experienced during the Lilac Fire in December 2017. The project's EIR outlined these dangers and the impact of this project on road congestion, and many residents, myself included, submitted letters sharing the harrowing experience of evacuating so many people on one main road exit. We've seen increased risk of wildfires in California since then, and tremendous loss of life in Paradise when evacuation is not efficient. The developer Integral has not provided adequate plans or solutions for this important consideration. Rather, their suggestion of an additional fire department only adds to the congestion on this road. Their proposal would include the addition of 656 dwellings to South Morro Hills. We currently have only 178 dwellings TOTAL in South Morro Hills and traffic during evacuation was bottlenecked and took one hour to travel two miles. This outlandish proposal would add nearly 400% to the current number of residents needing to use this already inadequate fire escape route. This seems downright reckless to me, and I don't feel that their proposal demonstrates care or concern about the gravity of this situation.

Late Comment Letters for North River Farms Environmental Impact Report

My next concern is that this development would alter and compromise this beautiful gem of Oceanside, and threaten farming by bringing in residents who don't farm or understand farming, and in numbers that outweigh those of our current farming community, allowing their voices to potentially carry more weight than the current longtime residents and potentially changing this area forever. Most people who are used to suburban or urban living are accustomed to an atmosphere that is very different from living in a farming region. In South Morro Hills we encounter very slow moving large vehicles that can slow commutes, lots of noise from farm vehicles and equipment, a lot of dust, helicopters spraying fields, pesticides, wildlife including many small rodents and coyotes, and noise from animals. Those of us who choose a rural farming lifestyle are accustomed to these inconveniences and even embrace them as part of the atmosphere, but most people would find these inconveniences intolerable and in areas around the country where high density residences have moved close to farming, many times the complaints from new residents end up pushing farmers out. I am extremely concerned about the prospect of moving residents unaccustomed to farming into a farming area in such large numbers, compromising this beautiful, historic, and unique tradition we have in South Morro Hills.

For the record, I am not opposed to development in South Morro Hills. I think Oceanside has a precious resource in the agricultural zone of South Morro Hills and has a unique opportunity to create a smart community plan that celebrates and encourages agriculture while creating more opportunities for people to live, work, and enjoy this rare and precious space. Few cities in the world have this kind of land and this type of opportunity to create something sustainable that engages and brings vitality to the region. I am all for development under a plan that is thoughtfully created with residents and farmers in South Morro Hills to help enrich and share the abundance of this region with other Oceanside residents and visitors.

What I am opposed to is allowing a self-interested developer be the one to decide the future of Oceanside's historic farming community. Some innovative developers should be included at the table alongside farmers and residents to help create a master plan for South Morro Hills, and only then should development proposals be entertained.

If we succumb to the power of this developer and their bullying dollars to carve off this acreage, we open the possibility for others to do the same, taking away agricultural zoned acres bit by bit, and eventually we won't have a farming community in Oceanside. We will miss out on the exciting opportunity to create something marvelous, historic, long-lasting, and perhaps even a model for other areas of the country. To create a community that celebrates farming and agriculture, welcomes visitors to learn about it and enjoy the abundance of this area, and includes smartly designed community developments that don't create dangerous bottleneck situations in the case of a disaster, that don't destroy our heritage by erasing farmland for high density housing that is unnecessary, and decreases quality of life for the region and neighborhood.

With a master plan, developers would have guidelines about smart development that would accommodate farming, wouldn't impede vistas, wouldn't increase risk during times of evacuation. Development that was part of a plan for South Morro Hills would also be able to address the very real inconveniences of farming, giving full disclosure to potential buyers and future residents of the realities of living in an agricultural area including increased noise, slow moving vehicles, helicopter spray, and the presence of wildlife. Smart community design can avoid development that causes congestion, proposes high density housing that destroys the rural atmosphere, and actually threatens farming beyond the loss of farming acreage already proposed.

There is no housing emergency here. This project is not an emergency. South Morro Hills deserves the opportunity to create a new vision plan together with the City of Oceanside that

Late Comment Letters for North River Farms Environmental Impact Report

addresses all of these concerns. This development project is premature and reckless and could compromise or lead to the destruction of one of Oceanside's most unique and precious resources.

Please vote NO on this development project. Please allow the vision plan to continue. Please listen to the hardworking staff that are in touch with the Oceanside community and their needs as well as the residents of South Morro Hills who have contributed to the city of Oceanside with their time, their taxes, and their hard work. Please don't give the power of determining the future of Oceanside's farming region to a greedy developer who cares only about profit. This development does nothing to improve life in South Morro Hills and many things to decrease the safety and quality of life of current residents.

Respectfully,

Rachel Jonte
Mrax Family Farms

Attachment: Letter

Late Comment Letters for North River Farms Environmental Impact Report

Rachel A. Ionle - 6329 La Paloma Lane, Oceanside, CA 92057 - Rachel@morrofamilyfarms.org

January 26, 2019

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My next concern is that this development would alter and compromise this beautiful gem of Oceanside, and threaten farming by bringing in residents who don't farm or understand farming, and in numbers that outweigh those of our current farming community, allowing their voices to potentially carry more weight than the current longtime residents and potentially changing this area forever. Most people who are used to suburban or urban living are accustomed to an atmosphere that is very different from living in a farming region. In South Morro Hills we encounter very slow moving large vehicles that can slow commutes, lots of noise from farm vehicles and equipment, a lot of dust, helicopters spraying fields, pesticides, wildlife including many small rodents and coyotes, and noise from animals. Those of us who choose a rural farming lifestyle are accustomed to these inconveniences and even embrace them as part of the atmosphere, but most people would find these inconveniences intolerable and in areas around the country where high density residences have moved close to farming, many times the complaints from new residents end up pushing farmers out. I am extremely concerned about the prospect of moving residents unaccustomed to farming into a farming area in such large numbers, compromising this beautiful, historic, and unique tradition we have in South Morro Hills.

Late Comment Letters for North River Farms Environmental Impact Report

Rachael A. Jontfa - 4329 La Paloma Lane, Oceanside, CA 92057 - Rachael@moztfamilykrm.org

For the record, I am not opposed to development in South Morro Hills. I think Oceanside has a precious resource in the agricultural zone of South Morro Hills and has a unique opportunity to create a smart community plan that celebrates and encourages agriculture while creating more opportunities for people to live, work, and enjoy this rare and precious space. Few cities in the world have this kind of land and this type of opportunity to create something sustainable that engages and brings vitality to the region. I am all for development under a plan that is thoughtfully created with residents and farmers in South Morro Hills to help enrich and share the abundance of this region with other Oceanside residents and visitors.

What I am opposed to is allowing a self-interested developer be the one to decide the future of Oceanside's historic farming community. Some innovative developers should be included at the table alongside farmers and residents to help create a master plan for South Morro Hills, and only then should development proposals be entertained.

If we succumb to the power of this developer and their bullying dollars to carve off this acreage, we open the possibility for others to do the same, taking away agricultural zoned acres bit by bit, and eventually we won't have a farming community in Oceanside. We will miss out on the exciting opportunity to create something marvelous, historic, long-lasting, and perhaps even a model for other areas of the country. To create a community that celebrates farming and agriculture, welcomes visitors to learn about it and enjoy the abundance of this area, and includes smartly designed community developments that don't create dangerous bottleneck situations in the case of a disaster, that don't destroy our heritage by erasing farmland for high density housing that is unnecessary, and decreases quality of life for the region and neighborhood.

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There is no housing emergency here. This project is not an emergency. South Morro Hills deserves the opportunity to create a new vision plan together with the City of Oceanside that addresses all of these concerns. This project is premature and reckless and could compromise or lead to the destruction of one of Oceanside's most unique and precious resources.

Late Comment Letters for North River Farms Environmental Impact Report

Rachel A. Jonte ~ 6329 La Paloma Lane, Oceanside, CA 92057 ~ Rachel@mrazfamilyfarms.org

Please vote **NO** on this development project. Please allow the vision plan to continue. Please listen to the hardworking staff that are in touch with the Oceanside community and their needs. Please don't give the power of determining the future of Oceanside's farming region to a greedy developer who cares only about profit. This development does nothing to improve life in South Morro Hills and many things to decrease the safety and quality of life of current residents.

Respectfully,

Rachel Jonte
Mraz Family Farms

Late Comment Letters for North River Farms Environmental Impact Report

L16 PRESERVE CALAVERA, JOSH CHATTEN-BROWN

Comment Letter L16

Hermosa Beach Office
Phone: (310) 756-2400
San Diego Office
Phone: (619) 446-4000
Phone: (619) 446-4322



Josh Chatten-Brown
Email Address:
jcb@cbcearthlaw.com
Direct Dial:
619-446-4322

January 27, 2019

(Via e-mail [planningcommission@ci.oceanside.ca.us]; hard copy to follow)

City of Oceanside Planning Commission
300 N. Coast Highway
Oceanside, CA 92057

Re: Comments on Final Environmental Impact Report for North River Farms
Project

Dear Honorable Planning Commissioners:

On behalf of Preserve Calavera, we submit the following comments on the Final Environmental Impact Report (FEIR) for the North River Farms project. Preserve Calavera is composed of many local residents who are deeply concerned about Oceanside's environment. While we congratulate the City on some of the additional energy conservation requirements for the Project (although the math does not always appear to be correct) that are set forth in the FEIR, we are disappointed that the City is ignoring and failing to mitigate serious climate change impacts of the Project's greenhouse gas emissions. The City also fails to adequately mitigate the impacts of diesel exhaust emissions that will result from Project construction.

As an initial comment, we note that the FEIR states at page I-5 that the City will consider comments made on the DEIR in making its decisions as to whether to certify the FEIR and to approve the Project, but does not say that it will consider comments made on the FEIR. CEQA requires that if an agency holds a public hearing on the approval of a project, the public may raise issues until the close of that public hearing, and may raise them in any subsequent litigation. We expect the City to fully consider the comments that Preserve Calavera and other members of the public make now and at the public hearing, and the City ignores such comments at its peril. (Public Res. Code § 21177(a), Guidelines § 15202(b); *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App.4th 1184, 1201 ["If the decision making body elects to certify the EIR without considering comments made at this public hearing, it does so at its own risk. If a CEQA action is subsequently brought, the EIR may be found to be deficient on grounds that were raised at any point prior to close of the hearing on project approval"].) Preserve Calavera now offers the comments below:

Late Comment Letters for North River Farms Environmental Impact Report

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I. The Air Quality Analysis Still Does Not Require All Feasible Mitigation.

CEQA dictates that public agencies not approve projects that may have significant environmental effects unless all feasible alternatives or mitigation measures have been adopted. (Pub. Res. Code § 21002, 21081(a).) In its discussion of emissions of the toxic air contaminant diesel particulate matter (“DPM”) emissions emitted from diesel-powered construction equipment, the FEIR, at page 4.3-10, recognizes that “approximately 70% of all airborne cancer risk in California is associated with [DPM] (CARB 2000).” It also continues to recognize that the cancer risk posed by the Project’s use of diesel-powered construction equipment is a 28 in one million risk of cancer to the maximum exposed person, almost three times the threshold of significance of a 10 in one million risk set out at FEIR page 4.3-34, and that this risk is chiefly or solely attributable to the use of diesel construction equipment. (FEIR, p. 4.3-31.)

We note, and appreciate, that Mitigation Measure MM-AQ-1 has been clarified to specify that Tier 4 diesel emission controlled equipment must be used unless it is unavailable, in which case Tier 3 equipment may be used, and that a definition of “unavailable” is now provided, (FEIR, p. 4.3-40.) However, the Mitigation Measure also provides that if both Tier 4 and 3 equipment is unavailable, the applicant may use the next-highest Tier available. Although the highest tier available is to be used, the Measure can reasonably be read to require no minimum Tier. (FEIR, p. 4.3-40 – 4.3-41.) The FEIR calculates the cancer risk with use of mitigation as reduced to 7.2 per million risk of cancer (FEIR, p. 4.3-41 – 4.3-42), but the modeling to determine that risk appears to assume the use of Tier 4 and 3 equipment (Air Quality Technical Report, pp. 2-3), without a showing that the modeling assumptions will actually correspond with equipment availability at the time of construction. Further, the FEIR deletes a mitigation measure that would allow the applicant to retrofit diesel equipment to meet the Tier requirements, without no explanation or evidence-based showing that the City considers such retrofitting to be infeasible.

Retrofits that significantly reduce particulate matter emissions are certified by the California Air Resources Board (CARB) and are available for use. That such devices are available makes such retrofitting a potentially feasible mitigation measure. In light of the 28 in one million cancer risk posed by Project construction without mitigation, and considering that availability of Tier 4 or even Tier 3 equipment is not guaranteed, such retrofits should be required where equipment with less than a Tier 3 rating is not available, and should be considered where equipment with less than a Tier 4 rating is not available. The City should either adopt this feasible mitigation measure, or provide a justification for not adopting it. As it stands, the FEIR does not meet CEQA’s

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requirement that all feasible mitigation be adopted. The FEIR absolutely should not affirmatively delete the option to retrofit diesel equipment from the FEIR.

In the area of conventional air pollutants, the FEIR continues to avoid coming to grips with the failure of the San Diego APCD's Regional Air Quality Strategy ("RAQS") to show attainment of the federal air quality standards by applicable deadlines, or with state air quality standards (which have no express deadline) at all. The FEIR's response to prior comments on this issue is, in essence, that advising the public that the San Diego Air Basin is nonattainment for the health-based federal and state ozone standards, and describing the RAQS, is all that is required to set out the baseline air quality conditions in the Oceanside area. (App. TO, p. 120.) The Sierra Club's comment letter on the Draft EIR pointed out that the RAQS is considerably behind its own schedule for air quality improvement, and the FEIR concedes that the Project could "minimally contribute to regional O₃ concentrations." (FEIR, p. 4.3-37 – 4.3-38.) However, the FEIR continues its reliance on "the existing good air quality in coastal San Diego areas" to find health impacts insignificant. (*Ibid.*) This is not enough. Ozone is a regional phenomenon, and a good-faith assessment of the Project's potential to contribute to ozone concentrations, and their health impacts, is required. (See, e.g., *Sierra Club v. County of Fresno*, 2018 WL 6729853, slip op. at 7-8 [correlation of project impacts with human health effects required].) At the least, the EIR can and should discuss the RAQS' actual state of progress towards attainment of the federal and state ozone standards in the San Diego Air Basin, since the EIR relies on the RAQS' ultimate success for its finding of no significant impacts by the Project's huge increases in vehicle miles traveled, and the attendant emissions, on air quality.

2. The Project Fails to Adequately Mitigate Greenhouse Gas Emissions and the EIR Fails to Demonstrate that the Emissions Offsets Will Comply with CEQA's Requirements for Effective and Feasible Mitigation.

Preserve Calavera is deeply concerned about the continued heavy reliance by the City on the purchasing of carbon emissions offsets, most likely to be bought in foreign countries and of highly questionable enforceability, to mitigate the climate change impacts of the Project. The applicant has now committed to zero net increase in greenhouse gas emissions. (FEIR, Appdx. TO, vol. II, pp. 23, 129.) It is vital to note that the FEIR's conclusion of a less than significant impact on climate change from the Project is based almost completely on the use of such purchased carbon emissions offsets. While Preserve Calavera notes and applauds the additional on-site measures included in the FEIR to reduce energy consumption and GHG emissions, such as requiring solar panels on residences, an electric car charging station in every private residential garage and most commercial parking lots, and low-albedo street paving materials (FEIR, Appdx.

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TO, vol. II, p. 127-128), it is the commitment to net zero increase in GHG emissions upon which the FEIR's no-significance conclusion is principally based.

However, these on-site measures will not achieve the zero net increase to which the Project is now committed. The City states that it will allow the Project to offset its remaining GHG emissions by buying and retiring carbon credits, and that the Project may use carbon emission credits purchased from carbon offset registries that either are used by CARB in the Cap-and-Trade program, or that utilize the "accounting procedures" that CARB-utilized registries use. (FEIR, p. TO-129 to 130.) It appears that the City has abdicated its own responsibility under CEQA (e.g., Pub. Res. Code § 21002) to ensure that all feasible mitigation measures for GHG emissions from the Project are applied, and has effectively delegated that responsibility to carbon offset registries in the voluntary carbon offset market. As discussed below, this approach does not meet CEQA's requirements for mitigation.

A. The FEIR Fails to Ensure that Carbon Offsets Will Achieve Real, Permanent, Quantifiable, Verifiable, and Enforceable Reductions.

The California Health and Safety Code, section 38562, subsections (d)(1) and (2), mandates that GHG offsets for purposes of the Cap and Trade program, must be shown to be "real, permanent, quantifiable, verifiable, and enforceable by the state board," and also "in addition to any greenhouse gas emission reduction otherwise required by law or regulation, and any other greenhouse gas emission reduction that otherwise would occur." CEQA requires no less for mitigation of greenhouse gas emissions. (See, e.g., Guidelines §§ 15126.4(a)(2) and (c)(3).) While the FEIR also claims that "the purchased carbon offsets used to reduce operational GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions" (FEIR, p. 4.8-46), the EIR does not contain any of the standards and protocols to ensure that these requirements are satisfied.

In fact, the available evidence indicates that the purchase of off-site GHG emissions offsets in the voluntary market frequently does not achieve real, verifiable, and enforceable reductions. The European Union has considerably more experience with off-site offsets than the United States has, and the European Commission evaluated such offsets in a report entitled "How additional is the Clean Development Mechanism?" (March 2016, accessible at https://ec.europa.eu/clima/sites/clima/files/ets/docs/clean_dev_mechanism_en.pdf). That report presents the European Commission's conclusions that fully 85% of offset projects they studied, and 73% of upcoming projects, have a low probability of being both additional and not overestimated in their benefits. (See, e.g., p. 54 of the report). Only 2% of projects they studied and 7% of upcoming projects had a high probability of being both. (*Ibid.*) One reason given for this dismal assessment is that, where countries have signed the Paris Framework accords, and have committed to numeric targets for GHG

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reductions within their own nations, they have a strong motive to not sell offsets to other countries, because they need those carbon reductions to satisfy their own obligations to reduce GHGs. (*Ibid.*)

B. The City's Offset Program Bears Little Resemblance to CARB's Highly Regulated CAP-and-Trade Program.

As stated above, the FEIR states that it will require the Project to use only off-site offsets purchased from "reputable" carbon registries, such as registries that either are used by CARB to identify offsets for the state's Cap-and-Trade program (referred to in the FEIR as "CARB-approved" registries), or that use the "accounting procedures" used by such CARB-utilized registries. (FEIR, p. TO-129 to 130.) However, it is vital to note that CARB has approved individual registries solely for the use of their offsets in the state's Cap-and-Trade program (the Cap-and-Trade compliance market), and has not approved any registry or its offsets for use in the voluntary (non-Cap-and-Trade) GHG offset market. CARB has not "approved" any carbon registry for use in the voluntary market. CARB has also adopted a full and complex set of regulations to ensure the efficacy of off-site GHG offsets. The City has not.

CARB issued the following statement regarding carbon registries in response to a reporter's questions:

The California Air Resources Board has approved offset project registries to aid in the implementation of the compliance offset program component of the state's Cap-and-Trade Program. The registries perform mainly administrative functions in ensuring that eligible offset projects have submitted required documentation and obtained third-party verification pursuant to the Cap-and-Trade Regulation and applicable CARB-approved Compliance Offset Protocols. CARB then reviews and approves all offset projects before issuing what are known as "compliance-grade offset credits" that are the equivalent to allowances and can be used by regulated entities in the Cap-and-Trade Program to meet a very limited portion (up to 8 percent) of their annual compliance obligations.

The offset project registries, as well as other organizations, also operate voluntary offset markets, where they issue voluntary offset credits that are NOT eligible to transition to compliance-grade offset credits. **The voluntary market is completely separate from the compliance market and CARB does not oversee it in any way, nor does CARB regulate how voluntary credits are used.** More information on CARB's Compliance Offset Program is available here: <https://www.arb.ca.gov/cc/capandtrade/offsets/offsets.htm>.

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...
CARB's Compliance Offset Program for the Cap-and-Trade Regulation is specifically limited to offset projects within the United States, although offset credits issued in Quebec or Ontario are also eligible for use since we have linked the California Cap-and-Trade Program with the cap-and-trade programs in those two jurisdictions. CARB does not issue compliance offset credits to international projects. Internationally generated credits are available through the voluntary market, which, as we mentioned above, is completely separate from offset credits that can be used in our Cap-and-Trade Program. CARB does not track voluntary credit prices nor who can use them.

(CARB statement issued January 28, 2018, by Stanley Young, CARB Office of Communications Director. The full e-mail exchange is attached to these comments as **Exhibit A.**)

CARB has not endorsed, does not regulate or "approve," and does not oversee or warrant in any way any carbon registries in the voluntary market. Further, CARB does not use, regulate, or approve any internationally obtained GHG offsets except those from the two Canadian jurisdictions that have formally joined the Cap-and-Trade program. The City cannot cite CARB's use of any individual registry in the Cap-and-Trade program as evidence that the registry or any offset it identifies will meet either the Health and Safety Code's requirements for GHG offsets, or CEQA's requirements for GHG mitigation, particularly as to internally obtained offsets. CARB does not regulate or oversee their actions in the voluntary market, nor does any other agency regulate the private voluntary carbon offsets market.

Equally important, CARB has adopted a full and complex set of regulations by which it governs and evaluates GHG offsets in the Cap-and-Trade program. (See Cal. Code of Regs., title 17, §§ 95972(a) [Protocols for offset use], 95972(c) [limiting Cap-and-Trade offsets to locations within the US and the two Canadian jurisdictions formally associated with the Cap-and-Trade program], and 95854 and 95856(h)(1)(A) [limiting any individual source's use of off-site offsets to no more than 8% of its allowable GHG emissions].) CARB itself evaluates the offsets identified by carbon registries under these regulations, using all the expertise in designing and enforcing air pollutant limitations that it has developed in its nearly 50-year storied history of air pollution control in California. (See, e.g., <https://ww2.arb.ca.gov/about/history>.) There is no evidence in the FEIR, nor could there be, that the Development Director has similar or comparable experience or expertise. Nor has the City has adopted regulations comparable to those adopted and used by CARB to evaluate off-site offsets. Preserve Calavera notes that CARB itself does not place blind trust in the registries it uses; while a registry may

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present a potential offset, CARB alone has the authority to issue the emission credit, using its own formidable air pollution control and engineering expertise.

It is especially important to note that CARB places a limit of 8% on the amount of its GHG emissions that a source in the Cap-and-Trade program may offset. The City here has imposed no limits on the amount of GHG emissions that the Project may mitigate with purchased offsets. The contrast is made more stark by the fact that the Cap-and-Trade program regulates industrial sources such as petroleum refineries and power plants (Cal. Code of Regs., title 17, § 95811), which are closely monitored and may have additional mechanical controls installed if they persistently exceed their emissions limitations. In contrast, the City cannot require the residential Project here to be differently designed, or the homes to be differently built, to reduce GHG emissions if offsets purchased at the time building permits are issued should fail in the future. The City has made no showing in the record that it has the legal ability to require subsequent property owners within the approved Project to replace any failed offsets, or to require that Project suspend its residential operation until failed offsets are replaced. This is especially important when many, if not all, offsets for the Project will be purchased in foreign countries, where the City will have no ability to monitor them and no authority to enforce them. The City has placed virtually unlimited faith in unregulated voluntary carbon registries, without substantial evidence to support the registries' long-term ability to carry out the functions they promise.

C. There Is Insufficient Oversight, and Insufficient Public Opportunity For Review of the Carbon Offsets the City Proposes To Accept.

The City's revised Mitigation Measure MM-GHG-2 provides for only a one-time review of the proposed GHG offsets for each Site Plan, providing in pertinent part:

MM-GHG-2 Purchase of Carbon Offsets. As to operational greenhouse gas (GHG) emissions, prior to the City of Oceanside's (City's) issuance of building permits for each implementing Site Plan ("D" Designator), the applicant or its designee shall purchase and retire carbon offsets in a quantity sufficient to offset approximately 100% of the proposed project-generated greenhouse gas (GHG) emissions in order to achieve carbon neutrality (i.e., a net zero emissions level), for a 30-year period, consistent with the performance standards and requirements set forth below.

(FEIR, p. 4.8-45, *emphasis added, strikethrough text omitted.*)

The mitigation measure appears to require a review of the offsets only once, at the time when building permits are issued for each Site Plan (FEIR, p. 141-142). No follow-up is provided to ensure that offsets are taking, or have taken, place as originally accepted

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(e.g., that dedicated tree plantings are still growing at the expected rate, or that farms applying methane capture to bovine waste are still operating and the equipment still functioning as expected). The City will make only a one-time determination, leaving all issues of follow-up and continued monitoring to the carbon registry involved, despite the fact that such registries in the voluntary market are not regulated or overseen by any government agency.

In addition, the City's determination as to the amount and validity under California law of GHG offsets will take place only after the CEQA process is completed, outside the sunlight of a public review and comment opportunity. CEQA puts the public in a "privileged position ... based on a belief that citizens can make important contributions to environmental protection and on notions of democratic decision-making." (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Agriculture Assn.* (1987) 42 Cal.3d 929, 936.) Here, the City has opted to cut the public out of the review of the actual offsets being proposed for each Site Plan, depriving the public of the role CEQA assigns to it.

D. The Requirement to Pursue Local Offset Projects Is Limited "to the Extent Such Offset Projects and Programs Are Financially Competitive," Where Financial Competitiveness Is Undefined.

MM-GHG-2 now provides:

The project applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the City to the extent such offset projects and programs are financially competitive in the global offset market. The project applicant or its designee shall submit proof to the City that offsets are unavailable in a higher priority category before seeking offsets from the next lower priority category.

(FEIR, Appdx., TO, vol. II, p. 142.)

The FEIR then goes on to say:

Practically speaking, the City anticipates that the evidentiary showing will be made through the applicant's submittal of reports authored by carbon brokers that provide a timely survey of and assess the marketplace for voluntary carbon offset transactions at the time of need for offsets. The City anticipates that one or more such reports may be submitted for approval as development is phased over time via the processing of individual Site Plans.

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(Ibid.)

While voluntary market offsets raise serious concerns regarding verifiability and enforceability, the most highly questionable are internationally obtained offsets. The language of MM-GHG-2 makes clear not only that internationally obtainable offsets will be accepted, but that the price of such internationally obtainable offsets will, “practically speaking,” drive the City’s determination of what offsets are available/feasible within the geographic hierarchy of offset locations set out in the measure. Local offsets, with their substantial potential for local co-benefits, including decreased local emissions of conventional pollutants and increased job opportunities, will be put into economic competition with international offsets that, due to cheaper labor costs in developing countries, will almost always tend to be cheaper. The result may well be that local offsets, with their local co-benefits, will be found unavailable and infeasible when they are, in fact, technologically feasible, but merely have a higher purchase price than international offsets. The purchase price may not reflect the full cost of obtaining offshored offsets. Local reductions of conventional pollutants as a result of increased energy consumption may result in decreased hospital admissions and healthcare costs, but those cost reductions apparently will not be weighed against cheaper initial purchase prices for international offsets.

The environmental consequences of the policy choice by the City making purchase prices quotes quoted by carbon offset brokers the main factor, “practically speaking,” in determining choice of GHG offsets have not been adequately explored or disclosed; instead, they have barely been mentioned in the EIR. CEQA requires that, when mitigation measures have environmental consequences of their own, those consequences must be disclosed and, if significant, must be mitigated. (Guidelines § 15126.4(a)(1)(D).) The City has not done either, making the EIR inadequate both as an informational tool and as a method of mitigation.

E. The 30-Year Lifespan Presumed for the Project Lacks Substantial Evidentiary Support.

The City has posited that the Project has a 30-year lifespan, and that only its projected GHG emissions need be calculated or mitigated assuming this 30-year life. (EIR, Appdx. H, pp. 51, 52.) The Sierra Club’s comment letter on the draft EIR contested this premise, and Preserve Calavera challenges it again here since the California Department of Housing and Community Development reports that the majority of housing in this state is over 35 years old. (California’s Housing Future: Challenges and Opportunities. Final Statewide Housing Assessment 2025, February 2018, available at http://www.hcd.ca.gov/policy-research/plans-reports/docs/SHA_Final_Combined.pdf.) The premise is crucial, since the City is only requiring GHG offsets for a 30-year period. (FEIR, Appdx TO, vol. II, p. 23.)

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The justifications presented by the City for the 30-year Project lifespan are not grounded in regulations or factual assessment of the useful life of a house in California, but in cherry-picked anecdotes and unadopted “guidance” regarding industrial sources in another jurisdiction. The FEIR relies chiefly on anecdotal evidence regarding individual projects for which CARB has accepted a 30-year lifespan in calculating GHG emissions, including projects subject to special circumstances or projects that possess specific AB 900 Leadership Project qualifications. (FEIR, Appdx. TO, vol. II, pp. 130-131.) The FEIR admits that the North River Farms Project has not applied for AB 900 Leadership status. Preserve Calavera submits that it thus does not qualify for the GHG treatment CARB has accorded such projects. The FEIR also cites the 30-year lifespan accepted by CARB for the Newhall Ranch project, in a reanalysis of that specific project in response to the decision of the California Supreme Court in *Center for Biological Diversity v. California Dept. of Fish and Wildlife* (2015) 64 Cal.4th 204. (FEIR, TO, vol. II, p. 131.) The treatment of an individual case, in response to a judicial reversal, is not a regulation, official guidance, or a binding precedent for other projects. It is not adequate justification for a 30-year life span here.

The FEIR also cites guidance from 2008 by the South Coast Air Quality Management District (SCAQMD) for industrial projects for which SCAQMD is the permitting agency, observing that such projects are allowed by SCAQMD to use a 30-year life for GHG emissions modeling purposes. (FEIR, Appdx. TO, vol. II, p. 132.) The FEIR also admits that:

SCAQMD’s Board was not asked to take final action on the significance evaluation framework developed by staff for residential and commercial projects, due to the need for further work efforts related to CARB’s then-pending interim GHG proposal.

(*Ibid.*) Thus, in 2008, the SCAQMD did not adopt a 30-year lifespan for residential projects, nor has it adopted once since. It is disingenuous, if not outright misleading, for the City to cite as authority a proposal that the SCAQMD Board did not then – or ever – act on, particularly since the FEIR admits that the Board did not take action on residential project guidance because it needed more work. The modeling guidance for industrial sources is not binding or relevant here.

The FEIR also cites the industry practice of amortizing GHG emissions from construction over 30 years for CEQA analysis purposes, and the City’s own acceptance of that practice. (FEIR, Appdx. TO, vol. II, p. 133.) Neither demonstrates that the 30-year lifespan should be used, only that it currently is used. This is a description of a current practice, not a regulatory standard or scientific justification for the use of a lifespan for housing that is exceeded in California by a majority of the housing units, as set out earlier in these comments.

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Finally, the FEIR pleads technical inability to predict or model the GHG emissions of residential projects past a 30-year lifespan. It also cites to Executive Order EO S-03-05, which set the GHG emissions reductions goals for California out to 2050, saying that "[t]he 30-year project life generally aligns with the 2050 horizon year established in EO S-3-05." (FEIR, Appdx. TO, vol. II, p. 134.) CEQA is clear that "[d]rafting an EIR . . . necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all it reasonably can." (Guidelines § 15144.) Whatever the limits of current GHG modeling, the City must find out and disclose all it reasonably can. Here, the City has shown that, even assuming for purposes of argument that it cannot forecast GHG emissions past a 30-year life for North River Farms, it apparently has enough information to require mitigation that will last beyond 2050. (FEIR, Appdx. TO, vol. II, p. 134.) The City should continue to do so. As part of its continuing obligation to monitor the mitigation for the Project, the City could revisit the GHG modeling and mitigation periodically and update it to reflect real-world progress in modeling and GHG controls. What it should not do is throw up its hands and claim it is powerless to predict or control GHG emissions beyond 30 years. Doing so violates Public Resources Code sections 21002 and 20181, subdivision (a).

Conclusion

The FEIR makes some changes in the Project that will reduce both conventional pollution and GHG emissions, mostly through increased energy conservation. However, the EIR remains profoundly inadequate, both as to conventional air pollution and as to climate change/GHG emissions offsetting. The City can and must do more. It has a legal obligation to its residents to revise and recirculate the EIR to address the problems and deficiencies discussed herein.

Thank you for your consideration.

Sincerely,



Josh Chatten-Brown

cc: Robert Dmubowski

EXHIBIT A

Late Comment Letters for North River Farms Environmental Impact Report

From: "Young, Stanley@ARB" <stanley.young@arb.ca.gov>
Date: February 1, 2018 at 11:17:52 AM PST
To: Ry Rivard <Ry.Rivard@voiceofsandiego.org>, "Diaz, Pamela@ARB" <Pamela.Diaz@arb.ca.gov>
Subject: RE: Carbon offset questions

Ry,

As we mentioned before, CARB only certifies the three registries, and we do not regulate or certify the voluntary offset market.

As for the CAPCOA GHG RX, You're right, it has not been active, as you note, but it is still available as a platform for parties to purchase or provide offsets.

Cheers
Stanley

From: Ry Rivard [<mailto:Ry.Rivard@voiceofsandiego.org>]
Sent: Tuesday, January 30, 2018 12:24 PM
To: Diaz, Pamela@ARB <Pamela.Diaz@arb.ca.gov>
Cc: Young, Stanley@ARB <stanley.young@arb.ca.gov>
Subject: Re: Carbon offset questions

Pamela,

Thanks for the email. Also, I think you may have accidentally called me earlier.

These answers are really helpful, but I may need some more help understanding something. The county and some of the developers down here are making a big deal about how they would only buy credits through CARB-approved registries. But some of them are planning to buy international credits, which, as I understand it from your email, are not regulated by CARB. So, as far as I can tell, they're using CARB's name as a seal of approval on a product that CARB does not oversee in any way?

For instance, here's what a spokeswoman for San Diego County said in an email responding (in red) to a question I asked (in blue):

Can you help me understand what sort of verification process a developer going abroad for credits would have to comply with? **The County requires CARB-approved registries so that we can ensure that the offsets will be quality based on CARB-approved performance standards.**

And here's what a developer said, first in quoting from an EIR they submitted to the county, and second in narrating what it means:

Late Comment Letters for North River Farms Environmental Impact Report

"carbon offset" shall mean an instrument issued by any of the following: (i) the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the State's cap-and-trade program, or (iii) if no registry is in existence as identified in options (i) and (ii), above, then any other reputable registry or entity that issues carbon offsets.

So, per above, CAR, ACR, and VCS are the most well-known registries that have been approved by CARB, but there are others as well. These registries must meet specific regulatory criteria to be approved by CARB. They help facilitate the listing, reporting, and verification of offset projects (worldwide, not just in CA), and they also issue registry offset credits.

So, they use terms like "CARB-approved" to apply to registries, when CARB's approval only covers certain credits used in the registries, almost none of which will be used by these developers. This seems, in light of your email, extremely disingenuous on their part, but I want to make sure I understand what ARB is saying.

Second, my understanding is that the CAPCOA GHG RX you mention isn't really up and running, hasn't sold any credits and is likely to be either shutdown or managed in some other way than its current form. I'm not sure if that's also CARB's understanding, but it's not really a functioning system at this point, as far as I can tell. Do you all have a different understanding of its status?

-Ry

From: "Diaz, Pamela@ARB" <Pamela.Diaz@arb.ca.gov>
Date: Tuesday, January 30, 2018 at 11:54 AM
To: Ry Rivard <Ry.Rivard@voicEOFsanDiego.org>
Cc: "Young, Stanley@ARB" <stanley.young@arb.ca.gov>
Subject: RE: Carbon offset questions

Good morning Ry,
CARB has issued the following response to your inquiry.
Please attribute the response to: Stanley Young, CARB Office of
Communications Director

1. Explain the difference between credits in the registries approved for cap and trade and those approved for other offsets, like developers trying to comply with San Diego County's proposed climate action plan.

Late Comment Letters for North River Farms Environmental Impact Report

The California Air Resources Board has approved offset project registries to aid in the implementation of the compliance offset program component of the state's Cap-and-Trade Program. The registries perform mainly administrative functions in ensuring that eligible offset projects have submitted required documentation and obtained third-party verification pursuant to the Cap-and-Trade Regulation and applicable CARB-approved Compliance Offset Protocols. CARB then reviews and approves all offset projects before issuing what are known as "compliance-grade offset credits" that are the equivalent to allowances and can be used by regulated entities in the Cap-and-Trade Program to meet a very limited portion (up to 8 percent) of their annual compliance obligations.

The offset project registries, as well as other organizations, also operate voluntary offset markets, where they issue voluntary offset credits that are **NOT** eligible to transition to compliance-grade offset credits. The voluntary market is completely separate from the compliance market and CARB does not oversee it in any way, nor does CARB regulate how voluntary credits are used. More information on CARB's Compliance Offset Program is available here: <https://www.arb.ca.gov/cc/capandtrade/offsets/offsets.htm>

2. Are international credits cheaper? Who can use them?

CARB's Compliance Offset Program for the Cap-and-Trade Regulation is specifically limited to offset projects within the United States, although offset credits issued in Quebec or Ontario are also eligible for use since we have linked the California Cap-and-Trade Program with the cap-and-trade programs in those two jurisdictions. CARB does not issue compliance offset credits to international projects. Internationally generated credits are available through the voluntary market, which, as we mentioned above, is completely separate from offset credits that can be used in our Cap-and-Trade Program. CARB does not track voluntary credit prices nor who can use them. Third-party sources, such as Forest Trend's "State of the Voluntary Carbon Market 2017"

Late Comment Letters for North River Farms Environmental Impact Report

(<http://forest-trends.org/releases/p/sovcm2017>) may provide some useful information on the voluntary market.

3. How does the air board's preference for local mitigation might conflict with a county CAP that allows for international credits?

CARB implements many clean air programs designed to address local air pollution, regional air pollution, and global pollutants (like greenhouse gases). For climate change, reductions of greenhouse gases anywhere in the world address the climate change problem, but reductions in our communities, regions and state can also provide jobs, economic, and environmental benefits.

The Scoping Plan (adopted in Dec 2017) encourages local jurisdictions to develop climate plans. For project level approvals, we note (on page 102) that to the degree that a project relies on GHG mitigation measures, we recommend that the lead agencies prioritize on-site design features that reduce emissions, especially those that contribute to air quality, health and economic co-benefits locally. To the extent that additional mitigation is needed, regionally, reductions can be achieved through a variety of projects within the region in question, like building retrofits, installation of EV chargers and investing in local urban forests. Where further project design or regional investments are infeasible, it may be appropriate to mitigate project emissions through purchasing and retiring carbon credits. The Scoping Plan also notes that the California Air Pollution Control Officers Association has developed a GHG Reduction Exchange for California Environmental Quality Act mitigation, which could provide credits to achieve additional reductions. It may also be appropriate to utilize credits issued by a recognized and reputable voluntary carbon registry.

If you have further questions, don't hesitate to contact us. Could you please tell us when are you going to publish your report.

Best regards,

Pamela Diaz
Office of Communications
Information Officer
[916-322-2638](tel:916-322-2638)

Late Comment Letters for North River Farms Environmental Impact Report

From: Ry Rivard [mailto:Ry.Rivard@voicofsandiego.org]
Sent: Monday, January 29, 2018 4:10 PM
To: Diaz, Pamela@ARB <Pamela.Diaz@arb.ca.gov>
Subject: Re: Carbon offset questions

Pamela,

Thank you. Is by noon tomorrow at all possible? I apologize for that suddenness, but having been out sick for a day and then playing a bit of phone tag with Stanley, things snuck up on me.

-Ry

From: "Diaz, Pamela@ARB" <Pamela.Diaz@arb.ca.gov>
Date: Monday, January 29, 2018 at 3:25 PM
To: Ry Rivard <Ry.Rivard@voicofsandiego.org>
Cc: "Young, Stanley@ARB" <stanley.young@arb.ca.gov>
Subject: RE: Carbon offset questions

Hello Ry,

Thanks for breaking down your questions. We are working on getting those answered. Please, can you confirm your deadline?
Talk to you soon.

Pamela Diaz
Office of Communications
Information Officer
[916-322-2638](tel:916-322-2638)

From: Ry Rivard [mailto:Ry.Rivard@voicofsandiego.org]
Sent: Monday, January 29, 2018 2:32 PM
To: Diaz, Pamela@ARB <Pamela.Diaz@arb.ca.gov>; Young, Stanley@ARB <stanley.young@arb.ca.gov>
Subject: Re: Carbon offset questions

Resending because I had the wrong email for Stanley.

-Ry

From: Ry Rivard <Ry.Rivard@voicofsandiego.org>
Date: Monday, January 29, 2018 at 2:34 PM
To: "Diaz, Pamela@ARB" <Pamela.Diaz@arb.ca.gov>; "stanley.young@arb.ca.gov" <stanley.young@arb.ca.gov>
Subject: Carbon offset questions

Late Comment Letters for North River Farms Environmental Impact Report

Stanley and Pamela,

Sorry I missed your call Thursday, Stanley, and your call today, Pamela.

I am trying to get some quick answers to a few questions about the CARB-approved registries.

First, I am trying to understand the difference between credits in the registries approved for cap and trade and those approved for other offsets, like developers trying to comply with San Diego County's proposed climate action plan.

Second, I'm trying to understand if international credits are cheaper and who can use them.

Third, I'm trying to understand how the air board's preference for local mitigation might conflict with a county CAP that allows for international credits.

-Ry

Ry Rivard

Reporter

[Voice of San Diego](#)

Desk: [619-550-5665](tel:619-550-5665)

Cell: [304-389-9982](tel:304-389-9982) (use Signal if you want to encrypt our communication)

twitter.com/ryrivard

Late Comment Letters for North River Farms Environmental Impact Report

L17 BUENA VISTA AUDUBON SOCIETY, JOAN HERSKOWITZ

Comment Letter L17



Buena Vista Audubon Society
PO Box 486
Oceanside, CA 92049-0486

January 24, 2019

City of Oceanside Planning Commission
Oceanside, CA

Sent by Email

Dear Commissioners:

We are writing in opposition to the proposed North River Farms development that will be heard by your Commission on January 28th. This development is not consistent with the Oceanside General Plan and policies, and will have environmental impacts that are either not adequately mitigated or are described as unavoidable in the EIR. Environmental impacts relate to the following:

GHG: It is sprawl development that changes the community character and increases greenhouse gas emissions. It thwarts efforts to reduce emissions and achieve the carbon emission goals called out in the Oceanside Climate Action Plan, adding to global warming.

Traffic: It would result in unacceptable level of traffic congestion which is an unavoidable project impact, as is the related potentially unsafe conditions for wildfire evacuations.

Agriculture: It is inconsistent with the Oceanside Land Use Element agricultural policy that includes a statement to "assure the integrity and viability of remaining agriculturally zoned properties in South Morro Hills and prevent land use conflicts between agricultural and non-agricultural uses". It will convert the last remaining farmland in Oceanside to a dense housing development, and discourage any other serious agricultural operations.

Biology: The draft Oceanside Habitat Conservation Plan, which designates this property as an Agricultural Exclusion Zone, indicates that when converted to nonagricultural uses it invokes additional conservation guidelines. In this case, there should be consideration of the adjacent San Luis Rey River wildlife and habitat linkages, as the current open farmland has habitat value for local species that forage and nest there.

Conclusion: It is clear to us that environmental impacts have not been fully mitigated. In addition, the EIR affirms that traffic circulation impacts are unavoidable, and that the project is growth inducing. Because of these issues, the developer should be directed to redesign the project or select EIR Alternatives that reduce environmental impacts. A revised plan is needed to ensure Oceanside residents that all environmental impacts are either eliminated or mitigated.

Thank you for your consideration of our views on this important matter to Oceanside and the region.

Joan Herskowitz
Conservation Committee
Buena Vista Audubon

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L18 CDFW, GAIL SEVRENS

Comment Letter L18



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3903 Ruffin Road
San Diego, CA 92123
(858) 487-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLOTTE H. BUNHAM, Director



January 23, 2019

Chairperson Kyle Krahl
Oceanside Planning Commission
300 N. Coast Hwy.
Oceanside, California 92054
(760) 435-3520
PlanningCommission@ci.oceanside.ca.us
cmshovels@ci.oceanside.ca.us

**Subject: Comments on the Final Environmental Impact Report for the North River Farms
Planned Development Plan Project SCH# 2017111069**

Dear Chairperson Krahl and Commissioners:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Final Environmental Impact Report (FEIR) for the North River Farms Planned Development Plan Project.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. The Department provided comments on the Notice of Preparation (January 22, 2018), and jointly with the U.S. Fish and Wildlife Service commented on the Draft Environmental Impact Report (September 11, 2018). Some of the FEIR's responses to our comments leave conservation considerations for regional planning efforts unresolved.

Department Role

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (k) & 1852; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15388, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (cf. § 1802.) Similarly, for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

The Department is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) The Department may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to the Department's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1800 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Conserving California's Wildlife Since 1870

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The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Oceanside (City) prepared a draft Oceanside Subarea Plan (SAP) under the Multiple Habitat Conservation Program Subregional Plan, which also included draft subarea plans for the cities of Carlsbad, Vista, San Marcos, Escondido, and Encinitas. Although the City has used its allotted 5 percent take of coastal sage scrub vegetation, it has not completed or adopted a final subarea plan. To date, only the City of Carlsbad has approved their Subarea Plan and received state and federal take permits.

Project Location:

The North River Farms Planned Development (PD) Plan site is located in the South Morro Hills area within the north-eastern portion of the City. The Project site is generally bisected into northern and southern sections by the existing North River Road alignment. To the west of the Project site is a mix of uses including churches, an elementary school, parks, and established residential subdivisions. To the east of the Project site is South Morro Hills, an area primarily defined by agriculture, rural residential development, as well as natural areas associated with agricultural production, rolling hills, ridges, streambeds, and rock outcroppings. Arrowood Golf Course is located northwest of the Project site, while single-family residences, agricultural uses, and the Paradise Falls wedding and event venue border the Project site to the east. Existing agriculture and the San Luis Rey River border the Project site to the south.

Project Description/Objective:

The proposed Project would constitute the zoning, use regulations, and development criteria for future development of the property. The proposed residential uses under the PD Plan would incorporate a range of architectural styles prevalent in South Morro Hills' residential architecture. The 177-acre Project area would be divided into four Planning Areas supporting different housing types and farm plots. The Riverside Village would consist of 45.1 acres of medium density residential uses. Residential densities in the Riverside Village would range from 8.0 to 15.0 dwelling units to the acre. The Village Core would consist of 25.0 acres of mixed uses including a hotel, retail shops, a farmers' market venue, collaborative work spaces, a park, farm facilities, and an education pavilion. Residential densities in the core would range from 15.1 to 20.0 dwelling units to the acre. The North Village would consist of 51.8 acres of single-family and medium density residential uses. Residential densities in the North Village would range from 3.6 to 9.9 dwelling units to the acre. The Hilltop Village would consist of 41.4 acres of single-family detached homes. The base density would range from 3.6 dwelling units per acre to a maximum density of 5.9 dwelling units per acre.

COMMENTS AND RECOMMENDATIONS

1. Response A8-2 of Appendix T0 of the FEIR states that impacts proposed to the 100-foot San Luis Rey buffer are allowable uses in reference to the draft SAP. However, section 5.2.4 of the draft SAP states that new development, among other uses, is prohibited in the buffer. The Department is unable to find provisions within the draft SAP allowing the type of impacts the Project proposes within the 100-foot San Luis Rey buffer. The Department recommends the City keep consistent with the draft SAP by prohibiting development within the buffer. Regardless of the status of or provisions of the SAP, the Department believes a 100-foot buffer of restored habitat is appropriate based upon the highly sensitive species known to occur along the San Luis Rey River, including the state and federal listed endangered least Bell's vireo (*Vireo bellii pusillus*), potentially occurring state and federal listed southwestern willow flycatcher (*Empidonax eximius*

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trill), and other sensitive species including the yellow-breasted chat (*Icteria virens*) and yellow warbler (*Dendroica petechia*).

2. Response AS-4 of Appendix T0 of the FEIR states that the City believes it does not have the authority to collect a Habitat Development Fee as provided for in Section 5 of the draft SAP. The Department recommends the City adopt a mechanism to facilitate an in-lieu fee program to offset direct impacts to agricultural and vacant lands (i.e., Habitat Group F in the draft SAP). The in-lieu fee program could serve as a critical source of revenue to restore or enhance lands in priority areas in the SAP's Wildlife Corridor Planning Zone and thus provide additional conservation standards as outlined in section 4.3.1.3 of the draft SAP.

CONCLUSION

The Department appreciates the opportunity to comment on the FEIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Eric Hollenbeck, Senior Environmental Scientist at (858) 487-2720 or Eric.Hollenbeck@wildlife.ca.gov.

Sincerely,



Gail K. Stevens
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento
Janet Stuckrath, USFWS
Rob Dmochowski, Associate Planner, rdmochowski@lloceanside.ca.us

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L19 PRESERVE CALAVERA, DIANE NYGAARD

Comment Letter L19



January 28, 2019

Planning Commission
City of Oceanside
Sent via email to planningcommission@ci.oceanside.ca.us

Subject: Comments on North River Farms FEIR

Dear Chair and Commissioners:

The few changes made to this project over the last few months have not changed this sow's ear into a silk purse. This remains an egregious sprawl development that will irreversibly change the character of the neighborhood, and add traffic congestion, air pollution and greenhouse gasses that adversely affect the entire community. We have reviewed the comment letters, responses to comments and changes made to the DEIR and incorporated into the FEIR that is before you tonight. We find that many of the responses were inaccurate, incomplete and in several cases ignored the primary issue that was raised. Since the original comments identified substantial issues with the adequacy of environmental analysis and/or mitigation proposed, failure to fully address them still results in numerous potentially significant impacts that have not been addressed.

The following are a few specific examples in support of our conclusion:

Aesthetics

Preserve Calavera 03-9 -12 and other commenters

The comments focused on insufficient number and poor selection of sites used to evaluate view impacts, cumulative view impacts from loss of farmland, and unsupported conclusion that impacts were less than significant. The response fails to address the specific issues raised. While the FEIR acknowledges that there are cumulative growth impacts it fails to recognize that the loss of farmland will also cause cumulative view impacts. The views of the Morro Hills farmland are currently appreciated from numerous areas throughout the city. The loss of these views as this land is converted from agriculture to housing also ensures the loss of the views of farmland.

Land Use

Buena Vista Audubon Society 05-2 and Karen Green 137B-33

The comments raise the concern of the impacts of converting this single large piece of agricultural land, 7 % of the total of the remaining agricultural lands in Oceanside, from agricultural land use to more dense housing and associated commercial. It cites the staff report that says this "would have a significant impact on the

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agricultural productivity of the rest of Morro Hills. " The response completely ignored the primary point which was impact on agricultural lands.

The response refers to Topical Response CU-1 That acknowledged the project would have growth inducing impacts and Topical Response LU-2 Project Density and Consistency. This response describes a broad range of uses, many a long distance from the project site, yet fails to discuss the potential impacts on the agricultural land uses which was the point of the comment. There often are land use conflicts between agriculture and adjacent land uses, particularly residential. These impacts include resident concerns about chemical use, receiving drift spray used on ag fields, slow moving traffic on roads, odors, etc. In fact, these conflicts are documented to have caused the loss of farmland in nearby cities, for example Carlsbad. The League of Women Voters conducted a study of agriculture in San Diego County and found that protective zoning was one key way to help preserve such lands. (Incorporated by reference). The staff report again emphasizes the adverse impact of this one project on the remaining agricultural lands in Morro Hills. The FEIR fails to adequately consider these potential conflicts on the remaining agricultural land and therefore this remains a potentially significant impact.

5 Morro Hills 08-3 and 8-8 and PC 03-33

Comments raise concerns about the impacts on the recently adopted city program to implement Phase One of a larger program to support agriculture by allowing associated uses that would make it more viable, the Agritourism Strategic Plan. This is an adopted program of the city of Oceanside and was well known to the Project applicant who attended several meetings with local proponents of such a program as documented in the comment letter. It is not just broad policy and marketing support as is suggested by Topical Response LU-4. The response to this comment just says the project includes 31.6 acres of agricultural land uses and lists the other land uses. That is not an adequate analysis of the project consistency with this land use program of the City of Oceanside that includes the project site. Again, city staff pointed out this concern in the staff report, yet it was not acknowledged in the FEIR. Failure to properly analyze the failure of this project to comply with the land use plan for this area and its impact on the ability to implement this adopted plan of the city remains a potential significant impact.

Transportation

SANDAG Comment A4-2

SANDAG comments that "Transportation options should connect to the San Luis Rey Transit Center... incorporating connections such as bike routes or a shuttle service (described below) will allow future residents to access the San Luis Rey Transit Center, reduce the need for single-occupant vehicle trips and help implement the 2015 Regional Plan." The response to this comment is that a bicycle and a pedestrian trail will be provided to the project boundary and bus stop infrastructure will be provided within the project. The comment was to provide full connections by active transportation to the transit center. The response only addresses bicycle and pedestrian connections to the project boundary- which by itself provides no such connection to the transit center. In other places the text talks about such connections, but no figure illustrates how these will function. It fails to provide a shuttle service and provides no explanation/analysis of the adequacy of what has been provided to address the concern about connections to the transit center.

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The project has not adequately responded to these comments resulting in a conflict with provisions of the Regional Transportation Plan and the city's circulation element guidelines which support the completion of such connections- not just along project boundaries which still leaves gaps in connectivity.

SANDAG Comment A4-5 says "Please consider incorporating Transportation Demand Management (TDM) strategies ...to help mitigate potential traffic impacts." The response states "The City and project applicant has considered inclusion of TDM measures as part of project implementation." "Considering" incorporation of such measures is not the same as actually doing them- and there is no condition of approval or mitigation measure that requires this to be done- only a statement about such potential measures. Furthermore, the city's own guidelines for mitigation of the traffic impacts requires the consideration of creative strategies to reduce traffic. These TDM measures should be incorporated as part of required mitigation for addressing significant traffic impacts. The FEIR has given lip service to this issue with no concrete, measurable, enforceable action.

PC 03-35 Access to public transit service

The response to the comment restates what is in the FEIR "NCTD does not currently provide service to the project site or to the east along N. River Rd." and that providing bus stops "prepares for any future contemplated service." Development like this outside the core service area results in an increased number of auto trips that will be generated by the increased intensity of use, and longer trips because of the need to access jobs, school, and housing that will be a long distance from the project site for most residents. Providing adequate alternative transportation is a key to reducing these impacts- to traffic, air quality, and GHG. The Transit Center is 1 mile from the Village Core. The primary impact area for Smart Growth (SG) is within ¼ mile of a transit center- which is incorporated into the SANDAG criteria that specifies the characteristics of the 200 designated SG sites in the San Diego region. This site is not a SG opportunity area as has been confirmed elsewhere in the FEIR. It is not located where there is a range of services (as is required by the Housing Element to support affordable housing) and in fact does not provide any real access to public transit. A serious effort to reduce the significant traffic impacts would strengthen alternative transportation as one way to reduce auto congestion. That of course could include, as suggested by SANDAG in their letter, a shuttle from the project to the Transit Center. Or it could actually fund transit service to the project, and connection to other links such as Park and Ride lots near the freeway. Instead it provides a bus stop for a bus that does not exist.

PC 3-39 -40 Gaps in Bicycle service and connection to SLR transit center

The response to comments references figures that only show connections within the project site, or Fig 3-11c that extends just a few feet to the west. We found no figure illustrating full bicycle/pedestrian access from the project site to the SLR Transit center. The key to reducing VMT is to change the mode split by increasing bicycle and pedestrian use and reducing auto use. Trips of a few blocks in length within the project site would have minimal impact- it is accessing the transit center that could make a difference in roadway congestion. The FEIR fails to provide a clear image of these connections. Furthermore, improvements to such connections should be a key mitigation measure to address the traffic failures and these have been ignored. Simply claiming there are no feasible mitigation measures is not sufficient. Where overriding considerations are being proposed to justify allowing significant adverse impacts, CEQA requires a good faith effort to reduce those impacts, even if they cannot be reduced to below a level of significance. The FEIR fails to provide sufficient reasonable actions to reduce the identified traffic failures. Numerous feasible actions have been

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ignored such as improving bicycle/pedestrian connections to the transit center, providing public transit service to the project site, providing a shuttle service to the transit center or nearby park-and-ride lots.

PC 3-75 Roadway Bottlenecks

The comment raises the concern that widening a road for just a limited section creates bottlenecks at both ends where the roadway transitions back to fewer lanes. The response to this comment refers back to C3-24 that provides a detailed description of where the road narrowing will occur. But it fails to discuss how this impacts traffic flow, or more importantly, emergency evacuation. The response also refers to Topical Responses FR 3 Emergency Evacuation and Access and FR-4 Shelter in Place. FR 3 states "clearing intersections to keep traffic moving out of the area is anticipated to be the focus of evacuation planning..." and "law enforcement understands the importance of maintaining clear intersections to support evacuating residents." The comment is talking about delays caused by roadway configuration changes from 4 lanes to 2 lanes, not traffic control at intersections. Lane changes like this are known to impact traffic speeds, delays and accidents. Having law enforcement staff at intersections will not address the delays caused by 4 lanes narrowing to 2 lanes- at a location where there are no first responders.

Biological Resources

USFWS Comment A6-2 Conversion of Ag Land

The comment states the project area is within the City of Oceanside draft SAP Agricultural Exclusion Zone (AEZ) It further states that conversion of agricultural lands within the AEZ require a 50-100' buffer to the wetlands of the San Luis Rey River plus and a 100' biological buffer along the wetlands. The response says the upland 50-100' buffer is not required because there is no conversion of agricultural land along the border with the San Luis Rey River. The SAP does not limit the requirement to provide the buffer just to impacts along the river- it applies to the entire 3200 or so acres of the AEZ. Agricultural lands were treated differently in the SAP for a number of reasons- including that it was assumed that protective zoning would continue this land use. The land use provides substantial benefits to biological resources- both plant and wildlife. Habitat exists in patches throughout the area. Wildlife live, forage and nest throughout the area. Even ag land that is in active agriculture still provides nest sites for burrowing mammals- and they provide food for raptors. The entire area has biological value for native plants and wildlife. This intent is clarified on page 5-60 of the SAP "Conversion of agricultural or vacant, disturbed lands to urban use would negate existing benefits of open space and preclude the possibility of future habitat restoration, resulting in indirect, adverse impacts on SAP species." Recent history shows that there is tremendous pressure to convert the few remaining ag lands to more dense housing throughout San Diego County (the Lilac Hills project for example). While there is not a direct ratio of acres of impact tied to acres of buffer, there is this single requirement to establish the buffer if such land is converted. If this language only applied to the land along the river then the conversion language would have specified and likely mapped the boundary of an area of impact. It did not- and it clearly applies to the entire AEZ. The FEIR incorrectly concludes this buffer requirement does not apply. This remains a potentially significant impact that has not been addressed.

USFWS A6-4 Fee for Ag Land Conversion

Because the wildlife agencies and others recognize that impacts to agricultural lands are less severe than impacts to actual habitat such impacts are assigned a value of .1 acre of conservation for 1 acre of impact in

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the SAP. (SAP 5-60). The SAP goes on to explain the basis of the fee determination which is set at \$ 4,000 per acre. It notes that the final determination would be based on a fee study and be "updated annually to reflect changes in the price of mitigation land." The response says that since the city has not adopted such a plan that no such fees are required. However, in other cases the FEIR has included fees where programs have not yet been adopted by the City (see fees for temporary fire station assuming a CFD is in place) or where mitigation is not adopted in the city- but has been in other areas (like the County of San Diego PACE program to mitigate for the loss of agricultural lands). In those cases the actual amount of the fees is not specified in the FEIR, but the mechanism to determine them and the obligation to do so is specified. There is no justification to exclude the habitat fee for conversion of this farmland. As stated in the SAP the conversion of such lands is an indirect adverse impact that has not been mitigated.

BVAS 05-5 and PC 03-24 Wildlife Movement

The comments raise concerns about wildlife movement through the area. The response to these comments completely ignored this point. Many wildlife rely on wetlands as part of their daily activities or life cycle. Movement between the wetlands associated with the San Luis Rey River and the open space areas of Morro Hills would be impacted by placing dense development and the associated roads and fast-moving cars between these acres of open space lands and the river. It is not just the ag lands next to the river that are of concern. It is wildlife movement from all of Morro Hills between agricultural lands that currently support wildlife, and the river. The FEIR has failed to adequately consider the impacts of placing dense housing and thousands of daily car trips between open land and the river.

Hazardous Materials

PC 04-47 Soil Testing

The comment raises concern about the lack of soil testing, report of dumping of unspecified hazardous waste on two occasions and relying on applicant report as a primary source for this information. The response references soil testing done in 2014 which to our knowledge was not previously reported and the results were not included in the FEIR. Every project we have been involved with over the last 20 years where there has been active agriculture use documented in the Phase 1 assessment has found residue from chemicals commonly used in agriculture in the soil on site. The thresholds for significance of these chemicals have changed over the years, becoming lower and covering more chemicals over time as there is better knowledge as to what constitutes a health risk. We believe this project site warrants at least some level of soil testing to confirm conclusions based on reports from parties that are not objective.

Fire Assessment

PC 3-53 Plant Palette

The comment specifically requested that plants that are known to be a fire hazard, including three species prohibited by city ordinances, are added to the list. The response is "The OFD and City reserve authority over planting within the fuel modification zones." The comment is not just limited to fuel mod zones. The prohibited species are restricted from being planted anywhere within the city. The initial plant palette needs to include such restrictions that are required by city ordinance for the entire project site. There also need to be provisions to maintain all of the planted area, partially through HOA conditions and partially through

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leasing or other agreements that ensure adequate maintenance, and prohibition of known fire hazard plants or other restricted plant species for the life of the project.

Numerous comments — Emergency response times

Response to numerous comments refers to Topical response FR 5 Emergency Response Standards. The revised analysis in the FEIR now properly concludes the impacts are significant unless mitigated. Mitigation measure MM-PUB -1 is proposed as the means to reduce this impact below the level of significance. By adding a temporary fire station. However, the MM says this measure will be provided "prior to the last certificate of occupancy." This provides uncertainty as to when, if ever this measure would actually be provided. Traffic delays are common during construction along arterial roads like North River Rd. Traffic will be impacted both during construction all the way through continued use of the project. Traffic delays along the roadway will impact emergency access to the site as well as the ability for all of Morro hills to evacuate if needed. It is also conceivable that the developer never files the "last" certificate of occupancy and thereby never triggers this requirement. The impacts will not occur all at once when the last residence is occupied- by that time an estimated 90% of responses will be outside the allowed 5" window. When will the first impact occur? The potential impacts begin to increase from the moment that construction starts. That is when the mitigation measure needs to be in force in order to mitigate these impacts and ensure response times are within the threshold of significance.

Water Quality and Public Health

PC 03-58 asks for clarification as to how the SWPP has been modified to address the combination of active agricultural land uses within the middle of a housing project. The response to comments simply describes the system with no explanation as to how the specific water quality concerns associated with agriculture will be addressed. The types of chemicals used and the methods of their application, which can include aerial spraying, could impact water quality and public health. This is an extremely unusual planned development with active agriculture within the middle of dense housing. It is reasonable to assume this will result in some unusual demands on the storm water system- and to ask for a clear explanation of that. It is also reasonable to assume there could be air quality impacts unless there are some controls on aerial spraying and use of chemicals. Many areas are now adopting the Toxic-free standards initiated in Irvine and more recently adopted by the city of Carlsbad (ordinance incorporated by reference). The CEQA process is supposed to identify potential impacts and how they will be mitigated in clear simple language understandable by the average citizen- and the lead agency officials that must rule on their adequacy. The FEIR has not addressed this potential concern about protecting water quality and the associated impacts on air quality and public health.

Fire Evacuation

Numerous commenters raised concerns about evacuations and public safety during emergencies. Many of these commenters experienced firsthand the problems with communication and evacuation during the December 2017 Lilac Fire. Topical Response FR-1 General Fire Safety basically described the new building codes and design features that make new construction, like that envisioned with this project, much safer than older construction prior to the development of these new codes. What this fails to address is that essentially all of the rest of the construction in Morro Hills, and much in the developed areas to the west of the project,

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were not built to these same standards. The risks of serious fire within the broader community are not reduced because one project is built to higher safety standards.

FR-3 Adequacy of Emergency Evacuation and Access also just looks at the project and fails to include the surrounding area and how it is impacted by the proposed project. Evacuation is not just of the project site, it is the entire surrounding area. With many fewer residents the area experienced long delays during an emergency evacuation. The referenced OES and Multi-Jurisdiction Hazard Mitigation Plans were already in effect when the Lilac Fire occurred yet evacuation was still a problem. How would Shelter In Place for the project area work when it extends on both sides of N. River Rd, and the other 200+ parcels that would need to use that road are not able to shelter in place?

Two intersections (Vandergrift/N. River Rd. and N. River Rd./College) and one road segment, (College from N. River Rd. to Adams) will be in traffic failure with the project and that will not be mitigated. Evacuations on top of this existing failure will make this condition much worse, and it will extend into a much larger area of the community. Furthermore, the Evacuation Plan described in Appendix J-2 was not updated to reflect the temporary on-site emergency response team.

These responses also imply that the Lilac Fire was an extremely unusual occurrence, conditions change with each emergency and the improved plans with the project would greatly reduce the risk of any such future problems. This conclusion is at odds with numerous studies that indicate that climate change will increase the number and severity of wildfires. (See San Diego Foundation report referenced in our original comment letter). The response to comments notes that CEQA analysis does not specifically require addressing evacuation plans. But it does require assessing the related impacts from climate change- and impacts on public facilities are already part of the required CEQA analysis. This project will add cumulative impacts to emergency response services and the related public safety facilities. These impacts have not been adequately addressed by the MM-PUB-1 funding a temporary fire/emergency response team unless such emergency response plans are current and regularly updated for the life of the project.

There needs to be an Evacuation Plan for the area that addresses the needs of the entire area and not just the project site; that includes lessons learned from the Paradise Fire; that addresses the added traffic congestion with the project with a realistic deployment of emergency response personnel doing traffic control; and that has provisions for regular updating of the plan

Green House Gas and Air Quality

See separate letter submitted on our behalf by Chatter-Brown & Carstens.

For all of these reasons we urge you to deny North River Farms and find that the FEIR has not adequately analyzed or mitigated many potential significant impacts associated with the project.

Sincerely,
Diane Nygaard, President
Submitted on behalf of Preserve Calaveras
760-724-3887

Cc: Jeff Hunt, Robert Dmohowski

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L20 JOHNSTON, PHIL (3)

Comment Letter L20

23 January, 2019

Dear Mr Dmohowski-

I have reviewed the response to my 11 January 2018 letter regarding flood risks in the Final EIR.

In that letter, I called attention to the fact that parts of the "Village Core", parts of the "Medium Density Housing" and part of the "Single Family Residential" areas of the proposed project are all within the mapped "Floodway Area" that is clearly annotated "Must be kept clear of encroachment... (to Prevent) substantial increases in flood heights".

The response to my letter directed me to Appendix L2, which I have studied carefully. Thank you for the helpful response.

The Floodway Area Boundary is administered by the Federal Emergency Management Agency (FEMA). Any changes to the Floodway Boundary require approval by FEMA through the Letter of Map Revision Request process. Hydrology changes are a serious issue; project development work such as earthmoving (grading) which changes the Floodway geometry could cause a serious public safety risk due to flooding.

Appendix L2 of the FEIR addresses this issue. It describes the Hydrology and Hydraulic Modeling work which was done to support a Letter of Map Revision Request to FIMA for the NRF proposed project. Appendix L2 "Section 6.0 Conclusion" includes the statement "The Effective Floodway was not revised, as shown in the HEC-RAS output table included in Attachments 4 and 5" (Appendix L2 p. 7).

However, changes to and evaluation of the Floodway Boundary appears to have occurred in a two-step process:

- 1) First, the mapped Floodway Boundary was changed, to move it OUTSIDE the project development area. This was done through a Letter of Map Revision Request to FIMA, with an effective date April 13, 2017 (Appendix L2 p. 23-27).
- 2) Second, and only AFTER the Floodway Boundary has been moved outside the project development area- a study was prepared with a conclusion that the project development does not encroach into the Floodway Area. This study does not consider the changes made in step 1.

The impactful step is the first one: moving the mapped location of the Floodway Boundary. As far as I can tell, support documentation related to this Floodway Boundary Revision is almost completely missing from the EIR documents. Once the Floodway Boundary has been moved outside the project development area, everything which follows is predetermined, and is presented as being benign. Step 2 includes the conclusion that "The Effective Floodway was not revised...". This is illusory, because it excludes the critical Floodway Boundary change made immediately before the study was done.

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Changes to the Floodway Boundary should have been prominently disclosed in the EIR process, so the City of Oceanside Planning Department and other reviewers could properly assess the public safety components of the project. As far as I can tell, this was not done.

I am hereby requesting documentation to support the Letter of Map Revision Effective April 13, 2017, described in Appendix L2 p. 23-27. This Map Revision includes the Floodway Boundary location change made PRIOR to the evaluation of mass grading of 130 residential lots.

It could well be the Map Revisions in the project area made effective on April 13, 2017 are well founded and defensible. But because this is a serious public safety issue, I would like to be able confirm this has been done properly and comprehensively. I expect the City of Oceanside Planning Department would want to see this as well.

I believe that before the project can be approved, it is imperative that all changes to the Floodway Boundary be fully documented so the project can be satisfactorily evaluated.

The evaluation is based on pages of Appendix L2 as described below. If I have misunderstood any of this, please let me know.

Thank you and Best Regards,

Phil Johnston

Supporting References:

The following link is to the FIMA FIRM map posted on the City of Oceanside Web pages [apparently this map is now obsolete, having been modified in the NRF proposed project area with an effective date April 13, 2017].

<https://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?blobid=26455>

Appendix L2 p. 23-27 show that a FIRM map revision was prepared and submitted to FIMA, was approved effective April 13 2017, and that this revision was specifically fit to the NRF project area.

Appendix L2 p. 35-36 are modified FIRM maps which show the position of the Floodway Boundary in the NRF proposed project area has been shifted to the south from the FIRM maps posted on the City of Oceanside web pages.

Appendix L2 p. 9-17 are the SECOND Letter of Map Revision Request, submitted to FIMA April 30, 2018 by Integral Communities. This request is supported by a report prepared by Tory R.

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Walker Engineering dated February 2018. The report uses the recently moved Floodway Boundary (effective April 13, 2017) as a baseline, consequently the impact of the Floodway Boundary change are NOT EVALUATED.

Appendix L2 p. 2-7 The Tory R. Walker Engineering Conditional Letter of Map Revision Request. The Conclusion in this report states "The Effective Floodway was not revised...". This statement is only valid because it uses as its baseline the Floodway Boundary which had been modified effective 13 April 2018.

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L21 SMHA, CHARLES KROLIKOWSKI AND STEPHANIE TALAVERA

Comment Letter L21

From: Stephanie L. Talavera <Stephanie.Talavera@ndlf.com>
Sent: Monday, January 28, 2019 2:06 PM
To: Planning-Planning Commission <PlanningCommission@ci.oceanside.ca.us>; Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Cc: Charles S. Krolkowski <Charles.Krolkowski@ndlf.com>
Subject: South Morro Hills Association: Written Comment to Include in AR re Planning Commission Review of Proposed Entitlements & Final EIR for North River Farms

Honorable Members of the City of Oceanside Planning Commission and Mr. Robert Dmohowski:

On behalf of the South Morro Hills Association, attached please find a written letter for consideration and inclusion in the administrative record in advance of the City of Oceanside Planning Commission hearing tonight.

Sincerely,



Stephanie L. Talavera
stephanie.talavera@ndlf.com
p 949.854.7000 - d 949.271.7144

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ATTORNEYS AT LAW

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File No.
4562 101

January 28, 2019

VIA IN-PERSON DELIVERY & E-MAIL
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City of Oceanside Planning Commission &
Robert Dmohowski
300 N. Coast Highway
Oceanside, CA 92054

Re: Comment on Agenda Item No. 4, Planning Commission Review of the Proposed Entitlements and the Final Environmental Impact Report for the North River Farms Planned Development Plan (SCH # 201711069)

Dear Members of the Planning Commission:

On behalf of the South Morro Hills Association and in accordance with the California Environmental Quality Act ("CEQA"), we submit this comment for consideration and inclusion in the administrative record in advance of the City of Oceanside (the "City") Planning Commission ("Planning Commission") hearing on Agenda Item No. 4. Agenda Item No. 4 asks the Planning Commission to consider and recommend a course of action to the City Council of the City of Oceanside ("City Council") with respect to the Proposed Entitlements ("Proposed Entitlements") and the Final Environmental Impact Report (the "Final EIR") for the proposed North River Farms Planned Development Plan project (the "Project"). The South Morro Hills Association respectfully requests that the Planning Commission recommend denial of the Proposed Entitlements and take no action with respect to the legally insufficient Final EIR, consistent with the staff report on the same.¹

Ultimately, it is the City's responsibility to independently ensure that a proposed project's EIR meets the requirements of CEQA and sufficiently identifies and mitigates for the significant environmental impacts associated with the same. There is no excuse for the City's failure to do so, as the Permit Streamlining Act does not apply its strict time limits or deemed approved remedy to a proposed project application that includes legislative entitlements as the Project does here. As such, the Planning Commission should recommend denial of the Proposed Entitlements: the General Plan Amendment (GPA16-00002) ("Proposed General Plan Amendment"), Zone Amendment (ZA16-00005) ("Proposed Zone Amendment"), Vesting Tentative Map (T16-00002) ("Proposed Vesting TM"), and Development Plan (D16-00002).

¹ The staff report is incorporated by reference herein.

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("Proposed Development Plan"), as they are inconsistent with the policies of the City's General Plan ("General Plan") and are not supported by a legally adequate EIR.⁷

Likewise, the Planning Commission should recommend that the City Council take no action on the Final EIR. The Final EIR is insufficient in a myriad of ways, many of which were problematic in the Draft EIR as well. The Final EIR, like the Draft EIR before it, is legally inadequate because it incorporates significant new information without providing an opportunity for meaningful public review and comment. At the same time, the Final EIR fails to meaningfully address or respond to many of the over 200 written comments submitted on the Draft EIR. As a result, the Final EIR, like the Draft EIR before it, suffers from many of the same problems while introducing new information improperly withheld from public review. Thus, the Planning Commission should recommend that the City take no action on the Final EIR, prepare its own, independent EIR, and, at the very least, recalculate the Final EIR to allow an opportunity for truly meaningful public comment.

As we warned in our extensive comment to the Draft EIR, if the City certifies the similarly problematic Final EIR as-is, it will remain subject to significant court challenge. For these reasons, among others, the Planning Commission must recommend that the City Council deny the Proposed Entitlements and take no action on the Final EIR.

1. Ultimately, the City is Responsible for an Inadequate EIR.

CEQA compliance must occur before the City approves the Project because when a public agency gives a project "approval" it "commits to a definite course of action in regard to a project."⁸ In *Sore Yara v. City of West Hollywood* (2008) 45 Cal.4th 116, 130-132, the Court struck down a project finding that the city violated CEQA because it had impermissibly committed itself to the project before completing an adequate CEQA review.

Moreover, while an applicant's consultant may prepare an EIR, that does not relieve the City from its independent duty to review and exercise judgment over the document. Indeed, the City must independently review, evaluate and exercise judgment over the document and the issues it raises and addresses.⁹ **Ultimately, the City is responsible for the failure to prepare an adequate EIR.¹⁰**

2. The Permit Streamlining Act's Time Limits and Deemed Approved Remedy Do Not Apply to the Project.

Even further, the City need not fear taking no action with respect to certification of the Final EIR, as the Permit Streamlining Act's¹¹ time limits do not apply to the Project application.

⁷ The staff report discusses the inconsistencies with the General Plan in great detail and are incorporated herein by reference.

⁸ (CEQA Guidelines, 14 Cal. Code Regs., § 1532, subd. (a).)

⁹ (*Friends of La Brea v. City of Los Angeles* (1991) 232 Cal.App.3d 1446, 1452; Pub. Res. Code, § 21082.1.)

¹⁰ (*Huffman Oaks Ranch, Ltd. v. County of Santa Barbara* (1998) 65 Cal.App.4th 713, 723-724.)

¹¹ (Gov. Code, §§ 65020-65064.)

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Because the Project requires legislative action,⁷ including the Proposed General Plan Amendment and the Proposed Zoning Amendment,⁸ the Permit Streamlining Act's time limits and "deemed approved" remedy are inapplicable to the Project.

Indeed, the Permit Streamlining Act cannot be used to compel legislative changes, including those to a zoning ordinance or a general plan, because the Permit Streamlining Act is limited to project approvals that are adjudicatory in nature.⁹ Legislative enactments cannot be compelled under the Permit Streamlining Act and local government agencies are powerless to issue land-use permits which are inconsistent with governing legislation. On whole, the Permit Streamlining Act was not meant to impose a rigorous timetable on a local government's exercise of its policy-making legislative function.¹⁰ As the *Land Waste* Court said:

We hold that the Permit Streamlining Act (Gov. Code, § 65920 et seq.) does not require that permit applications be deemed approved if not acted upon within the statutory period when such permit applications would require legislative changes in applicable zoning ordinances, general plans, or other controlling land-use legislation.¹¹

As such, time constraints under the Permit Streamlining Act are not a valid excuse for improperly rushing the Project through without conducting a sufficient environmental review.

3. To be Properly Considered, the Final EIR Must Be Recirculated for Public Comment Because It, For the First Time, Includes Significant New Information That Was Improperly Withheld from Public Review.

An EIR must be recirculated if significant new information is added, in which case, further public and agency review is required.¹² Indeed, as the Public Resources Code makes clear:

When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 and consultation has occurred pursuant to Sections 21104 and 21153, but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult

⁷ (*Land Waste Regret v. Contra Costa Cty. Bd. of Supervisors* (1990) 222 Cal.App.3d 950, 959 [271 Cal. Rptr. 989] [holding that Permit Streamlining Act is inapplicable to application submitted with general plan amendment and rezoning request, as both of which are legislative acts] (hereinafter "*Land Waste*").)

⁸ (Final North River Farms Environmental Impact Report, at ES-2, ES-6 prepared by Duale for the City of Oceanside (Jan. 2019), available at <https://www.ci.oceanside.ca.us/govdocs/planning/ceqa/efid4.asp?file=efid4%20%20%20>)

⁹ (*Land Waste, supra*, 222 Cal.App.3d at p. 959.)

¹⁰ (*Id.* at pp. 955-56 [citing *Land v. County of Monterey* (1985) 139 Cal.App.3d 930, 935-937 [189 Cal.Rptr. 35] (hereinafter "*Land*").)

¹¹ (*Id.* at p. 961.)

¹² (Pub. Resources Code, § 21092(i); 14 Cal. Code Regs., § 15088.5.)

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again pursuant to Sections 21104 and 21153 before certifying the environmental impact report.¹¹

New information in an EIR is "significant" where the EIR is changed in a way that deprives the public of a meaningful opportunity to comment.¹² Specifically, recirculation is required under section 21092.1 when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented, (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt; or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless.¹³

For example, the *Spring Valley* Court found revisions to the air quality impacts analysis, as well as the hydrology and water quality impacts analysis "problematic," as the new analyses constituted significant new information requiring recirculation under section 21092.1.¹⁴ As to the air quality impacts analysis, the revisions analyzed the project's consistency with several general plan air quality policies and implementation measures. The Court found as follows with respect to the new information on air quality:

As there is insufficient evidence to support the City's finding the project is consistent with these two implementation measures (see pt. I, *ante*), the information discloses a substantial adverse environmental effect.¹⁵

Moreover, the information was omitted from the draft EIR.¹⁶

Likewise, the *Spring Valley* Court found the revisions to the hydrology and water quality impacts analysis to be problematic because it consisted of a complete redesign of the project's stormwater management plan.¹⁷ Unlike the other provisions, the changes were not provided in redline showing the specific amendments; instead, those portions of the EIR were globally amended to reflect current designs, information, and analysis, essentially replacing "26 pages of

¹¹ (Pub. Resources Code, § 21092.1.)

¹² (See *Spring Valley Lake Assoc. v. City of Folsom* (2016) 248 Cal.App.4th 91, 106–109 (finding the revisions to the air quality analysis and hydrology and water quality impact analysis "problematic") (hereinafter "*Spring Valley*") (citing *Lorenz Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1128 (hereinafter "*Lorenz Heights II*")); [the California Supreme Court] held that new information is "significant" within the meaning of section 21092.1, only if as a result of the additional information "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." (Accord, [Guidelines], § 15000.5, subd. (a)(7).)

¹³ (See *Lorenz Heights II*, *supra*, 6 Cal.4th at p. 1130.)

¹⁴ (*Spring Valley*, *supra*, 248 Cal.App.4th at pp. 106–109.)

¹⁵ (*Id.* at p. 108.)

¹⁶ (*Ibid.*)

¹⁷ (*Ibid.*)

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the EIR's text with 350 pages of technical reports and bold assurance the new design is an environmentally superior alternative for addressing the project's hydrology and water quality impacts.²⁰ Ultimately, the Court found that the revisions constituted significant new information requiring recirculation because their "breadth, complexity, and purpose" deprived the public of a meaningful opportunity to comment on an ostensibly feasible way to mitigate a substantial, adverse environmental effect.²¹

3. The Final EIR, for the First Time, Outlines New Substantial Environmental Impacts, Significant Environmental Impacts Resulting from the Project and New Mitigation Measures.

Here, notice and consultation has occurred as to the Draft EIR, but the Final EIR still has not been certified, which is why it is before the Planning Commission for recommendation tonight. Because the Draft EIR was fundamentally inadequate due to its inaccurate, inconsistent, and poor project description as to the density of the Project, the resulting environmental analysis was likewise flawed. As a result, the Final EIR incorporates significant, new analysis and mitigation measures, resulting in a substantial increase in the severity of environmental impacts unless new mitigation measures are implemented. Moreover, the Final EIR proposes various new, feasible project alternatives or mitigation measures that clearly would lessen the environmental impacts of the Project, but which the Project's proponents decline to adopt.

For these reasons, among others, the Final EIR is legally inadequate in part because it must be recirculated for meaningful agency and public review and comment.

4. For Example, the Final EIR Adds a New Mitigation Measure in the Form of an Omitte "Temporary Fire Station" Without Addressing Its Obvious, Significant Environmental Impacts.

As just one example of the significant new information provided in the Final EIR, the Final EIR proposes implementation of an entirely new mitigation measure that will result in a new, substantial environmental impact. Specifically, the Final EIR states that the Project "has been revised to require the provision of a temporary fire station through implementation of mitigation measure MM-PUB-1, incorporated into Section 4.15 of the Final EIR."²² In a remarkably self-serving fashion, the Final EIR conclusively determines, without proper factual support, that "[t]he identified potential location of the temporary fire station is within the same proposed development footprint of the proposed project assumed in the Draft EIR."²³ The Final

²⁰ (EIR).

²¹ (Id. at pp. 108-109; see also *Save our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 98, 107 (hereinafter "*Save our Peninsula*") ("We conclude that the EIR in this case did not comply with CEQA in its treatment of several critical water issues. Because of these inadequacies, the Board's act in certifying the EIR and approving the project constituted an abuse of discretion.") *Viewed Arco Citizens for Responsible Growth, Inc. v. City of Warner* (2007) 40 Cal.4th 412, 421, as modified (Apr. 18, 2007) (finding that the Draft EIR must be revised and recirculated for public comment).

²² (Final EIR, at 10-8.)

²³ (Final EIR, at 10-8.)

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EIR does not explain why that is the case or what it considers to be the “development footprint” of the Project, aside from the fact that the potential location was identified as a “proposed mixed-use development.”²⁴ Such an explanation is plainly insufficient.

This same conclusory statement also appears to serve as the basis for the Final EIR’s determination that the inclusion of an onsite temporary fire station would not result in new, significant environmental impacts. As the Final EIR states:

The introduction of a temporary fire station would not substantially alter the construction or operational characteristics of the proposed project such that new environmental effects to areas such as aesthetics, air quality, biological resources, energy, noise, traffic, and utilities, would occur. Therefore, the introduction of a temporary fire station would not result in new significant impacts.²⁵

Because the Final EIR only vaguely suggests that there would be no new environmental effects to areas such as “aesthetics, air quality, biological resources, energy, noise, traffic, and utilities” per the above, we must assume that it would cause significant environmental impacts in other areas of review excluded in that statement. Indeed, this is consistent with common sense, as how including a temporary fire station onsite would fail to result in new and significant environmental effects as to utilities, energy, and noise belies reason.

Moreover, the impacts that an onsite temporary fire station would have on the amount of water usage, alone, must be significant. If a temporary fire station is located on site, the increase in water usage attributable to the Project will very likely have new and significant environmental effects, including, but not limited to the effects on the following: agriculture and forestry resources due to the increased water use; geology and soils due to the increased water use; greenhouse gas emissions due to the additional trips attributable to the fire station; hazards and hazardous materials, due to the increased use in the presence of fire-retardant chemicals; hydrology and water quality due to the increased use in fire-retardant chemicals; water supply—it is a fire station—this much should be obvious; mineral resources as a result of the impact to water supply; public services; and, traffic and circulation due to trips attributable to the temporary fire station.

Although this is just one example of a new mitigation measure that has a significant, adverse environmental impact, it shows the significance of new information included in the Final EIR for the first time and withheld from public review.

- ii. **Likewise, the Final EIR Adds, for the First Time, Significant New Information, Alternatives, and Analyses that Have Not Been Subject to a Meaningful Public Review or Were Summarily Rejected.**

²⁴ (Final EIR, at 10-8.)

²⁵ (Final EIR, at 10-8–10-9.)

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Although the above is just one example of the significant new information provided for the first time in the Final EIR, other new information was included and must be subject to further public comment and review via recirculation. Such new information includes, but is not limited to, the purportedly minor modifications made to the following appendices:

Appendix B – North River Farms Planned Development Plan;
Appendix D1 – Air Quality Analysis Technical Report;
Appendix E – Biological Resources Technical Report;
Appendix H – Greenhouse Gas Emissions Technical Report;
Appendix J1 – North River Farms Fire Protection Plan;
Appendix J2 – Conceptual Wildland Fire Evacuation Plan; and,
Appendix N – Transportation Impact Analysis.²⁶

Entirely new appendices, information, and analyses include the following, which were only added to the Final EIR and not made available for public comment in the Draft EIR:

Appendix T1 – Purchase of Agricultural Conservation Easement (PACE) Program;
Appendix T2 – Purchase of Agricultural Conservation Easement (PACE) Program Fact Sheet;
Appendix T3 – South Murro Hills Visions Plan;
Appendix T4 – City of Oceanside Agritourism Strategic Plan;
Appendix T5 – California's 2017 Climate Change Scoping Plan;
Appendix T6 – California Natural Resources Agency Final Statement of Reasons for Regulatory Action, Amendments to the State C/Q/A Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97;
Appendix T7 – Fire/Medical Response Analysis;
Appendix T8 – Additional and Re-Analyzed Intersections and Street Segments and Revised Trip Generation Table; and,

²⁶ (Final EIR, at 10-9.)

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Appendix T9 – SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.²⁷

Likewise, the Final EIR, for the first time, includes a two additional legislative acts, including a Proposed Development Agreement and a new Zoning Ordinance Amendment, without allowing for public comment on the same.²⁸ While the Final EIR includes this new information, when approval of a development agreement is proposed, it should be identified in the EIR or negative declaration. In addition, any mitigation measures imposed on the project and any mitigation monitoring required under Public Resources Code section 21081.6 should be coordinated with the terms of a development agreement.

Accordingly, the Final EIR remains inadequate as it includes significant new information that must be subject to meaningful public review and comment.

b. Again, the Draft EIR was so Fundamentally Inadequate and Conclusory in Nature that Public Comment on the Draft was in Effect Meaningless.²⁹

Overall, the Final EIR reveals that the City has still failed to undertake the type of thorough analysis that CEQA requires before approving the Project. Instead, and as set forth below, the Final EIR minimizes the real and significant environmental harms that will result from build-out of this high-density development in an agricultural, scenic park space. Unfortunately, and despite the extensive comments received in advance of the Draft EIR, the Final EIR still suffers from the same deficiencies.

i. The Final EIR, like the Draft EIR, Still Fails to Evaluate Reasonably Foreseeable Project Density, Resulting in an Equally Tainted Environmental Analysis.

As discussed in detail in our written comment to the Draft EIR and incorporated by reference herein, the Draft EIR was fundamentally flawed. Specifically, the Project Description was often inconsistent, inaccurate, or vague as to the anticipated Project density. As a result, much of the environmental analysis was similarly problematic.³⁰

Again, an EIR is at the heart of the environmental control process established by CEQA.³¹ A proper EIR provides the public and governmental decisionmakers with detailed information on a project's likely environmental effects, describes the ways of minimizing such

²⁷ (Final EIR, at 16-4–10–10.)

²⁸ (Final EIR, at 15-6 [underlining the inclusion of a "Development Agreement is proposed in conjunction with the proposed project," as new in the Final EIR].)

²⁹ (See *Laurel Heights II*, *supra*, 6 Cal.4th at p. 1150.)

³⁰ Attached to this letter submitted in advance of the Planning Commission hearing on the Final EIR is the comment letter provided during the period for public review on the Draft EIR. Because the Final EIR fails to meaningfully respond to the over 200 comments provided, including the attached, the Final EIR suffers from the same flaws.

³¹ (BAC; see also 14 Cal. Code Regs., § 15124.)

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effects, and considers potential alternatives to a project.²¹ An accurate project description “is the *sine qua non* of an informative and legally sufficient EIR.”²² When a proposed project is accompanied by an inaccurate or incomplete description, it undermines CEQA by drawing “a red herring across the path of public input.”²³

CEQA defines “project” as “the whole of an action”²⁴ and an EIR must also describe the entire proposed project and all of its required approvals—not a piecemeal version.²⁵ The action subject to CEQA review must encompass all components of the activity being approved, **as well as reasonably foreseeable consequences.** Relatedly, a project description must include future expansion or later phases of a project that will **foreseeably result from project approval.**²⁷ **Additionally, the EIR’s project description must be internally consistent. If not, it cannot provide a vehicle for informed public participation in the decision-making process.**²⁸

A court will reject an EIR with an incomplete or inaccurate project description because, as the court stated in *County of Inyo v. City of L.A.*:

Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the “no project alternative”) and weigh other alternatives in the balance.²⁹

As discussed in detail in our written comment on the Draft EIR, the Project proposed a 689 (again, it still remains unclear whether the Final EIR proposes 656 units, 689 units, or approximately 4.4 units per acre or 777.04 units) unit development, but clearly has a planned development footprint that will include a much higher density.

As also stated in our prior written comment, the likelihood that the planned development footprint will include a higher density than that currently being evaluated is more than reasonably foreseeable and beyond speculative. Aside from being consistent with the Project as originally proposed, these higher density estimates align with similar projects constructed by the same developer in the area. For example, the developer’s Palomar Station in nearby San Marcos

²¹ (Pub. Resources Code, §§ 21002.3, 21001, 21046.)

²² (*County of Inyo v. City of L.A.* (1977) 71 Cal.App.3d 385, 393, 394 (hereinafter “*County of Inyo*”).)

²³ (*Id.* at pp. 393, 399.)

²⁴ (14 Cal. Code Regs., § 15378; see *Haklao & Hainakal Contractors v. City of Santa Cruz* (2013) 217 Cal.App.4th 1277, 1297; *Boeing North Corporation v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1220 (hereinafter “*Boeing North*”).)

²⁵ (*East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 181, 201; *Boeing North*, 211 Cal.App.4th at p. 1222; *Communities for a Better Env. v. City of Redwood* (2010) 184 Cal.App.4th 76, 98.)

²⁶ (*Level Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376 (hereinafter “*Level Heights*”); 14 Cal. Code Regs., § 15126 (EIR’s impact analysis must consider all phases of project).)

²⁷ (*County of Inyo*, 71 Cal.App.3d at p. 397 (drafting EIR description from groundwater pumping to repairing the entire aqueduct system).)

²⁸ (*Id.* at p. 398.)

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plans for 170 apartments on 15 acres.⁴⁰ Likewise, the developer's Mission Lane master-planned community, also in Occochee, "calls for up to 420 homes on 35.5 acres".⁴¹ The boutique hotel proposed in the current Project iteration is unlikely to remain within the range estimated and evaluated in the current Draft EIR. It will likely result in a hotel that will never be built and will likely transform into three story condominiums, similar to the Villa Storia project.

Even the City was confused as to the nature of the Project, on the same webpage that it hosted the Draft EIR, it listed a "Project Description" that set out an entirely different, and denser, maximum build-out:

Project Description: The North River Farms project application represents a request for a General Plan Amendment, Zone Amendment, Tentative Map and Development Plan for the North River Farms Planned Development Plan. Located on a 177-acre site on North River Road between Stallion Drive and Wilshire Road, the project proposes to **construct 725 dwelling units** with associated agricultural, commercial, and recreational uses. The Planned Development would constitute the zoning, use regulations, and development criteria for future development of the property. The project area would be divided into four planning areas supporting different housing types and farm plots.

The Riverside Village would consist of 45.1 acres of medium density residential (RMA and RMB) uses. This area includes 12.9 acres of agricultural uses, and 4.2 acres of open space/recreational. Residential densities in the Riverside Village would range from 6.0 to 15.0 dwelling units to the acre.

The Village Core would consist of 25.0 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers market venue, collaborative work spaces, a park, farm facilities, and an education pavilion. Residential densities in the core would range from 15.1 – 20.0 dwelling units to the acre.

The North Village would consist of 51.8 acres of single-family and medium density residential (RS, RMA) uses. Residential densities in the North Village would range from 3.6 to 9.9 dwelling units to the acre.

The Hilltop Village would consist of 41.4 acres of single-family detached homes. The base density would range from 3.6 dwelling units per acre to a maximum density of 5.9 dwelling units per acre.⁴²

The Final EIR still suffers from the same problems. As further detailed below, the Final EIR includes responses to comments that waffle back and forth on the planned development

⁴⁰ (b)(5)

⁴¹ (b)(5)

⁴² (City of Occochee, North River Farm Planned Development Project, available at <https://www.ci.occochee.ga.us/200/city-planning/17034/17034.html> (last accessed Sept. 6, 2018 at 6:10 p.m. PST).)

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footprint as it relates to density and other factors. On one hand, the Final EIR asserts that an entirely new, temporary onsite fire station can be retained within the “planned development footprint” because Village Core is identified as a “mixed use” area. Moreover, in response to the comment from the California Department of Transportation, the Final EIR asserts a lower unit count of 656 units. But, in response to our comment, the Final EIR still asserts the same 689 unit count, along with the concurrent and ambiguous description of the same as “approximately 4 units per gross acre”.

Thus, and as further detailed below, the Final EIR still suffers from the same fundamental flaws due to its failure in describing its own development footprint at the outset.

II. As Another Example, the Final EIR, like the Draft EIR, Still Assumes a Post-Development Baseline.

In addition to the major problem identified above, the Final EIR, like the Draft EIR before it, still suffers from the adoption of a post-development baseline. Again, here, the NOP for the project was published in 2017 and the Project site was, and still is, currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road.⁴³ Therefore, baseline conditions should reflect the existing conditions, applicable plan designations, and zoning for the Project area in effect at the time. Yet, the Final EIR’s impact analysis and conclusions are based on the assumed approval of the underlying entitlements it purports to evaluate.⁴⁴

For example, in its evaluation of change in aesthetics, the Draft EIR answered the question of whether the Project would adversely impact the scenic vista as though the approval had already occurred:

Would the project have a substantial adverse effect on a scenic vista? [...] With the future approval and adoption of the rezoning from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning). [...] Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant.⁴⁵

⁴³ (Notice of Preparation (NOP), Environmental Impact Report (Nov. 22, 2017), available at <https://www.ci.oceanside.ca.gov/files/116bank/06040101.asp?fileID=46270>.) Unsurprisingly, the possible density unit range identified in the NOP is 985-1,915. Again, well above the density evaluated in the Draft EIR. (See *id.*, at TR-1 North River Farms Development Plan, at p. 2.)

⁴⁴ In addition to the example above, the Sierra Club’s comment, dated September 7, 2018, identifies and discusses issues regarding the baseline with respect to air quality impacts, among other issues identified that are important for consideration in revising this Draft EIR.

⁴⁵ (Draft EIR, at 4.1-14-4.1-15, 4.1-16.)

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Similar issues exist throughout the Draft EIR and were not meaningfully corrected in the Final EIR. Thus, because the Final EIR evaluates the Project against a false or shifting baseline that is inconsistent with existing baseline conditions, the resulting analysis likewise fails.

iii. Again, the Final EIR, like the Draft EIR, Still Fails to Evaluate the Project in Its Existing Environmental Setting.

Separately, the Final EIR still fails to properly consider its impacts relative to the applicable general, regional, and specific plans.⁴⁶ This also renders the Final EIR legally inadequate, as CEQA guidelines require an evaluation of the Project in its existing environmental and regulatory setting—not in a vacuum. Accordingly, an EIR must discuss and evaluate inconsistencies between the proposed Project and its applicable general, specific, and regional plans.⁴⁷

Here, existing land use designations allow for a maximum density of 61 dwelling units for the entire Project area. This is consistent with the applicable general, regional, and specific plans, but entirely inconsistent with the development proposed by this Project. Another example of this inconsistency is that the City's General Plan permits residential development only where such development does not interfere with existing agricultural resources. Although the Draft EIR acknowledged that the entire Project site will be considered a significant agricultural resource based on the Land Evaluation and Site Assessment Model ("LESA"), it still failed to properly consider the significant impacts or mitigation thereof in accordance with the same.

The Final EIR likewise fails for declining to meaningfully evaluate the above-mentioned inconsistencies, among others, in accordance with CEQA.

4. The Final EIR Fails to Meaningfully Address Major Environmental Issues Identified in the Draft EIR, Independently Rendering the Final EIR Legally Inadequate.

Failure to meaningfully respond to written comments independently renders the Final EIR legally inadequate. Here, the Final EIR includes responses to comments that are cursory, conclusory, self-serving, unsupported by facts, and, at times, wholly arbitrary. For example, the Final EIR makes frequent reference to the use of "speculative" and " undue speculation" without acknowledging the careful line must be drawn between Project impacts which are reasonably foreseeable and speculation. As we discussed in great detail in our comment to the Draft EIR and again as incorporated herein, the vague and inconsistent Project description, along with extrinsic facts easily available to the public, suggest that the likelihood of future, higher than presently anticipated density of the Project is far more than reasonably foreseeable and certainly not speculative. The Final EIR still fails to account for that reasonable foreseeability.

⁴⁶ (14 Cal. Code Regs., §15123, subd. (b).)

⁴⁷ (Ibid. ["applicable" plans have been adopted and legally apply to a proposed project].)

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In response to our written comment that the vague, inconsistent Project description allows for a density and, consequently, planned development footprint much higher than that anticipated by the current environmental review, the response says, in entirety:

The comment states that although the Draft EIR evaluates the development of up to 689 dwelling units, within 4 planning areas, the original project proposal would have involved the construction of 1,000 dwelling units. In response, as described in the Draft EIR, **the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre.** Any previous proposals are not relevant to the discussion of the Draft EIR. The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response is provided to this comment.⁴⁹

Yet, by responding with **"the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre"** the Final EIR reveals itself as suffering from the same problems as the Draft EIR. First, the use of both "689 units" and "approximately 4 dwelling units per gross acre" is, in and of itself, so vague and ambiguous as to allow for a significantly increased density. Given the size of the Project, the ambiguity would allow for an increased density of up to 777.04 dwelling units (176.6 acres multiplied by "approximately" 4.4 dwelling units per acre). One must ask, why is 689 dwelling units not specific enough, alone?

Second, and in the very same set of responses, the Project waffles back and forth on density, reducing it so as to assuage specific comments which rely in large part on density as a base value for evaluating environmental impacts. For example, in response to a comment from the California Department of Transportation regarding inaccurate or improper trip generation, the Final EIR asserts an entirely different proposed Project density:

In response to this comment, the project residential trip generation has been revised as shown in the table below. It should be noted that trip generation from other proposed land uses within the project have been revised. **In order to account for this change in trip generation rates for the residential portion of the proposed project, the total dwelling units have been reduced from 689 to 656 units, in order to maintain a similar total project trip generation.** Please refer to Section 10.2 of the Final EIR for a full explanation regarding the change in dwelling unit total.

The project trip generation was calculated using SANDAG trip rates from the (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002, which is incorporated in Appendix T8 to the Final EIR (also available at https://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf).

⁴⁹ (Final EIR, at TD-15), O6-5.1

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SANDAG categorizes trip generation rates based on density and housing type. Residential densities correspond to the following trip rates:

1) Condominium (or any multifamily 6-20 DU per acre) = 8 ADT per DU

2) Single Family Detached (average 3-6 DU per acre) = 10 ADT per DU

Based on the proposed development densities, the Final EIR correctly applies the condominium (6-20 DU per acre) and single-family detached (average 3-6 DU per acre) trip rates to the trip generation calculations shown below, with a reduction to a total 656 units. Based on this evaluation, there is a reduction in the overall trip generation reported in the Draft EIR; no new or more severe impacts would result. Refer below and Appendix T8 for a revised project trip generation table reflecting 656 units.⁴⁹

Inconsistently and in response to our written comment, "the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre". Again, because of the use of both 689 units and the phrase "overall density of approximately 4 dwelling units per gross acre," the actual resulting density could potentially include 777.04 dwelling units. An entirely new total from the various inconsistent totals referenced in the Final EIR in response to comments on the Draft EIR.

Third, the Final EIR also responded to this unsettling problem as outlined in our comment by simply stating that this inconsistency and ambiguity is "not an environmental issue". If the Final EIR truly takes the position that proposed development density is not an "environmental issue", then it must explain how it can also respond to the California Department of Transportation's comment on traffic impacts by using a value calculated "[b]ased on the proposed development densities". As we made clear in our written comment, proposed development density affects transportation impacts, water impacts, and any other such environmental analysis that relies on proposed development density as a base value. As just one example, in response to a variety of comments that addressed issues related to the Project's description and consequently, its cumulative growth inducing impacts, the Final EIR casually responds as follows:

Even though there is no specific number or percentage available to determine whether this estimated growth would be considered a substantial increase in population, the proposed project would nevertheless increase the population of the area and exceed the planned population growth under the site's current General Plan land use designation. Sections 6.1 and 4.14 of the Draft EIR acknowledge that, as the project site is developed and eventually built out as proposed, existing adjacent and nearby land may be encouraged to intensify uses as a result of property owners in the area being encouraged to propose additional community serving retail uses based on the new residences. In

⁴⁹ (Final EIR, at (U-70), A7-5.)

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other words, construction of the proposed project would generate an economic stimulus from the operation of the proposed project's commercial and agricultural facilities, and introduction of new consumer demand in the area. **Additionally, the proposed land use intensification could potentially result in growth inducement due to potential for unplanned infrastructure improvements.** Accordingly, the Draft EIR concluded the project would be considered growth inducing.

However, an EIR is not required to provide a detailed analysis of a project's effects on growth, and is not required to engage in speculation (CEQA Guidelines Section 15126.2(a) (2); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369; *Federation of Millside & Campen Assn. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1265). The particular growth that can be attributed to a project can be difficult to predict, given the large number of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the project. As a result, the court in *Napa Citizens* concluded that it would not be reasonable to require the EIR to "undertake a detailed analysis of the results of such growth." The court concluded that nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth. (91 Cal. App. 4th at p. 369).³⁰

The topical response LU-1 is similarly unavailing. In response to "Comments on the Draft EIR state that the project conflicts with a number of the City's General Plan policies" the Final EIR responds in a similarly conclusory fashion:

Under CEQA, a conflict or inconsistency with an applicable plan is not, by itself, considered a significant environmental impact. Instead, **the inconsistency must result in a significant physical impact for there to be a significant impact under CEQA.**³¹

Conclusion

The adequacy of an EIR's project description is inextricably linked to the adequacy of its analysis of environmental effects. If the description, baseline, and consistency requirements are not met, the resulting environmental analysis will likely reflect the same mistakes.³² For example, if an EIR bases its cumulative impact analyses on general plan projections, it must explain why these projections function as a realistic predictor of related impacts.³³ Moreover, a

³⁰ (Final EIR, T0-9.)

³¹ (Final EIR, T0-38.)

³² (See *Carroll (Agg'ns)*, 47 Cal.3d 376 [EIR failed to describe or analyze project accurately].)

³³ (See 14 Cal. Code Regs. § 15131, subd. (b)(1)(B).)

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general plan's projections of future growth and related impacts are an inadequate basis for an EIR's cumulative impact analysis if the plan's projections do not cover a sufficiently wide area or exclude relevant data.³⁴

This is particularly true in situations like those at issue here, where the Project as originally envisioned was a higher density development and the Final EIR's statements regarding Project density are inconsistent, vague, and often incomplete. Because the Draft and Final EIRs both rely on inaccurate and inconsistent estimates of projected development density, the analysis that follows is similarly flawed. In sum, limiting each analysis on a whim to a projected density of 689 units or 656 units, while still including a qualifying statement that allows for an "overall density at 4 units per gross acre" or 777.04 units, qualifies as impermissible CEQA piecemealing. It follows that the other specific environmental analyses related to traffic, air quality, public resources, etc., should have been likewise revised to adequately consider the potential for full build-out relative to the existing environmental conditions at the time of the NOP. Because they were not, the Final EIR remains insufficient.

Once a new, truly independent EIR is prepared, then additional substantive issues may be raised and addressed. South Morro Hills Association reserves its right to submit supplemental information and evidence up to the public hearing on the Project.³⁵ Please do not hesitate to contact either of the undersigned should you have any questions, comments, or concerns regarding the above.

Sincerely,



Charles S. Krollkowsky, Esq. &
Stephanie L. Talavera, Esq.
Newmeyer & Dillon, LLP
On Behalf of South Morro Hills Association

CSK:ah

cc: South Morro Hills Association

³⁴ (See *Kings County Farm Bureau v. City of Hayford* (1990) 221 Cal.App.3d 692 [no explanation of why analysis of cumulative air quality impacts was limited to Central Valley]; *Citizens to Preserve the Ocean v. County of Fresno* (1985) 176 Cal.App.3d 421 [air quality analysis defective for failure to include contribution to pollution from offshore oil operations].)

³⁵ (See, e.g., *Golden Vineyards v. Monterey Peninsula Water Management* (1997) 60 Cal.App.4th 1109, 1119-1120 [applicant has right to present comments "prior to the close of the public hearing on the project"]; *Coal Air Studies Action v. City of Fontana* (1984) 152 Cal.App.3d 1194, 1197 [same principle].)

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ENCLOSURE 1

Late Comment Letters for North River Farms Environmental Impact Report



NEUMEYER DILLON LLP
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THE P&L
0001.111

September 17, 2018

VIA U.S. MAIL & E-MAIL RDMOHOWSKI@CLOCEANSIDE.CA.US

Rob Dmohowski
Associate Planner
City of OceanSide
300 N. Coast Highway
OceanSide, CA 92054

Re: Comment on the Draft Environmental Impact Report for the North River Farms
Planned Development Plan (SCH # 2017111065)

Dear Mr. Dmohowski:

On behalf of the South Mereo Hills Association and in accordance with the California Environmental Quality Act ("CEQA"), we submit this comment to the City of OceanSide's (the "City") Draft Environmental Impact Report ("DEIR") for the North River Farms Planned Development Plan ("Project").¹

Overall, the DEIR reveals that the City has failed to undertake the type of thorough analysis that CEQA requires before approving the Project. Instead, and as set forth below, this DEIR minimizes the real and significant environmental harms that will result from building this high-density development.

If the City certifies the DEIR as is, each of the defects identified below will independently render the Final EIR unlawful and subject to court challenge.

I. **The DEIR Fails to Meet Many of CEQA's Most Basic Legal Requirements.**

a. **The DEIR's Project Description is Inaccurate, Incomplete, Inconsistent, and Inadequate—as is the Resulting Environmental Analysis.**

An Environmental Impact Report ("EIR") is at the heart of the environmental control process established by CEQA.² A proper EIR provides the public and governmental

¹See generally Dadd, *Draft North River Farms Environmental Impact Report*, July 2018, http://www.ci.oceanside.ca.us/files/assets/development/2018/07/18/20180718_nrfm_deir.pdf (hereinafter "DEIR").

²QAI; see also 14 Cal. Code Regs., § 1.51261.

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decisionmakers with detailed information on a project's likely environmental effects, describes the ways of minimizing such effects, and considers potential alternatives to a project.⁷

An accurate project description "is the sine qua non of an informative and legally sufficient EIR."⁸ When a proposed project is accompanied by an inaccurate or incomplete description, it undermines CEQA by drawing "a red herring across the path of public input."⁹

A court will reject an EIR with an incomplete or inaccurate project description because, as the court stated in *County of Inyo v. City of L.A.*:

Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project alternative") and weigh other alternatives in the balance.⁸

Because CEQA defines "project" as "the whole of an action,"¹¹ an EIR must also describe the entire proposed project—not a piecemeal version.⁸ A project description must include future expansion or later phases of a project that will foreseeably result from project approval.⁸ Additionally, the EIR's project description must be internally consistent. If not, it cannot provide a vehicle for informed public participation in the decision-making process.¹²

Here, the Project proposes a large-scale planned residential development that contemplates "the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre."¹³ The DEIR describes the Project and its objectives as including the "underlying purpose" of implementing a "planned residential, mid-density, and sustainable community on existing agricultural land."¹⁴ However, when read in context, the Project's description is inaccurate, incomplete, and inconsistent because it fails to identify, and thus properly consider, the changes to existing land use designations and density in the Project's 4 planning areas.

⁷ (Pub. Resources Code, §§ 21082.1, 21061, 21003.)

⁸ (*County of Inyo v. City of L.A.* (1977) 71 Cal.App.3d 185, 183, 199 (hereinafter *County of Inyo*)).

⁹ (*Id.* at pp. 193, 190.)

¹⁰ (*Id.* at p. 198.)

¹¹ (14 Cal. Code Regs., § 15378; see *Malden & Warren had Condomers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1297; *Banning Ranch Condomers v. City of Newport Beach* (2012) 211 Cal.App.4th 1299, 1239 (hereinafter *Banning Ranch*)).

¹² (*East Sacramento Partnership for a Livable City v. City of Sacramento* (2018) 5 Cal.App.5th 281, 295; *Banning Ranch*, 211 Cal.App.4th at p. 1222; *Communities for a Better Env't v. City of Redwood* (2010) 184 Cal.App.4th 711, 98.)

¹³ (*Local Heights Improvement Area v. Agency of Gov. of Cal.* (1988) 41 Cal.3d 376 (hereinafter *Local Heights*); 14 Cal. Code Regs., § 15124 (EIR's impact analysis must consider all phases of project).)

¹⁴ (*County of Inyo*, 71 Cal.App.3d at p. 197 (stating EIR description from groundwater pumping to replacing the water treatment system)).

¹⁵ (DEIR, at 3-1-5-2.) For the complete Project description, see DEIR, at 3-1-3-22.

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i. The Governing Restrictions on Residential Development.

Because the Project largely proposes the construction of residential dwelling units, it is important to first understand the governing restrictions on residential development.

Per the City's Zoning Ordinance,¹³ residential districts such as those contemplated by the Project may be designated as follows: "RE" for Residential Estate District, "RS" for Single-Family Residential District, "RM" for Medium-Density Residential District, "RH" for High-Density Residential District, or "RT" for Residential Tourist District.¹⁴ Depending on the designation, certain types of development are permitted. For example, an RS district allows for the construction of single-family residential units, but prohibits the construction of duplexes and townhomes.

Aside from categorizing the type of development permitted, the residential district designations also set the range of density allowed. Significantly, each district designation is associated with a particular base and maximum density, measured in dwelling units per gross acre. For the RS designation, the base density is 3.3 dwelling units per gross acre with a maximum density of 5.9 dwelling units per gross acre. For the RM designation, the Zoning Ordinance establishes three subcategories, RM-A, RM-B, and RM-C, each associated with an increase in density up to 20.9 units per gross acre.¹⁵

ii. The Project's Description.

Again, the Project proposes a large-scale planned development that contemplates the addition of up to 688 dwelling units within 4 planning areas. But, a brief review of the Project's history reveals that, from the outset, the Project anticipated a higher density development. As proposed in early 2017, the Project called for the construction of approximately 1,000 dwelling units on 176.64 acres of open land. Although the initial proposal also incorporated an agricultural aspect, City "planners concluded it's still far too many homes for the area" and "[a]ny residents agree[d]." While the developer described the Project as a "sustainable, multi-generational agricultural community," the City and its residents understood that development at

¹³ See generally City of Oceanside, Zoning Ordinance [last accessed Sept. 7, 2018, at 2:04 p.m. PST], available at <https://www.ci.oceanside.ca.us/government/development/zoning> [hereinafter Zoning Ordinance]. Although the Project is not subject to a Planned Development District, it must still conform to the applicable residential development restrictions identified in the General Plan and land use designations. Zoning Ordinance, § 1703, subd. (B).

¹⁴ Residential use types included in a PD Plan shall conform to the applicable residential unit type for the General Plan land use designations. . . . City of Oceanside, General Plan, Section 2.3 Residential Development, at pp. 62-77 (June 2002) [prohibiting the construction of residential density usage in the Zoning Ordinance for the purposes of residential development] [last accessed Sept. 6, 2018], available at <https://www.ci.oceanside.ca.us/government/development/gp>.

¹⁵ Zoning Ordinance, § 1010, at pp. 10-2-10-3.

¹⁶ *Id.* at p. 10-2.

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that density would impermissibly overburden the City's already limited resources and infrastructure.¹³

At present, the DEIR describes the Project as allowing "for the development of up to 899 dwelling units for an overall density of approximately 4 dwelling units per gross acre."¹⁴ Per the DEIR's Project description, the Project includes a total of four planning areas: (1) Riverside Village, (2) Village Core, (3) North Village, and (4) Hilltop Village.¹⁵ As shown in DEIR Table 3-1 below, each planning area is accompanied by a proposed use. For Riverside Village, a total of 26.4 acres is designated as "Single-Family" residential, 20.6 acres "RMA" and 7.8 "RMA."¹⁶ North Village and Hilltop Village also include designations for "Single-Family" residential, with 49.3 and 29.5 respective acres designated "RS."¹⁷ Only the Village Core identifies 13.8 acres as "Medium-Density Residential/Mixed Use Development."¹⁸

Table 3-1
Proposed Land Uses

Planning Area	Category	Acres/Aft
Riverside Village	Single-Family Residential (RSR)	26.6
	Single-Family Residential (RMR)	7.8
	Park	1.9
	Agriculture	12.3
	Water Quality Buffer	1.7
Village Core	Medium-Density Residential/Mixed Use	13.8
	Park	1.6
	Agriculture	6.1
North Village	Single-Family Residential (RS)	49.3
	Park	2.6
	Agriculture	9.9
	Water Quality Buffer	1.7
	Buffer	1.7
Hilltop Village	Single-Family Residential (RS)	29.5
	Park	2.8
	Buffer	4.1
	Buffer	5.6
	Backlot Roads	11.1
Total		176.8

¹³ (PHI Draft), Occorville Says No to Rural Development, The San Diego Union Tribune (Feb. 28, 2017, 8:50 a.m. PST), <http://www.sandiegouniontribune.com/sdut-occorville-says-no-to-rural-development-20170228-story.html>; Phil Dick, Rural vs. Urban: Occorville Esquipes Mount Hills (Mar. 12, 2017, 8:00 a.m. PST), <http://www.sandiegouniontribune.com/sdut-occorville-says-no-to-rural-dev-20170312-story.html>.

¹⁴ (DEIR, supra note 3-3 (emphasis added).)

¹⁵ (Id. at 3-4-3-8.)

¹⁶ (Id. at p. 3-4 [Table 3-1 Proposed Land Uses].)

¹⁷ (Id. at 3-4.)

¹⁸ (Id. at 3-4.)

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iii. The Project's Description Mischaracterizes Riverside Village as "Single-Family Residential" Development.

At first glance, the Project's description of the proposed land use may appear sufficient. However, read in context with the governing restrictions on residential development, it becomes misleading, inaccurate, and incomplete, as it does not reflect the projected density of the proposed development or its substantial likelihood of future expansion. Upon closer inspection, the individual planning areas reveal a much higher projected density, consistent with the Project as initially proposed in early 2017.

For purposes here, the pertinent designations include the RS and RM designations. The RS designation, referenced in describing the proposed land use for North Village and Hilltop Village, is the only residential district designation for "single-family" residential developments.²¹ Per the Zoning Ordinance, the RS designation is intended to "provide opportunities for single-family residential land use" and specifically excludes the construction of "[d]uplexes, triplexes and fourplexes," as all new residential construction in an RS district must be single-family dwellings or approved accessory structures.²¹ Importantly, an RS district's base density is 3.6 dwelling units per gross acre, with a maximum density of 5.9.²²

In contrast, the RM designation, used to describe Riverside Village, contemplates medium-density development and specifically excludes "single-family residential" dwellings, contrary to representations made in the DEIR.²⁴ In fact, the RM designation expressly prohibits the construction of single-family dwellings in favor of "patio homes, duplexes, townhouses, multi-dwelling structures, and cluster housing."²⁵ Unless preexisting, "no new single-unit conventional (S/U-C) single-family dwellings, as defined in this Article, shall be permitted" in an RM district.²⁶ Also significant, RM designations, unlike RS designations, allow for a maximum density of up to 20.9 dwellings per gross acre.

Thus, to characterize the development contemplated in Riverside Village as "Single-Family Residential" is not only misleading, but inaccurate, as a single-family dwelling cannot be constructed in Riverside Village under the identified designations RMA or RMB.

iv. The Project Allows for the Construction of 1,010 Dwelling Units, Not Just 659.

Aside from improperly characterizing the nature of the development in Riverside Village as "single-family" residential, the DEIR's vague references to the residential districts result in an

²¹ Compare DEIR, at 3-4, with 3-1 Proposed Land Use (describing North Village and Hilltop Village as "Single-Family Residential (RS)"; with Zoning Ordinance, § 1010, at p. 10-2 ("RE Single-Family Residential District").

²² Zoning Ordinance, § 1010, at p. 10-2.

²³ *Ibid.*

²⁴ Compare DEIR, at 3-4, with 3-1 Proposed Land Use (describing Riverside Village as "Single-Family Residential" but using the RMA and RMB designations), with Zoning Ordinance, § 1010, at p. 10-2 ("RM Medium-Density Residential District").

²⁵ Zoning Ordinance, § 1010, at p. 10-2.

²⁶ *Ibid.*

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inaccurate and incomplete estimation of proposed density. While the DEIR frequently refers to development as contemplating a maximum of 689 units at 4 units per gross acre, using the proposed designations as outlined in the Project description allows for development at a much higher density.

v. The Project Description Allows for Construction of at Least 752 Dwelling Units at Riverside Village, North Village, and Hilltop Village, Alone.

Again, the DEIR identifies Riverside Village as having 20.6 acres designated RMA and 7.8 acres designated RMB. North Village and Hilltop Village include designations for single-family residential, RS, at 40.3 and 29.5 acres, respectively.²⁷ Village Core's designation as stated in the DEIR does not clearly correspond to a designation in the City's Zoning Ordinance, but it does generally categorize 13.8 acres as "medium-density residential/mixed use development[.]"²⁸

Momentarily putting aside the Project's improper failure to meaningfully describe Village Core's proposed designation, the Project's description of the Riverside Village, North Village, and Hilltop Village planning areas allows for development at a much higher density than that contemplated in the DEIR.

As to Riverside Village, the DEIR describes the proposed land uses as including 20.6 acres zoned RMA and 7.8 acres zoned RMB. Per the Zoning Ordinance, RM-A, or "RMA" as used in the DEIR, is a Medium Density A District with a base density of 6.0 dwelling units per gross acre and a maximum potential density of 9.9.²⁹ RM-B, or "RMB" as used in the DEIR, refers to a Medium Density B District, which requires an increased base density of 10.0 dwelling units per gross acre with a maximum potential density of 15.0.³⁰

Accordingly, the 20.6 acres designated RMA for Riverside Village can have a maximum potential density of 9.9 dwelling units per gross acre, whereas the 7.8 acres designated RMB can have a maximum density of 15.0 dwelling units per gross acre. Based on this, we can estimate that the maximum dwelling units in Riverside Village could be up to 207 for the portion identified zoned RMA (9.9 dwelling units multiplied by 20.6 acres). For the 7.8 acres zoned RMB, the Project description allows for the construction of up to 117 dwelling units (15.0 multiplied by 7.8). In total, the maximum number of dwelling units authorized by the Project's description of the Riverside Village planning area alone is 324 units.

Likewise, using the RS district's maximum density of 5.9 dwellings per gross acre, North Village and Hilltop Village could add an additional 411 dwelling units.³¹ For North Village, a

²⁷ (DEIR, at 5-4, Table 3-1 Proposed Land Uses.)

²⁸ (Ibid.)

²⁹ (Zoning Ordinance, § 2010, at p. 10-2.)

³⁰ (Ibid.)

³¹ (Ibid.)

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total of 237 additional units could be constructed (40.3 acres multiplied by 5.9 dwellings per acre). Hilltop Village could add 174 dwelling units (29.3 by 5.9).

Thus, based on the designations provided in the Project's description, the total dwelling units contemplated for 3 of the 4 identified planning areas (Riverside Village, Village Core, and North Village), could include up to about 732 dwelling units, already in excess of the 689 dwelling units identified as the maximum density in the DEIR.

VI. The Project Authorizes at Least 288 Additional Units in the Village Core Planning Area for a Total of 1,020 Dwelling Units.

Again, because the DEIR refers to the Village Core as "Medium-Density Residential/Mixed Use," it is unclear which associated land use designation and density restriction applies. This is, in itself, problematic as it does not allow an accurate projection of the Project's proposed density.

Regardless, because the Project description does propose a "Medium-Density" residential development for Village Core, using the RM classifications to estimate proposed density makes sense. Using the RM classification, Village Core's maximum potential density could be up to 20.9 dwelling units per gross acre. This would add an additional 288 units (20.9 dwelling units multiplied by 13.8 acres).

On whole, this conservative estimate of the Project's potential development would result in a total of 1,020 dwelling units,²¹ well beyond the 689 units referenced in the Project's description and used as the basis for the analysis conducted in the DEIR. Unsurprisingly, 1,020 dwelling units is much closer to the proposed Project's initial estimate of approximately 1,000 units.²² Although this higher estimate accurately reflects the projected development based on the Project description, it could also be included independently as representative of the substantial likelihood of future development.

Aside from being consistent with the Project as originally proposed, these higher density estimates align with similar projects constructed by the same developer in the area. For example,

²¹ This estimate is conservative because the Project description, in conjunction with the Zoning Ordinance, could easily authorize development based on total gross acreage for each of the planning areas. If we instead use the gross acreage of each planning area as identified in Table 3-2 of the DEIR, the amount of dwelling units increases to 1,346—over 2 times the estimated 689 units relied upon as the basis for the DEIR. For Riverside Village, with a gross acreage of 45, the total dwelling units could be up to 470 (45.2 multiplied by 10.3 units per gross acre, the average of the RMA and RMB designations). For Village Core, it could be up to 570 units (gross acreage 24.7 multiplied by the RMC density of 23.0). For North Village and Hilltop Village, the combined total could be an additional 131 dwelling units (83.4 gross acres multiplied by 5.9, the maximum density for R5 districts). For gross acreage of each planning area, see DEIR, at 3-3, Table 3-2 Proposed General Plan Land Use Designations and Zoning by Planning Area.

²² Both sources discuss the proposed development as including approximately 1,000 dwelling units, see sources cited, supra, at 16.

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the developer's Palomar Station in nearby San Marcos plans for 370 apartments on 15 acres.³⁴ Likewise, the developer's Mission Lane master-planned community, also in Oceanside, "calls for up to 429 homes on 35.5 acres".³⁵ The boutique hotel proposed in the current Project iteration is unlikely to remain within the range estimated and evaluated in the current DEIR. It will likely result in a hotel that will never be built and will likely transform into three-story condominiums, similar to the Villa Storia project.

Even the City, on the same webpage that it hosts the DEIR, lists a "Project Description" that sets an entirely different maximum build-out:

Project Description: The North River Farms project application represents a request for a General Plan Amendment, Zone Amendment, Tentative Map and Development Plan for the North River Farms Planned Development Plan. Located on a 177-acre site on North River Road between Stallion Drive and Wilshire Road, the project proposes to construct 725 dwelling units with associated agricultural, commercial, and recreational uses. The Planned Development would constitute the zoning, use regulations, and development criteria for future development of the property. The project area would be divided into four planning areas supporting different housing types and farm plots.

The Riverside Village would consist of 45.1 acres of medium density residential (RMA and RMB) uses. This area includes 12.9 acres of agricultural uses, and 4.2 acres of open space/recreational. Residential densities in the Riverside Village would range from 6.0 to 15.0 dwelling units to the acre.

The Village Core would consist of 25.0 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers market venue, collaborative work spaces, a park, farm facilities, and an education pavilion. Residential densities in the core would range from 15.1 – 20.0 dwelling units to the acre.

The North Village would consist of 51.8 acres of single-family and medium density residential (RS, RMA) uses. Residential densities in the North Village would range from 3.6 to 9.9 dwelling units to the acre.

The Hilltop Village would consist of 41.4 acres of single-family detached homes. The base density would range from 3.6 dwelling units per acre to a maximum density of 5.9 dwelling units per acre.³⁶

Thus, as further detailed below, the DEIR must be substantially revised to adequately, accurately, and completely describe the Project in a way that includes its maximum build-out.

³⁴ (ibid)
³⁵ (ibid)

³⁶ (City of Oceanside, North River Farms Planned Development Project, available at https://www.ci.oceanside.ca.gov/files/1619/1619mainimgproj_desc/page_desc_0000048_Sep_6_2018_ar610_a_n_1907)

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potential. For these reasons, among others, the City must also revise its environmental analysis accordingly.

b. The DEIR Improperly Assumes a Past-Development Baseline.

The idea of a "baseline" in the context of a DEIR is a fundamental tenet of its legitimacy. As a general matter, a baseline is important in part because it operates as the starting point by which all future comparison is made. It follows that an EIR, like the DEIR here, which purports to report the environmental impacts of a proposed project, must start at the beginning. In other words, the baseline used as the yardstick by which relative change is measured must, itself, be a sound source for comparison.

Experts explain the concept of a false baseline as the shifting "waitline" problem. For many of the same reasons it would be difficult to determine weight loss if the starting scale measured you 30 pounds underweight, an EIR is likewise of little value if potential impacts and alternatives are evaluated relative to a false or shifting starting point. CEQA acknowledges this by defining how a project must determine its baseline. According to Title 14 Section 15125(b), a baseline condition must reflect existing conditions when a notice of preparation ("NOP") is published. If no NOP is published, the baseline must reflect the time at which environmental analysis is commenced.⁷⁷

Here, the NOP for the project was published in 2017 and the Project site was, and still is, currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road.⁷⁸ Therefore, baseline conditions should reflect the existing conditions, applicable plan designations, and zoning for the Project area in effect at the time. Yet, the DEIR's impact analysis and conclusions are based on the assumed approval of the underlying entitlements it purports to evaluate.⁷⁹ For example, in its evaluation of change in aesthetics, the DEIR answers the question of whether the Project would adversely impact the scenic vista as though the approval had already occurred:

Would the project have a substantial adverse effect on a scenic vista? [...] With the future approval and adoption of the rezone from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning). [...] Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial

⁷⁷ 14 Cal. Code Regs., § 15125, subd. (b).

⁷⁸ Notice of Preparation (NOP), Environmental Impact Report (Rev. 22, 2017), available at <https://www.ci.chico.ca.us/sites/default/files/efile/2017/09/17/18-0033%20NOP%20Final.pdf>. Unsurprisingly, the possible density use range identified in the NOP is 905-1,015. Again, well above the density evaluated in the DEIR. (See *id.*, at Title 1 North River Farms Development Plan, at p. 2.)

⁷⁹ In addition to the example above, the Sierra Club's comment, dated September 7, 2018, identifies and discusses issues regarding the baseline with respect to air quality impacts, among other issues identified further important for consideration in revising the DEIR.

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obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant.⁴⁰

Similar issues exist throughout the DEIR. Thus, because the DEIR evaluates the Project against a false or shifting baseline that is inconsistent with existing baseline conditions, the resulting analysis likewise fails, rendering the DEIR legally insufficient.

c. The DEIR Fails to Properly Evaluate Inconsistencies with Existing Land Use Designations, Allowing for Only 61 Dwelling Units in the Project Area.

Separately, the Project fails to properly consider its impacts relative to the applicable general, regional, and specific plans.⁴¹ This also renders the Project's DEIR legally inadequate.

CEQA guidelines require an evaluation of the Project in its existing environmental and regulatory setting—not in a vacuum. Accordingly, an EIR must discuss and evaluate inconsistencies between the proposed Project and its applicable general, specific, and regional plans.⁴²

Here, existing land use designations allow for a maximum density of 61 dwelling units for the entire Project area. This is consistent with the applicable general, regional, and specific plans, but entirely inconsistent with the massive development proposed by this Project. Another example of this inconsistency is that the City's General Plan permits residential development only where such development does not interfere with existing agricultural resources. Although the DEIR acknowledges that the entire Project site will be considered a significant agricultural resource based on the Land Evaluation and Site Assessment Model ("LESAM"), it still fails to properly consider the significant impacts or mitigation thereof in accordance with the same. Thus, the DEIR likewise fails for improperly evaluating these inconsistencies in accordance with CEQA.

2. Conclusion

The adequacy of an EIR's project description is inextricably linked to the adequacy of its analysis of environmental effects. If the description, baseline, and consistency requirements are not met, the resulting environmental analysis will likely reflect the same mistakes.⁴³ For example, if an EIR bases its cumulative impact analyses on general plan projections, it must explain why these projections function as a realistic predictor of related impacts.⁴⁴ Moreover, a general plan's projections of future growth and related impacts are an inadequate basis for an

⁴⁰ (DEIR, at 4.1-14-4.1-15, 4.1-16.)

⁴¹ (14 Cal. Code Regs., §15125, subd. (d).)

⁴² (Ibid. ["applicable" plans have been adopted and legally apply to a proposed project].)

⁴³ (See *General Impact*, supra, 47 Cal.3d 776 [EIR failed to describe or analyze project accurately].)

⁴⁴ (See 14 Cal. Code Regs., § 15130, subd. (b)(2)(B).)

REV: 09/17/2018/02

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EIR's cumulative impact analysis if the plan's projections do not cover a sufficiently wide area or exclude relevant data.⁴⁵

This is particularly true in situations like those at issue here, where the Project as originally envisioned was a higher density development and the DEIR's statements regarding Project density are inconsistent, vague, and often incomplete. Because the DEIR relies on inaccurate estimates of projected development density, the analysis that follows is also flawed. In sum, limiting the DEIR analysis to 489 units qualifies as impermissible CEQA piecemealing. It follows that the other specific DEIR analyses related to traffic, air quality, public resources, etc., must likewise be revised to adequately consider the potential for full build-out relative to the existing environmental conditions at the time of the NOP.

In addition to the problems identified in this comment and the various additional comments submitted, the DEIR also fails to properly consider cumulative impacts; improperly rejects feasible alternatives; insufficiently considers the traffic and circulation impacts;⁴⁶ fails to evaluate the impacts on ingress/egress in the event of an earthquake or fire (like the recent Lilaac Fire), either of which would require a mandatory evacuation via this route; fails to properly substantiate the significance threshold for greenhouse gas emissions and their reduction from proposed mitigation measures; and fails to propose adequate mitigation and ignores feasible alternatives, among other major inadequacies.

Once the DEIR is revised to include an accurate Project description, then additional substantive issues may be raised and addressed. South Morro Hills Association reserves its right to submit supplemental information and evidence up to the public hearing on the Project.⁴⁷

⁴⁵ See *Albga County Farm Bureau v. City of Bayfield* (1998) 221 Cal.App.3d 692 [an explanation of why analysis of cumulative air quality impacts was limited to Central Valley]; *Chavez v. Preserve the Jobs v. County of Fresno* (1985) 136 Cal.App.3d 421 [air quality analysis defective for failure to include contribution to pollution from offshore oil operations].

⁴⁶ For a detailed review of issues related to traffic and circulation, please see the comment from the Department of Transportation ("Caltrans"), dated September 30, 2018. In that comment, Caltrans identifies several problems with the traffic studies, including inconsistent inclusion of a new interchange at Rancho Del Oro and SR-78; incorrect land configurations; improper use of condominium and apartment project trip generation instead of single-family detached; trip distributions using SR-76 appears low and unreasonable and needs to be substantiated; several SR-76 intersections need to be added to the network and analyzed; failure to include or justify the exclusion of several corresponding SR-76 segments and intersections; and clarification of several impact findings at various locations.

⁴⁷ *See, e.g., Calaveras Pioneers v. Monterey Peninsula Water Management* (1997) 60 Cal.App.4th 1100, 1119-1120 [applicant has right to present comments "prior to the close of the public hearing on the project"]; *Coal for Students Action v. City of Redding* (1984) 127 Cal.App.3d 1194, 1197 [same principle].

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Please do not hesitate to contact me should you have any questions regarding the above.

Sincerely,



Charles S. Kuchukowski
Neumeyster & Dillon, LLP

CSK:slt

cc: South Morro Hills Association

400.326.7771#403

Late Comment Letters for North River Farms Environmental Impact Report

L22 HAMMERSCHMIDT, ARLEEN

Comment Letter L22

From: Arleen Hammerschmidt <leenhammer@gmail.com>
Date: November 21, 2018 at 11:40:51 AM PST
To: Oside ALL council <council@ci.oceanside.ca.us>, "Jonathan E. Borrego - Devel. Serv. Director" <jborego@ci.oceanside.ca.us>, "Beck, Zack" <zbeck@ci.oceanside.ca.us>, PlanningCommission@ci.oceanside.ca.us
Cc: Joe Hill <oceansidesoejr@gmail.com>, donna geierman <dgeierman1959@yahoo.com>, Dana Corso <danacorso@sbcglobal.net>, Janet Lacy <janet.lacy@glkhlaw.com>, Arleen Hammerschmidt <leenhammer@gmail.com>
Subject: North River Farms, So. Morro Hills, Wildland Urban interface, Planning for our current climate

City Clerk, Zack Beck - PLEASE INCLUDE IN THE PUBLIC RECORD

Council & All -

When the wind blows faster than evacuation driving speeds, people die in their cars; Staggered Evacuation Plans F A I L.

Continuing to allow homes in the Wildland Urban Interface, and counting on staggered evacuation is bordering on **Criminal Negligence**.

And, Oceanside's lead Fire Emergency person recently testified to Council that (the same Paradise-type) Staggered Evacuation Plan is in place for So. Morro Hills via North River Rd., and he believes adding more residents, cars, is safe and that residents can be safely evacuated.

I DISAGREE !

- Cal Fire is now urging people to evacuate when they feel in danger - NOT wait for an evacuation order.
- We can't keep using our development paradigm based on the last century because
- The climate has changed; fires are more intense

Late Comment Letters for North River Farms Environmental Impact Report

- We must update our planning paradigm to match new conditions.
- "We're in a different environmental climate now. We can't keep thinking the way we used to think." (Rick Halsey, Chaparral Institute, Allison St. John reporting, KPBS, min. 9:27 - 14:45, <https://www.kpbs.org/news/evening-edition/>)

Recommendation: City Code/requirement that residential projects can ONLY be approved AFTER physical infrastructure to guarantee resident's safety and long term sustainability is actually in place.

With great concern,
Arleen Hammerschmidt
Rural-ish Fire Mt.

Late Comment Letters for North River Farms Environmental Impact Report

L23 HANSON, DIANE

Comment Letter L23

From: Diane Hanson <ddshanson@gmail.com>
Sent: Thursday, January 17, 2019 8:31 AM
To: Robert Drazkowski
Subject: North River Farms

I am totally against this crazy project. Changing the zoning in the Master Plan is unacceptable. If the City Council is looking for money this is not the place to find it. It will cost the citizens of Oceanside more than it will give a bunch of new residents.

1. These homes are in the San Luis Rey Flood Zone. The first floor must be built 7 feet above ground.
2. The density will effect adversely the traffic, the fire and paramedics, the police, the schools. SO VERY BAD!!!

The City Council must think this through for ALL the citizens of Oceanside and not just this project which set a very bad precedence.

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L24 ELAINE (1)

Comment Letter L24

From: Elaine <ece61a7@att.net>
Sent: Tuesday, January 15, 2019 5:16 PM
To: Robert Demchowski
Subject: L15 News re Fire risk

Valley Center in worst fire zone

[news desk](#) | on January 02, 2019

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In a story published December 18 in *The Los Angeles Times*, the headline read, "A million California buildings face wildfire risk. 'Extraordinary steps' are needed to protect them."

The article noted "A *Times* analysis of wildfire hazard across California found that hundreds of communities from Redding to San Diego are at high risk of deadly wildfires like those in Paradise and Malibu last month." It added, "More than 1.1 million structures, or roughly 1 in 10 buildings in California, lie within the highest-risk fire zones in maps drawn by the Department of Forestry and Fire Protection (Cal Fire,) the analysis showed."

The Roadrunner asked Valley Center Fire Chief Joe Napier if Valley Center is in this zone. "Most of Valley Center is the Highest Severity of Wildfire Threat in the State," said the chief, noting that among the most threatened areas is the Lilsac Road and Old Castle Road corridor that contains scrub and brush that hasn't burned in many decades, in some cases as much as a hundred years.

As many as 1.1 million residents of California live in the "very severe hazard zone" identified by Cal Fire. Los Angeles has about 114,000 structures in this zone, but San Diego County comes in second with more than 88,000 structures.

State scientists created this risk map more than a decade ago, using a model that employs terrain, vegetation and where past fires have occurred.

As the *L.A. Times* story observed "Although they identify areas where stricter building standards and brush clearance are required, the maps do not directly trigger land-use restrictions or funds to make communities less vulnerable. They do give notice to local agencies, insurance companies and residents, and they support requests for fire planning and mitigation grants."

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Localized map of the High Hazard Severity Zones for Valley Center Fire Protection District. Yellow is Moderate Risk. Orange is High Risk. Red is Very High Risk.

More From Valley News [Go To The Valley News Section](#)

[Prescribed Cole Grade Road as burn will resume this week](#)
[Planning group encourages your participation in Community Plan Update](#)

Late Comment Letters for North River Farms Environmental Impact Report

L25 ELAINE (2)

Comment Letter L25

From: Elaine <eefola7@att.net>
Sent: Tuesday, January 15, 2019 5:13 PM
To: Robert Dmochowski
Subject: L15 re N.R. River Farms or ANY developments for Orosi side

Hello,
From The Mercury News.com , Dec. 18 2018

Cal Fire chief: State must consider ban on homes in fire-prone areas

**Top firefighter, leaving the job this week after 30 years,
says we need to think differently**

⋮



Haven Daley/Associated Press
In this photo taken Monday, Dec. 10, 2018, California Department of Forestry and Fire Protection Director Ken Finlott works at his desk in his office in Sacramento, Calif. Finlott:

Late Comment Letters for North River Farms Environmental Impact Report

told The Associated Press he prepares to retire on Friday, Dec. 14, 2018, after a 30-year career.

By [The Associated Press](#) |

PUBLISHED: December 11, 2018 at 6:13 pm | UPDATED: December 12, 2018 at 4:40 am

By DON THOMPSON | Associated Press

SACRAMENTO — California's increasingly deadly and destructive wildfires have become so unpredictable that government officials should consider banning home construction in vulnerable areas, the state's top firefighter says.

ADVERTISING

Department of Forestry and Fire Protection Director Ken Pimlott will leave his job Friday after 30 years with the agency. In an interview with The Associated Press, he said government and citizens must act differently to protect lives and property from fires that now routinely threaten large populations.

That may mean rethinking subdivisions in thickly forested mountainous areas or homes along Southern California canyons lined with tinder-dry chaparral.

Yet Los Angeles County supervisors stung by California's housing shortage approved a massive rural housing development Tuesday despite the fire danger.

Developers said the 19,000-home community in rugged mountains 65 miles north of downtown Los Angeles would be built to minimize fire hazards with anti-ember construction and buffers around homes. It would include four new fire stations and roads wide enough to help people evacuate from an area the state has designated as a "high" and "very high" fire hazard zone.

ADVERTISING

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Faced with such dangers, California residents should train themselves to respond more quickly to warnings and make preparations to shelter in place if they can't outrun the flames, Pimlott said.

Communities in fire zones need to harden key buildings with fireproof construction similar to the way cities prepare for earthquakes, hurricanes or tornadoes, and should prepare commercial or public buildings to withstand fires with the expectation hundreds may shelter there as they did in makeshift fashion when flames last month largely destroyed the Sierra Nevada foothills city of Paradise in Northern California.

California already has the nation's most robust building requirement programs for new homes in fire-prone areas, but recent fire seasons underscore more is needed. Officials must consider prohibiting construction in particularly vulnerable areas, said Pimlott, who has led the agency through the last eight years under termed-out Gov. Jerry Brown.

He said it's uncertain if those decisions should be made by local land managers or at the state level as legislative leaders have suggested. But Pimlott said "we owe it" to

Late Comment Letters for North River Farms Environmental Impact Report

homeowners, firefighters and communities “so that they don’t have to keep going through what we’re going through.”

“We’ve got to continue to raise the bar on what we’re doing and local land-use planning decisions have to be part of that discussion,” he said.

California’s population has doubled since 1970 to nearly 40 million, pushing urban sprawl into mountain subdivisions, areas home to fast-burning grasslands and along scenic canyons and ridgetops that are susceptible to fires. After a crippling drought, the last two years have seen the worst fires in state history. November’s fire in the northern California town of Paradise was the deadliest U.S. wildfire in a century, killing at least 85 people and destroying nearly 14,000 homes.

A year earlier, a fire that ripped through the San Francisco Bay Area city of Santa Rosa killed 22 people and destroyed more than 5,000 homes and other structures.

Every year since at least 2013, firefighters did not anticipate California’s wildfires could get worse, Pimlott said. But each year the fires have increased in intensity — driven by dry fuels, an estimated 129 million drought- and bark beetle-killed trees, and climate change.

In response, the state is doing more planned burning to eliminate brush and dead trees that serve as fuels for wildfires. The state will also add seven large firefighting aircraft, replace a dozen aging helicopters, provide firefighter counseling and ensure that firefighters have enough time off for medical checkups to help them manage the mental and physical stress from a fire season that now never ends.

He said California leads the nation in clearing away dead trees and thinning forested areas that are crowded with trees that can fuel fires, contrary to criticism by President Donald Trump who has blamed forest mismanagement for the fires.

“No other state, or even the federal government, are putting the amount of investment into this space as California,” Pimlott said.

The department’s philosophy for many years has been to stamp out fires quickly to protect people and property. Prescribed burns were previously used sparingly out of concern they could get out of control, but he said the department is making “a sea change” by recognizing that starting fires under optimum conditions is a good way to reduce dangerous fuels.

Recent fires that have burned into cities have made clear that those protections need to be centered around vulnerable communities, he said. Paradise, for example, was built on a ridge atop steep canyons that helped channel the wind-driven fire, while wildfires have repeatedly blown into Northern and Southern California subdivisions from neighboring wildlands thick with tinder-dry fuel.

Pimlott rose through the ranks from seasonal firefighter to deputy director of fire protection before his appointment as chief of the agency. In that role he doubles as the state’s chief forester and oversees a department that includes nearly 8,000 firefighters, forest managers and support staff.

Late Comment Letters for North River Farms Environmental Impact Report

He said he has seen fire conditions worsen each passing year during his three decades with the agency, taking its toll on residents and firefighters alike.

Related Articles

- [This might happen after a PG&E bankruptcy](#)
- [Destruction of Paradise fire spurs rush to build fuel breaks](#)
- [PG&E bankruptcy could trigger higher monthly bills](#)
- [PG&E to file for bankruptcy due to wildfire lawsuits, shares tank](#)
- [PG&E CEO quits amid utility's mounting wildfire woes](#)

"Folks can say what they want to say, but firefighters are living climate change. It's staring them in the face every day," he said.

To adapt, he advocates wildfire warning systems that not only use new technology like automated phone calling systems, but maybe restoring civil defense-style emergency sirens in some areas. City planners must prepare communities "unlike we ever have before" with easy evacuation routes and new evacuation centers.

And he said Californians must treat "red flag" extreme fire danger warnings the way Midwesterners treat tornado warnings — as imminent threats.

"The reality of it is, California has a fire-prone climate and it will continue to burn," he said. "Fire is a way of life in California and we have to learn how to live with it, we have to learn how to have more resilient communities."

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Late Comment Letters for North River Farms Environmental Impact Report

L26 ELAINE (3)

Comment Letter L26

From: Elaine <ecf0ta7@att.net>
Sent: Tuesday, January 15, 2019 5:09 PM
To: Robert Dmohowski
Subject: L15 re: North River Farms Planned Development

Read how developments cause fires. From The Associated Press News:

<https://apnews.com/ad343bbb451543e4bc6ab1ca7ea371e7>

On Tuesday, 15 January 2018, 3:14:43 PM GMT-8, Robert Dmohowski wrote:

NOTICE OF PLANNING COMMISSION PUBLIC HEARING, CITY OF OCEANSIDE

On Monday, January 28, 2019 at 6:00 p.m. at City Council Chambers, 300 North Coast Hwy., the Planning Commission will conduct a Public Hearing on the following application:

Consideration of a GENERAL PLAN AMENDMENT (GPA)16-00002, ZONE AMENDMENT (ZA)16-00005, VESTING TENTATIVE MAP (T)16-00002, and DEVELOPMENT PLAN (D)16-00012 to allow for the development of a planned residential, mixed-use, project on 176.6 acres of land in the northeastern portion of the City. The project site is bisected by North River Road and located between Stallion Drive and Wilshire Road in South Muro Hills. The proposed project would allow for the development of up to 656 dwelling units with a variety of housing types as well as agricultural uses, a boutique hotel, an education center, and flexible commercial uses on the site. Approximately 31.6 acres would be dedicated to agriculture throughout the project site. Another 16.0 acres of the site are planned for park and open space features, including parks, buffers, trails, and farm plots.

The project site currently has a General Plan land use and zoning designation of Agricultural (A). A General Plan Amendment is proposed that would re-designate the site to the following: Agricultural (A), Open Space (OS), Single-Family Residential (SFD-R), Medium Density Residential A (MDA-R), Medium Density Residential B (MDB-R), and Special Commercial (SC). The project also proposes a General Plan Amendment to reclassify N. River Road from Stallion Drive to Sleeping Indian Road as a Four-Lane Secondary Collector. A Zone Amendment is proposed that would designate the entire property as Planned Development – (PD-26), with the proposed PD Plan serving as the regulating document. A Zone Amendment is also proposed to amend the Zoning District/ Land Use Designation Consistency Matrix (Appendix – A) in Article 2 of the Zoning Ordinance to include the PD District as being consistent with both the Agricultural (A) and Single Family Detached (SFD) land use designations of the General Plan. – **NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN – The NRF Project Owner, LLC**

In accordance with the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) has been prepared for this project. A Draft EIR was made available for public review between July 27, 2018 and September 17, 2018. The Final EIR, including a mitigation monitoring and reporting program, findings of fact,

Late Comment Letters for North River Farms Environmental Impact Report

and responses to public comment, are available on the City's website at: <https://www.ci.oceanside.ca.us/gov/dev/planning/ceqa/default.asp>

You are being notified of this hearing because you are listed as either an owner of real property within 1,500 feet or an occupant residing within 100 feet of the exterior boundary of the site. This notice invites you to attend and provide testimony at the forthcoming public hearing. You may also submit written comments on the application prior to the public hearing; these comments will be provided to the Planning Commission and entered into the public record.

You may review the application file, including any CEQA-related documents, at the Planning Division, 300 North Coast Hwy., between 7:30 a.m. and 5:00 p.m. (Monday – Thursday), and 7:30 a.m. and 4:00 p.m. (Friday). The meeting agenda and staff report are available on the City's Website at <http://www.ci.oceanside.ca.us/services/comms/ce.asp>. For more information, please contact Project Planner Robert Dmuchowski, Associate Planner at (760) 435-3563 or via email at rdmuchowski@ci.oceanside.ca.us.

Should you wish to challenge this project at some future time, you may be limited to raising only those issues you or someone else raised at the public hearing, or in written correspondence delivered to the Planning Commission at or prior to the public hearing.

Late Comment Letters for North River Farms Environmental Impact Report

L27 ORTON, ELIZABETH

Comment Letter L27

From: Elizabeth Orton <LIZARDLLO@yahoo.com>
Sent: Tuesday, January 25, 2019 4:50 PM
To: Robert Dmochowski
Subject: Re: North River Farms Planned Development - Notice of Planning Commission Hearing

I do not approve of this project at all. The developer is corrupt and now in the pockets of our politicians. He put a wonderful school out of business and the development he built in Mission is hideous.

Sent from my iPhone

On Jan 15, 2019, at 1:11 PM, Robert Dmochowski <RDmochowski@ci.oceanside.ca.us> wrote:

NOTICE OF PLANNING COMMISSION PUBLIC HEARING, CITY OF OCEANSIDE

On Monday, January 28, 2019 at 6:08 p.m. at City Council Chambers, 300 North Coast Hwy., the Planning Commission will conduct a Public Hearing on the following application:

Consideration of a GENERAL PLAN AMENDMENT (GPA16-00002), ZONE AMENDMENT (ZAI16-00002), VESTING TENTATIVE MAP (T16-00002), and DEVELOPMENT PLAN (D16-00012) to allow for the development of a planned residential, mixed-use, project on 178.6 acres of land in the northeastern portion of the City. The project site is bisected by North River Road and located between Stallion Drive and Wilshire Road in South Norro Hills. The proposed project would allow for the development of up to 450 dwelling units with a variety of housing types as well as agricultural uses, a boutique hotel, an education center, and flexible commercial uses on the site. Approximately 31.6 acres would be dedicated to agriculture throughout the project site. Another 25.0 acres of the site are planned for park and open space features, including parks, buffers, trails, and farm plots.

The project site currently has a General Plan land use and zoning designation of Agricultural (A). A General Plan Amendment is proposed that would re-designate the site to the following: Agricultural (A), Open Space (OS), Single-Family Residential (SFR-S), Medium Density Residential A (MDR-A), Medium Density Residential B (MDR-B), and Special Commercial (SC). The project also proposes a General Plan Amendment to reclassify N. River Road from Stallion Drive to sleeping Indian Road as a Four-lane Secondary collector. A Zone Amendment is proposed that would designate the entire property as Planned Development - (PD-26), with the proposed PD Plan serving as the regulating document. A Zone Amendment is also proposed to amend the Zoning District/ Land Use Designation Consistency Matrix (Appendix - A) in Article I of the Zoning Ordinance to include the PD District as being consistent with both the Agricultural (A) and Single Family Detached (SFD) land use designations of the General Plan. - **NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN -- The NRF Project Owner, LLC**

In accordance with the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) has been prepared for this project. A Draft EIR was made available for public review between July 27, 2018 and September 17, 2018. The Final EIR, including a mitigation monitoring and reporting program, findings of fact, and responses to public comment, are available on the City's website at: <https://www.ci.oceanside.ca.us/ceqa/View/Planning/CedaCofaair.asp>

You are being notified of this hearing because you are listed as either an owner of real property within 1,500 feet or as occupant residing within 100 feet of the exterior boundary of the site. This notice invites you to attend and provide

Late Comment Letters for North River Farms Environmental Impact Report

testimony at the forthcoming public hearing. You may also submit written comments on the application prior to the public hearing; these comments will be provided to the Planning Commission and entered into the public record. You may review the application file, including any CEQA-related documents, at the Planning Division, 300 North Coast Hwy., between 7:30 a.m. and 5:00 p.m. (Monday - Thursday), and 7:30 a.m. and 4:00 p.m. (Friday). The meeting agenda and staff report are available on the City's Website at <http://www.ci.oceanside.ca.us/services/corps/pc.asp>. For more information, please contact Project Planner Robert Bachowski, Associate Planner at (760) 435-3563 or via email at rbachowski@ci.oceanside.ca.us. Should you wish to challenge this project at some future time, you may be limited to raising only those issues you or someone else raised at the public hearing, or in written correspondence delivered to the Planning Commission at or prior to the public hearing.

Late Comment Letters for North River Farms Environmental Impact Report

L28 MORIN, ERIN

Comment Letter L28

From: Erin Morin <erinmorin1@gmail.com>
Sent: Thursday, January 17, 2019 3:01 AM
To: Jeff Hunt; rgreenbauer@co.sosarside.ca.us; Robert Dinohowski
Subject: Article

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning

I came by this article I feel that the North River Farms Project needs to be put on hold due to that we are in the process of our General Plan and our Climate Action Plan is still in the works.

https://www.valleycenter.com/articles/opponents-of-newland-sierra-lilac-hills-ranch-estate-over-court-decision/?fbclid=IwAR3bCpdt5C6wJnP7s_Hg7y9jB0pWSWXA6Y

—
Erin Gilligan Morin

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Opponents of Newland Sierra, Lilac Hills Ranch, ecstatic over court decision | Valley Road... Page 1 of 7



Hometown Newspaper of Valley Center, Puma Valley, Pala, Salton Mountain & North Escondido

Opponents of Newland Sierra, Lilac Hills Ranch, ecstatic over court decision

David Ross on January 01, 2019

By DAVID ROSS

A court decision that could alter the landscape for developers in San Diego County—by not allowing them to alter the landscape as much as they would like—has been released like a thunderclap, shattering County policy for approving residential developments.

It holds, among many other things, that the County's director of planning services may not violate the General Plan and approve emission reduction plans at his whim.

Opponents of the Newland Sierra, Warner Ranch and Lilac Hills Ranch projects are encouraged by a court decision they hope could force the County to ramp back approvals of several large developments due to the inadequacy of its Climate Action Plan, which among several other things the court found inadequate, relies on developers—and the County—claiming they have reduced emissions of green house gases, "in exchange for the purchase of carbon offset credits applicable to another location in California, the United States, or the world" in the words of the judge.

On Wednesday, December 26 Superior Court Judge Timothy Taylor issued a final ruling on requests for an injunction in the case of *Sierra Club v. County of San Diego*, finding that the county's Climate Action Plan (CAP) was invalid. Taylor ordered the County to

<https://www.valleycenter.com/articles/opponents-of-newland-sierra-lilac-hills-ranch-ecstat...> 1/22/2019

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Opponents of Newland Sierra, Lilao Hills Ranch, ecstatic over court decision | Valley Res... Page 2 of 7

stop using Mitigation Measure M-GHG-1, which requires General Plan Amendments to reduce emissions to achieve green house gas emission targets by either "no net increase" or "net zero." It's not the goals of M-GHG-1 the judge takes issue with, but the way it achieves them.

The Court held that the CAP failed to comply with the County's prior commitments in its General Plan and achieve state goals for reducing green house gas emissions ("GHGs") that allegedly cause climate change.

Taylor invalidated the CAP because it relies in part on offsetting green house gas emissions from developments by relying on offset credits purchased outside the County and State of California.

The judge states: "The County's General Plan in its 2011 format stated that the CAP should achieve GHG [Green House Gases] emissions from the 'unincorporated County' and from 'County operations,' and yet the 2018 CAP allows essentially unlimited increases in GHG within the County. In this respect, applicants proposing projects in the County can meet their GHG mitigation requirements by purchasing offsets from anywhere in the world, in the discretion of the Director of a County department."

The judge ruled "The petitions are granted, and the County is ordered to set aside its February 14, 2018 approval of the 2018 CAP and the Supplemental EIR (SEIR) on which the 2018 CAP is based."

The judge peppered his ruling with sarcastic comments about SD County's ability to follow the law when it wants to, concluding that it didn't want to in this instance. He writes, "The court knows full well that, when it decides to do so, the County knows how to prepare a lawful and valid EIR. . . . In finding that the County did not do so when it approved the 2018 CAP, the court does not write on a clean slate. The County's efforts to comply with the statewide GHG/global warming requirements summarized in part IIA of the Court of Appeal's September 28, 2018 opinion in Consolidated Case Nos. D072406 and D072433 have given rise to several decisions by the court, and two by the Court of Appeal. Virtually every decision has found the County's efforts wanting; this is particularly true in connection with the County's penchant for proceeding in the absence of substantial evidence."

In the section "The County Persists in Failing to Carry Out its Legal Obligations With Regard to Greenhouse Gas Reduction" the judge provides a long list of the County's efforts and observes: "Virtually every decision has found the County's efforts wanting; this is particularly true in connection with the County's penchant for proceeding in the

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absence of substantial evidence and without adequate analysis" and adds, "Although it does some things well, the 2018 SEIR fails as an informational document and as a document of public accountability in material ways, and the court finds the County has once again failed to proceed according to CEQA." CEQA is the California Environmental Quality Act.

Continuing in his methodical take-down of the County's logic: "The Court noted the County had failed to consider the use of the CAP and the Thresholds 'as a plan-level program,' ... that the Sierra Club had proposed 'feasible mitigation measures,' that the County 'rejected these mitigation measures without substantial evidence for doing so,' and that the CAP did 'not fulfill the County's commitment under CEQA and Mitigation Measure CC-1.2, to provide detailed deadlines and enforceable measures to ensure GHG emissions will be reduced.'"

The judge added, "More recently, in Golden Dose, the Court of Appeal affirmed this court and held the 2016 Guidance Document violated CEQA and that the threshold of significance was not supported by substantial evidence."

In taking apart the County's logic for allowing local emissions to be mitigated by reducing emissions in another locale, the judge noted that the County General Plan "incorporated a fundamental, mandatory and clear policy into both the 2011 and the 2018 iterations of the General Plan: that GHG emission reductions be local. In 2011, the County explicitly used the words 'local GHG emissions.' " To be blunt, the County was violating its own General Plan.

The judge writes, "Thus, the County's General Plan has consistently, for 7 years, stated that it required in-County GHG reductions. However, M-GHG-1, which is expressly incorporated into the 2018 CAP (see e.g., AR 1340:58761 that states the 2018 CAP expressly incorporates M-GHG-1) allows essentially unlimited increases in GHG within the County."

Not only does the County violate the General Plan, says the judge, it allows Director of Planning Services Mark Wardlaw to violate it at his discretion: "all that is required is the 'satisfaction' of the Planning Director.' No standards or criteria are stated for achieving the 'satisfaction.'"

The practical effect of this ruling could be that no large developments are approved in San Diego County that rely on cheap converted farmland for maximized profit, such as Lilao Hills Ranch or Newland Sierra. In other words, no developments not already called for in the General Plan that was approved in 2011. The result may be that developers

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will cease to view the General Plan as a mere impediment to largescale projects that can be overcome by greasing the regulatory and political skids with large donations—but instead, one with big, sharp teeth.

The Sierra Club and other environmental groups, include co-petitioners the Center for Biological Diversity, Cleveland National Forest Foundation, Climate Action Campaign, Endangered Habitats League, Environmental Center of San Diego and Preserve Wild Santee, have suggested multi-story housing developments could be built in deserted shopping malls near places where people work.

Judge Taylor ordered the County "to set aside its February 14, 2018 approval of the CAP and the SEIR. A permanent injunction is also issued essentially in accordance with the preliminary injunction granted on September 14, 2018 (ROA 321). The injunction does not prohibit all development projects in the County, only those projects reliant on the use of the program set forth in M-GHG-1. While the injunction is in place, the County may consider any project that does not depend on the use of the M-GHG-1 program."

This does not invalidate approval of Newland Sierra, Valiano or Harmony Grove Village South, which relied on similar out-of-area offsets, but places them in jeopardy as Sierra Club, the Golden Door et al have launched a legal challenge on those grounds seeking to invalidate the Board of Supervisors' General Plan Amendment approval for the projects.

On Friday this courteous victory encouraged the Sierra Club and its allies to call on the County to comply with state law.

Sierra Club Attorney Josh Chatten-Brown, of the law firm Chatten-Brown and Customs LLP, commented, "We are extremely grateful for the Court's comprehensive and well-reasoned decision. Unfortunately, despite losing in Court at every step of the way since 2012, the County has failed to provide the people of San Diego the type of effective and enforceable climate action plan it committed to, and which is sorely needed. As shown in the most recent climate change report from the UN's International Panel on Climate Change, local governments play a critical role in addressing climate change and our planet will be in dire straits if we don't dramatically reduce greenhouse gases. Increases in violent storms, flooding, drought, wildfires and extreme temperatures will destabilize countries and threaten life as we know it. Evidence of the adverse health effects of extreme temperatures is just emerging."

Chatten-Brown concluded: "We hope that the County will finally accept this responsibility and work with the Sierra Club and other stakeholders to promptly prepare a truly effective and enforceable climate action plan."

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Mark Jackson, a leader of the coalition opposing Lilac Hills Ranch, hailed the judge's action: "This is really good news! The Court found that the County Climate Action Plan is invalid. The top level flaw is that increased greenhouse gases generated by sprawl developments with commuters driving cars can't be offset by loosely regulated or unregulated offset credits purchased outside the County and State of California."

George Courser, chairman of the Conservation Committee Sierra Club San Diego, commented, "Today, the people of San Diego County and the environment were the big winners in the Sierra Club's successful lawsuit against the County of San Diego for its Climate Action Plan ('CAP')." He added, "This decision was the latest in a series of defeats by the County and victories for the Sierra Club in challenges to the County's CAP."

The Palo Verde has vehemently opposed the Warner Ranch project proposed near Palo Verde Casino. Robert Smith, chairman of the band, commented, "The Palo Verde applauds the decision. It is important that the Court held the County accountable to sound policies that protect the community where a project impacts occur. Allowing leapfrog development under the premise that mitigation may occur in some distant area does not satisfy the intent of CEQA or the County's obligation to its San Diego constituencies."

Besides the above-mentioned criticisms, Taylor also ruled that the County violated CEQA by allowing out-of-County offsets without sufficient analysis. And that the County's EIR was inadequate for several other reasons, including failing to analyze how facilitating developments in rural lands far from transit and often in high fire hazard zones could impact achievement of SANDAG's regional plans for so-called smart growth.

Judge Taylor ruling also stated, "the County failed to adequately respond to comments, thereby violating CEQA. Comments are an integral part of the EIR and should be relied upon by the decisionmakers." He included this example: "Sempra commented that only 13% of CAP GHG reductions would come from a transportation sector that emits 45% of County GHGs and advocated decreasing VMT through the County's comprehensive planning powers, AR 16-15041-42. The County's 'response' was that it will explore increasing the use of electric vehicles, which was nonresponsive."

The judge continues, "Response 9 admits that transportation sector reductions are proportionally low, but does not explain why transportation reductions were not included in the alternatives analysis . . . Master Responses 2 and 5 are likewise nonresponsive and rely on data that does not include VMT generated by GPAs under consideration and the

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ones that are likely to be submitted for County review. These are not adequate responses under CEQA."

Newland Sierra contends the ruling does not apply to it. Rika Brandlin, vice president, Newland Communities, commented, "Our greenhouse gas analysis and mitigation measures were established before the county's CAP (Climate Action Plan) ever came out." She added, "We don't rely on or use the county's climate action plan. We have our own mitigation, and see no impediment to moving forward with our project."

We asked for a comment from Lilac Hills Ranch, but an automatic reply from Project Manager Jon Rilling indicated his offices are closed until January 2.

Acknowledging Newland Sierra's position, Jackson commented, "But, the Project offers mitigation that is sooooo similar to the County's CAP -- buying offshore carbon offset credits for cheap." He added, "Lilac Hills Ranch took a similar approach -- a 'spin job' to offer the essence of the County Climate Action Plan but call it something different to try and avoid getting stopped by a Court Order."

Jackson concluded, "Boiling it down to what it means to Lilac Hills Ranch requires a legal interpretation of the ruling, a guess at how County elected officials and staff will implement the ruling, and a guess at whether or not and when the County or a coalition of Development interests will appeal the Court's decision."

Jackson said his group will consult with attorneys in January on how this ruling could relate to Lilac Hills Ranch: "Boiling it down to what it means to Lilac Hills Ranch requires a legal interpretation of the ruling, a guess at how County elected officials and staff will implement the ruling, and a guess at whether or not and when the County or a coalition of Development interests will appeal the Court's decision."

He added, "Also in early January, we will contact the County staff and see how the County plans to deal with Lilac Hills Ranch."

One local observer and activist in many such cases over the years, Patsy Fritz of Prama Valley commented, "This means that the County cannot approve any GPA (General Plan Amendment) that relies on its defective Climate Action Plan ("CAP"), which would have allowed developers to purchase offsite mitigation for greenhouse gas production -- INTERNATIONAL, offsite mitigation to the satisfaction of the Department of Planning and Development Services' and at the lowest cost to the developer ... while we would get all the smog, air pollution and GHG (greenhouse gases) locally that these long-haul 'commuter communities' would produce -- Lilac Hills Ranch, Newland Sierra ('Merriam

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Mountain' in the old days), Warner Ranch, etc. An overwhelming victory! The County
may use your tax dollars to appeal — but this shoots down every one of their arguments."

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L29 HILL, JOE

Comment Letter L29

North River Farms Project Comments. January 8, 2019

Is Integral doing the density bonus on or offsite. Who determines?

Homes on NRF property are single family homes and attached multifamily homes? Is that why they are now asking for a 20 density per acre from one area to another?

Is there legally binding language to guarantee CSA (farming) space and Park space remains open space IF CSA becomes unattainable (i.e.: Carlsbad's 'Urban 4 Farms)

Since all the numbers being discussed are only for a 30 year plan, are we tearing down all the homes at that time because of the pollution. Grandchildren and Great grandchildren can't live there? GHG get even worse?

Are we really going to play the Carbon Credit offset with a project that already says they will exceed the GHG federal and state standards? The document states, "The CITY has determined that additional on-site and off-site mitigation can further reduce impacts from GHG emissions to a less than significant level through the purchase of carbon offsets." (Hard to believe) So, the GHG emissions are generated locally, but the Carbon offset mitigation is purchased elsewhere and is not verifiable or quantifiable. But the best way to say it, is this. This project will generate GHG emissions of 4.8 MT CO2 per person per year. They admit that in the document. So they will buy carbon offsets from somewhere else in the county, state or the world, to guarantee cleaner air in that location. But, the residents in NRF will still be breathing the bad 4.8 MT CO2 per person per year, because the air is not being cleaned up by a tax deductible financial transaction, instead of the required cleaner air,

Document says this project will add result in 25,394,434 VMT every year. OMG

Document says the traffic situation is significant and unavoidable.

Oceanside City does not have a final approved CAP. How can this project go forward without complying with whatever the goals and targets are in the City plan?

Document says project is 1.5 miles from ocean. Really?

Document says there is no evacuation plan for North River Farms Project.

When deciding whether to approve the proposed project, the City will use the information in this EIR to consider potential impacts to the physical environment. Hope that is true. The true impacts despite questionable mitigation are unconscionable.

Joe Hill—Oceanside CA

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L30 KEN

Comment Letter L30

From: Ken <kdepesa@gmail.com>
Sent: Thursday, January 17, 2019 9:06 AM
To: Robert Dmohrski
Subject: NRF
Follow Up Flag: Follow up
Flag Status: Flagged

What's with the council looking at this project when the planning dept said no , I hope the council does what the people want and not what the corporation wants. The environmental report is a joke, it doesn't address the traffic issue at all , what about another fire up here how a we going to get out . This project is wrong you know it I know it, why doesn't the council know it?

Sent from my iPad

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L31 DAVIES, LESLIE & SMITH, JOLENE

Comment Letter L31

From: leslie davies <nopuppymills198@gmail.com>
Sent: Thursday, January 17, 2019 12:32 PM
To: Robert Dmohowski
Subject: NRR project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

I am deeply concerned about the General Plan Amendment for a project called the North River Farms. The project conflicts with Smart Growth development and will result in unnecessary increases in green-house gases and air pollution.

A project of this magnitude will require the widening of the 76 freeway. This will result in unnecessary destruction of wildlife and wildlife habitat. Once the habitat and the wildlife are gone, we can never get them back. Furthermore, where are the funds coming from for all the infrastructure for this project?

-- Thank you,
Jolene Smith
194 Edgewood Dr.
Oceanside, CA 92054

Leslie Davies
2015 Winchester S.
Oceanside, CA 92054

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L32 TAYLOR, MICHELE

Comment Letter L32

From: Michele Taylor <michele@vrsintl.com>
Sent: Thursday, January 17, 2019 11:46 AM
To: Robert Dmohowski
Subject: North River Farms - Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Commission,

The High Density North River Farms project is bad for Oceanside.
The zoning should remain the way it is. We have enough traffic / high density in this area already.

Oceanside has come a long way in trying to clean up crime, etc.
The majority of our budget already goes to Police and Fire. This project will cost the city money.
Money we don't have.

This project is incompatible with the City's plan for agritourism and will result in the loss of revenue
and jobs.

Agritourism should be the main focus of this area. (not high density housing)

Thank you,
Michele
Oceanside Resident

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Late Comment Letters for North River Farms Environmental Impact Report

L33 NADINE

Comment Letter L33

From: Nadine
Sent: Sunday, December 30, 2018 12:47 PM
To: City Council ; nadia
Subject: Here's how Paradise ignored warnings - NO On N River Farms

Please enter into the Record for the N River Farms project.

Please heed this message. NO high density in Micro Hills. Similar conditions to Paradise exist including canyons/weed and brush filled San Luis Rey River, frequent Santa Ana winds, dead end streets and a main street that cannot accommodate a full evacuation.

Oceansiders were very lucky that the Lālac fire stopped near vacant land but reports of 2 1/2 hours plus evacuation times make this area extremely vulnerable to wind and ember driven rapidly spreading fires.

<http://www.sandiegocountytribune.com/news/california/la-me-camp-fire-deathtrap-20181230-story.html#share=email-story>

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Here's how Paradise ignored warnings and became a deathtrap



Embers blow in the wind as the Camp Eid dining room restaurant in Paradise, Calif., on Nov. 8. Fueled by high winds and low humidity, the rapidly spreading wildfire ripped through the town. (Austin Sullivan/Getty Images)

By Paige St. John, Joseph Serna and Rong-Gong Lin II

DECEMBER 30, 2018, 3:33 AM | REPORTING FROM PARADISE, CALIF.

The fate of Paradise was cast long before a windstorm last month fueled the deadliest fire in California history.

The ridge settlement was doomed by its proximity to a crack in the mighty wall of the Sierra Nevada, a deep canyon that belled gale-force winds.

It was doomed by its maze of haphazard lanes and dead-end roads that paid no heed to escape.

<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-2018123...> 1/22/2019

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It remained doomed because for all the preparations community leaders made, they practiced for tamer wildfires that frequently burned to the edge of town and stopped — not a wind-driven ember storm.

In the aftermath of the Camp fire — 86 dead, more than 17,900 homes destroyed and Paradise decimated — local and state officials said the tragedy was unforeseen and unavoidable, an “unprecedented” monster of fire.

In truth, the destruction was utterly predictable, and the community's struggles to deal with the fire were the result of lessons forgotten and warnings ignored. The miracle of the tragedy, local officials now concede, is how many people escaped.

A Los Angeles Times investigation found that Paradise ignored repeated warnings of the risk its residents faced, crafted no plan to evacuate the area all at once, entrusted public alerts to a system vulnerable to fire, and did not sound citywide orders to flee even as a hail of fire rained down.

Historical records show the Camp fire was typical of the catastrophic wind-driven fires responsible for California's greatest wildfire losses.

A state fire planning document warned in 2003 that Paradise risked an ember firestorm akin to the one that ripped through Berkeley and Oakland 14 years earlier, killing more than two dozen people and destroying more than 2,000 homes. But Paradise officials framed risk in historical terms: In 50 years, no wildfire had crossed the Feather River.

The roads out of Paradise gridlocked within an hour of the first evacuation order, and began moving again only by a herculean effort of firefighters, police, bureaucrats and politicians who rushed to jammed intersections to try to unspool the knot, the benefit of having practiced for small fires.

In another three hours, hundreds of residents were trapped deep within town, cut off by flames. The town communications system was dead, as were cell towers. Police radios were crippled.

People jumped from cars and fled on foot. Hundreds sought refuge in parking lots and commercial buildings never intended to be temporary shelters in a firestorm. The remains of scores of residents were found inside the homes they never left.

The disaster occurred despite the fact that Paradise was proactive about preparing for fire, not just with drills and plans, but advertising its warning system, promoting “pack and go” preparations by residents, and even writing fire precautions into public construction projects. City leaders believed no other California community, except perhaps fire-dogged San Diego, was better prepared.

<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-20181231...> 1/22/2019

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National transportation planners say the town's destruction should set a new bar for emergency planners in wildfire areas, the way Hurricane Katrina reshaped evacuation planning on the Gulf Coast. But despite vows to create statewide evacuation standards after previous deadly wildfires, California has yet to take action and evacuation planning remains a local responsibility.

The question is more urgent than ever after two wildfire seasons with a staggering death toll: More than 40 killed by fires in wine country, more than 20 dead from the Montecito mudslides.

But experts fear the lessons will go unheeded.

"Memories are very short and people will soon forget how terrible Paradise was," said Michael Robinson, director of the Center for Innovative Transportation Solutions at Old Dominion University, which helps communities plan for evacuations. "Or they'll think, 'It was terrible for Paradise, but it won't happen to me.'"

An imperfect place

Paradise was built upon a system of volcanic ledges bisected by a fan of deep ravines emptying into the Sacramento Valley.

Developers started with what had been gold mine trails and then apple orchard roads to pave a street system that maximized buildable space the way blood vessels branch into capillaries. There are nearly 100 miles of private roads that dead-end on narrow overlooks and few connector streets.

For more than 38,000 people, access to the outside world came via four roads running south, down finger ridges and through forest canopy. After 2008, a forest road north was paved to provide escape for residents on the upper ridge above Paradise. On the day of the fire, the narrow winding passage jammed and was impassable.

Other historic mining towns in the Sierra Nevada foothills follow similar chaotic, organic layouts.

"The DNA of these towns is such that they're ... set up for disaster," said Zeko Lander, a Chico-based fire specialist and geographer whose company helps private landowners and public agencies conduct prescribed burns and prepare for inevitable wildfires.

The population boom for Paradise came in the 1960s and '70s. Nine out of 10 homes were built before 1990 and most were more than three decades old. Tax assessor records show that only 285 homes were built on the Paradise ridge since new fire codes went into effect in 2008. A Times analysis of assessor records and fire surveys showed those newer structures had a 45% survival rate in the Camp fire, compared with 3% for older homes.

<http://www.sandiegouniontribune.com/news/california/in-me-camp-fire-deathtrap-2018123...> 1/22/2019

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Paradise officials repeatedly told The Times they never envisioned a firestorm reaching the town.

But the 2005 state fire management plan for the ridge, developed in consultation with some of those same Paradise planners, warned that canyon winds posed a "serious threat" to Paradise.

The "greatest risk" was an "east wind" fire, the document said, "the same type of fire that impacted the Oakland Berkeley Hills during the Oct. 20, 1991, firestorm" that killed 25 people.

The plan also warned of "a high potential for large-damaging fires and loss of life and property" in the Concow Basin beside Paradise. "Heavy fuel loads, steep terrain, poor access and light flashy fuels create severe fire hazards. The increased population in this area creates a high potential for catastrophic life and property loss."

Subsequent fire plans created by Butte County and Paradise officials in conjunction with the California Department of Forestry and Fire Protection use much less direct language. Those plans warn only of "extreme" fire, a step below catastrophic. Canyon wind fires are not mentioned at all.

The town's vulnerability to fire was evident in 2008, first by the Humboldt fire that destroyed 87 homes west of Paradise, then a week later by a lightning storm that sparked dozens of fires to the east. Residents trying to flee were caught in massive traffic jams, flames burning on both sides of the road as they sat trapped in their cars. One person died of a heart attack.

The 2008 fires primed the land around Paradise to burn again, Lunder said, leaving both dead timber and open spaces for thick grass. It was as if the gun had been cocked.

A year later, the Butte County grand jury warned that the town faced disastrous consequences if it did not address the capacity limits of its roads. But Butte County supervisors and planners rejected the panel's call for a halt to growth until the evacuation problem was met.

The largest paper in Chico ran an editorial concluding that sufficient evacuation roads could not be built, and that those who chose to live in Paradise needed to be aware of the risk they took and be prepared to leave early.

Five of the grand jurors, interviewed by The Times, said the improvements that were made — paving of the forest road and straightening of another route — were inadequate. They felt they had been ignored.

Among them was Walt Sipher, a Chico resident whose sister followed their parents to Paradise and remained on the ridge after they died. Sipher called his sister the morning of the Camp fire to warn her to leave. She told him she didn't need to — it would be contained.

<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-20181231...> 1/22/2019

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Judith Sipher was typical of those who perished that day: elderly, infirm with congestive heart failure and ill in bed with the flu. She had a car but seldom drove.

Walt tried driving into Paradise to fetch her, but hit blocked traffic and could not get in. He was summoned weeks later to the old Sears store in Chico to submit a saliva sample for the coroner, who was using DNA to identify the human remains found in his sister's apartment.

"There are a lot of folks on that ridge, and so few escape routes," Sipher said. "The possibility was always on everybody's mind. ... You hope it's not going to be that bad, but it was."

Narrowing the main road out

The same month the grand jury released its June 2009 report, Paradise was deep into plans to narrow its main evacuation route, Skyway.

Eight pedestrians had been injured by passing cars in the narrow business district, and heavy traffic gave the strip an "expressway" feel. The engineering firm that designed the project said it would reduce the number of vehicles that could pass through and advised against further "improvements," such as a concrete median, citing the need to remember that the road was a fire evacuation route. More than half the ridge population lived above the strip.

Town recordings show a lone voice of concern at the 2014 council meeting giving final approval to the road narrowing.

"The main thing is fire danger," said Mildred Eselin, 88. "If the council is searching for a way to diminish the population of Paradise, this would be the way to do it."

City Fire Chief David Hawks pointed to Paradise's plan to evacuate neighborhood by neighborhood rather than all at once.

"When everybody tries to evacuate at one time, that's when the bottleneck creates," Hawks said.

Not preparing for the worst

Staggered evacuations have been at the heart of Paradise evacuation plans since 1998. An updated plan approved in March 2015 codified decisions after the 2008 fires to convert Skyway into a one-way route during emergencies, doubling its capacity for evacuations. The town practiced its plan during a 2016 drill, part of regular mock disasters, and warned residents ahead of time so they could detour if need be.

<http://www.sandiegocitizen.com/news/california/la-me-camp-fire-deathtrap-2008123...> 1/22/2019

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Jim Broshears, the city's emergency management director during the fire and its former longtime fire chief, estimated Paradise's roads could support the combined evacuation of four zones in two hours — less than a fourth of the population. But city officials told The Times they had no idea how long it would take to empty the entire town. They said they never envisioned a need.

"We trained on what was most probable," said town engineer Marc Mattox.

Planning for a firestorm would have been "akin to, 'Is the L.A. Basin in its entirety planned for an earthquake that may devastate the L.A. Basin?'" Hawks said. "I don't think that's realistic.

"Obviously, it's the largest or most devastating fire in California's history," he said. "It didn't get that [way] because it was a normal event."

Traffic simulation software housed at Old Dominion University and required by the Federal Emergency Management Agency for emergency plans around nuclear power plants was used by The Times to analyze Paradise's roads. It showed the entire town would need eight hours for residents to leave under blue sky conditions, and more than five hours if Skyway were immediately converted to one-way traffic out.

Those estimates are without a rain of embers, burning obstacles, exploding propane tanks and heat blasts that melted tires. They do not account for roads that were blocked by falling power poles and abandoned cars the day of the fire or the two hours that it took police to establish one-way traffic on Skyway.

Paradise did not make use of such software. Told of The Times' findings, Mattox said he would have liked to have had that information before Nov. 8. "Every public works planner, every emergency planner across the country should be aware about what those types of models would say for their community," he said.

Broshears, the architect of most of the town's emergency plan, and others acknowledge their plans were built around the sort of slower-moving wildfire Paradise had seen in the past.

"Let's all just be honest," Broshears said. "We didn't have a plan that addressed a fire that would be everywhere. ... We had an evacuation plan built for a wildland fire. We had a hydrogen bomb. ... We were so overmatched."

Failing to prepare for the larger disaster is hardly unique to Paradise, said former FEMA Administrator Craig Fugate.

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Flaws in such planning are so common that Fugate describes them as the “deadly sins” of emergency management: Practicing drills that guarantee success; assuming that plans can be scaled up when a massive disaster strikes; relying on government systems to work under pressure; failing to plan how to protect vulnerable populations, such as the elderly; and mistrusting the public, which often leads to not warning the public early enough.

“We plan for what we’re capable of, and we hope it isn’t any worse,” he said.

Walt Scherer, who lost an earlier house to fire in the foothills of Loomis, where he was a city official, moved to Paradise in April and knew there was high fire risk. Again he lost his house.

He said he was stunned when he later heard Paradise’s mayor answer a public question about the stalled fire evacuation by stating that enough roads could never be built to evacuate the whole town at once.

“Anybody in their right mind would know that the whole town was a large oak forest, and everybody was at risk,” Scherer said. It was a “colossal failure,” he added, not to warn residents that the entire community couldn’t be evacuated at once. “You’ve got to recognize the risk.”

Firebrands and embers

The Feather River Canyon, where the Camp fire began, was well-known for high winds. The so-called Jarbo Gap winds rocket down the canyon from the northeast every fall, caused by high-pressure air parked over the Great Basin seeking a path through the Sierra Nevada to fill the low-pressure voids on the California coast.

Meteorological records show 36 days since 2003 with gusts of 100 mph or more, and as high as 200 mph. Paradise sat in the path.

The morning the Camp fire ignited, the drying winds had been blowing for a week. According to weather equipment atop the fire station at Jarbo Gap, the probability that a single spark would ignite a fire big enough that fire crews would be needed to put it out was 76%. The station recorded gusts of up to 52 mph hours before the fire.

Rather than spreading as a flame front working its way through the forest, the Camp fire became wind-borne, lofting firebrands and embers that landed like rain. They fell on receptive fuels — trees and brush stressed by several years of drought, thick grass grown during heavy spring rains and now dry. The fuels also contained stands of gray pine, notorious for spouting embers.

<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-2018123>. 1/22/2019

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The fire grew at a rapid clip — about 4,600 acres an hour, according to a Times analysis of fire maps and satellite imagery. Town and state fire officials called the speed of the fire unprecedented.

But the analysis shows other devastating California fires moved as fast, or faster.

In San Diego, the Cedar fire in 2005 kindled for hours until a Santa Ana wind rolled in at midnight. By 3 a.m., the wind-driven fire had jumped a river and a reservoir and ran nearly 17 miles. In the three-hour run, the fire spread an average of more than 19,600 acres an hour. Fifteen people were killed and more than 2,200 homes destroyed.

The Tubbs fire in 2017 matched the Camp in speed, roaring 22 miles in four hours into Santa Rosa, killing 22 people and eventually destroying more than 5,000 homes.

As the Camp fire blew into Paradise, the same high-pressure, low-pressure gradient set up a Santa Ana wind event that pushed the Woolsey fire into Malibu. Its pace in the first three hours was 21,290 acres an hour.

After the Camp fire was reported at 6:31 a.m., the wind carried embers to nearby Concord, where a mandatory evacuation order was demoted to “warning” status at 7:47 a.m.

Fifteen minutes later, embers were setting houses in Concord on fire and the evacuation order became mandatory. In short order firefighters were trapped with residents who had no time to flee. They deployed their fire shelters. Some people jumped into a lake.

The bodies of at least six people were found outside or inside their cars.

No warnings

In Paradise, the first order to evacuate part of the city came at 7:57 a.m., and the first report of fire at the edge of town two minutes later. Immediately there were a dozen spot fires in town.

The ember storm hailed on most of the town at once. Within an hour, spot fires were spread halfway across Paradise, congealing into substantial fires in backyards and on houses. They primed Paradise for the big burn hours before the arrival of the main wildfire, creating an urban firestorm that moved horizontally house to house and left trees overhead untouched.

As planned, evacuation orders began zone by zone. Calls, texts and emails were sent via CodeRed, a private service that contracted for the city and county.

<http://www.sandiegouniontribune.com/news/california/in-me-camp-fire-deathtrap-2018123...> 1/22/2019

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But interviews and records released by the city and county show the emergency warning system failed on many levels.

Only a fraction of Paradise residents were signed up for the service — city officials at first estimated there was no better than 30% enrollment, then later told *The Times* they did not have access to the subscription list.

Many of the emergency alerts failed to go through — CodeRed logs showed initial call failure rates of 40%, climbing to 60% as the fire progressed. Many subscribers told *The Times* they never received calls.

A large portion of Paradise received no evacuation order before the fire.

Documents released under the state's Public Records Act show that three of Paradise's 14 zones received only warnings — not mandatory orders to leave — the morning of the fire, and no notifications at all were sent to three others. The loss of fiber optic lines and cell towers shut down the warnings entirely — Paradise police abandoned their dispatch center without ever sending a citywide order for other residents to flee.

Most residents said they relied on word of mouth, emergency vehicles driving down their streets with loudspeakers, or the sight of flames.

'Get people moving now!'

It took only an hour for Paradise to jam so thoroughly that a sheriff's sergeant jumped on the radio, his voice urgent.

"Flames!" he shouted. "Get people moving now!"

The order to open all of Skyway to one-way traffic finally came, but what took 45 minutes during a mock drill required an hour under fire conditions. The road wasn't fully converted to one-way traffic until shortly after 10 a.m. By then, dispatch recordings indicate that Skyway was choked down to Chico, and entire stretches began to be lost to fire.

Brosnears said he was surprised by how quickly intersections became a choke point. Traffic backed up on secondary roads so solidly that motorists were trapped on dead-end streets. On one, Edgewood Lane, the bodies of five people were recovered in or just outside their cars. Firefighters were summoned to rescue burn victims at the end of another, after they attempted to flee down a horse trail.

<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-20181231...> 1/22/2019

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Motorists for the most part did not panic, and stayed in their slowly moving cars as the wind-driven fire shifted around them, requiring detours and double-backs and turning the 16-mile exit into a five-hour escape. By 3 p.m., seven hours into the exodus, Paradise Mayor Jody Jones said, the evacuation was complete.

But at the north end of town, firefighters radioed reports of civilians leaving their cars and running on foot, leaving behind a blockade of abandoned vehicles. Hundreds of residents had to ride out the fire until heavy equipment arrived to bulldoze a path for buses to carry them out.

Lessons from Paradise

In the aftermath, local emergency leaders defended their preparations. The scale of the disaster, they said, would have been much worse had Paradise not repeatedly conducted drills.

"We set the goal on traffic control," said Hawks, the city's fire chief. "We set the bar on evacuations."

Emshears said he wants an intensive study "to account for every decision that was made." He now favors a siren system that could warn everyone at once, and better plans to do what Paradise did by default — shelter people in place when escape is not possible.

Mattox, the town engineer, said he wanted to "dispel the narrative" that people died while trapped on Skyway in traffic. But he said Paradise should grade new emergency routes out of town.

During the early hours of the fire, Mattox stood in the smoke directing traffic on Skyway and watched his own family pass by. He lost his home. He now struggles with the question of whether Paradise failed to heed warnings of a wind-driven fire.

"I don't want to say 'No, we weren't prepared' because we worked so hard," he said. "And what would have been different? I just don't know."

Times staff writer Jon Schleuss contributed to this report.

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<http://www.sandiegouniontribune.com/news/california/la-me-camp-fire-deathtrap-2018123...> 1/22/2019

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L34 KADAH, SHEILA

Comment Letter L34

From: Sheila BeachBum <osidebeachbum@yahoo.com>
Sent: Thursday, January 17, 2019 6:08 PM
To: Robert Dimchowski
Subject: NRF
Follow Up Flag: Follow up
Flag Status: Flagged

I don't think NRF is smart growth. It will cost the people of Oside money that will increase our taxes. It doesn't have the infrastructure and we will have to build a new fire station for safety. We need to preserve Ag land and this is doing just the opposite. Once you allow this kind of thing to happen very soon the whole place will be built up and the open space/ag land is gone. Please do not change the zoning for this it isn't smart growth.

Sheila Kadah

[Sent from Yahoo Mail on Android](#)

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L35 DUBOIS, STEVE

Comment Letter L35

From: stavedubois1@aol.com
Sent: Thursday, January 17, 2019 10:17 AM
To: Robert Dmohowski

Follow Up Flag: Follow up
Flag Status: Flagged

Robert:

I strongly oppose the North River Farms proposed project for the following reasons.

- 1) Increased traffic and congestion in the area.
- 2) Increased traffic will result in unsafe evacuation routes as there are insufficient roads crossing the San Louis River as it is today.
- 3) This high density project does not fit in with the areas agriculture environment is in conflict with the City of Oceanside, General Plan for Agritourism.
- 4) The North River Farms proposal, if approved would set a precedent for other housing developments in Oceanside's agricultural area.
- 5) More City provided infrastructure would be required such as Police, Fire and Utilities which the City of Oceanside is struggling to support at its current rate.
- 6) I have never seen any positive side to Low Income Housing areas as the problems the residents bring with them from these former area include gang violence, drugs, crime and generally bringing down the value of the area like seen in Marion Valley in Riverside and Palmdale in LA county.

Please take these concerns under advisement.

Just say NO to NRF .

See you at the meeting on the 28th.

Regards,

Steve duBois
1133 Village Dr.
Oceanside Ca.
92057

t

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L36 LETTERS OF SUPPORT

Comment Letter L36

From: A Cowell <mat@firesuite.net>
Sent: Friday, October 19, 2018 10:35 AM
To: City Council
Subject: A message from A



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

A Cowell

ajohnrowell@gmail.com

92011

Late Comment Letters for North River Farms Environmental Impact Report

From: Adrian Roldan <amit@firesuite.net>
Date: October 29, 2018 at 9:55:05 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Adrian



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Adrian Roldan

rolan8998@yahoo.com

92139

Late Comment Letters for North River Farms Environmental Impact Report

From: Alane Schechter <mat@fresuite.net>
Date: January 20, 2019 at 6:18:22 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Alane



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Alane Schechter

alaneschechter@yahoo.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Allison Tartari <allt@firesmile.net>
Date: December 24, 2018 at 3:35:06 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Allison



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Allison Tartari

allt@firesmile.net

92106

Late Comment Letters for North River Farms Environmental Impact Report

From: Allison Tartari <inatt@fresno.kn.net>
Sent: Friday, September 28, 2018 11:52 PM
To: City Council
Subject: A message from Allison



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Allison Tartari

brocilla@gmail.com

92106

Late Comment Letters for North River Farms Environmental Impact Report

From: Ally Voss <matb@firesuiten.net>
Sent: Friday, October 19, 2018 12:16 PM
To: City Council
Subject: A message from Ally



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ally Voss

ajvoss45@gmail.com

92103

Late Comment Letters for North River Farms Environmental Impact Report

From: ALYSSA MCCLINTON <matt@firestate.net>
Date: September 27, 2018 at 9:51:51 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from ALYSSA



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

ALYSSA MCCLINTON

amariemc91@gmail.com

92083

Late Comment Letters for North River Farms Environmental Impact Report

From: Amanda Davis <amoti@freemove.net>
Date: October 26, 2018 at 12:44:03 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Amanda



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Amanda Davis

amanda.m.davis0422@gmail.com

9/20/17

Late Comment Letters for North River Farms Environmental Impact Report

From: Amanda Schwartz <msst@firesuite.net>
Date: September 27, 2018 at 9:24:08 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Amanda



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Amanda Schwartz

mandysanders@gmail.com

92111

Late Comment Letters for North River Farms Environmental Impact Report

From: Amanda Sumrow <amatt@firesite.net>
Date: January 15, 2019 at 7:40:23 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Amanda



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Amanda Sumrow

Amanda.thibault@outlook.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Amy Copeland <amc@finesuite.net>
Sent: Tuesday, January 01, 2019 7:41 PM
To: City Council
Subject: A message from Amy



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Amy Copeland

teamcopeland@gmail.com

92026

Late Comment Letters for North River Farms Environmental Impact Report

From: Anissa Colonna <anissac@finessite.net>
Date: January 9, 2019 at 8:10:44 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Anissa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Anissa Colonna

anissac@finessite.net

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Anita Cosio <anita@firesite.net>
Date: January 18, 2019 at 4:58:29 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Anita



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Anita Cosio

Cosioanita@yahoo.com

92104

Late Comment Letters for North River Farms Environmental Impact Report

From: Ann Elston <ann@finesuba.net>
Sent: Friday, September 28, 2018 4:54 PM
To: City Council
Subject: A message from Ann



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Ann Elston

Cheaperthanawife@gmail.com

92051

Late Comment Letters for North River Farms Environmental Impact Report

From: Anna Fleming <m.st@firesuite.net>
Date: January 4, 2019 at 4:32:56 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Anna



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

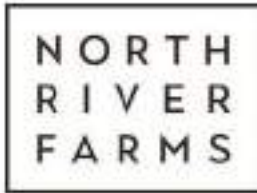
Anna Fleming

afleming92054@gmail.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Ashley Mathews <math@fresuite.net>
Sent: Thursday, October 25, 2018 10:19 AM
To: City Council <Council@oceanside.ca.us>
Subject: A message from Ashley



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ashley Mathews

ashleypalgemathews@yahoo.com

92065

Late Comment Letters for North River Farms Environmental Impact Report

From: Ashley Topp <mat@farmsite.net>
Sent: Friday, October 19, 2018 10:58 AM
To: City Council
Subject: A message from Ashley



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Ashley Topp

atopp44@aol.com

92122

Late Comment Letters for North River Farms Environmental Impact Report

From: Audrey James <crattb@finesuite.net>
Sent: Thursday, September 27, 2018 8:35 AM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from Audrey



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Audrey James

jaudrey.m@gmail.com

9/20/28

Late Comment Letters for North River Farms Environmental Impact Report

From: Benjamin Quinones <bquino@futureside.net>
Date: January 12, 2019 at 2:59:02 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Benjamin



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Benjamin Quinones

Flipmb2000@yahoo.com

92117

Late Comment Letters for North River Farms Environmental Impact Report

From: Bob Cummings <bmatt@firesuits.net>
Date: January 7, 2019 at 9:56:39 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Bob



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Bob Cummings

bcummings@chaikainwestco.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Brandi Cooper <brandi@firesuite.net>
Date: October 2, 2018 at 8:14:22 AM EDT
To: Council@ci.oceanside.ca.us
Subject: A message from Brandi



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Brandi Cooper

Brandi.cooper@gmail.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Brandy Meeks <brandy@nrfarms.net>
Date: September 24, 2018 at 4:31:26 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Brandy



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Brandy Meeks

brandy@nrfarms.net

92029

Late Comment Letters for North River Farms Environmental Impact Report

From: Breanna Powell <matt@finesuite.net>
Date: September 21, 2018 at 5:17:07 PM PDT
To: Council@ci.cocarside.ca.us
Subject: A message from Breanna



33073 Big Range drive

Breanna Powell

powellb92@gmail.com

92596

Late Comment Letters for North River Farms Environmental Impact Report

From: breno Moraes <mat@fireside.net>
Date: January 21, 2019 at 10:02:59 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from breno



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

breno Moraes

brenonz@hotmail.com

92109

Late Comment Letters for North River Farms Environmental Impact Report

From: Bria Weir <bwair@fireside.net>
Date: October 29, 2018 at 9:53:17 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Bria



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Bria Weir

Briamweir@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: BRIAN ABRAHAM <mat@finesitenet>
Sent: Tuesday, January 01, 2019 12:35 PM
To: City Council
Subject: A message from BRIAN



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

BRIAN ABRAHAM

brian.abraham@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Carolyn Yates <matto@finau/ta.net>
Sent: Friday, September 28, 2018 2:55 PM
To: City Council
Subject: A message from Carolyn



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Carolyn Yates

Carolynyates@mac.com

92061

Late Comment Letters for North River Farms Environmental Impact Report

From: Casandra Potter <cpotter@firesuite.net>
Date: November 22, 2018 at 11:27:12 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Casandra



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Casandra Potter

Snowcal2@gmail.com

92591

Late Comment Letters for North River Farms Environmental Impact Report

From: Cassandra Moores Kristensen <cmatt@fireguita.net>
Date: January 11, 2019 at 7:34:17 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Cassandra



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cassandra Moores Kristensen

Cassiemoores@gmail.com

92673

Late Comment Letters for North River Farms Environmental Impact Report

From: Charles Anacker <charles@northriverfarms.net>
Date: January 7, 2019 at 6:22:29 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Charles



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Charles Anacker

charles@anacker.fr

91943

Late Comment Letters for North River Farms Environmental Impact Report

From: Cheri Bell <cheri@freesite.net>
Date: October 24, 2018 at 5:25:15 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Cheri



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cheri Bell

Cheri_bell@cox.net

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Chris Blasingame
Sent: Monday, December 24, 2018 2:09 PM
To: City Council
Subject: A message from Chris



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Chris Blasingame

cbblasingame@gmail.com

92104

Late Comment Letters for North River Farms Environmental Impact Report

From: Christina Bustamante <cmatt@firresults.net>
Date: October 29, 2018 at 6:46:11 PM PDT
To: Connell@ci.oceanside.ca.us
Subject: A message from Christina



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Christina Bustamante

christinambustamante@gmail.com

92585

Late Comment Letters for North River Farms Environmental Impact Report

From: Christina Jordan <enatt@fresubs.net>
Sent: Thursday, September 20, 2018 8:35 AM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Christina



Dear Mayor and Honorable Council Members:

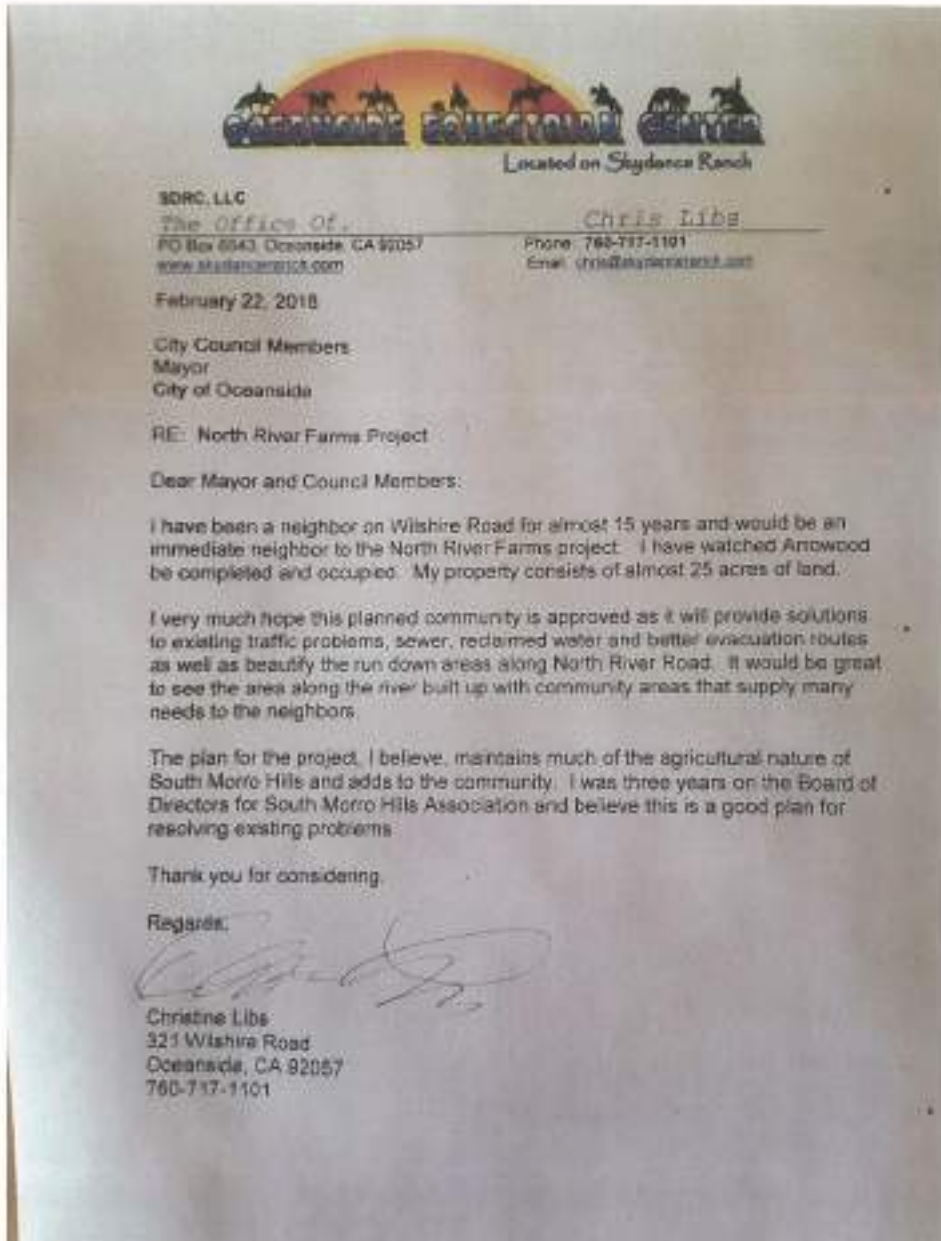
I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Christina Jordan

momchasebloke@gmail.com

92128

Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report

From: Christopher Blasingame <mati@firesprite.net>
Date: November 19, 2018 at 10:23:52 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Christopher



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Christopher Blasingame

Chblasingame@gmail.com

91901

Late Comment Letters for North River Farms Environmental Impact Report

From: Chrystal Coleman <cmatt@fresquite.net>
Date: October 2, 2018 at 12:18:55 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Chrystal



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. Since there is always going to be development, I would rather that the development be geared towards sustainability, and walkable cities. A planned community, like North River Farms, with local agriculture, businesses and community centers would only increase the value of both living in, and visiting, Oceanside. I would LOVE to live in a community like North River Farms, and I plan on looking into purchasing a home there if it is given the go-ahead. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. Please support the North River Farms project.

Chrystal Coleman

chrystalcoleman79@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Cody Harrison <cmh@nrfarms.net>
Date: October 2, 2018 at 12:03:03 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Cody



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and sustainability as part of a broader community is something that appeals to me. This is a place that I would consider either visiting or living. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms is doing a better job than most of looking toward the future. My only advice for them would be to go beyond sustainability and make regeneration their metric for success. Currently their website states they are committed to reducing their carbon footprint and my hope is that a community like this will actually do far more than that and will end up working to improve the health of their watershed, increase biodiversity, and bring the other major nutrient cycles back in balance in addition to carbon (nitrogen and phosphorus).

Sincerely,
Cody Harrison
Beyond Sustainability Specialist, Corona Enterprises

Cody Harrison
charrison@corona-enterprises.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Corinna Nires <cnat@fireside.net>
Date: October 25, 2018 at 7:39:30 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Corinna



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Corinna Nires

corinnanires@gmail.com

92118

Late Comment Letters for North River Farms Environmental Impact Report

From: Craig Johnson <matt@firesuite.net>
Date: November 19, 2018 at 11:07:10 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Craig



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Craig Johnson

ccraig@gmail.com

92103

Late Comment Letters for North River Farms Environmental Impact Report

From: Crystal Green <mattd@fresulite.net>
Sent: Tuesday, January 01, 2019 12:58 PM
To: City Council
Subject: A message from Crystal



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Crystal Green

crystalvoyles@tagoo.com

92671

Late Comment Letters for North River Farms Environmental Impact Report

From: Damian DeRobbio <matt@firesite.net>
Date: January 14, 2019 at 9:42:13 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Damian



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Damian DeRobbio

bestfoodandmusic@gmail.com

92010

Late Comment Letters for North River Farms Environmental Impact Report

From: Darcy Oliver <mat@finesuite.net>
Date: September 25, 2018 at 8:08:00 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Darcy



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Darcy Oliver

darcyoliverdesign@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: David Hollingsworth <matt@firconline.net>
Date: October 27, 2018 at 4:25:50 PM PDT
To: Connell@ci.oceanside.ca.us
Subject: A message from David



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

David Hollingsworth

dhollings@gmail.com

92102

Late Comment Letters for North River Farms Environmental Impact Report

From: Dianne Afalava <matt@fincos.ita.nvib>
Sent: Tuesday, September 18, 2018 10:33 PM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from Dianne



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Dianne Afalava

dianne.afalava@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Derek Smith <smatt@fresuits.net>
Sent: Monday, October 15, 2018 2:49 PM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from Derek



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Derek Smith

smith.derek88@gmail.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Dianna Ataiyan <mati@firesuite.net>
Date: October 24, 2018 at 5:05:31 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Dianna



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Dianna Ataiyan

Dianna.ataiyan@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Donna Geierman <dmatt@firesite.net>
Date: September 25, 2018 at 8:31:19 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Donna



Dear Mayor and Honorable Council Members:

I Do Not support North River Farms because I believe Smorrow Hills is an Oceanside treasure, and should be our source of healthy food not more traffic, pollution, expense to the city, strain on our Already strained police and fire department. The next time we have a wildfire and it follows the natural path at the river bed if this project goes through will be like Northern California and see homes lost but worse lives lost and I don't think anyone wants that on their conscience. I know some of you have already have taking large donations for your campaign funds from these developers or Have worked with them closely throughout the years but that does not mean you need to make a decision, a wrong decision and allow this project to go any further please really help us save the farmers the farmlandHomes and lives. Thank you so much for taking the time to read this.

Donna Geierman

dgeierman1959@yahoo.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Donna Niemann <donna@firesuite.net>
Date: October 24, 2018 at 8:33:06 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Donna



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Donna Niemann

donnaniem@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Duvas Morgan <dm111@fresno.net>
Sent: Thursday, October 25, 2018 3:06 PM
To: City Council <Council@oceanside.ca.us>
Subject: A message from Duvas



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Duvas Morgan

duvasm@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Dylan Voss <matt@frescue.net>
Sent: Friday, October 19, 2018 12:02 PM
To: City Council
Subject: A message from Dylan



{Field Name: 2}

Dylan Voss

dv903@ryu.edu

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Elisha Mulligan <mott@firesuite.net>
Sent: Wednesday, September 19, 2018 10:00 PM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from Elisha



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Elisha Mulligan

bemulligan7@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Elizabeth Hunter <ematt@fresuits.net>
Date: January 17, 2019 at 2:51:45 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Elizabeth



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Elizabeth Hunter

elizabeth.hunter@gmail.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Ellie Vos <mat1@firsuite.net>
Sent: Friday, October 19, 2018 11:43 AM
To: City Council
Subject: A message from Ellie



{Field Name:2}

Ellie Vos

evoss1399@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Elyssa Cortado <ematt@firesuite.net>
Date: November 3, 2018 at 10:25:00 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Elyssa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Elyssa Cortado

Elyssa.cortado77@gmail.com

92028

Late Comment Letters for North River Farms Environmental Impact Report

From: Emily Majeske <emaj@firssuite.net>
Date: October 4, 2018 at 9:24:42 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Emily



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Emily Majeske

emilyda83@gmail.com

92106

Late Comment Letters for North River Farms Environmental Impact Report

From: Emma Voss <emma@nrfarms.net>
Sent: Friday, October 19, 2018 11:41 AM
To: City Council
Subject: A message from Emma



{Field Name: 2}

Emma Voss

emnavoss7@gmail.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Erica Swick
Sent: Monday, December 24, 2018 2:25 PM
To: City Council
Subject: A message from Erica



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Erica Swick

EricaSwick@gmail.com

91901

Late Comment Letters for North River Farms Environmental Impact Report

From: Erica Terry <eratt@fres.lta.net>
Sent: Monday, September 24, 2018 1:27 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Erica



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Erica Terry

terrecoast08@gmail.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Erin Delgado <erind@freesuite.net>
Date: October 23, 2018 at 11:33:35 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Erin



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Erin Delgado

erindelgado91@gmail.com

92139

Late Comment Letters for North River Farms Environmental Impact Report

From: Faith Bright <cmatt@firesprite.net>
Date: October 24, 2018 at 6:59:57 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Faith



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Faith Bright

Fatherino@yahoo.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Frank Cowell <matto@fineultra.net>
Sent: Friday, October 19, 2018 10:43 AM
To: City Council
Subject: A message from Frank



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Frank Cowell

frankcowell@gmail.com

92011

Late Comment Letters for North River Farms Environmental Impact Report

From: Fred Custodio <fredcustodio@nrfarms.com>
Date: January 7, 2019 at 6:50:53 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Fred



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Fred Custodio

fredcustodio@gmail.com

92692

Late Comment Letters for North River Farms Environmental Impact Report

From: Gavin Brown <matt@firesuite.net>
Date: September 24, 2018 at 4:39:31 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Gavin



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Gavin Brown

valentinelgbrown@gmail.com

92081

Late Comment Letters for North River Farms Environmental Impact Report

From: Gloriceel Smiley <mat@fresuita.net>
Sent: Friday, September 28, 2018 8:18 PM
To: City Council
Subject: A message from Gloriceel



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Gloriceel Smiley

gloriceel@yahoo.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Heather Thomas <matth@fireault.net>
Date: October 2, 2018 at 7:30:00 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Heather



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Heather Thomas

kutieska@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Heido Jones <msstt@firesuite.net>
Date: October 29, 2018 at 5:28:05 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Heido



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Heido Jones

heidi.k.jones@gmail.com

91932

Late Comment Letters for North River Farms Environmental Impact Report

From: Heidi Terry <matt@fresuite.net>
Date: October 7, 2018 at 12:44:42 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Heidi



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Heidi Terry

H5_cjbad@yahoo.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Jacob Chambers <mat@fresults.net>
Date: January 16, 2019 at 5:48:36 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jacob



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jacob Chambers

Socialresidential1@gmail.com

92563

Late Comment Letters for North River Farms Environmental Impact Report

From: Jacqueline Becker <jmatt@farsuite.net>
Date: October 30, 2018 at 8:11:42 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Jacqueline



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jacqueline Becker

jlradioccd89@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: James Assali <jmat@frfarmllc.net>
Date: January 3, 2019 at 6:58:30 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from James



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

James Assali

jamesassali@gmail.com

92692

Late Comment Letters for North River Farms Environmental Impact Report

From: Jamie Hackbarth <matt@firesuite.net>
Date: October 24, 2018 at 9:55:41 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Jamie



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jamie Hackbarth

jeesching@sahco.com

92508

Late Comment Letters for North River Farms Environmental Impact Report

From: Janice Patterson <jpatt@firesuite.net>
Date: January 7, 2019 at 8:04:58 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Janice



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

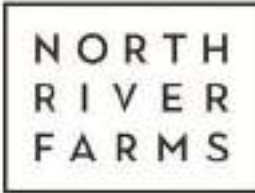
Janice Patterson

jpatterson@emmeronconstruction.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Jasmine Zheng
Sent: Friday, December 28, 2018 1:33 PM
To: City Council
Subject: A message from Jasmine



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jasmine Zheng

jasminezheng@msn.com

92068

Late Comment Letters for North River Farms Environmental Impact Report

From: Jason Pinio1 <jpinio1@fresate.net>
Date: September 24, 2018 at 4:48:27 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Jason



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Jason Pinio1

jpinio1@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Jason Prall <jprall@nrfarms.net>
Date: January 14, 2019 at 9:13:42 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jason



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jason Prall

jprall@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Jennifer Vermillion <jamv@fresno.gov>
Sent: Friday, September 28, 2018 4:35 PM
To: City Council
Subject: A message from Jennifer



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Jennifer Vermillion

jenniferisok@msn.com

92026

Late Comment Letters for North River Farms Environmental Impact Report

From: Jenny Foster <onalt@finesuite.net>
Sent: Tuesday, October 16, 2018 3:48 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Jenny



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Jenny Foster

jenny.foster.guru@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Jessica Solorzano <jmatt@firesuite.net>
Date: September 27, 2018 at 7:04:09 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Jessica



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Jessica Solorzano

Solofam03@yahoo.com

92040

Late Comment Letters for North River Farms Environmental Impact Report

From: Jordan Lapidot <jlapidot@firesuite.net>
Date: September 28, 2018 at 4:08:24 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Jordan



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Jordan Lapidot

jordan.lkalliv@gmail.com

92026

Late Comment Letters for North River Farms Environmental Impact Report

From: Joseph Agustin <jagustin@fresnoite.net>
Date: January 17, 2019 at 4:49:54 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Joseph



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Joseph Agustin

josephagustin@me.com

91941

Late Comment Letters for North River Farms Environmental Impact Report

From: Joshua Smiley <jms11@nrfarms.net>
Date: September 27, 2018 at 1:43:04 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Joshua



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Joshua Smiley

jms11@nrfarms.net

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Julia Ritzo <matt@firesuite.net>
Date: October 25, 2018 at 6:43:51 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Julia



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Julia Ritzo

jritzo@yahoo.com

92086

Late Comment Letters for North River Farms Environmental Impact Report

From: Julien Brack <matth@firesuite.net>
Sent: Friday, October 19, 2018 10:54 AM
To: City Council
Subject: A message from Julien



Mayor (and Honorable Council Members),

I wanted to express my support of North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creative space as part of a thriving community is something that appeals to me. This is a place that I would either visit and consider moving into. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Julien Brack

julienbrack@gmail.com

92011

Late Comment Letters for North River Farms Environmental Impact Report

From: Katherine Helock <math@iresulife.net>
Sent: Tuesday, September 25, 2018 2:12 PM
To: City Council
Subject: A message from Katherine



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Katherine Helock

Katherinsbelock@gmail.com

92595

Late Comment Letters for North River Farms Environmental Impact Report

From: Kelly Krezek <kelly@frassita.net>
Date: January 9, 2019 at 6:46:50 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Kelly



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kelly Krezek

kellykrezek@gmail.com

92003

Late Comment Letters for North River Farms Environmental Impact Report

From: Kelly Miller <kmat1@fireadite.net>
Date: January 4, 2019 at 9:41:23 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Kelly



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kelly Miller

keweefan78@hotmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Kendra Uminger <kmatt@fresubn.net>
Sent: Friday, October 19, 2018 10:58 AM
To: City Council
Subject: A message from Kendra



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Kendra Uminger

kendra.uminger@gmail.com

92061

Late Comment Letters for North River Farms Environmental Impact Report

From: Kevin Boryk <kb@firmsuits.net>
Date: January 14, 2019 at 9:19:41 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Kevin



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kevin Boryk

kevin.boryk@gmail.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Kierstin R. Jolly <mat@firesmitc.net>
Date: January 4, 2019 at 11:14:19 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Kierstin



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kierstin R. Jolly

kierstinrjolly@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Kim Gonzalez <kimg@firesuite.net>
Date: October 26, 2018 at 2:46:46 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Kim



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kim Gonzalez

kimgonzalez121@gmail.com

92025

Late Comment Letters for North River Farms Environmental Impact Report

From: Kory Hunter <mat@fresita.net>
Sent: Friday, October 19, 2018 10:54 AM
To: City Council
Subject: A message from Kory



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Kory Hunter

kory.hunter@gmail.com

92018

Late Comment Letters for North River Farms Environmental Impact Report

From: Kristina Garcia <kr2011@finesite.net>
Sent: Thursday, October 25, 2018 8:12 AM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Kristina



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Kristina Garcia

kr2011@gmail.com

92530

Late Comment Letters for North River Farms Environmental Impact Report

From: krystina gillenwater <mktt@finesuite.net>
Sent: Wednesday, October 17, 2018 3:50 PM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from krystina



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

krystina gillenwater

kgzille@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: Lana Olmstead <mat@finaulite.net>
Sent: Friday, September 28, 2018 4:55 PM
To: City Council
Subject: A message from Lana



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Lana Olmstead

Lolms18733@gmail.com

92049

Late Comment Letters for North River Farms Environmental Impact Report

From: Landon Schechter <matt@fresuits.net>
Date: January 20, 2019 at 8:23:34 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Landon



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Landon Schechter

alandrschachter@yahoo.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Loree Hawkins-Arbaugh <lore@fireside.net>
Date: January 21, 2019 at 3:55:28 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Loree



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Loree Hawkins-Arbaugh

LoreeArbaugh@gmail.com

93083

Late Comment Letters for North River Farms Environmental Impact Report

From: Maddison Hinkle <matt@firesuite.net>
Sent: Tuesday, October 23, 2018 3:08 PM
To: City Council
Subject: A message from Maddison



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Maddison Hinkle

Perfectwbu@gmail.com

92530

Late Comment Letters for North River Farms Environmental Impact Report

From: Maressa Conover <mpatt@fresuits.net>
Date: January 13, 2019 at 9:25:34 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Maressa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Maressa Conover

maressaconover@gmail.com

91977

Late Comment Letters for North River Farms Environmental Impact Report

From: Marivel Morrison <matt@firequite.net>
Date: December 25, 2018 at 1:31:46 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Marivel



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Marivel Morrison

marivelmorrison32@yahoo.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Marivel Pena-Morrison <mpm@firesite.net>
Date: November 20, 2018 at 2:27:45 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Marivel



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Marivel Pena-Morrison

marivelmorrison32@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Marnee Hamdi <mght@firesuite.net>
Date: January 8, 2019 at 9:01:41 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Marnee



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Marnee Hamdi

Marneehamdi@gmail.com

92083

Late Comment Letters for North River Farms Environmental Impact Report

From: Matt Fallesen <matt@firesuite.net>
Date: January 14, 2019 at 6:54:13 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Matt



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Matt Fallesen

matt.fallesen@edwardjones.com

92590

Late Comment Letters for North River Farms Environmental Impact Report

From: Meg Simon <matt@firesite.net>
Date: January 17, 2019 at 7:48:27 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Meg



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Meg Simon

megsimon4@gmail.com

92081

Late Comment Letters for North River Farms Environmental Impact Report

From: Megan Allison <matt@firesuite.net>
Date: January 11, 2019 at 11:24:44 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Megan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Megan Allison

mallison@miracosta.edu

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Megan Anderson <mati@fire.suite.net>
Date: January 13, 2019 at 9:47:34 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Megan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Megan Anderson

MAnderson951@aol.com

92591

Late Comment Letters for North River Farms Environmental Impact Report

From: megan malone <mm126@fresquite.net>
Date: October 29, 2018 at 10:52:40 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from megan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

megan malone

mmalone126@gmail.com

91977

Late Comment Letters for North River Farms Environmental Impact Report

From: Meghan Marion <mmarion113@gmail.com>
Date: October 13, 2018 at 9:51:39 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Meghan



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Meghan Marion

mmarion113@gmail.com

92592

Late Comment Letters for North River Farms Environmental Impact Report

From: Melissa Mika <mmika@resulte.net>
Sent: Friday, September 21, 2018 9:13 AM
To: City Council <Council@d.oceanside.ca.us>
Subject: A message from Melissa



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Melissa Mika

mmika@cox.net

92679

Late Comment Letters for North River Farms Environmental Impact Report

From: Melissa Barnes <mati@firesuite.net>
Date: October 24, 2018 at 8:29:46 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Melissa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Melissa Barnes

a.m.davis1811@gmail.com

92570

Late Comment Letters for North River Farms Environmental Impact Report

From: Melissa Clough <mand@freemite.net>
Sent: Tuesday, October 23, 2018 3:35 PM
To: City Council
Subject: A message from Melissa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Melissa Clough

yoginimelly@yahoo.com

92078

Late Comment Letters for North River Farms Environmental Impact Report

From: Melissa Kimler <mk2@humboldt.edu>
Sent: Tuesday, September 18, 2018 3:11 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Melissa



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Melissa Kimler

mk2@humboldt.edu

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Melissa Ninagar <mnagar@finesuite.net>
Date: September 23, 2018 at 7:53:14 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Melissa



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Melissa Ninagar

mnagar@mn.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Michelle Crisp <mtt@firesite.net>
Date: October 20, 2018 at 9:35:10 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Michelle



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Michelle Crisp

Michellemcrisp@gmail.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Natasha Horkison <natt@firewrite.net>
Date: January 19, 2019 at 3:44:24 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Natasha



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Natasha Horkison

nello@chipplant.com

92708

Late Comment Letters for North River Farms Environmental Impact Report

From: Natasha Warrick <nwarrick@firesuite.net>
Date: October 23, 2018 at 12:09:25 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Natasha



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Natasha Warrick

nwarrick@gmail.com

92591

Late Comment Letters for North River Farms Environmental Impact Report

From: Nelly Buchanan <nelt@firesite.net>
Date: October 24, 2018 at 6:07:36 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Nelly



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nelly Buchanan

neltvdpt@yahoo.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Becker <nick@firesuite.net>
Date: November 16, 2018 at 9:57:24 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nicole Becker

nick@vshoo.com

92028

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Chavira <nchl@fresno.ca.gov>
Date: September 23, 2018 at 9:44:34 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Nicole Chavira

nchavira28@yahoo.com

92530

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Lander <nait@firesuite.net>
Date: September 28, 2018 at 6:26:08 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Nicole Lander

lander.nicole@gmail.com

92075

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Lo <nlo@fireside.net>
Date: January 13, 2019 at 9:59:52 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nicole Lo

colemanzell@gmail.com

92003

Late Comment Letters for North River Farms Environmental Impact Report

From: Olivia Aguilanza <olivia@fresno.net>
Date: November 21, 2018 at 6:58:58 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Olivia



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Olivia Aguilanza

oliviamedia@outlook.com

92591

Late Comment Letters for North River Farms Environmental Impact Report

From: pamela minix <nraact@frsolutions.net>
Sent: Saturday, September 28, 2018 7:57 PM
To: City Council
Subject: A message from pamela



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

pamela minix

pamminix@gmail.com

92109

Late Comment Letters for North River Farms Environmental Impact Report

From: Patrick Farmer <matt@firesuite.net>
Date: January 11, 2019 at 5:13:19 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Patrick



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Patrick Farmer

patrickandrewfarmer@gmail.com

92101

Late Comment Letters for North River Farms Environmental Impact Report

From: Raquel Carrillo <mat@fircauife.net>
Date: October 21, 2018 at 12:53:59 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Raquel



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Raquel Carrillo

Amal111@aol.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Reagan Helms <rmh1@freemove.net>
Date: November 17, 2018 at 5:37:54 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Reagan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Reagan Helms

helmsreagan@gmail.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: "Richard (Dick) Bartlett" <matt@firesuite.net>
Date: January 4, 2019 at 6:42:38 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Richard (Dick)



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Richard (Dick) Bartlett

dickbartlett40@gmail.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Richard Trammell <rmatt@fireaite.net>
Date: October 28, 2018 at 5:31:11 PM PDT
To: Cornell@ci.oceanside.ca.us
Subject: A message from Richard



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Richard Trammell

rmatt122180@gmail.com

92584

Late Comment Letters for North River Farms Environmental Impact Report

From: Robert Macejak <rmact@firesuite.net>
Date: September 24, 2018 at 7:18:56 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Robert



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Robert Macejak

rmacejak@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Rolan joy Garcia <mattd@freemove.net>
Sent: Friday, September 28, 2018 6:43 PM
To: City Council
Subject: A message from Rolan joy



9966 Scripps Westview way
168

Rolan joy Garcia

rjoygarcia@gmail.com

92131

Late Comment Letters for North River Farms Environmental Impact Report

From: Samantha Tanner <smattg@results.net>
Sent: Wednesday, September 26, 2018 1:12 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Samantha



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Samantha Tanner

smattg@results.net

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Sara Berner <msatt@firesuite.net>
Date: October 24, 2018 at 5:38:44 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Sara



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sara Berner

sberner@me.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: SARA PLUTA <matt@fireside.net>
Date: September 24, 2018 at 5:03:34 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from SARA



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

SARA PLUTA

sjs1177@gmail.com

85251

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarah Davila <matd@fireautes.net>
Sent: Friday, September 28, 2018 3:07 PM
To: City Council
Subject: A message from Sarah



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Sarah Davila

Sedavils@hotmail.com

92571

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarah Shortridge <matt@firecrite.net>
Date: November 2, 2018 at 1:42:06 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Sarah



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarah Shortridge

northriverfarms@vsnbo.com

92217

Late Comment Letters for North River Farms Environmental Impact Report

From: Sean Donovan <mat@frsulta.net>
Sent: Saturday, September 28, 2018 8:49 AM
To: City Council
Subject: A message from Sean



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Sean Donovan

seandonovan@gmail.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Shannon Carey <mat@finesuite.net>
Sent: Wednesday, September 28, 2016 8:25 AM
To: City Council
Subject: A message from Shannon



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Shannon Carey

Shannon.carey.m@gmail.com

92675

Late Comment Letters for North River Farms Environmental Impact Report

From: Shannon Rame <matt@firesuite.net>
Date: October 30, 2018 at 3:12:06 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Shannon



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Shannon Rame

shannonrame@gmail.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Shelly Edwards <smati@firesuite.net>
Date: October 25, 2018 at 7:20:23 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Shelly



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Shelly Edwards

shelly@whiteconstructioninc.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Sheri Lopez <matl@fireaukenet>
Sent: Friday, October 19, 2018 10:43 AM
To: City Council
Subject: A message from Sheri



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Sheri Lopez

sherireelopez@gmail.com

92011

Late Comment Letters for North River Farms Environmental Impact Report

From: Sherry moore <smalt@finesite.net>
Sent: Saturday, September 29, 2018 9:23 AM
To: City Council
Subject: A message from Sherry



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Sherry moore

smoore@ucsd.edu

92101

Late Comment Letters for North River Farms Environmental Impact Report

From: Stephanie Hassani <msst@fresuite.net>
Date: September 22, 2018 at 5:32:00 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Stephanie



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Stephanie Hassani

Stephanie.hassani@na.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Steve Schur <matt@firesite.net>
Date: October 24, 2018 at 7:18:23 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Steve



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Steve Schur

Stevanhaw12@yahoo.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Susan Insko <msiti@fresate.net>
Date: October 8, 2018 at 12:09:49 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Susan



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Susan Insko

susaninsko@vshoo.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Suzanne Rodriguez <smatt@fresale.net>
Date: October 29, 2018 at 7:55:05 PM PEST
To: Council@ci.oceanside.ca.us
Subject: A message from Suzanne



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Suzanne Rodriguez

rodriguez_suzanne@hotmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Tiana Sterling <tmatt@fresuits.net>
Date: October 24, 2018 at 7:00:42 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Tiana



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Tiana Sterling

Tianajgray@yahoo.com

92021

Late Comment Letters for North River Farms Environmental Impact Report

From: Timothy Beveridge <tmatt@firerivers.net>
Date: September 21, 2018 at 11:59:20 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Timothy



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Timothy Beveridge

ranrxtb98@gmail.com

92586

Late Comment Letters for North River Farms Environmental Impact Report

From: Tina Rebe-Matckle <matck@finesubs.net>
Sent: Saturday, September 23, 2018 9:15 AM
To: City Council
Subject: A message from Tina



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Tina Rebe-Matckle

Rebe.tina@gmail.com

92139

Late Comment Letters for North River Farms Environmental Impact Report

From: Tj Majeske <tmaj@firevalley.net>
Date: October 21, 2018 at 1:17:03 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Tj



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Tj Majeske

Majesketj@gmail.com

92008

Late Comment Letters for North River Farms Environmental Impact Report

From: TJ majeske <tjmaj@firesprite.net>
Date: October 4, 2018 at 9:20:42 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from TJ



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

TJ majeske

tjmaj@firesprite.net

92106

Late Comment Letters for North River Farms Environmental Impact Report

From: Vanessa Gibson <van@gibson.net>
Date: November 5, 2018 at 8:44:32 AM PST
To: Connell@ci.oceanside.ca.us
Subject: A message from Vanessa



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Vanessa Gibson

VanGibson@gmail.com

92562

Late Comment Letters for North River Farms Environmental Impact Report

From: Whitney Haynes <whitney@fireault.net>
Date: November 3, 2018 at 7:58:07 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Whitney



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Whitney Haynes

whitney@fireault.net

92130

Late Comment Letters for North River Farms Environmental Impact Report

From: Whitney Lettin <mat@fresuits.net>
Sent: Friday, October 19, 2018 10:58 AM
To: City Council
Subject: A message from Whitney



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Whitney Lettin

wlettin@yshoo.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Will Cangiano <will@cangiano.net>
Date: October 2, 2018 at 9:34:02 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Will



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

Will Cangiano

Will.cangiano@gmail.com

92111

Late Comment Letters for North River Farms Environmental Impact Report

From: William Felton <matt@firesite.net>
Date: October 15, 2018 at 9:37:37 AM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from William



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

William Felton

mwf1@gmx.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Zach Smoot <zsmoot@firesprite.net>
Date: November 4, 2018 at 7:02:07 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Zach



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Zach Smoot

Floydflowers@live.com

93463

Late Comment Letters for North River Farms Environmental Impact Report

From: Zachary Smoot <zsmoot@freesite.net>
Date: December 23, 2018 at 7:17:33 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Zachary



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Zachary Smoot

Floydflowers@live.com

99465

Late Comment Letters for North River Farms Environmental Impact Report

From: Nichole Deol <niatt@firesuite.net>
Date: February 17, 2019 at 11:40:02 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nichole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nichole Deol

Nhayes412@gmail.com

92653

Late Comment Letters for North River Farms Environmental Impact Report

From: Nathan Gonzalez <nmtr@firesaite.net>
Date: February 16, 2019 at 4:48:34 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nathan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nathan Gonzalez

ngonzalez@llu.edu

92508

Late Comment Letters for North River Farms Environmental Impact Report

F. JAMES GRECO
1017 Village Drive
Oceanside, CA 92057
619.962.6655

fjamesgreco@gmail.com ♦ <http://fjamesgreco.wordpress.com>

February 18, 2019

Sent via e-mail

Mayor and Honorable Members
Oceanside City Council
300 N. Coast Highway
Oceanside, CA 92054

Council@ci.oceanside.ca.us

RE: NORTH RIVER FARMS

Dear Honorable Mayor and Members of the City Council:

At first glance and from a Not-In-My-Back Yard (NIMBY) perspective, North River Farms—to be considered by you later this month—may raise fears of increased traffic and congestion with no plus side for existing residents. As a homeowner in the adjacent community of Arrowood, I think that would be a short-sighted view.

After reviewing the project EIR and a Supplementary Analysis dated February 19, 2019, I believe North River Farms will provide more “roses” than “thorns” for our community and the City in general.

Prior to enumerating those benefits, I must provide full disclosure. I am a retired professional land planner and environmental analyst, who worked for the City of San Diego and my own private planning firm for nearly 30 years. You should know:

- Although the EIR preparers competed directly with my firm, I found Dudek Environmental Consultants to be honest, competent and thorough.
- The developer, Integral Communities, was a long-time, respected and trustworthy client of mine. I have had no relationship—financial or otherwise with the firm or its employees—for over a decade.
- Although financially imprudent, I and my firm declined to serve developers that failed to meet high standards of quality and integrity. Integral met our high standards.

As a professional land planner, I have the benefit of being able to analyze a proposed project’s pluses and minuses with a dispassionate view. As a resident of Arrowood, I am bias as it relates to maintaining and retaining our quality of living. From these vantage points, I have discerned the following partial list of benefits for Arrowood:

- North River Farms should generate little or no increased traffic congestion for Arrowood residents, except at the intersection of Vandegrift Boulevard/North River/College and along College to Highway 76. However, the project will mitigate or improve conditions by:
 - a. Widening and improving the College Boulevard Bridge;

Late Comment Letters for North River Farms Environmental Impact Report

Honorable Mayor & City Council
North River Farms
February 18, 2020
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- b. Improving the Vandegrift Boulevard/North River/College intersection to compensate for increased traffic;
 - c. Causing the Highway 76 traffic signals to be synchronized, improving the flow of traffic, which is a significant positive change to me.
- The project will provide Arrowood residents and other nearby communities up to 30,000 square-feet of much needed retail space, consisting of shops, a farmers' market, and possibly a restaurant or two. For comparison sake, the existing San Luis Rey Crossing consists of only about 20,000 square-feet of shops.
 - The developer is required to purchase mitigation credits from an adopted County agricultural conservation program that will result in a net zero loss of agricultural land. In addition, the project will offer a community farm and serve as a corner stone for creation of a Morro Hills agricultural district cultural and commercial attraction.
 - The project will provide a temporary fire station with equipment and staffing, to remain until such time as the City identifies a permanent location.
 - North River Farms residents will create a new pool of potential golfers to financial support the Arrowood Golf Course.

As a planning professional, I know that new development is inevitable, but it should be accommodated only when the project is of high quality, mitigates its impacts, and offers significant benefit to existing surrounding residents. I believe North River Farms meets or exceeds these requirements.

Thank you for your time and consideration. As I write this letter, I understand the hearing for North River Farms is scheduled for February 27, 2019, when I will not be able to attend. I otherwise would have testified in person.

With warm regards,



F. James Greco

Late Comment Letters for North River Farms Environmental Impact Report

From: Darcy Oliver <mat@firesoak.net>
Date: February 15, 2019 at 7:56:26 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Darcy



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Darcy Oliver

darcyolivedesign@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Rion Harmon <rmatt@fireside.net>
Date: February 15, 2019 at 8:11:22 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Rion



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Rion Harmon

Orion@yahoo.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarahi Sandoval <msart@firesuite.net>
Date: February 15, 2019 at 3:15:52 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Sarahi



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarahi Sandoval

vito2259@aol.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

Begin forwarded message:

From: Priscila Carmona <cmatr@fireside.net>
Date: February 17, 2019 at 8:48:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Priscila



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Priscila Carmona

griscarmona@gmail.com

92084

Late Comment Letters for North River Farms Environmental Impact Report



March 6, 2019

Mayor Peter Weiss and Councilmembers
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Mayor Weiss and Councilmembers:

I am writing to express the Oceanside Chamber's support of the North River Farms project. First, I want to let you know that the Chamber has the utmost respect for City Staff and we consider them to be important community partners.

However, on this particular project, we do have a different perspective than staff. It is our opinion that much of the objection to the project is based on an outdated Land Use Element of the City's General Plan.

As you know, the Chamber did not rush into support of this project. In February of 2017 we indicated that we would not support any specific development proposals in the South Morro Hills area for 24 months in order to allow a community vision plan to develop. To date, we have not seen a specific plan adopted that would address housing needs or spark a robust agritourism program in Oceanside.

While we support this project for a variety of reasons, including its heavy investment (\$40M) into backbone infrastructure as well as the prospect of it being a catalyst for future agritourism projects in the region, the main issue is workforce housing. In order to attract and maintain quality businesses in Oceanside, we must have a diversity of housing for their employees.

The South Morro Hills Community vision plan has had many years to take shape, and we believe that any further delays would equal lost opportunity to address our housing crisis. We urge you to support the North River Farms project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott M. Ashton', written over a horizontal line.

Scott M. Ashton
Chief Executive Officer

928 North Coast Highway • Oceanside, California 92054

phone (760) 722-1534 • fax (760) 722-8336 • www.oceansidechamber.com

Late Comment Letters for North River Farms Environmental Impact Report

From: Andre Gamache <mat@frresults.net>
Date: February 11, 2019 at 7:19:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Andre



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Andre Gamache

andreandkays2@gmail.com

92101

Late Comment Letters for North River Farms Environmental Impact Report

From: Ben Mattioda <bmatt@fireworks.net>
Date: January 31, 2019 at 7:42:54 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Ben



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ben Mattioda

bmattioda@gmail.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Brad Colonna <matt@fruitz.net>
Date: February 12, 2019 at 5:52:27 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Brad



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Brad Colonna

colonnadog@yahoo.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Cassandra Wolff <cmatt@firesuite.net>
Date: February 11, 2019 at 4:33:07 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Cassandra



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cassandra Wolff

nurse4earth@gmail.com

92083

Late Comment Letters for North River Farms Environmental Impact Report

From: Cody Harrison <cmst@frsults.net>
Date: February 11, 2019 at 10:02:10 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Cody



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cody Harrison

charrison@corona-enterprises.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Craig Balben <matt@fircaute.net>
Date: February 28, 2019 at 3:43:41 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Craig

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Craig Balben

craig.balben@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Darcy Oliver <mat@firesuite.net>
Date: February 15, 2019 at 7:56:26 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Darcy



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Darcy Oliver

darcvoliverdesign@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: David Powell <dmp117@fresnoite.net>
Date: February 13, 2019 at 10:08:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from David



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

David Powell

d.a.powell117@gmail.com

92127

Late Comment Letters for North River Farms Environmental Impact Report

From: Dyana Springer <dngett@firesuits.net>
Date: February 11, 2019 at 3:31:28 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Dyana



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Dyana Springer

dnrusspringer@gmail.com

91911

Late Comment Letters for North River Farms Environmental Impact Report

From: Elizabeth Hunter <emati@fresuits.net>
Date: February 12, 2019 at 1:03:12 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Elizabeth



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Elizabeth Hunter

elizabeth.hunter@gmail.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Emerald Lowe <matt@nriverfarms.net>
Date: February 13, 2019 at 8:07:55 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Emerald



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Emerald Lowe

emmylms2012@gmail.com

92592

Late Comment Letters for North River Farms Environmental Impact Report

F. JAMES GRECO
1017 Village Drive
Oceanside, CA 92057
619.962.6655

fjamesgreco@gmail.com ♦ <http://fjamesgreco.wordpress.com>

February 18, 2019

Sent via e-mail

Mayor and Honorable Members
Oceanside City Council
300 N. Coast Highway
Oceanside, CA 92054

Council@ci.oceanside.ca.us

RE: NORTH RIVER FARMS

Dear Honorable Mayor and Members of the City Council:

At first glance and from a Not-In-My-Back Yard (NIMBY) perspective, North River Farms—to be considered by you later this month—may raise fears of increased traffic and congestion with no plus side for existing residents. As a homeowner in the adjacent community of Arrowood, I think that would be a short-sighted view.

After reviewing the project EIR and a Supplementary Analysis dated February 19, 2019, I believe North River Farms will provide more “roses” than “thorns” for our community and the City in general.

Prior to enumerating those benefits, I must provide full disclosure. I am a retired professional land planner and environmental analyst, who worked for the City of San Diego and my own private planning firm for nearly 30 years. You should know:

- Although the EIR preparers competed directly with my firm, I found Dudek Environmental Consultants to be honest, competent and thorough.
- The developer, Integral Communities, was a long-time, respected and trustworthy client of mine. I have had no relationship—financial or otherwise with the firm or its employees—for over a decade.
- Although financially imprudent, I and my firm declined to serve developers that failed to meet high standards of quality and integrity. Integral met our high standards.

As a professional land planner, I have the benefit of being able to analyze a proposed project’s pluses and minuses with a dispassionate view. As a resident of Arrowood, I am bias as it relates to maintaining and retaining our quality of living. From these vantage points, I have discerned the following partial list of benefits for Arrowood:

- North River Farms should generate little or no increased traffic congestion for Arrowood residents, except at the intersection of Vandegrift Boulevard/North River/College and along College to Highway 76. However, the project will mitigate or improve conditions by:
 - a. Widening and improving the College Boulevard Bridge;

Late Comment Letters for North River Farms Environmental Impact Report

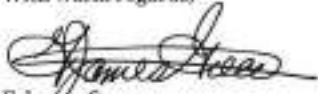
Honorable Mayor & City Council
North River Farms
February 18, 2020
Page 2 of 2

- b. Improving the Vandegrift Boulevard/North River/College intersection to compensate for increased traffic;
- c. Causing the Highway 76 traffic signals to be synchronized, improving the flow of traffic, which is a significant positive change to me.
- The project will provide Arrowood residents and other nearby communities up to 30,000 square-feet of much needed retail space, consisting of shops, a farmers' market, and possibly a restaurant or two. For comparison sake, the existing San Luis Rey Crossing consists of only about 20,000 square-feet of shops.
- The developer is required to purchase mitigation credits from an adopted County agricultural conservation program that will result in a net zero loss of agricultural land. In addition, the project will offer a community farm and serve as a corner stone for creation of a Morro Hills agricultural district cultural and commercial attraction.
- The project will provide a temporary fire station with equipment and staffing, to remain until such time as the City identifies a permanent location.
- North River Farms residents will create a new pool of potential golfers to financial support the Arrowood Golf Course.

As a planning professional, I know that new development is inevitable, but it should be accommodated only when the project is of high quality, mitigates its impacts, and offers significant benefit to existing surrounding residents. I believe North River Farms meets or exceeds these requirements.

Thank you for your time and consideration. As I write this letter, I understand the hearing for North River Farms is scheduled for February 27, 2019, when I will not be able to attend. I otherwise would have testified in person.

With warm regards,



F. James Greco

Late Comment Letters for North River Farms Environmental Impact Report

From: Fred Custodio <fcust@fresuits.net>
Date: February 12, 2019 at 9:03:14 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Fred



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Fred Custodio

Fredcustodio@gmail.com

92692

Late Comment Letters for North River Farms Environmental Impact Report

From: Grace Lovio <matt@firesuits.net>
Date: March 4, 2019 at 11:27:54 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Grace

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Grace Lovio

grsedivale@gmail.com

92590-2855

Late Comment Letters for North River Farms Environmental Impact Report

From: haley wonley <hwstt@firesub.net>
Date: February 27, 2019 at 10:56:55 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from haley



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

haley wonley

haley@ntesacorn.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Jackson Fuller <matt@fireunits.net>
Date: January 30, 2019 at 5:33:38 PM PST
To: Connell@ci.oceanside.ca.us
Subject: A message from Jackson



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jackson Fuller

Jacnfuller@hotmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Jake Chambers <gmatt@firesuite.net>
Date: February 11, 2019 at 4:09:09 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jake



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jake Chambers

Socalresidential1@gmail.com

92563

Late Comment Letters for North River Farms Environmental Impact Report

From: Jeanne Iman <matt@fresuite.net>
Date: February 27, 2019 at 5:52:58 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jeanne

Warning: This email originated from outside of the City of Oceanside network. Do not click on links or open attachments unless you recognize the sender and are expecting the message.



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jeanne Iman

jiman1@cox.net

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Jerri Starkey <matt@firesuite.net>
Date: February 12, 2019 at 1:01:52 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jerri



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jerri Starkey

jarristarkey@cox.net

92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Ka Yama <kmgt@firresults.net>
Date: February 12, 2019 at 9:08:47 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Ka



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ka Yama

ackee0000@gmail.com

92107

Late Comment Letters for North River Farms Environmental Impact Report

From: Latisha Coe <matt@fireaulte.net>
Date: February 12, 2019 at 5:00:01 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Latisha



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Latisha Coe

latisha_a001@hotmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Matt Fallesen <matt@fireriv.com>
Date: February 11, 2019 at 3:58:43 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Matt



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Matt Fallesen.

Matthew.Fallesen@EdwardJones.com

92590

Late Comment Letters for North River Farms Environmental Impact Report

From: Meg Simon <matt@firesuite.net>
Date: February 11, 2019 at 4:26:24 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Meg



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Meg Simon

megsimon4@gmail.com

92081

Late Comment Letters for North River Farms Environmental Impact Report

From: Megan McCaffrey <matt@firesuite.net>
Date: February 28, 2019 at 10:14:42 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Megan

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Megan McCaffrey

mcm636@umboldt.edu

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Michael DeSena <matt@fireroute.net>
Date: February 11, 2019 at 8:01:36 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Michael



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Michael DeSena

michaelderena@outlook.com

92562

Late Comment Letters for North River Farms Environmental Impact Report

From: Michelle Hakala-Wolf <matti@fireriver.net>
Date: February 12, 2019 at 8:08:13 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Michelle



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Michelle Hakala-Wolf

mihakala@yahoo.com

91203

Late Comment Letters for North River Farms Environmental Impact Report

From: Monica Lopez <monicalopez.2016@yahoo.com>
Date: March 5, 2019 at 10:31:40 AM PST
To: Council@ci.oceanside.ca.us
Subject: Please Approve North River Farms!

Warning: External Source

The Honorable Peter Weiss and Members of the City Council
City Hall
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Mayor and Members of the City Council,

I write this letter to urge the Council to approve the North River Farms Project. This project will add to the vibrancy and quality of life of this wonderful community.

As an Oceanside resident only two miles from River Road, I believe that my family and my neighbors will benefit from the innovative design, community opportunities, and sensible planning embodied in this project.

It is well known that Oceanside needs more housing, in particular it is in dire need of progressive innovative housing developments. Growth is necessary and inevitable. Why not embrace a well designed idea? Local contrarians are always there, some folks will never embrace change under any circumstance. Creative solutions however are far and few. Please approve this exciting opportunity.

I have lived in Oceanside for ten years. I'm here for the reasons that we all live here – great location, great weather, great community, and this beautiful setting.

Late Comment Letters for North River Farms Environmental Impact Report

I firmly believe North River Farms will blend well into the landscape and our lifestyle while at the same time bringing new energy. This is an inspirational concept of community and aesthetic that will lift Oceanside's cache as a desired place to live and work.

Sincerely,

Monica Lopez
858-774-5627

Late Comment Letters for North River Farms Environmental Impact Report

From: Nathan Gonzalez <nmati@firesuite.net>
Date: February 16, 2019 at 4:48:34 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nathan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nathan Gonzalez

ngonzalez@llu.edu

92508

Late Comment Letters for North River Farms Environmental Impact Report

From: Neka Rae Shamberger <mratt@freesuite.net>
Date: February 13, 2019 at 2:57:28 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Neka Rae



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Neka Rae Shamberger

nekaraephotography@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Nichole Deol <ematt@firesuite.net>
Date: February 17, 2019 at 11:40:02 AM PST
To: Cornell@ci.oceanside.ca.us
Subject: A message from Nichole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nichole Deol

Nhayes412@gmail.com

92653

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Nelson <natt@firesuits.net>
Date: February 11, 2019 at 3:39:09 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nicole Nelson

naturallynokie@gmail.com

92069

Late Comment Letters for North River Farms Environmental Impact Report

From: Priscila Carmona <mati@firesuite.net>
Date: February 17, 2019 at 8:48:27 PM PST
To: Cornell@ci.oceanside.ca.us
Subject: A message from Priscila



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Priscila Carmona

priscarmona@gmail.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Rion Harmon <matt@firesuite.net>
Date: February 15, 2019 at 8:11:22 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Rion



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Rion Harmon

Orionh@yahoo.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarah Apke <matt@fire.milite.net>
Date: February 26, 2019 at 10:11:58 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Sarah



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarah Apke

smanke@gmail.com

92620

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarahi Sandoval <rnatt@firesaite.net>
Date: February 15, 2019 at 3:15:52 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Sarahi



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarahi Sandoval

vito2259@aol.com

92064

Late Comment Letters for North River Farms Environmental Impact Report

From: Tiana Sterling <matt@firesuite.net>
Date: February 13, 2019 at 9:24:29 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Tiana



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Tiana Sterling

TianaJrwy@yahoo.com

92021

Late Comment Letters for North River Farms Environmental Impact Report

From: trenton wonsley <matt@firesuite.net>
Date: February 27, 2019 at 10:57:19 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from trenton



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

trenton wonsley

wonsleyt@yahoo.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Xuan Vu <matt@firesuite.net>
Date: February 12, 2019 at 5:12:36 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Xuan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Xuan Vu

xuanvu11@gmail.com

92026

Late Comment Letters for North River Farms Environmental Impact Report

Oceanside Planning Commission

4.3.2019

To whom it may concern;

This narrative is related to the proposed North River Farms project by Integral Communities.

My family shares a property line with the proposed project and has resided in Oceanside for the better part of 52 years and I am a Pirate alumnus. As a Senior Construction Manager for the County of San Diego, with a construction industry career spanning over 40 years, I have designed, built, managed and witnessed a multitude of construction project(s) both in Oceanside and throughout the County of San Diego. I would encourage the board to embrace this project to move forward on its current merit. In my opinion, this proposed project is out of the box thinking, progressive, environmentally conscientious, and represents an Oceanside upgrade. This is in fact a design the likes of which Oceanside does not currently have and is the most well thought out, neighborhood friendly project I've ever seen proposed for Oceanside.

My wife and I have spent time with the developer both as a concerned Oceanside resident, a business owner, a building professional, and a home owner and find them to be honest, conscientious and genuinely concerned about the project locals, the environment and the project design. From a social approach, we were fortunate to join them for dinner at the now existing neighborhood farm[®] Ecology Center[®] in San Juan Capistrano, representative of the model they used for this project. It was an enjoyable refreshing evening of home-grown vegetable(s) & fruits, locally harvested fish and wines. It was a firsthand look at the capabilities of this type of a project neighborhood and an absolute wonderful concept and experience. We would support this type of a neighborhood next door to us without a doubt.

Is this project without obstacles to overcome? Perhaps. I've never witnessed a perfect construction project in my career. I would like to point out at every incident of concern, the Developer implemented adjustments and introduced concessions, from the beginning to the current changes, in density, street improvements, bridge expansion, health and safety and proposed infrastructure design criteria.

Open space is both provided for in this proposed project and is already protected in Oceanside and the fear of a lesser project, should be a consideration. We support this project and would appreciate the Planning Commission and City Council doing the same.

Thank you.

Respectfully,

Dayle and Stephanie Imlay

5325 Mare Rd.

Late Comment Letters for North River Farms Environmental Impact Report



May 3, 2019

Oceanside Planning Commission
300 North Coast Highway
Oceanside, CA 92054

Chairperson Krahel and Commissioners,

I am sure you have noticed that the state of California is taking a more aggressive stance on housing, with bills such as SB50. I believe this is possibly just the tip of the iceberg in terms of what we will see coming from the State in the future. The opportunity for Oceanside and other municipalities to maintain local control over housing is a window that is closing quickly.

It is time for Oceanside to approve a wide variety of housing projects that will meet the needs of our future generation of residents.

I am writing on behalf of the Oceanside Chamber of Commerce Board of Directors to express our support for North River Farms, the proposed agrifood in South Morro Hills. Our city is at a critical point of addressing our current housing crisis and planning for our future. We need to embrace innovative and forward-thinking projects that plan for the next generation of Oceanside.

This project incorporates an agritourism design that serves as the perfect catalyst for the agrivision effort in eastern Oceanside, which began three years ago.

In February of 2017, the Chamber agreed to wait to take a position for two years on any specific developments in South Morro Hills, so that a vision plan could take shape. Meanwhile, Integral Communities continued their processing of the North River Farms project, designing a plan to fit the agricultural setting of the area.

By the time the project was prepared to go to a public hearing in February of 2019, our 2-year window had expired, so our Board reviewed the North River Farms project and voted to support it.

In the course of the planning process, we have watched the project change in scope and size in response to City staff, City Council and public comment. The current project includes over 70 acres of agriculture, reservation of a hotel site, 15 traffic improvements, forward planning efforts, abundant recreation and open space, a variety of housing types and tremendous infrastructure improvements. North River Farms sets

928 North Coast Highway • Oceanside, California 92054

phone (760) 722-1534 • fax (760) 722-8336 • www.oceansidechamber.com

Late Comment Letters for North River Farms Environmental Impact Report

a positive vision for the future through the merits mentioned above, as well as, making a significant contribution to the city's RHNA deficit which is currently only 17% fulfilled.

While we support this project for a variety of reasons, including its heavy investment into backbone infrastructure as well as the prospect of it being a catalyst for future agritourism in the region, the main issue is workforce housing. In order to attract and maintain quality businesses in Oceanside, we must have a diversity of housing for their employees.

I encourage you to join the Chamber in supporting North River Farms.


Scott M. Ashton, CEO
Oceanside Chamber of Commerce

Late Comment Letters for North River Farms Environmental Impact Report

From: Joshua Smiley <jmat@finesuite.net>
Date: May 2, 2019 at 6:18:53 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Joshua

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Joshua Smiley

smileyjoshua@gmail.com

92057

Late Comment Letters for North River Farms Environmental Impact Report

From: Thomas Dennert <tdennert@hotmail.com>
Sent: Sunday, May 05, 2019 1:43 PM
To: Planning-Planning Commission
Subject: IN FAVOR of Momo Hills Development.

Warning: External Source

I believe the Planning Commission has the wisdom to review and choose without all the outside pressure from a small, but very vocal group who:

- have got theirs, but want to keep others out of 'their' area and jack up the price of housing;
- can not see the benefit of adding to the tax base with new and young families;
- want use the power of government to take away the rights of property owners to do what the owners believe is in their own best interest;
- use scare tactics promoting pending doom to food availability (Proportionately very little of the food consumed in Oceanside is grown, butchered, processed whether meats, fruits, vegetables, canned, frozen or fresh.);
- use alarmist predictions about wild fires ("Wild fires" are virtually non-existent in developed areas. There has not been one in 'Fire Mountain' since....)
- and regarding pollution, I just bet they did not walk or bike to City Hall and doubt if they all have solar, drive electric cars (which get their power mostly from 'polluting' sources), have xeriscaped yards, etc.

Thank you for listening and the work you do,
Tom Dennert

Late Comment Letters for North River Farms Environmental Impact Report

From: Jay Berman <j.berman@psnet.com>
Sent: Monday, May 06, 2019 8:02 AM
To: Planning-Planning Commission
Subject: N River Farms

Warning: External Source

Hello,

I am absolutely in favor of this project. It's a good project, this developer has bent over backwards to satisfy concerns. The NIMBY opponents will never be for any development in the city and they don't understand the challenges of farming here.

Regards,

Jay Berman
Loma Alta neighborhood

Sent from [Nine](#)

Late Comment Letters for North River Farms Environmental Impact Report

Damian Taitano
5256 S. Mission Road
Bonsall, CA 92003
619.733.5802

May 2, 2019
Re: **North River Farms**

Dear City of Oceanside,

Thank you for your time to consider my thoughts on your upcoming decision. We bought our first home in Oceanside in 1998 just above the airport in a master planned community which allowed us to begin our family and lifestyle along the 76 Hwy. After a few years, we moved to the east side of the Hwy 76 near Bonsall but remained along the San Luis Rey River Valley which we love. We work in Bonsall and our children attend Mission Vista High School, so we are very familiar with the area and have many friends and family who live and work surrounding this project.

WE COMPLETELY SUPPORT THE PROJECT FOR A FEW REASONS:

1. THIS IS SMART GROWTH as deemed by SANDAG as this project is only a half mile away from the northern most transit node which ties into entire San Diego county transit system and is directly connected to arterial roadways in all directions. All urban transit systems throughout the world rely on local buses and shuttles to reach into the neighborhoods.
2. This project is AGRI-Tourism. North River Farms promote local makers and farmers while creating a community destination and support system that makes local farming sustainable. If you don't make a change to the current situation, eventually all the farmland will just become estate lots which is allowed as we all know local farming is failing and cannot compete with modern industrial farming.
3. The 76 traffic could actually be improved by supporting more local development rather than pushing the new construction inland to east of the 15 or Riverside county. We see where the traffic starts on the 76 and that most of the traffic that clogs our beloved highway are the cut-through commuters from the 15 to the 5 and back. Supporting more local trips would naturally reduce out-through trips.
4. Carbon footprint is just a distraction to the real issue of people wanting to limit new neighbors in their community. Your job is to see 10, 20, 50 years out and soon we will all be driving electric cars. Vehicle pollution will not exist in 20 years. You should eliminate it from any part of your decisions.
5. Also, the propaganda about fire safety being a reason to reject the project are just scare tactics. We live in planned community along the 76 and could feel the heat of the 2017 fire as it passed by our neighborhood as none of our homes were lost because the plan was designed with the appropriate defensible spaces and access for the fire fighters to protect our community. The real unfortunate inherent danger lies in the random estate lots of places like Morro Hills that are not well protected because of compromised access and natural overgrowth.
6. North River Farms is the right project at the right time for our community as a whole. Oceanside is not a rural community and doesn't need to cater to the elite NIMBY who think development is only good everywhere us. We are a workforce community and that is why we love it here. We need more housing for our future generations to be able to establish their lives here with us locally.

PLEASE VOTE TO SUPPORT NORTH RIVER FARMS

Sincerely,
Damian Taitano

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L37 JOHNSTON, PHIL (4)

Comment Letter L37

From: Phil Johnston <pjohnston@runbox.com>
Sent: Tuesday, February 05, 2019 8:57 AM
To: Robert Dmochowski <RDmochowski@oceaniduca.org>
Subject: Plot of Dam inundation boundary goes through proposed NRF project area

Dear Mr. Dmochowski-

I made a California Public Records Act request for Dam inundation data for the Lake Henshaw Dam in San Diego County, CA. In response, I received an optical disk of Dam Inundation data from Cal OES (Office of Emergency Services).

The disk contains topographic maps with the Henshaw Dam inundation area border added to the maps. These maps cover the proposed North River Farms (NRF) project area.

I have scaled these maps in order to overlay the inundation area border on the proposed NRF project map. Due to the different map vintages and scanning steps, it's very difficult to get everything registered perfectly. However I feel I've got it pretty close. Please see the two attachments.

This exercise shows the Henshaw Dam inundation area boundary goes directly through the development area of the proposed NRF project. This contradicts the statements in the EIR that "The project site would not be located within a dam inundation zone (SanGES 2009)", and "... the proposed project would not expose people or structures to hazards associated with the failure of a dam". (Section 4.10-17).

1

Late Comment Letters for North River Farms Environmental Impact Report

This is a serious public safety issue. The EIR is dismissing the hazard due to a dam failure without any qualification whatsoever. Yet the available inundation data does not support that conclusion.

I believe the EIR preparer should be given a chance to explain the discrepancy. If there is no satisfactory explanation, then rejecting the EIR on this basis alone would require serious consideration.

If the topographic contours in the project area have been redrawn to reflect planned grading activities, and the inundation boundary "reinterpreted" based on revised contours, that would not be an acceptable explanation. That would need to be fully explained in the EIR, endorsed by the Division of Safety of Dams, and there would need to be absolute assurance that the grading activities could not deviate from the plan, without revising the EIR and readdressing EIR approval and Division of Safety of Dams endorsement.

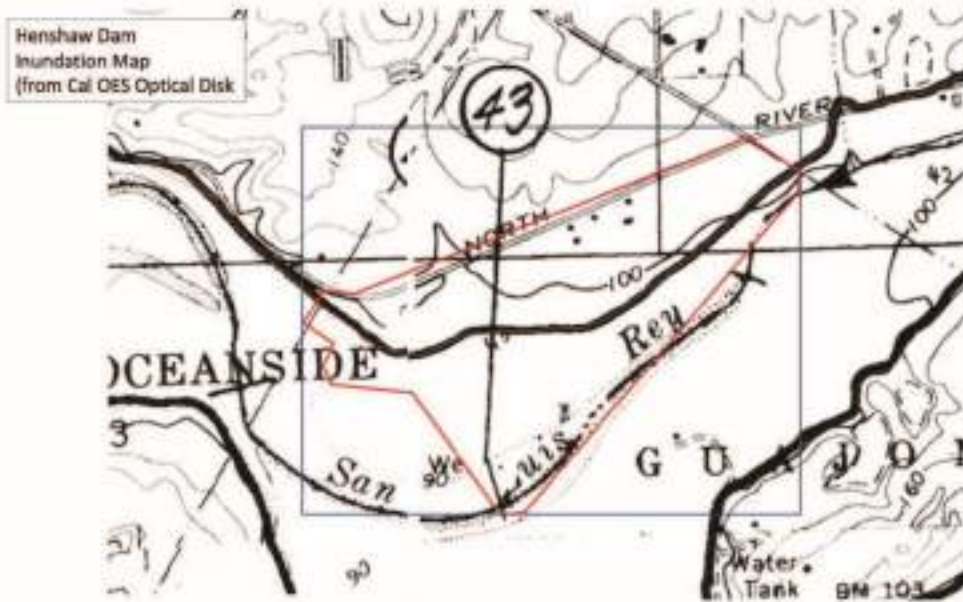
Overriding all this, as of June 27, 2017, dam owners are now required to submit their inundation maps to the California Department of Water Resources pursuant to California Water Code section 6161. Maps to satisfy this requirement for Henshaw Dam are currently under review with the Division of Safety of Dams. These might show the inundation risk to be either lesser than or greater than the currently available data. The proposed NRF project should not be considered for approval until this more recent data becomes available and is evaluated.

Please let me know if there is anything further I can do to assist with the evaluation of this serious public safety issue.

Thank you,

Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report

L38 ENGLESON, ALLEGRA

Comment Letter L38

From: Allegra Engleson <allegravich@gmail.com>
Date: February 10, 2019 at 6:45:35 PM PST
To: Council@ci.oceanside.ca.us
Subject: Morro Hills development

Please do not change the zoning to allow development off of North River Road in the Morro Hills area. My family is concerned with the following if this area is developed:

- Loss of agriculture, oceanside/rural identity
- Permanent change in the view shed, loss of open space vistas. Let's not turn into Orange and LA counties
- Major congestion along North River road and in general with the increase in population

Thank you for your consideration on this matter.

Allegra Engleson
776 Aldea Drive
Oceanside, 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L39 KRUEGER, CHARLES AND DOROTHY

Comment Letter L39

From: Chuck Krueger
Sent: Monday, January 28, 2019 5:00 PM
To: City Council
Subject: North county development

So this is what it means to keep the farmers farming. My wife and I are opposed to the large development being proposed for North river road on current farm land that is zoned for agriculture. We live off route 76 where traffic is already impacted by the widening of route 76. The recent opening of the high school (several years ago) at the corner of Melrose and route 76 has also impacted our neighborhood with people cutting through our development twice a day dropping off children in the morning and picking them up in the afternoon. These folks have no respect for speed limits. Are we no longer concerned about the safety and quality of life of the folks who live in Oceanside? Please do not approve this request to over populate our already congested environment.

Charles & Dorothy Krueger
578 Edgewater Ave
Oceanside, Ca. 92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L40 LAPPORTE, CYNTHIA

Comment Letter L40

From: Cynthia Lapporte <clapporte@gmail.com>
Date: February 11, 2019 at 10:42:58 AM PST
To: Council@ci.oceanside.ca.us
Subject: North River Road

Just wanted to register my disapproval of the current development plan being considered for the agricultural land in Oceanside on North River Road. Adding 1,000+ cars to a road during an evacuation puts everyone at risk. In addition, it is another step in destroying the rural/agricultural environment that lead us to move to this area in the first place. Do you really want Oceanside to look like Orange County? Yikes!

There are PLENTY of acres of land to be developed to help Oceanside meet it's state mandated numbers for the building of affordable residential housing. This project is NOT needed in this location! If you want to build homes using the current zoning of 2.5 acres per lot, fine. However, adding 743 new dwellings only puts undo pressure on current residents in terms of traffic, noise from residential housing vs rural landscape not to mention competition in trying to get out in an emergency, is just irresponsible.

I've attended meetings and heard the developers story and I still think this is a HUGE mistake. Approval of this developer's plan, after being rejected by every other city department will be another sign of the short sided vision of the City Council. It will show, beyond a shadow of a doubt that the current City Council only listens to dollars that represent greed since this is NOT in keeping with Oceanside's master plan. Shame on you if you approve this plan!

Cynthia Lapporte
Morro Hills

PS The fact that you would not let the opposition present their views at the last City Council meeting demonstrates bias and unfair practices. SHAME OF YOU! Not very democratic too!

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L41 ALWARDT, DELLA

Comment Letter L41

From: Della Alwardt
Sent: Wednesday, February 06, 2019 10:17 AM
To: City Council
Subject: North River Farms development

I am opposed to the North River Farms as proposed. It is a thinly disguised attempt to increase density in an area that is zoned agricultural with a current 2.5 acre minimum. Sure, there will be a community farm plot in an area of the flood plain that is not usable for housing. The proposed hotel will not provide enough revenue to offset the City's additional infrastructure expenditures. The addition of 700 homes will make traffic congestion unbearable plus unsafe during mandatory evacuations. Personally, I know my sales tax dollars will shift from Oceanside to Bonsall/Fallbrook in order to avoid the traffic congestion this project will create. The mitigation measures proposed are insufficient. Please follow the advice of your planning commission and deny this project.

Sincerely,

Della Alwardt
1055 Sleeping Indian Rd.
Oceanside, CA 92057

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L42 DEVINY, DEREK

Comment Letter L42

From: MalaCo/D
Sent: Tuesday, January 29, 2019 1:37 PM
To: City Council
Subject: North River Farms project violates city's plan and vision

I'm Derek Deviny at 892 Glenwood Dr, OceanSide, CA 92057.

I live near Alamosa Park, on what used to be hilly ranch land. Rancho del Oro suburban sprawl was a bad use for this area:

- * There's little community due to car commuting- what's the average commute for the residents that can afford the \$3200 mortgage? Streets divide neighbors, endanger children and pets, and few people are out walking or relaxing in their front or rear yards. Most use their garage for storage and park on the street.
- * Homes near the arterials suffer pollution and noise.
- * There are arterial bike lanes (none separated and safe like in Denmark) and only parks have restroom facilities. Most residents use a car to get to the nearby retail, which is bland and unremarkable franchises.
- * Termites and wild fire are an unsolvable problem. Maybe don't allow timber construction?
- * Pools go unused most of the time and lawns waste precious water resources. Natural gas lines are dangerous. Cox/ATT are not providing the leading-edge connectivity we need at an affordable rate.

Your due diligence as a Council member requires that you review the planning and processes which went into RdO sprawl and have a vision for the long term plan of this sacred Laisefu land which addresses all of the concerns I have listed above.

In the slick CGI videos from the developer:

Where is the vehicle traffic and on-street parking?

Sparsely populated public spaces?

There will be hot air balloon rides?

Farm integration for what crops? Cannabis would have a small foot print and profits, as well as ease opioid crisis.

How much food will be made- enough for all residents in as much volume as sunset market?

What is the estimated monthly cost of living in these dwellings? Where will residents obtain employment to afford the housing?

Granted, the NRF plan is slick and innovative, but it MUST do MUCH more. Before any development of this area, we need a vision/plan for the area. Developers are welcome to contribute, but public input should be the guiding majority. Who will design this process? As of now, it seems any developer can direct the council agenda with a half-conceived request- this topic is a waste of time as presented, just like last time.

Some ideas which any future development should have:

- a. Schools which will support kids arriving without cars
- b. Mandate no car ownership for clean air zone for asthmatics- encourage telecommuting
- c. No busy roads near residences
- d. Should be built well- plan to exist as a historic site in 200 years
- e. How will the development react to the worst flood on record?... because it will happen again with climate change

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you would have the resident's approval. Don't poison our air with this and other projects like it in the wrong area.

Joe Hill
2855 Rutgers Pl
Oceanside CA 92056

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L43 HILL, JOE

Comment Letter L43

From: Kay and Joe <warthehills@cox.net>
Date: February 11, 2019 at 10:21:50 AM PST
To: <council@ci.oceanside.ca.us>
Subject: North River Farms Project.

Honorable Mayor and City Council Members

Jonathan Borrego says Oceanside "will be able to demonstrate adequate capacity to accommodate its RHNA allocation for the next Housing Element Cycle (2021-2029)" without projects that are not located in the proper areas, such as NRF.

You all should know already if you read some of the final EIR and the staff reports about the Traffic, Fire, Flood, and the Remote Location issues.

The biggest health problem with NRF is the pollution of the air in that area and other parts of Oceanside that would be caused by this project.

This project will add 25,394,434 Vehicle Miles Travelled every year to this area of Oceanside. This number alone should terrify those residents with traffic concerns, no matter how many roads are improved. What wasn't made clear is the Greenhouse Gas health concerns due to the huge increase in emissions of CO2 from these vehicles and the project itself.

In a nutshell: because the emissions generated by the project are higher than the thresholds allowed by state and local regulations, special mitigation measures are needed to lower it below the thresholds.

The Final EIR frankly admits that these Air quality thresholds were set for stationary industrial projects and not intended or developed to apply to residential development. But they came up with a legal threshold of GHG per person of 3.5 metric tons per person per year as complying with the state/local regulations. However, the project will generate 4.8 metric tons of CO2 emissions per person per year for a total of 10K metric tons per year (37% higher than the threshold). This is considered a very significant impact and needed to be mitigated. The EIR submitted in July 2018 showed that they would purchase 87,000 metric tons of carbon offset credits elsewhere to offset the emissions generated in Oceanside, which got them down to exactly 3.5 metric tons/CO2 /per person /per year. However the final EIR submitted in January 2018 was even more aggressive and egregious, by proposing to purchase 308,640 metric tons of carbon offset credits to get the new emissions down to zero metric tons of CO2 per person per year. But this is only a paper entry on a signed document, with no actual cleaning up the 4.8 metric tons of CO2 per person per year air (I call it smog) in Oceanside. We will still breathe it.

So the final question is. Are we really going to play the Carbon Credit offset game and allow a project that already says they will exceed the GHG federal and state standards?

The GHG emissions are generated locally in Oceanside, but the Carbon offset mitigation will be purchased elsewhere and is not verifiable or quantifiable. But the best way to say it is this. This project will generate GHG emissions of 4.8 MT CO2 per person per year. They admit that in the document. So they will buy carbon offsets from somewhere else world (NORMALLY IN DEVELOPING COUNTRIES) to guarantee cleaner air in that location through Forestation or Clean Energy projects. But the residents in North River Farms and Oceanside will still be breathing the bad 4.8 MT CO2 per person per year, because the air is not going to be cleaned up by a tax deductible financial transaction. The Air will still be dirty not cleaner, but the EIR number will be a fake Zero.

I say bring on as many houses in the SMART GROWTH AREAS, as we can. We are not against proper development in our city. You can rezone Commercial as easy as you can Agriculture if you choose. And

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you would have the resident's approval. Don't poison our air with this and other projects like it in the wrong area.

Joe Hill
2855 Rutgers Pl
Oceanside CA 92056

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L44 SPANSKI, LINDA

Comment Letter L44

From: Linda Spanski
Sent: Monday, January 28, 2019 4:03 PM
To: City Council
Subject: North River Farms project

Dear Oceanside City Council Members:

As a longtime Oceanside resident I am very familiar with local geography and traffic. I strongly oppose the proposed development of the North River Road area due to the lack of access to this rural area. What happens when there's a fire?

This sounds to me like a great deal for some rich investors and a bad deal for the rest of us.

Thank you for considering my opinion.

Linda Spanski
2154 S Coast Hwy
Oceanside

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L45 PERARO, ROSA

Comment Letter L45

From: Rosa <rosefalconstar@aol.com>
Date: February 7, 2019 at 4:43:35 PM PST
To: council@ci.oceanside.ca.us
Subject: North river project

Dear council member I realize that development is part of a city planning however this project is so much out of place it will create a traffic nightmare in north river road and ruin the precious area that Oceanside should be proud to preserve. Please vote against this project

Cordially
Rosa Peraro

Sent from my iPhone

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L46 SERENA

Comment Letter L46

From: Serena <serena@afol.com>
Date: February 5, 2019 at 10:44:21 PM PST
To: Council@ci.eccemside.ca.us
Subject: No to NRF

Chris,

Please say no to NRF.

Thank you.

Serena

Sent from my iPhone

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L47 DUBOIS, STEVE

Comment Letter L47

From: stavedubois1@aol.com
Sent: Friday, February 15, 2019 8:13 AM
To: Robert Dmohowski
Subject: NRF
Follow Up Flag: Follow up
Flag Status: Flagged

The North River Farms project is a bad idea, The developer is NOT pushing this project for the good of Oceanside, it is simple greed. They don't plan on living here and never will

The City Council should be wise enough to see this is the truth.

Regards,

Steve duBois

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L48 HOWE, WILLIAM

Comment Letter L48

From: bruce howe <zumague42@yahoo.com>
Date: February 14, 2019 at 1:41:09 PM PST
To: "Council@ci.oceanside.ca.us" <Council@ci.oceanside.ca.us>
Subject: NORTH RIVER FARMS FINANCIAL IMPACT
Reply-To: bruce howe <zumague42@yahoo.com>

It is almost certain the North River Farms project will end up costing the Citizens of Oceanside. To make the project appear to have a positive financial impact on the City, a Hotel and Commercial Development were included. By their plans the housing will be built, but the Hotel and Commercial MAY be built. The Sales Tax from the Commercial Space and the Transient Occupancy Tax from the Hotel will never materialize. The Commercial spaces at the San Luis Rey Transit Center are still vacant. A Hotel in this location does not appear viable and is unlikely. Has an operator or franchise been identified?

Development in areas which already have public services, nearer jobs, and according to the City General Plan make a lot more sense for the City.

William Howe
686 Sleeping Indian Road

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L49 JOFFE, DARON

Comment Letter L49



441 Saxony Rd, Barn 2 Encinitas, CA 92024
Farmerd@Farmerd.com
760.814.9681

Dear Mayor and City Council,

For the past twenty years I have been helping to design, build and manage community farms and have been a leader in the Agrihood movement. In 2001, I started the farm at Serenbe, a conservation Agrihood community outside of Atlanta and have been working on similar projects ever since. I am the contributing author and initiator of a new report by the Urban Land Institutes called "Agrihoods – Cultivating Best Practices". This report can be downloaded for free at ull.org/food.

In 2014, Farmer D Consulting was engaged by Integral Communities to provide an initial agricultural feasibility study for the North River Farms site to assess the viability of a roughly 17-acre organic farming operation as part of the development plan. In 2016, Integral Communities hired Farmer D Consulting to assist with the planning of the agricultural elements of the project. We worked with the lead design firm, SWA, and the client to help them integrate agriculture into their master plan. As we began to understand the South Morro Hills ag district better it became clear to us how North River Farms could serve as a gateway and catalyst for preserving agriculture and enhancing agritourism opportunities in the district.

At the time I was the Director of Agricultural Innovation and Development at Leichtag Foundation and Founding Director of Coastal Roots Farm (CRF) in Encinitas, CA. Some preliminary ideas I had for the North River Farms project included a working community farm and education center with an incubator farm to provide opportunities for new and beginning farmers like those that were graduating from the CRF apprenticeship program to be able to incubate their farm enterprise on a small scale (1/4 to 2 acres) with the support of shared equipment, infrastructure, marketing and technical assistance. The roughly 30 acres of farmland at North River Farms could have served that need. In addition, I suggested the fields at the gateway to the South Morro Hills District on the North River Farms property could serve as a demonstration of the diversity and history of agriculture in the district. It was important to us to preserve and enhance the views and character of this entry area to be reflective of the agricultural character of the region. The farm would serve as an agritourism hub for the region that celebrates and showcases the diversity of agriculture in the region.

On several occasions I was asked by Integral to speak to City Council on behalf of North River Farms to share my experience and expertise on Agrihoods. I shared the many benefits that community farms can provide and how development when done well can help preserve and subsidize the kind of farming that is highly beneficial to the environment and community, which is extremely difficult to do without a development to support it. At one of the City Council meetings the Council recommended that the South Morro Hills Ag District community work on a

Late Comment Letters for North River Farms Environmental Impact Report

larger vision for the region in order to provide an alternative approach than what was being presented by Integral Communities.

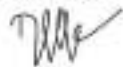
My recommendation to the client was to follow that advice and that in order to best serve this region and community and get support for a project like this it needed to be part of a larger planning exercise. This is something we as a firm have a lot of experience with and offered to help represent the landowners in the district with that vision and plan. The plan that North River Farms was trying to get approved was not in alignment with the appropriate land use for the rural character of the region (totally disregarding the underlying allowable overall density for a rural agricultural area) from our perspective and we did not want to have our name associated with it. We felt the number of homes should have been far fewer and the amount of ag land preserved should have been significantly larger. At this point, our consulting relationship with Integral came to an end as we did not align on how to move forward. We were not comfortable representing the vision being pursued by Integral and were not able to get traction on working with the landowners on a larger vision. For the past few years, Farmer D Consulting has not been involved in the project other than following it on social media and in the press.

We believe transferring density to a hamlet, village cluster is the best way to allow for development while preserving as much of the farmland as possible. In a rural community we recommend between 70-90% preservation and 10-30% development. This is the model that was used at Serenbe with approximately 80% preserved ag and open space and 20% developed. In a transition zone from suburb to rural such as North River Farms, a 50% conservation and 50% development ratio is reasonable. The plan being proposed far exceeded this ratio and pushed the zoning beyond what we felt was reasonable for this area.

At a regional scale such as South Morro Hills, our recommendation was to do an ag overlay on the region to determine the best areas for development, agriculture and open space in order to inform a longer-term vision and strategy for the region. We felt this process should drive how development happens in the district and not the other way around where development pressure on the edge pushes sprawl into the district. If the objective is to preserve agriculture and stimulate the economy with ag tourism then that needs to be what guides the process.

This process in our opinion should be led by the landowners and farmers in the region and not by the developers. A successful planning effort will need to involve all of the key stakeholders—especially the farmers and the city as well as other NGO's and businesses in the area. We do not support the project as it is currently planned for the reasons mentioned in this letter and recommend the City pursue a planning process that looks at how best to preserve and develop this precious agricultural region to be a model for the rest of the country.

Sincerely,



Daron "Farmer D" Joffe
Founder and CEO, Farmer D Consulting

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L50 DUBOIS, STEVE

Comment Letter L50

From: stvedubois1@aol.com
Sent: Wednesday, March 27, 2019 2:43 PM
To: Robert Dmohowski; Vickie Prosser; Christopher Rodriguez
Subject: Re: North River Farms Project Update

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

The "New" proposal for the NRF project is smoke . with no flame.

The idea that \$500K will help fund a bridge across the SLR river and connect with Melrose is perhaps enough to plan the study and engineering plans but no way scratching the surface of the actual construction. Should the proposed Melrose extension (another under estimated project) does not pass tonight (and I hope it does NOT pass) then it will be a bridge to another traffic jam. The idea of adding additional turn lanes for the North River Road/Vandergrift intersection will require buying additional property from already developed sites. . where does all this money come from?

The idea of adding the 37 acre farm that is ALREADY approved for 27 homes does nothing for the NRF proposal density issue and why are they trying to through another 5 acres (that are TBD) into the mix must is simply be a numbers game. It does not change the over build proposal, just adds 5 more acres to the plan and (for some reason) brings the 27 homes on 37 acres into the plan to further dilute the residents per acre calculation...Lipstick on the pig..

The developer continues to stress that this s good for you... just drink the Kool-Aid and all will be better is just NUTS.

The vast majority of residents in district 2 did not ask for this fight, but we are not backing down.

Please vote **No** on the Melrose extension proposal and vote **NO** on the NRF fairy tail.

Regards,

Concerned resident and home owner in District 2.

Steve duBois
1133 Village Dr.
Oceanside Ca.
92057

In a message dated 3/27/2019 9:53:42 AM Pacific Standard Time, RDMohowski@oceansideca.org writes:

North River Farms Project Update

The project applicant submitted a [memorandum](#) on March 22, 2019 detailing proposed modifications to the project. In response to public comments and the review by the Planning Commission, the applicant is proposing project enhancements through added conditions of approval. Staff is currently reviewing the proposed modifications.

The applicant also provided a GHG Mitigation [memorandum](#) to address the sufficiency of GHG mitigation proposed for the project. Both documents are available on the City's project webpage at: <https://www.ci.oceanside.ca.us/gov/lev/planning/project/nrfp.asp>

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Next Steps

Based on the proposed modifications, the project will be reconsidered by the Planning Commission prior to final consideration by the City Council. The Planning Commission shall make a recommendation to the City Council regarding the General Plan amendment, zoning amendment, and discretionary application. The City Council shall then review and take final action on the requested entitlements.

The project is tentatively scheduled to be reconsidered by the Planning Commission on May 6, 2019 followed by a City Council hearing on May 22, 2019. Formal notification will be provided in advance of both meetings.

Public Comment Letters

Written comments may be submitted to the Planning Division or City Clerk by mail or email prior to the hearings and will be made part of the public record and provided to the Planning Commission and City Council.

All correspondence previously submitted for either the January 28th Planning Commission meeting or March 13th City Council meeting has been added to the project record and will also be provided to the Planning Commission and City Council for the upcoming meetings.

Please contact Rob Dmohowski at (760) 435-3563 or rdmohowski@oceansideca.org for questions regarding the project.

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L51 DUBOIS, STEVE

Comment Letter L51

-----Original Message-----

From: Steve DuBois <Stavedubois1@aol.com>
Sent: Friday, March 29, 2019 10:30 AM
To: Robert Omohowski <ROmohowski@oceansidoca.org>
Subject: NRF

Warning: External Source

Just say NO to this project that does not fit in our area and is NOT wanted by the vast majority of district 1

Vote NO on NRF

Regards

Steve duBois
1133 Village Dr
Oceanside Ca
92057

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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L52 PISTOLE, APRIL

Comment Letter L52

From: April Pistole <aprilwpistole@scloval.com>
Date: March 28, 2019 at 11:05:31 AM PDT
To: council@ci.oceanside.ca.us
Subject: North River Farm Development Project

Warning: External Source

To Mayor Weiss and all City Council Members,

My name is April W. Pistole and I live off North River Road. I am writing to you today to urge you to Please Vote No on the North River Farm Development. My family moved to this area of Oceanside/Bonsall over 10 years ago to enjoy the rural lifestyle. Traffic at the intersection of North River Road and the 76 is already over congested and adding over 600 homes, a hotel and commercial area will spoil not only our few remaining urban farming areas, but will completely destroy the charm of this area, community character, and increase traffic congestion. It will put my family and my neighbors at risk for higher pollution, and sprawling development crowding. It will also greatly impact the evacuation route we used for the Lilac Fires! I believe it will negatively effect my community and the neighboring communities. Please Vote No on the North River Farms Development.

Thank you,
April W. Pistole
a.pistole@att.net

Sent from my iPhone

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L53 HILL, JOE AND KAY

Comment Letter L53

From: Kay and Joe <wethehills@cox.net>
Sent: Thursday, April 04, 2019 10:07 AM
To: City Council <Council@oceasideca.org>
Cc: Robert Dmohowski <RDmohowski@oceasideca.org>; Jonathan Borrego <JBorrego@oceasideca.org>
Subject: NRF Project Enhancement Letter

Warning: External Source

Honorable Mayor and City Council Members,

Someone needs to please explain, how integral finding an extra \$700,000 for two project studies and \$100,00 of possible solar money for the city, just to sweeten the pot, is making any major changes/enhancements to this project?

Let's Review:

1. NRF will buy the lot next door to their property and make it a vacant land buffer? So then we play the phony Density Numbers game. More gross acres to divide by the number of houses. Looks great on paper, doesn't it? Let's look for some more property and get the numbers down really low?? But all the houses will still be built and crammed into the 116 acres on current plan with the real density of 1.6 to 15.0. They don't move farther apart and are not reduced in number. They also claim a 135% increase in AG land, because they count the AG acreage number already inside the project already. Better numbers for them to look good on paper.

And, I'm sure all of you know that Integral does not even own either of the properties. I was always puzzled by that. But I guess that is the development game.

2. We still have the Hotel gimmick going on. Now NRF has up to ten years to reasonably market and attract a developer to build it. There is no TOD for 10 years, and remember the \$355,174 savings benefit the hotel was supposedly giving the city. It still won't be there as promised in the initial numbers. But wait, maybe that's where all this money they are throwing at us now, is coming from? And really think about a Hotel in Oceanside, that is 9 miles from the beach? People aren't going to be beating down the doors to stay in this hotel when they can stay at the beach or very close now and with the 2 new hotels being built.

3. Master planners and more knowledgeable people than you and I, have consistently said the South Momo Hills Vision plan should always have been the first step in this whole process. As an afterthought NRF is now throwing up to 200K at something they never proposed. It looks like NRF has total control over the selection, and wanting a real quick study, and with their money involved. The old cart before the horse, rush to judgment game.

4. Interesting that NRF doesn't want to improve the Vandergrift turn lane until the 100th house permit and the city has to buy right of way egress. That could be a year or more. And if you check with NCTD, there are NO buses that serve South Momo Hills. And NCTD is eliminating low rider bus stops in the city already. There may never be busses out there.

Late Comment Letters for North River Farms Environmental Impact Report

5. A Melrose Bridge over San Luis Rey River? NRF wants to throw **500K** at the initial study, and everything else involved, and give the City a budget and Schedule to build it. Think about the cost and what year, up to 2035, it will get built. Of course, NRF doesn't offer to pay for any of it. It will probably be the same as the Melrose Extension, \$40 million. Don't we have far more pressing budget issues in our city?

6. WOW! A whole **100K** for City Solar use? Just a conscious cover up for the GHG gas problem they can't fix. By buying carbon credit swaps, somewhere else in the world. It does not fix the GHG gases in Oceanside. Kind of like a bribe since city doesn't get paid till first residential building permit is given!

7. NRF keeps touting the 6 lane College Ave Bridge but never gives the exact date that will be done. But, I will bet it's around 2025 and right in the middle of the biggest traffic nightmare Oceanside will ever experience.

NRF is going to be its own sustainable community as the new letter reads? So why wouldn't they suggest a permanent Fire Station, instead of an interim one? If they are really serious, about showing they value people's lives.

On the last paragraph on the last page of the letter, Nina Hammond is still saying there is over a **600K** benefit annually for our city. But on the second page she says the Hotel is a high probability or possibility within ten years. Why the continual lie?? Read the letter and my third point above again.

Thank you all for reading my concerns. Please try to understand that I and most Oceanside residents "Still believe in the right developments, in the right places, in our city." No Way is this suburban Sprawl Project even close to that.

For those of you who did not receive the integral letter I have attached my copy.

Joe Hill
2855 Rutgers place
Oceanside CA 92056

Late Comment Letters for North River Farms Environmental Impact Report

L54 BURTON, RICHARD

Comment Letter L54

From: "M.Mas-Burton & R.Burton" <catalana@sbcglobal.net>
Date: March 28, 2019 at 4:34:27 AM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: NORTH RIVER FARMS PROJECT UPDATE 03/27/2019

Warning: External Source

Honorable mayor and city council members,

Below please see an excerpt of my post on the local Nextdoor Neighborhood website regarding this project proposal as it now stands.

It is my hope to plant seeds of ideas to do better for our city, it is up to all of us residents to decide, but you folks most of all.

Thanks for all your considerations in this matter, past, present and future.

And...You all did a great job on the Melrose Gap decision BTW.

We can have another great decision in this matter, but only IF you take the time to let that decision grow and ripen to bear the best possible fruits of your labor.

Thanks a million for all you do for our city, it is a beautiful "beachy", "rural'ish", "harbor'ish" kind of place, and getting even better.

My dad lived here and died here. Now I live here in Jeffries Ranch with my wife Montserrat and Sydney the cattle dog. We are old retired folks transplanted from North Orange County, Brea/Yorba Linda/Fullerton.

We love Oceanside, it's a better place to live.....Lets shine this baby up some more folks!!

Thanks for reading and best regards to you all,

Richard Burton
Resident homeowner, taxpayer and register voter

.....
EXCERPT FROM MY NEXTDOOR NEIGHBORHOOD POST BELOW:

Late Comment Letters for North River Farms Environmental Impact Report

MY OPINION.....THIS PLAN AND THIS DEVELOPER ARE A BAD DEAL FOR THIS CITY. We can, and must do better than this. Do not be apathetic folks, it's important to get any and all of the development in NORTH RIVER FARMS done in the most favorable manner to build and maintain an agricultural and equine friendly community. THIS PLAN IS NOT IT! A better plan for instance would include a minimum of five acre plots sold as mini-ranches in an upscale type development with equine emphasis. Think first rate riding trails and equine training/competition facilities. Think small scale agricultural operations of organic produce only, no chemical pesticides, no chemical herbicides, no poisons harmful to people and critters. Think gymkhana/O-Mok-See, and other user friendly type horse show competitions. Think small breeder farms for registered purebred horses of all types. Think about a classy set up my friends. Build something special and THEY will come. O'side North River Farms could become a world class place recognized by all for this type of lifestyle. It is currently a diamond in the rough, it is up to us to make that area shine! And, there is much money possible to be generated for the city coffers by this type life style community folks.....BRING IT TO O'SIDE! Don't settle for another cookie cutter quickie job by some outfit, one who just makes money and runs. Converting a once virtually pristine rural area into a new jungle of angry and tense suburban city folk. KEEP IT AS RURAL AS POSSIBLE! Good luck everybody.....Richard Burton

Late Comment Letters for North River Farms Environmental Impact Report

L55 RIGG, ALICE

Comment Letter L55

From: Alice <alice_rigg@hotmail.com>
Date: March 5, 2019 at 12:39:40 PM PST
To: "Council@ci.oceanside.ca.us" <Council@ci.oceanside.ca.us>
Subject: NRF vote on Wednesday

Warning: External Source

Hello Council members,
I hope that the North River Farms project will be defeated at the Council meeting on Wednesday. It is not a good fit for that isolated corner of Oceanside and it is not how we should want to see our city grow.
Thank you.
Alice Rigg
5335 Raspberry Way
Oceanside 92057

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Late Comment Letters for North River Farms Environmental Impact Report

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L56 SIMONS, ANITA

Comment Letter L56

From: anita simons <asimonsays@gmail.com>
Date: February 23, 2019 at 1:14:29 PM PST
To: Council@ci.oceanside.ca.us
Subject: North River Farms

As a resident of Oceanside, I am extremely concerned about the North River Farms development project. Not only has the Oceanside Planning Commission asked the city to deny this farmland development, citing flooding and fire risks; but this development will bring more traffic congestion, air pollution and higher taxes/fees for services. Please listen to the Planning Commission and those of us who are opposed to the project. Do the right thing!

anita simons
4764 miletus way, oceanside 92056

--
Anita Simons

"You must do the things you think you cannot do."
Eleanor Roosevelt

A message from my talented and recently deceased friend Joan Kurland
<http://www.youtube.com/watch?v=6QqJ3edrpj&authoruser=0>
c: 619-884-6482

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L57 NELSON, BOB

Comment Letter L57

Mayor and City Council of the City of Oceanside

RE: The North River Farms Development Plan and the Melrose Drive Extension

Mayor & City Council,

As a 31 year Oceanside resident of the Guajome Regional Park and Jeffries Ranch neighborhoods and as an Architect with Urban Planning training and experience I would like to share my thoughts on these two inter-related projects and offer alternative solutions that would reduce costs for the City, reduce environmental and recreational impacts, provide better traffic solutions and a more acceptable solution for the majority of residents that are to be impacted by these two projects. I've been a volunteer member on a Bicycle and Pedestrian Circulation element advisory committee of the City's General Plan Update and understand the traffic flows in this area both as a longtime resident, driver and also as a cyclist.

My alternate solutions respond to the expressed concerns of many members of the Guajome, Jeffries Ranch, Rancho Del Oro, Arrowwood, Libby Lake and South Morro Hills Communities. The Communities concerns are traffic, including emergency access from South Morro Hills, an additional emergency exit from the Jeffries Ranch neighborhood, preservation of the South Morro Hills Agriculture Region and environmental and recreational opportunities provided at Guajome Regional Park, including the Rancho Guajome Adobe and the Antique Steam Engine Museum. These issues are all quality of life concerns for the existing residents and represent very substantial assets to the City along with a balanced economy.

As previously discussed in the 2010 EIR on the Melrose Extension proposal the traffic improvements to be realized for this \$60+ million project are very limited. The long term incentive for this project is to provide a bridge on Melrose Drive to South Morro Hills to provide access for housing tracts in the Agricultural region as expressed to me by a current Councilman in contrast to the proposed Agri Vision Proposal for the area.

The Melrose Extension proposal from Sagewood Drive to North River Road would total nearly 5,000 feet of road additions and improvements and would cost approximately \$100 million dollars. The current incremental improvement plan is approximately 3,700 feet long and is currently designed to be the least expensive option while doing the greatest harm to the community and recreational opportunities. Pedestrian, equestrian and bicycling recreational activities would be heavily impacted eliminating the Dos Palmas Horse Boarding facility affecting nearly 50 jobs and removing much of the equestrian access from the Park. The proposed larger intersection at Melrose & N. Santa Fe will further divide the Regional Park requiring pedestrians and cyclists to cross at grade 14 traffic lanes to get to the Adobe, Steam Engine Museum and Sports Park from the remaining Park trails. The Bridge option for the intersection of N. Santa Fe Avenue and Melrose Drive with a trail alongside the re-routed Guajome Creek would solve this problem and reduce the wetlands and riparian damage and costs of replacement required by CEQA. The full take of the Paradise Farms greenhouses and farmland as proposed would impact another 40+ jobs. The routing of the extension within about 200' of the Upper Pond in Guajome Park will be an extreme visual, noise and environmental impact on the Park and recreational activities for our region. The migrating birds, the frogs that Guajome is named after, and several other small and

Late Comment Letters for North River Farms Environmental Impact Report

large animals will be impacted. Bobcats, and Mountain Lions have both frequented the park, I personally saw a Mountain Lion years ago within the park.

A BETTER SOLUTION:

The North River Farms Development:

This project should NOT be approved in its present design due to its intense density, traffic, and flooding and farming impacts. I offer the following potential changes to make it an acceptable project.

- 1) Require the N. Santa Fe Extension for access, described below under the Melrose Extension, to be constructed before 100 housing units are completed.
- 2) Require that the project NOT encroach into the existing Flood Plain. Currently the project is designed to fill over 10' within approximately 30+ acres of the floodplain forcing the flood waters to impact Guajome Park, the San Luis River Trail and City Sewer Manholes along the trail by raising the flood level by one foot and increasing velocity on the river during flood episodes. The flood impact analysis provided seeks to meet FEMA standards to raise housing out of the floodplain but without review and conditioned response from the Army Corps of Engineers regarding added river dikes or possible impacts to existing dikes downriver as a result of removing some 30+ acres from the river floodplain. The Army Corps of Engineers and Fish and Wildlife have jurisdiction within the river. Approximately 75% of the property south of North River Road is within the 100 year flood plain. I remember when North River Road was washed away near Melba Bishop Park during a prior flood event. While farming is allowed within certain floodplain areas the farming is currently planted in portions of the primary river floodway. The floodway has been encroached upon by the farmers over the years, often illegally beyond their property lines into the river. Recent rains have caused the river to run through acres of the existing farm areas that have been planted within the river floodway.
- 3) Require the commercial aspects of the development to be constructed on the eastern edge of the housing areas to provide a buffer to the adjacent farming areas. Require that a minimum development of more than the one commercial or community use building supporting the AgriVision concept be developed rather than being contingent upon demand AFTER all the housing is constructed as now indicated.
- 4) Improve North River Road without turning circles which will impede traffic flow and particularly emergency traffic egress and creates dangerous conditions for cyclists and pedestrians.
- 5) Require minimum 12,000 SF Estate Lots with potential for equestrian use and for ADU additions as an appropriate transition from the residential neighborhoods to the west and the remaining South Morro Hills Agricultural Region.
- 6) DO NOT AMEND the Zoning Ordinance to allow PD development as an approved use in the agricultural zone.

Late Comment Letters for North River Farms Environmental Impact Report

The Melrose Extension Option:

- 1) Improve Melrose from Sagewood to N. Santa Fe and N. Santa Fe from North Coast Church to Melrose with the Bridge option for Guajome Creek as it crosses below the intersection. This will reduce two choke points and will complete part of critical bicycle improvements on N. Santa Fe serving cyclists riding to the Guajome Regional Park and the SLR River Trail from Vista.
- 2) Extend N. Santa Fe from the 76 to North River Road directly into the North River Farms Development. A four lane bridge over the SLR River would connect the North River Farms project directly to the 76 and would only impact one townhome. The road extension to North River Farms is approximately 1,700', added to the 1,300' of improvements to Melrose and N. Santa Fe to North Coast Church totaling about 3,000 LF versus the 5,000 LF currently planned for the Melrose Extension, resulting in a considerable cost savings with better traffic improvement. The N. Santa Fe Extension would only add one new and two revised signals. The Melrose extension would require four new and one revised traffic signal to reach North River Road. While the N. Santa Fe Extension would also impact Guajome Regional Park it is an area that is primarily leased to farmers to grow tomatoes to supplement the Park's Operation. This option would only impact one existing nearby residence, a townhome at 76 and N. Santa Fe. A widening of N. Santa Fe northbound as it approaches the 76 for more turn stacking areas and two through lanes would fit within the current right-of-way.
- 3) Extending N. Santa Fe to North River Road would reduce traffic substantially on the 76 to College and College to North River Road at Vandegrift Boulevard. This is a major traffic relief for all the existing commuters to the back gate of Camp Pendleton that live in Vista and eastern Oceanside and Bonsall. This would also provide a critical emergency access option for South Morro Hills Residents reducing delays and the impacts on Vandegrift and College and Douglas.
- 4) The Jeffries Ranch Neighborhood's concern for a second access could be created from the 76 at Singh Way, an already signalized intersection to Ranchview Road where it previously connected to 76, a street length of approximately 600 LF and is in a location that would serve the eastern portion of Jeffries Ranch but would provide the second emergency access desired.
- 5) Completion of the bridge across Spring Creek at the South end of Old Ranch for equestrians, pedestrians and cyclists to access Guajome Park from Jeffries Ranch. This bridge was originally part of the Townhomes project that was never completed.
- 6) By not extending Melrose Drive through Guajome Regional Park the portion of Melrose Drive between Old Ranch Road and Spur Avenue could be reduced to a 2 lane residential collector street with the remaining right-of-way turned into new residential housing and an addition to Spring Creek Park, while helping reduce the costs of the North Santa Fe Road improvements. Additional housing would also help provide the City with infill development in an established neighborhood rather than removing prime farmland and recreational opportunities for the residents of Oceanside and North County.

Late Comment Letters for North River Farms Environmental Impact Report

Please see the attached diagrams of the proposed solutions to the Melrose Extension and North River Farms Development Projects.

Call me if you would like to meet and discuss in further detail my proposed solutions.

Sincerely,

Bob Nelson,
Occanside Resident
760-717-9946

Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report

L58 CEFOLA, ELAINE

Comment Letter L58

From: Elaine
Sent: Thursday, February 14, 2019 9:11 AM
To: City Council
Subject: Feb. 14th. : Feb. 7th - Establish a Land Trust for those having hardships.

Santa Clara County is also starting a land trust as Marin did years ago.

Instead of a foolish road through Melrose, start a land trust in Moro Hills and veto North River Farms Development. Think.

Elaine Cefola

[Santa Clara County supervisors approve spending \\$20 million to start farm preservation program](#)



Santa Clara County supervisors approve spending \$20 million to start far...

Santa Clara County supervisors Tuesday unanimously approved up to \$20 million in seed funding for a program to p...

Santa Clara County is also starting a land trust as Marin did years ago. Instead of a foolish road through Melrose, start a land trust in Moro Hills and veto North River Farms Development. Think. See Mercury News article below. Elaine Cefola <https://www.mercurynews.com/2019/02/29/supervisors-approve-seed-funding-for-farmland-preservation-program/> ?bolid=WAR19PozL5YUd5mdkHbaHVmrT4fQNh84HCih10xCPd4toHjwkLC&WFO:

Date: 2/27/19 2:26 PM (GMT-08:00)
To: Council@co.sccparks.ca.us
Subject: Feb. 7th - Establish a Land Trust for those having hardships

1

Late Comment Letters for North River Farms Environmental Impact Report

in farming. Save our land in Oceanside, no housing developments like NRF.
Vote NO on Feb. 27th to the greedy developers.

Affordable housing is needed by transit of Oceanside Blvd to refurbish in
the blighted areas.

Contact Officials of the Marin Agricultural Land Trust in Point Reyes, CA
415-663-1158. [Home Page - Marin Agricultural Land Trust](#) Learn and Study about this
great concept that has worked here and around the country!!
Once established, invite the public to join as members. P.O. Box 809, Point Reyes Sta., CA
94956
Think first before voting!! Listen to the Planning Commission who voted on Jan 28th to
deny the development.

Elaine Cefola, M.A. Ed. - former Marin resident, now in Oceanside since 2011, 92056



From: Elaine vecefolo7@att.net Date: 2/7/19 2:38 PM (GMT-08:00) To: Council@oceanside.ca.gov Subject: Feb. 7th-
Establish a Land Trust for those having hardships in farming.
Save our land in Oceanside, no housing developments like NRF. Vote NO on Feb. 27th to the greedy developers.
Affordable housing is needed by transit of Oceanside Blvd to refurbish in the blighted areas. Contact Officials of the Marin
Agricultural Land Trust in Point Reyes, CA 415-663-1158. [Home Page - Marin Agricultural Land Trust](#) Learn and Study
about this great concept that has worked here and around the country!! Once established, invite the public to join as
members. P.O. Box 809, Point Reyes Sta., CA 94956 Think first before voting!! Listen to the Planning Commission who
voted on Jan 28th to deny the development.
Elaine Cefola, M.A. Ed. - former Marin resident, now in Oceanside since 2011, 92056 [Home Page - Marin Agricultural
Land Trust](#)

Late Comment Letters for North River Farms Environmental Impact Report

L59 GAMMAN, EVAN

Comment Letter L59

From: Evan Gamman <evangamman44@gmail.com>
Date: March 13, 2019 at 9:39:15 AM PDT
To: Council@oceasidca.org
Subject: Morro Hills Development

Warning: External Source

Hello City Council Members,

My name is Evan Gamman and I've lived in Oceanside my entire life (24 years). I'm concerned about the proposition to alter Morro Hills from agricultural land into residential housing. I studied Land Use Planning in college and am worried that by converting this land into large subdivisions many residents in Oceanside will be negatively impacted along with the environment. Oceanside has always been a working class town, the proposed subdivisions will only benefit the wealthy developers not the people of Oceanside. Most will not be able to afford the proposed houses, and this will cause prices in the adjacent areas to sky rocket due to inflation. The effects on already horrible traffic on the 76 highway and north river road will only be exacerbated with this project. Oceanside is not like Carlsbad, San Clemente, or Encinitas we do not need homes for the wealthy, rather we need residential infill that is affordable. This plan is sprawl at its finest, altering land for the wealthy while the residents who have been living here their whole lives have to deal with the repercussions. Please think of the people of Oceanside, not large wealthy corporations who seek to only benefit themselves while destroying communities in their path.

Thank you and I look forward to hearing from you.

-Evan Gamman

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L60 HAWTHORN, HENRY AND TERRY

Comment Letter L60

From: Gas Hawthorn <gushawthorn@gmail.com>
Date: February 25, 2019 at 7:01:38 PM PST
To: council@ci.oceanside.ca.us
Subject: Deny North County Farms High Density Housing Project

Dear City Council Members,

Please support your Planning Commission's recommendation. Say NO to North County Farms High density housing development for the reasons reiterated in the following article!

Respectfully,

Henry Hawthorn
Terry Hawthorn

110 Sherri Lane,
Oceanside, CA 92054

<https://www.sandiegocountribune.com/communities/north-county/sd-no-farms-denial-20190129-story.html>

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L61 WHITE, JANET

Comment Letter L61

From: J W <janwhite18@yahoo.com>
Date: March 13, 2019 at 7:45:41 AM PDT
To: Council@cccoastsideca.org
Subject: North River Farms

Warning: External Source

Dear Council Member,

I am writing to voice my opposition to the North River Farms Project. Our agricultural lands must not be given over to sprawl development. The myriad problems associated with this project cannot be underestimated. Please take the long view and deny developers these resources.

Respectfully,
Janet White
Fire Mountain resident

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L62 BIVIN, S JOAN

Comment Letter L62

From: Joan <stray.barn.cat@gmail.com>
Date: February 26, 2019 at 7:51:58 AM PST
To: council@ci.oceanside.ca.us
Subject: Please listen to your own Planning Commission

I live in Oceanside, 92056.

I am concerned about any development that starts by trying to fill flood plain. All of that fill is potentially harmful. Also you are adding a lot of homes to areas prone to wildfires. That means enormous resources will be spent on saving those homes.

If our own planning commission finds problems with it, please vote NO. It seems to me that this project is backed by \$\$\$ and not by common sense. The number of outside letters you are receiving is a huge clue to the interference by Political factions

S Joan Bivin

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L63 BOCKMAN, JOAN

Comment Letter L63

From: joan bockman <joanbockman@rbcglobal.net>
Date: March 8, 2019 at 7:58:10 AM PST
To: City Council <council@ci.oceanside.ca.us>
Subject: Sprawl is the problem

Warning: External Source

Hello City Council,

The biggest mistake any city can make is to sprawl out. This results in all the ills of increased traffic, higher cost services, and loss of identity as a community.

Once sprawl has occurred, no amount of "eco-friendliness" will make up for it.

We need to get serious about where development should occur by looking first at what makes Oceanside a town. Blurred boundaries with other cities do not help. We are a diverse community and have a clear identity with an urban downtown, historic neighborhoods (beach and Mission), suburbs and a wonderful open space agricultural boundary. We have industrial areas, transit, an airport, harbor and 3 rivers with trails, lagoon habitat and views. We even have a Central Park.

We have it all! No other city can say that.

Let's grow in a truly smart way that ensures we all can live here forever.

Regards,
Joan

Late Comment Letters for North River Farms Environmental Impact Report

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L64 WILLIAMS, JODI

Comment Letter L64

From: Mike Williams <nickkiki@att.net>
Date: March 1, 2019 at 1:35:35 PM PST
To: 'council@ci.oceanside.ca.us' <council@ci.oceanside.ca.us>
Subject: No on NRF

Warning: External Source

Dear Mayor and City Council members,

Last night, I became aware of an advertisement that Integral has posted asking people to come forward to support their project here in Oceanside. I realize that they have every right to do so under the freedom of speech angle. HOWEVER, what about the people who actually live in Oceanside and want what's best for the majority of the residents? Don't they count?

Your very own city planners voted UNANIMOUSLY AGAINST the proposal from Integral. Dispassionately, all of them voted no. The planning commissioners, with one recused, voter 3-1 AGAINST the proposal. Of the 11 possible votes, 10 of them give very factual reasons why this project doesn't fit the city plan.

The General Plan consistency violations include the overburdening of the circulation system, violation of limiting non agricultural uses, violating locating projects along transit corridors, not being located in a smart growth area or employment center and failure to preserve community character among others. These points and more have already been presented as I'm sure you would know.

As for the city planners' analysis, it is inconsistent with anti-sprawl policies in the general plan. Additionally, it DOES NOT satisfy the RHNA guidelines that Mr Rodriguez contends it does. It is not consistent with the agricultural land use objectives and has the potential to NEGATIVELY impact the agritourism efforts of South Morro Hills. Mr Rodriguez Facebook page states he wants his property to be a part of that with his coffee bean farming as well as other crops.

I have pictures of the flood waters in the San Luis Rey riverbed across the street from the Melba Bishop Center from February 14 as well as further east on North River Road. The project plan is supposed to add TEN FEET of elevation on the south side due to the flood potential but I can't find any reference to the road being raised as well.

I cannot begin to express my frustration over Christopher Rodriguez method of blasting anyone who tries to bring up opposite points of view in a civil way. How Integral was able to hand out cookies at his Town Hall meeting a few weeks back while a member of the community stood outside very politely handing out pamphlets with some opposing views was told to leave in that she was being disruptive.

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I would like to believe that there are no "handshakes in back boardrooms" but it is increasingly hard to believe. Please listen to your city staffers who went to great lengths to study this project from every angle and still came up with a unanimous vote as to it being a poor fit.

Common sense isn't very common any more. I hope that isn't the case here. Thank you for your time in reading this email.

Very respectfully submitted.

Jodi Williams
Park Lake
Oceanside
92056

Late Comment Letters for North River Farms Environmental Impact Report

L65 HILL, JOE AND KAY

Comment Letter L65

From: Kay and Joe <joethhills@cox.net>
Date: March 4, 2019 at 11:37:16 PM PST
To: <council@ci.orcasanyc.ca.us>
Subject: Fraudulent Developer Financials

Warning: External Source

Honorable Mayor and City Council Members:

I'm sure you have all read the 3 page NRF Updated Fiscal Impact Analysis. If not I pasted page 2 below (and attached it), for both the previous and current numbers.

1. NRF claims the city will receive \$673,045 yearly to our City General Fund. Of that amount, a conceptual mystery hotel is projected to contribute \$355,174 of the total \$673,045.
2. Guess what! There are no permits, plans, drawings, comments, or FEIR documents of any kind in the 6,000 page documents we had to read before the Planning Commission meeting or even in the latest documents that were just sent.
3. It was not brought up because it doesn't exist in the current plans. So that means that the City General Fund contribution is now down to \$317,871. That number includes only \$122,283 for housing and \$92,588 for Commercial (Retail) and Agriculture. (One bad weather year wipes out the Ag and there's not enough planned parking for commercial.)

So basically the city is getting less than half the money promised to the General Fund just for building houses, if this project is approved, instead of the fraudulent numbers proposed.

My questions are: Does anyone else see anything wrong with this picture? What else is there we don't know about? The Developer is certainly not being up front about this, or thinks it is hidden and no one will catch it.

Late Comment Letters for North River Farms Environmental Impact Report

2. PROJECTED FISCAL IMPACT

The fiscal impact analysis was prepared to estimate the allocable revenue and cost impacts to the General Fund as a result of the Project's development. The Updated FIA uses a combination of study methods and multiplier methods to estimate Project impacts. The cost and revenue multipliers were calculated using the City's fiscal year 2017/18 adopted Operating Budget. The Updated FIA uses the same methodology, data sources, and salient assumptions as the November 2017 FIA. The change being the revised land use assumptions described above.

The Project will generate additional revenue for the General Fund primarily through increased taxes, sales taxes, and transient occupancy taxes. The additional costs estimated to impact the Fund as a result of the Project, consisting primarily of police and fire services, are less than the revenues projected to be generated.

In the November 2017 FIA the Project was anticipated to generate a \$818,000 surplus to the City on an annual basis at buildout and stabilization. In the Updated FIA the Project is anticipated to generate a \$673,045 surplus to the City on an annual basis at buildout and stabilization. These estimates are summarized in the tables below:

Original Land Use Assumptions - November 2017 FIA					
	Market Rate Residential	Commercial	Hotel	Agricultural	Project Tot
Fiscal Surplus (Deficit)	\$262,379	\$128,439	\$426,717	\$830	\$818,364
Per Unit	\$362 /Unit	\$3.13 /SF	\$3,358 /Rm	\$28 /Acre	\$1,130 /Unit

Current Land Use Assumptions - Updated FIA					
	Market Rate Residential	Commercial	Hotel	Agricultural	Project Tot
Fiscal Surplus (Deficit)	\$225,283	\$91,759	\$355,174	\$829	\$673,045
Per Unit	\$327 /Unit	\$3.06 /SF	\$3,052 /Rm	\$28 /Acre	\$977 /Unit

3. FISCAL IMPACT ANALYSIS – PEER REVIEW

As background, the City commissioned Keyser Marston Associates ("KMA") to conduct a comprehensive peer review ("KMA Peer Review") of the November 2017 FIA. As stated in the KMA Peer Review dated March 7, 2018, KMA was in agreement with the majority of the inputs, assumptions, and conclusions of the November 2017 FIA. KMA identified certain adjustments which resulted in an overall decrease of the Project's estimated total annual surplus by approximately 18% resulting in an annual fiscal surplus of \$669,000 pursuant to the KMA Peer Review report. The main difference between DPF's methodology was the calculation of Other Revenues whereas cost projections were relatively consistent. As previously noted, DPF did not revise its methodology for the Updated FIA due to differences in the

Late Comment Letters for North River Farms Environmental Impact Report

Joe Hill
2855 Rutgers Pl
Oceanside Ca 92056

Late Comment Letters for North River Farms Environmental Impact Report

2. PROJECTED FISCAL IMPACT

The fiscal impact analysis was prepared to estimate the allocable revenue and cost General Fund as a result of the Project's development. The Updated FIA uses study methods and multiplier methods to estimate Project impacts. The cost and revenue were recalculated using the City's fiscal year 2017/18 adopted Operating Budget. The same methodology, data sources, and salient assumptions as the November 2017 FIA change being the revised land use assumptions described above.

The Project will generate additional revenue for the General Fund primarily through taxes, sales taxes, and transient occupancy taxes. The additional costs estimated General Fund as a result of the Project, consisting primarily of police and fire services, are revenues projected to be generated.

In the November 2017 FIA the Project was anticipated to generate a **\$818,000** sur annual basis at buildout and stabilization. In the Updated FIA the Project is an **\$673,000** surplus to the City on an annual basis at buildout and stabilization, summarized in the tables below:

Original Land Use Assumptions - November 2017				
	Market Rate Residential	Commercial	Hotel	Agriculture
Fiscal Surplus (Deficit)	\$262,379	\$128,439	\$426,717	\$830
Per Unit	\$362 /Unit	\$3.13 /SF	\$3,556 /Rm.	\$28 /Acre

Current Land Use Assumptions - Updated				
	Market Rate Residential	Commercial	Hotel	Agriculture
Fiscal Surplus (Deficit)	\$225,283	\$91,759	\$355,174	\$829
Per Unit	\$327 /Unit	\$3.06 /SF	\$3,552 /Rm.	\$28 /Acre

3. FISCAL IMPACT ANALYSIS – PEER REVIEW

As background, the City commissioned Keyser Marston Associates ("KMA") to conduct a peer review ("KMA Peer Review") of the November 2017 FIA. As stated in the KMA Peer Review, the City's fiscal impact analysis is based on the same methodology, data sources, and salient assumptions as the November 2017 FIA.

Late Comment Letters for North River Farms Environmental Impact Report

L66 SMITH, JOLENE

Comment Letter L66

From: Jolene Smith <j@uncozy@sbcglobal.net>
Date: March 6, 2019 at 7:26:21 PM PST
To: Council@oceansideca.org
Subject: NRF Project

Warning: External Source

Dear Mayor and Council Members,

I am against Integral Communities' upcoming request to change the General Plan and Zoning on 177 acres of farmland so they can build the North River Farms Project.

The NRF project is inconsistent with Smart Growth policies that conserve resources and increase Oceanside's sustainability. It will also result in the permanent loss of agricultural land that generates jobs and local food.

Please vote against their request and preserve our all of our farmland.

Thank you,
Jolene Smith
194 Edgewood Dr.
Oceanside, CA 92054
760 754-8986

Late Comment Letters for North River Farms Environmental Impact Report

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L67 BALMA, LARRY

Comment Letter L67



March 4, 2019

Councilmember

The following is a historical perspective of the development process for Arrowood and a comparison to Integral North River Farms development process so far.

I was President of the SMHA during the Arrowood PD and now during the NRFs PD.

By Larry Balma

Arrowood Planned Development

- Early '90s Arrowood planned development begins on the 600 acres of agricultural land at the north end of Vandegrift on both sides of the street. The majority of the acreage lay on the east side of Vandegrift and bordered South Morro hills. The land had been leased to Mellano and Nagata who were farming Flowers and Strawberries respectively for many years.
- The developers first submittal proposed building 4000 high density homes. There was no proposed school or parkland.
- Staff was not in favor of that many homes and cited need for school and parkland.
- The South Morro Hills Association was also not in favor of the high-density buildout.
- SMHA was also not in favor of all the homes tapping into the water reservoir that had been built to supply the agricultural land of South Morro Hills.
- After 5 years in planning with very little change in density a second large developer, Florida Southchase, purchased the 600 acres and proposed a PD of 2400 dwelling units.
- The Planning Department was still not in favor of the plan.
- The City Council directed Florida Southchase to work with the planning Department and also with the South Morro Hills Association.
- The Council also directed Florida Southchase to frame all of the development items into a CC&R which would be signed by the City, the Developer and the South Morro Hills Association before any permits would be issued.
- We worked through this process for another 5 years, 10 years total.

The results were all entered into the CC&R. The City Planning staff worked hand in hand with the developer and SMHA. The SMHA had 3 Attorneys in the neighborhood and one attorney that we hired who worked with the developer for a solid two years before we agreed to sign the CC&R. I was President of the SMHA through the last five years of the process.

Late Comment Letters for North River Farms Environmental Impact Report

Key points negotiated.

- The dwelling units were reduced from 4000 to 1006, a 75% reduction.
- A park and a school were added to the project.
- A golf course and clubhouse were added to buffer the subdivision from South Morro Hills.
- Homes on the golf course bordering SMHs were on an aggregate of one acre lots which we allowed to be easements on the golf course.
- The golf course would be built first before any dwelling units and therefore insure its existence.
- There would be five types of dwelling unit neighborhoods each constructed by a different builder and in different stages.
- Each water meter throughout the entire project would be charged four times the normal city fee and 75% of the money would be applied to our water bond for the reservoir that SMHs property owners were charged to build. Each SMHs parcel was billed a per acre fee for the water bond on our property tax bill each year.
- The Arrowood development got the use of our reservoir. Our water bond was paid off during the first year of Arrowood sales and saved SMHs property owners from making eight more years of payments.

Yes, it took the developer 10 long years to negotiate through the process with Planning to entitlement to Permit, but all the details were vetted out along the way and Arrowood is now built and occupied. Arrowood was approved by all the City Staff and their departments, approved by the South Morro Hills Association and ultimately approved by the City Council.

Integral, North River Farms, Planned Development

During the very first meeting that the SMHA AgriVision Committee had with the Integral staff I explained the Arrowood process we went through and how the estate homes border SMHs. Their leader at the time said, "We're not going to do that, it takes too long to sell, we want to get in and get out."

At the Planning Commission meeting in February 2017 the Staff report indicated that the integral proposal to build between 680 and 985 dwelling units did not meet any of the City's or County's criteria required to make such drastic zoning changes from Agriculture to medium and high-density subdivision. The integral PD is simply not Smart Growth.

The Planning Commission was unanimously in support of Staff.

At the City Council meeting in March of 2016 Chuck Lowery, Jerry Kern and Jack Feller agreed to let the integral PD continue through the process and for them to work with Staff and South Morro Hills. Jack Feller stated that they should come back with something more like 100 to 400 dwelling units.

Integral has continued to ramrod their PD with little regard to City Staff, who they look upon as ignorant with absolutely no vision. During the many meetings with SMHs they

Late Comment Letters for North River Farms Environmental Impact Report

stated every time that density was not on the table. They did state to SMHA in November 2017 that they were in it for the money period.

Integral is a marketing and entitlement company. Integral says that because they have spent \$\$ and so much time they should get their entitlement even though they have not met the needs of the City. Most PDs this size take years of planning to reach approval with staff and result in a project that benefits the City and enhances the surrounding neighborhoods future Vision.

South Morro Hills recognizes that we need to update our Vision plan. We have been working on a Vision plan before Integral came along and we continue to work on our AgriVision plan with the support of Council and Staff. Jonathon Borrego and Jeff Hunt are working closely with SMHs and are confident that a Specific Plan for SMHs will be adopted within 2 to 3 years.

Without an updated vision plan in place Integral will use up almost all of the current infrastructure planned for the entire 3500 acres of SMHs. Integral is determined to rape all the existing infrastructure in SMHs for their own benefit leaving all future development to be burdened by the rest of the landowners and that is morally wrong. We need to have an updated Vision for SMHs so that any development will pay their fair share for infrastructure. Integral wants to obtain their entitlement without regard to the rest of the City.

The AgriVision plan when complete will allow for orderly development of SMHs. The AgriVision plan will embrace agriculture and Agritourism while providing clusters of homes, large and small, casitas and affordable housing in a rural setting. Integral can work within the AgriVision plan.

Integral does not own any property in SMHs. The owner of the 177 acres, Self-Realization Fellowship did not have their property for sale, Integral came to them and signed an option agreement. The SRF has leased their property to various farmers at a profit for over 40 years. The property is currently farmed by West Coast Tomato Growers.

Integral is pushing for entitlement with an incomplete PD which is absolutely not acceptable to our highly qualified and intelligent City Staff. The only logical decision is to deny the PD at this time and send Integral back to finish working with Staff until the project becomes acceptable and will enhance the City and AgriVision in SMHs.

Please respect the entire City Staff and Planning Department Staff Report recommendation to deny Integral Development North River Farms PD at this time.

Thank you for your service.

Respectively,

Larry Balma

President

South Morro Hills Association

LB1122@hotmail.com mobile: 760-419-2211

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L68 HAMILTON, LISA

Comment Letter L68

From: Lisa Hamilton <lisa@vestoski.com>
Date: March 3, 2019 at 8:33:54 AM PST
To: Council@ci.oceanside.ca.us
Subject: North River Farms

Warning: External Source

Honorable Mayor and Council Members:

I completely oppose the zoning change which would allow this development to go forward.

There is little good to say about this project and the lengthy report given by the Planning Department has detailed most of the bad and irremediable effects.

Please vote "NO" on this item at the March 13 Council meeting.

Lisa Hamilton
323 S. Ditmar St.
Oceanside 92054

Sent from my iPad

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L69 HIGBEE, LISA

Comment Letter L69

From: Lisa Higbee <lisahigbeerealtor@gmail.com>
Date: March 7, 2019 at 3:10:25 PM PST
To: council@ci.oceanside.ca.us
Subject: No on North River Farms!!

Warning: External Source

Lisa Higbee, ERI, ABR
Realtor, Pilot, ASEL, AMEL
Fallbrook Flight Academy, Fallbrook, CA
Windermere Homes & Estates, San Diego County, CA
Oregon Professional Group, Coos County, OR
CA BRE #01935723
OR #961100215
951-225-5009 Cell
714-927-3872 Flight school office
866-833-5604 E-fax

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L70 BALMA, LOUISE

Comment Letter L70

Subject: PW North River Farms-Oceanside needs a plan first!

Dear Mayor and Councilmembers;

I know you're getting flooded with emails, but as you know this is **HUGE for Oceanside**, it took the developers of Arrowood 10 years to get a project that fit within our city, we need to take our time and make this right for Oside. Staff has said **2 to 3 years to complete a Specific Plan for South Morro Hills with your support**, this will be time well spent. I support our city staff and urge you to hold the line with North River Farms (NRF) and not approve a development that would change South Morro Hills (SMH) forever. **A project of this size would take the entire available infrastructure** leaving nothing for future developments without major infrastructure investments.

Allowing a project of this magnitude would open the floodgates, and set a precedencethat the City would find impossible to hold back. Our General Plan is over 40 years old and the current zoning of South Morro Hills (SMH) isn't viable. If NRF's were entitled **City staff would spend hours of time battling future developers** and our attorney hours defending the cities position. All this **staff time can be better spent** into a positive direction, the **development of Oceanside AgriVision Specific Plan and our General Plan Update.**

Lets do the math...If you take the NRF's project and project its densities (3.8 to 15 DU's per acre) and the 18% of its projected farmland over the 3500 acres of SMH's we would see in addition to NRF's 656 dwelling units and 31 acres of farmland the **potential addition of 9,800 dwelling units** and only 540 acres of agricultural land, with no plan for Agritourism or Agricultural land preservation. **NRF's is not a gateway into Oceanside's Agricultural region** helping to promote Agritourism it is **instead a dense subdivision with no business plan for the viability of the commercial space, hotel, farm, and the education center.**

Back in 2017 City Council gave Integral the go to further study the proposed development with **direction from two councilmembers to reduce densitybetween 100 and 400 dwelling units**, to work with the City, the community and South Morro Hills. **Did Integral listen?** Density is at 656 DU's, the City staff is recommending denial as did the Planning Commission and the only thing Integral did with SMH's was take the AgriVision talking points to better market their project on social media:

North River Farms will not jumpstart Agritourism or preserve Agriculture, what it will do is grow houses. There is nothing of meaningful value given to the city or its residents unless you feel opening the floodgates to development on the **largest agricultural area in San Diego County** west of the 15 freeway a bonus. **Oceanside needs to develop its plan for this area**, working together with the community, South Morro Hills neighbors and most importantly the farmers to **create a place in Oceanside like no other in the nation**, we can and will do this with your support.

Sincerely and with much respect

Louise Balma

Louise Ravera Balma

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Late Comment Letters for North River Farms Environmental Impact Report

Architect/Artist/Agriculturalist

website trackerhistory.com

cell# (760) 505-4421

home# (760) 945-5454

Late Comment Letters for North River Farms Environmental Impact Report

L71 OBRITE, PHIL

Comment Letter L71

From: Phil Obrite <philobrite@gmail.com>
Date: March 6, 2019 at 11:22:22 AM PST
To: Council@coceansideca.org
Subject: Fwd:

Warning: External Source

Agritourism - THE CON JOB

I looked up the definition of Agritourism : as it is defined most broadly, involves any agriculturally based operation or activity that brings visitors to a farm or ranch. Agritourism has different definitions in different parts of the world, and sometimes refers specifically to farm stays, as in Italy. Elsewhere, Agritourism includes a wide variety of activities, including buying produce direct from a farm stand, navigating a corn maze, stopping bogs, picking fruit, feeding animals, or staying at a bed and breakfast (B&B) on a farm.[1] It lists several counties including Latvia , Italy , Turkey, Switzerland, United States.

No where does it state or even SUGGEST that you start with a... FARM..... CHANGE the ZONING from Agriculture (farm) to High Density Housing, then pave over that farm, build new expensive homes and call it "affordable housing." (1)

Then, if the developer decides, they will erect a fruit and vegetable stand , a petting zoo , erect something that looks like a Barn with signage that educates you (if you bother to read it) as to how this area use to look when it was a farm with a barn. This is all after the housing is built and sold.

So here is the Question

How did the sausage get made ? Who put the lipstick on the pig ?

All This is my opinion and of course I'm not very smart

Agricultural Land owners who decided that they were done farming and wanted to sell the land that gave them a living and raised their families, with benefit of the Williamson Act gave them low tax rates, low water rates, and public subsidies got together with developers and were convinced that there farm land would be more valuable if it was re zoned to high density housing.

The Con Job

Late Comment Letters for North River Farms Environmental Impact Report

YES on Y vs NO on Y —

Save our Farms vs Save our Farms

Today if you ask voters of Oceanside how did they vote, they say, Oh, I voted to "Save our Farms".

Did you vote Yes on Y or No on Y? I'm not sure it was confusing but I voted to "Save our Farms" as they are... today.

and

Let's not forget "the Blade" the political rag that shows up at election time masquerading as a newspaper that I have been "duped" to think was our beloved "Blade Tribune" (like I said I'm not very smart). The Blade featured the farmers that wanted to sell their Morro Hills Agriculture Zoned land to the highest bidder because they were done farming and this was the only way they would get re paid for their hard work and heritage or some such thing. Not to mention of course, the land that provided them a living, raised their families, with benefits of low tax rates, low water rates, and public subsidies.

Also, I haven't seen it mentioned anywhere that if they simply put a for sale sign in front of their farm it would SELL. Are you kidding me, what realtor wouldn't want that listing "Prime Ag Land 365- 24- 7 growing season in Southern California near the beach with Ocean views . What gentleman farmer or any farmer would deny that this is a GREAT Opportunity.

Every Realtor is salivating over the idea of getting that listing.

Simple put

You can't fault the developer for Trying, I mean WHAT developer doesn't want virgin land of that size with that location to grade off easily no "in fill" to deal with build high density housing High and Tight and as many as possible and "BLOW and GO" as they say.

Except, the citizens of Oceanside obviously do not want it.

The Planning Department voted it down the Planning Commission voted it down and now with the City Council backing its citizens will also vote it Down.

Thank you for your time.

Sincerely ,

Phillip Obrite

Oceanside Resident best part of 33 years.

(1) The builder states the homes will sell between \$450,000—\$800,000.

\$450,000.. 3% down.. balance \$436,500 @ 5% \$2183 mo + \$350 mo HOA+ \$450 mo taxes + Mello Roos+ Insurance + there was talk about also a farm maintenance fee

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The "Affordable Housing" payment is going to be in the neighborhood of \$3200 mo. plus

Please excuse my approximate math.

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L72 BURTON, RICHARD

Comment Letter L72

From: "M.Mas-Burton & R.Burton" <cgala@aol.com>
Date: March 6, 2019 at 1:27:23 PM PST
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: March 13, 2019 Council decision by vote regarding the NRF Morro Hills development plan

Warning: External Source

Respected Council Members,
I once again implore you to not approve the subject development plan under consideration.....VOTE NO!

This plan is not a good fit for the city and epitomizes the very definition of URBAN SPRAWL.

Below is an excerpt from "The Coast News Group" dated 03/06/2019. This is the last two paragraphs of an article concerning the city General Plan Update known as "Onward Oceanside", and Russ Cunningham's (plan administrator) comments.

EXCERPT.....START

The economic development and energy and climate action elements of the General Plan Update aim to apply "smart growth," a type of community development plan that attempts to curb urban sprawl and environmental impacts.

"Oceanside's going to continue to grow," Cunningham said. "What we want to do is discourage sprawl, which could increase greenhouse gas emissions due to extra vehicles and miles spent on the road."

EXCERPT.....END

There are sooo many excellent development projects recently completed here, and more now underway in this small coastal city.
It is a lovely and charming place, warts and all. Please do not rezone the Morro Hills agricultural areas to open them up for urban sprawl.
Thanks for reading.

Respectfully,
Richard Burton
Oceanside resident homeowner, taxpayer and registered voter

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L73 KADAH, SHEILA

Comment Letter L73

From: Sheila Beachbum <osidebeachbum@yahoo.com>
Date: March 5, 2019 at 3:52:45 PM PST
To: City Council <council@ci.oceanside.ca.us>
Subject: NRF
Reply-To: "osidebeachbum@yahoo.com" <osidebeachbum@yahoo.com>

Warning: External Source

Please do not support North River Farms. The reasons are these:

1. This is the last remaining Farmland and it will lead to more dense housing. We need to preserve farm land.
2. This will cause increase risk do to wildfire. Evacuation is not good. People will be sitting ducks trying to get out.
3. The people of Oside will pay for this sprawl not the developers. This will result in loss of community character, will increase air pollution, and traffic congestion will be terrible. But the number one thing is it will result in higher taxes. No one wants that!

You work for the people and are to vote for what the people want and we do not want increased taxes and we want smart growth! This is not smart growth. There is many other places that high density housing can be built that already has the infrastructure. Please support the people.

Sheila Kadah

[Sent from Yahoo Mail on Android](#)

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L74 DUBOIS, STEVE

Comment Letter L74

From: stevedubois@aol.com
Date: March 8, 2019 at 7:47:01 AM PST
To: Council@cccansideca.org
Subject: North River Farms

Warning: External Source

Please vote No on the NRF project

Its not good fro us who live here in district 2,

A concerned resident of district 2. Steve duBois. 1133 Village Dr

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L75 JOHNSTON, PHIL

Comment Letter L75

From: Phil Johnston <pjohnston@runbox.com>
Sent: Tuesday, April 30, 2019 1:49 PM
To: Robert Dmohowski <Rdmohowski@oceansideca.org>; Marty Eslambochi <MEslambochi@oceansideca.org>;
Maryam Wagner <MWagner@oceansideca.org>
Cc: Barbara L. Hamilton <BLHamilton@oceansideca.org>
Subject: NIRP FEIR Dam Failure Assessment

Warning: External Source

Dear Mr. Dmohowski, Mr. Eslambochi, and Ms. Wagner-

The Revised FEIR for the proposed North River Farms project contains inaccurate and misleading statements regarding the nature of an earth fill dam failure, as well as other risk elements. The concluding paragraph of their inundation risk evaluation (4.10-17) includes this sentence:

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Late Comment Letters for North River Farms Environmental Impact Report

Thus, given the distance of Lake Henshaw from the project site, low average water retained in the Lake, earthfill structure of Henshaw Dam, its "Satisfactory" condition rating from the DSOD, and design of the project to remove proposed housing outside of the 100-year flood hazard zone, the risk from flooding caused by dam inundation is not considered significant.

First, consider the claim that "earthfill structure" dam will fail slowly. This is incorrect. Two recent earth fill dam failures have been captured on video, which are very instructive. Please watch at least the first of these, the Baldwin Hills disaster in S. California (3 minutes in length). This shows how quickly a modern earth fill dam can fail. The Great Johnstown Flood in Pennsylvania, the worst loss of life in a dam failure in U.S. History, was an earth-fill dam which failed catastrophically.

Baldwin hills dam collapse

<https://www.youtube.com/watch?v=McNM8sm6J8>

Lawn Lake dam collapse

<https://www.youtube.com/watch?v=mgap-YD8Vc8>

Second, consider the claim that the distance from Lake Henshaw to NRF is great. In 1928, the St. Francis Dam failed, killing >430 people including numerous people in Santa Paula (I have discussed this in a previous e-mail, and at the previous planning commission meeting). Compared to St. Francis dam, Lake Henshaw holds a larger volume of impounded water, it's water is perched higher above, Henshaw is older, and it's distance to NRF is closer. For dams this size, disastrous floods will extend many tens of miles downstream. It is inaccurate to portray Henshaw Dam as being far enough away so the impact won't be severe. The Recent inundation maps from Division of Safety of Dams (DOSD) show this also.

Third, consider the claim that the "low average water retained" in the lake lessens the risk. Dams almost always fail when they are full. If several high-rainfall years are closely spaced, the dam will fill up, and the dam owner will keep it full, happy to have that water available. When the lake is full, the risk will be at it's full magnitude. It is true the probability of a failure will be lower if the dam is not always full, but the severity of the risk to people and property will be at its maximum during those failure prone times when it is full or near-full.

Fourth, consider the claim that Henshaw Dam has a satisfactory rating from DOSD. I agree this is a good rating. However, the dam was built in 1922. Dam engineering, construction, and inspection practices were not very advanced at that time. Also, serious deficiencies in Dam Safety rating procedures have been documented recently. I'm not claiming this is definitely happening at Henshaw dam, but it certainly was at Oroville Dam, one of the most important dams in California (details are in the link below). So a satisfactory rating is a good thing, but it is far from being an assurance that the dam won't fail. You may remember the serious difficulties Oroville Dam faced in 2017.

<https://www.circhoffline.org/2018/workforce-panel-finds-deficiencies-in-oroville-dam-safety-reviews/>

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Fifth is the claim that the project "would remove all housing and other structures outside of the 100-year flood hazard zone". I have been investigating this claim and am not yet satisfied it is true. The 100 yr. flood boundary and the floodway boundary were altered in 2016-2017, moving them away from the NRF project area. The reason given for this was "New Topographic Data". I have made a Public Records Request for this "New Topographic Data" to the City of Oceanside. The response I received from the City did not contain the requested data. A follow up query to the City was ignored. If in fact there is no new topographic data, then I would question if the floodplain characterization has been improperly tampered with.

Five reasons are given in the Revised FEIR to support the claim that "the risk from flooding caused by dam inundation is not considered significant". Each of these five reasons is either inaccurate or problematic. The FEIR claim is inconsistent with DOSD classification of Hemlow dam as "Extremely High Hazard". It is also inconsistent with the DOSD Inundation Map. This FEIR risk assessment is not satisfactory, and must not be accepted.

Please let me know if I can be of further assistance regarding this matter.

Best Regards, Phil Johnston

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L76 MARTINEK, DENNIS

Comment Letter L76



April 25, 2019

Oceanside Planning Commission
300 N. Coast Highway
Oceanside, CA 92054

RE: North River Farms Housing Project

Dear Members of the Planning Commission:

The recommendation of Oceanside's professional planners should be heeded and the request by NRF - LLC for a General Plan Amendment, Zone Amendment, Tentative Map, and Development Plan **should be denied**.

This housing project has several serious problems that would result in Oceanside's residents bearing increased safety risks, increased congestion, higher taxes, and the loss of future revenue for parks, safety services, and infrastructure. The recent modifications made by NRF do not change the most serious negative impacts:

1. NRF is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.
2. NRF is a **sprawl project** that will result in higher taxes for existing residents to finance services away from existing facilities and services.
3. NRF will **result in further distortion of Oceanside's Jobs/Housing Ratio** which is already one of the worst in San Diego County.
4. NRF will **result in the permanent loss of prime agricultural land** that generates jobs and local food.
5. NRF will **negatively impact efforts to increase agritourism** and its related jobs and income.
6. NRF will **result in significant and unavoidable impacts to population, housing, transportation, and traffic**.
7. NRF will **hurt the image of Oceanside** as a safe and well-balanced community.

Late Comment Letters for North River Farms Environmental Impact Report

8. NRF will **result in future liability** for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
9. NRF will **result in conflicts between farmers and residents** because of inadequate buffers.
10. NRF **conflicts with Oceanside's General Plan** that promotes community values, aesthetics, character, and safety.

Your decision on the North River Farms Project should be taken very seriously. Approving NRF would have long-term and cumulative impacts that will be irreversible. It would negatively affect our environment, increase green-house gases, increase traffic congestion, increase the risk of loss of life because of inadequate fire evacuation routes and flooding, and decrease the number of long-term jobs related to agriculture and agritourism. Your decision will affect the safety and well-being of Oceanside's citizens.

Oceanside's professional planners are to be commended for their honest and accurate report that recommends that the Council deny North River Farms requests to change the City's General Plan and Zoning. Supporters of Oceanside SOAR ask that you listen to the City's experts and reject the North River Farms project.

Sincerely,

Dennis Martinek, Ph.D.
President, Save Open-space and Agricultural Resources (SOAR)

Late Comment Letters for North River Farms Environmental Impact Report

L77 ORAHOOD, DON

Comment Letter L77

From: Don Orahood <djo60gt@gmail.com>
Sent: Tuesday, April 30, 2019 11:26 AM
To: Robert Orzechowski
Subject: Proposed North River Farms Development in Oceanside, CA

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I am writing to register my position against the proposed development on 177 acres of farm land for development by North River Farms which would include 656 homes. This development is poor use for such valuable land and would obviously add to more sprawl (like Los Angeles and Orange County is famous for) and make the traffic problems in the Oceanside area even more unbearable. As it is, I try to avoid driving on Highway 76 as much as possible. I can't imagine how much worse it would be if such development (along with others along the same highway) takes place.

There are numerous excellent reasons for NOT approving such a development in Oceanside—the damages would be irreversible.

Sincerely,
Don Orahood
31340 Cottontail Lane
Bonsall, CA 92003

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Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L78 SAUNDERS, JOAN

Comment Letter L78

From: Joan Saunders <cajun1@dslextrane.com>
Date: April 29, 2019 at 12:38:23 PM PDT
To: <council@oceansideca.org>
Subject: Vote no on Integral/North River

Warning: External Source

I have lived in north county for more than 24 years. Please vote no on the North River development. I traverse North River Road and cannot imagine a housing development on that land or the sewage requirements!
Please vote no.

Sincerely,

Joan V. Saunders

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L79 SAUNDERS, JOAN

Comment Letter L79

From: Joan Saunders
Sent: Monday, April 29, 2019 12:41 PM
To: Planning Web
Subject: Please vote no on North River Road Project

Warning: External Source

As a 24 year resident of North County who uses North River Road, I ask you to vote no on the project. I cannot fathom what those additional homes will do to traffic and sewage in the area. Let's and make it a healthy mix of residential/agricultural - not 680 homes!
Please vote no.

Sincerely,

Joan V. Saunders

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L80 WILLIAMS, JODI

Comment Letter L80

From: Mike Williams <nrickiki@att.net>
Sent: Monday, April 29, 2019 5:18 PM
To: Planning-Planning Commission; council@oceasidc.org; cityclerk@oceasidc.org
Robert Dmohowski
Subject: No on NRF
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Good day one and all!

I would just like to add my voice to what should be a pretty significant number of people who think the NRF project does not fit in South Mono Hills whatsoever! As "pretty" as it is, it is somewhat analogous to the cheerleader who has no depth or substance but thinks it doesn't matter because she's pretty. Well, we need something done in SMH AND it needs to be carefully planned in a master planned sort of way. This patchwork quilt of amending the city vision every time a developer waves some money under someone's nose has got to stop. I'm still one of those people who believe government is supposed to be "of the people, by the people and for the people" not "of the money, by the money and for the money". This is Oceasidc's big chance to do the right thing! The last large piece of agricultural land west of the 15 needs some real vision for a better plan than high density housing! Agritourism without high density housing?

To whitt - NRF violates the city's anti sprawl policies in the General Plan. It is not located within a Smart Growth area. There are not sufficient facilities in the area to accommodate the increase in population and traffic out there and nor will there be. Widening North River road in the middle is like looking at a snake that just swallowed a rat - big in the middle and little on both ends. The project is not consistent with the city's agricultural land use objectives and policies. "Farms" may be in the name of the project but it is high density housing period. Not one home would satisfy the RHNA requirements.

How about floods and fires? The Lilac Fire proved that quick evacuation isn't possible and this "shelter in place" idea - right. Let the developers shelter in place while we start a fire around them and see if it works. (sarcastic comment there lest it be misconstrued) As for the flooding, I have pictures taken February 14th when it was raining so hard. I was standing across the street from the Melba Bishop Center. It wasn't the "100 year rain" but the river bed was quite full. What if the dam in Escondido fails (it is a "red light" dam due to being built in the early 1920's). The amount of water that would roar through the San Luis Rey River would kill scores and injure even more. So, for the homes that will be built south of North River Road on that ten feet of fill dirt don't seem all that safe to me. What will the city do when the lawsuits come pouring in? Have some integrity please. There are other options! How about infill as per the city plan?

Most of all, I would like to extend my deepest gratitude to the planning staff who are having to rehash all of this a third time. May I point out that they are the resident experts on all of this and after all of their hard work and research, have unanimously voted the project down due to all of the flaws. Please listen to them! THEY have Oceasidc's best interest in their FACTUAL survey.

Thank you each and every one of you for taking the time to read this! I actually hope that you get to this line!

Respectfully and sincerely submitted,

Jodi Williams

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L81 BALMA, LARRY

Comment Letter L81

From: Larry Balma <lb1122@hotmail.com>
Sent: Tuesday, April 30, 2019 9:59 AM
To: Planning-Planning Commission; Robert Dmochowski
Subject: NRFs PD --- Arrowood PD

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

March 4, 2019

Planning Commissioner

The following is a historical perspective of the development process for Arrowood and a comparison to Integral North River Farms development process so far.

I was President of the SMHA during the Arrowood PD and now during the NRFs PD.

By Larry Balma

Arrowood Planned Development

- Early '90s Arrowood planned development begins on the 600 acres of agricultural land at the north end of Vandegrift on both sides of the street. The majority of the acreage lay on the east side of Vandegrift and bordered South Morro hills. The land had been leased to Mellano and Nagata who were farming Flowers and Strawberries respectively for many years.
- The developers first submittal proposed building 4000 high density homes. There was no proposed school or parkland.
- Staff was not in favor of that many homes and cited need for school and parkland.
- The South Morro Hills Association was also not in favor of the high-density buildout.
- SMHA was also not in favor of all the homes tapping into the water reservoir that had been built to supply the agricultural land of South Morro Hills.
- After 5 years in planning with very little change in density a second large developer, Florida Southchase, purchased the 600 acres and proposed a PD of 2400 dwelling units.
- The Planning Department was still not in favor of the plan.
- The City Council directed Florida Southchase to work with the planning Department and also with the South Morro Hills Association.
- The Council also directed Florida Southchase to frame all of the development items into a CC&R which would be signed by the City, the Developer and the South Morro Hills Association before any permits would be issued.
- We worked through this process for another 5 years, 10 years total.

The results were all entered into the CC&R. The City Planning staff worked hand in hand with the developer and SMHA. The SMHA had 3 Attorneys in the neighborhood and one attorney that we hired who worked with the

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Late Comment Letters for North River Farms Environmental Impact Report

developer for a solid two years before we agreed to sign the CC&R. I was President of the SMHA through the last five years of the process.

Key points negotiated.

- The dwelling units were reduced from 4000 to 1006, a 75% reduction.
- A park and a school were added to the project.
- A golf course and clubhouse were added to buffer the subdivision from South Morro Hills.
- Homes on the golf course bordering SMHs were on an aggregate of one acre lots which we allowed to be easements on the golf course.
- The golf course would be built first before any dwelling units and therefore insure its existence.
- There would be five types of dwelling unit neighborhoods each constructed by a different builder and in different stages.
- Each water meter throughout the entire project would be charged four times the normal city fee and 75% of the money would be applied to our water bond for the reservoir that SMHs property owners were charged to build. Each SMHs parcel was billed a per acre fee for the water bond on our property tax bill each year.
- The Arrowood development got the use of our reservoir. Our water bond was paid off during the first year of Arrowood sales and saved SMHs property owners from making eight more years of payments.

Yes, it took the developer 10 long years to negotiate through the process with Planning to entitlement to Permit, but all the details were vetted out along the way and Arrowood is now built and occupied. Arrowood was approved by all the City Staff and their departments, approved by the South Morro Hills Association and ultimately approved by the City Council.

Integral, North River Farms, Planned Development

During the very first meeting that the SMHA Agrivision Committee had with the Integral staff I explained the Arrowood process we went through and how the estate homes border SMHs. Their leader at the time said, "We're not going to do that, it takes too long to sell, we want to get in and get out."

At the Planning Commission meeting in February 2017 the Staff report indicated that the Integral proposal to build between 680 and 985 dwelling units did not meet any of the City's or County's criteria required to make such drastic zoning changes from Agriculture to medium and high-density subdivision. The Integral PD is simply not Smart Growth.

The Planning Commission was unanimously in support of Staff.

At the City Council meeting in March of 2016 Chuck Lowery, Jerry Kern and Jack Feller agreed to let the Integral PD continue through the process and for them to work with Staff and South Morro Hills. Jack Feller stated that they should come back with something more like 100 to 400 dwelling units.

Integral has continued to ramrod their PD with little regard to City Staff, who they look upon as ignorant with absolutely no vision. During the many meetings with SMHs they stated every time that density was not on the table. They did state to SMHA in November 2017 that they were in it for the money period.

Integral is a marketing and entitlement company. Integral says that because they have spent \$\$ and so much time they should get their entitlement even though they have not met the needs of the City. Most PDs this size take years

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of planning to reach approval with staff and result in a project that benefits the City and enhances the surrounding neighborhoods future Vision.

South Morro Hills recognizes that we need to update our Vision plan. We have been working on a Vision plan before Integral came along and we continue to work on our AgriVision plan with the support of Council and Staff. Jonathon Borrego and Jeff Hunt are working closely with SMHs and are confident that a Specific Plan for SMHs will be adopted within 2 to 3 years.

Without an updated vision plan in place Integral will use up almost all of the current infrastructure planned for the entire 3500 acres of SMHs. Integral is determined to rape all the existing infrastructure in SMHs for their own benefit leaving all future development to be burdened by the rest of the landowners and that is morally wrong. We need to have an updated Vision for SMHs so that any development will pay their fair share for infrastructure. Integral wants to obtain their entitlement without regard to the rest of the City.

The AgriVision plan when complete will allow for orderly development of SMHs. The AgriVision plan will embrace agriculture and Agritourism while providing clusters of homes, large and small, casitas and affordable housing in a rural setting. Integral can work within the AgriVision plan.

Integral does not own any property in SMHs. The owner of the 177 acres, Self-Realization Fellowship did not have their property for sale, Integral came to them and signed an option agreement. The SRF has leased their property to various farmers at a profit for over 40 years. The property is currently farmed by West Coast Tomato Growers.

Integral is pushing for entitlement with an incomplete PD which is absolutely not acceptable to our highly qualified and intelligent City Staff. The only logical decision is to deny the PD at this time and send Integral back to finish working with Staff until the project becomes acceptable and will enhance the City and AgriVision in SMHs.

Please respect the entire City Staff and Planning Department Staff Report recommendation to deny Integral Development North River Farms PD at this time.

Thank you for your service.

Respectively,

Larry Balma
President
South Morro Hills Association
760-419-2211

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Late Comment Letters for North River Farms Environmental Impact Report

L82 **KELSEY, LINDA**

Comment Letter L82

From: Linda Kelsey <lkelsey@ma.com>
Sent: Monday, April 29, 2019 1:37 PM
To: Robert Orszowski, Planning Web; Planning-Planning Commission
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Please stop this development. Give the South Morro Hills Agrivision a chance to go forward to preserve and promote Morro Hills agriculture. At a time of global weather uncertainty, NRFs adds just what we cannot sustain: housing density with uncertain water availability, massive increase in pollution and traffic as jobs are elsewhere, fire threat including evacuation traffic impeding emergency vehicles, forever loss of what little local agriculture we have left. Please preserve Morro Hills and give local agriculture a fighting chance to remain a viable business contributor to north county.
Thank you
Linda Kelsey
Resident of Fallbrook

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Late Comment Letters for North River Farms Environmental Impact Report

L83 DEE, LISA

Comment Letter L83

From: Lisa Dee <hosenle@gmail.com> on behalf of Lisa Dee <ld-dee@cox.net>
Sent: Tuesday, April 30, 2019 11:03 AM
To: Robert Dmohowski
Subject: NO on the North River Farms Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmohowski,

I am voicing my opinion against the proposed development known as the "North River Farms" and I ask you to vote NO on the development for the following reasons:

1. We already have heavy (and noisy) traffic on the 76 and this would increase it exponentially. The 76 has been widened to its max, and still cannot accommodate the traffic we currently have.
2. We had to evacuate from the Lilac fire just over a year ago, and I cannot imagine the increased risk this development proposes. Evacuation will be a serious problem.
3. We moved to east Oceanside to enjoy the rolling farmlands and wildlands nearby and this would absolutely destroy that. In exchange for what, more expensive homes that our low-income population can't afford anyway?
4. This development is the beginning of more urban sprawl, stretching our precious water resources.
5. Such a huge development will also require more fire, and police, and hospital services -- all of which will probably raise everyone's property taxes, which are already high.

Again, please vote no. The only one who wins here are the developers, who get richer. It will certainly ruin our Jeffries Ranch neighborhood.

Sincerely,

Lisa Dee

1645 Trotting Hoese Rd.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L84 RIVERA, LOUISE

Comment Letter L84

Dear PC:

I wanted to explain why I will be recusing myself from the May 6th Planning Commission's review of the North River Farms Project.

Some of you who have been on the commission with me for several years and know of my involvement with Oceanside AgriVision, previously the South Morro Hills Vision, which is a responsible development plan for our Agricultural Region in Oceanside. I am part of a group of like-minded individuals composed of large commercial farmers, agritourism businesses, neighbors and community members. We set out on this task of developing a plan long before Integral and North River Farms. Joining with the City, and Visit Oceanside we brought in consultants to study our area, we held three community workshops to gather information as to what the community of Oceanside would like to see happen in this area with our goal to preserve agricultural land, create vibrant agritourism opportunities, bring benefits to the City Of Oceanside, the neighborhood but most importantly the farmers.

From our work the city staff and the City Council has made it a priority to bring lower cost recycled water to help the farmers continue to farm, we got approval from the City Council and the Planning Commission to add Agritourism Strategic Plan opportunities into our zoning, we hired a consultant SWA to put together the Oceanside AgriVision plan in a format we can use to communicate to our community. We got City Council approval to work with our city staff to study what it would take with infrastructure and the costs associated to develop this plan and form a matrix to give to our city planning staff to begin the work on a AgriVision Specific Plan; we are currently compiling this matrix. You might be thinking why is this taking so long, well without Integrals North River Farms and Measure Y both of which set us back years of time, effort and money we would have been finished by now.

As you see from the staff report our very competent city staff has held tight to the fact that North River Farms as designed is not right for Oceanside, it's inconsistent with the General Plan, goes against the county's Smart Growth plan, is not identified in the city's RHNA needs, and goes against our recently approved Climate Action Plan, EDE and ECAE. Our Agricultural Region, which I might add is 3500 acres of prime agricultural land currently which all is utilized and farmed, is the most agricultural land of any city in all of San Diego County west of the 15 freeway, this is yet another reason to develop an updated vision plan to create another jewel in Oceanside crown and not convert this land into just another subdivision.

With a plan like AgriVision we would create a place like no other in the US. Its been worth my time to devote to something as important and meaningful to create a place on earth that would be something we can all be proud of for generations to come.

From the very first city council meeting Integral was asked to work with us in the development of North River Farms, but they never did. They instead took our AgriVision work and used it in their marketing of their housing development in hopes to gather the support they need for approval.

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I would like to point out a few areas of major concerns as to why this project needs to be held back and revised in order to fit into Oceanside's plan.

Melrose Bridge: letting Integral put dollars into the improvements of the College Bridge and leading roadways when the real and only solution for traffic and circulation for NRF and future development in South Morro Hills as well as our neighbors Fallbrook and Bonsall evacuation plans is the Melrose Bridge. All future development in South Morro Hills will need to address and build this bridge. The bridge was put into the city's traffic and circulation plan years ago to handle the future development of the 1400 dwelling units allowed within our current zoning (2.5 acres per DU divided into 3500 acres). In our planning for AgriVision Specific Plan we are finding the need to increase this density based on infrastructure costs there by making the Melrose Bridge even more necessary. Integral with its proposed 656 DU's would take 50% of this existing planned capacity and not pay 50% of the costs of this bridge.

Increase the farm land and push back the housing from the roadways: Granted Integral might need a plan more dense than all future developments in South Morro Hills because they are the first and they have more of the major roadways both North River Road and Wilshire road along their perimeter, but the project needs more farming along the major road ways in order for the balance of Oceanside AgriVision plan to work. In the AgriVision plan we call it the farm mosaic, NRF proposed development is located at the major gateway into Oceanside's Agricultural Region so its essential that when entering this area farming is what you see, smell, and experience not housing. Presently NRF has no more landscaping/farming than the residential developments along Rancho del Oro. It's very important that NRF sets the scene visitors and the community will experience. As designed NRF is just another subdivision and as many call urban sprawl. The idea Integral has adding the 42 additional acres of farming to the project is a good one, but as Mayor Weiss asked this additional acreage needs to be within the project boundaries and most importantly front and center. The Bree property is 37.5 acres adjoining NRF what Integral needs to do is place the homes along North River Road and Wilshire onto this property and open up the major roadways of North River and Wilshire to more farming. As for the balance of the 42 acres having land offsite someplace in South Morro Hills has no value to the creation of the farm in North River Farms, and having only 1/3 of the total acres devoted to farming is not enough and is not part of the Oceanside AgriVision plan.

North River Farms Commercial Tenants: Integral needs to have anchor tenants in place for the hotel, restaurant, makers spaces and commercial space or eliminate it. Integral is not a commercial residential builder; they are a marketing and entitlement company. They told us this at their first meeting with us. They used these elements, which were taken out of our AgriVision plan to help market their project to Oceanside and to beef up their revenue to the city. The commercial will never get built it's a throwaway piece of

Late Comment Letters for North River Farms Environmental Impact Report

their project and no revenue will come to the City. As an example, look down North River Road to the bus transfer station and townhomes; this was a commercially zoned parcel that the developer convinced the City Council to change the zoning on. This project was also not supported by Planning Commission and City Staff. The developer convinced the City Council that their project was a mixed used project (townhomes with commercial). But even after 12 years no tenant has occupied any of the commercial spaces. The developer told us they never intended any of the mixed-use space to sell. The developers pitch in 2006, "A mixed use development features quality townhomes, neighborhood commercial space and a state-of-the-art transit center for bus riders" was just another marketing speech.

Farm run as a for profit business: The farm portion of North River Farms is not a farm, the farm consultant Integral hired to layout the farm portion of NRF walked away when he could see that Integral was not building a successful farming and agritourism business but was rather using it as a marketing piece to sell their subdivision to the city. In order for the farming portion (organic or commercial) to be successful it needs larger contiguous parcels of land with the proper buffers from the residential portion of the project and it needs a commercial for profit farmer. From the beginning I had asked integral to find a commercial farmer or vineyard to put in an operation, they never listened because they never intended this to be successful, it's another throwaway piece for houses.

Oceanside Chamber of Commerce: The Chamber was behind Oceanside AgriVision from the beginning until Integral placed a member of their team on the executive board. Money does move people.

Oceanside is not the Oceanside of years past; we are blooming with new development that fits the new standard we need to achieve. The beach cities to the south and north of us demand developments that are great and fit into the fabric of their cities direction. We do not need to take the first Rodeo that comes our way in SMH. Remember the landowner and farmer didn't push this project on us this is one out of town developer looking to make a buck.

We have the chance to make our agricultural region something special and to include this new direction into the authentic fabric of Oceanside. Our General Plan needs to include the AgriVision Specific Plan first, and once its complete I invite integral to build NRF within our plan, please side with our excellent staff and recommend denial of NRF to our City Council.

Thanks for your time and support of Oceanside.

Cheers
Louse

Late Comment Letters for North River Farms Environmental Impact Report

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L85 PERARO, ROSA AND FABIO

Comment Letter L85

From: roseflowerstar@icloud.com
Date: April 30, 2019 at 1:27:38 PM PDT
To: Council@oceansideca.org
Subject: NRF project

Warning: External Source

A project that will destroy and create a great deal of division between farmers and residents of our area, should be taken into consideration, a project of this magnitude will be inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability and improve citizens quality of life.

It will result in significant and unavoidable impacts population, housing, transportation AND TRAFFIC. During the ordered evacuation due to the fire of 2017, it took us 1 hour from Sleeping Indian to North River Road and 1 hour from North River Road to Vandegrift. what chance would we have if this project is approved for us to reach safety?

NRF will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park. We remember the damage and closing of the road due to the extensive damage.

We oppose this project. Oceanside deserves better planning and respect for such a beautiful area that future generations should be able to enjoy.

Your time and attention appreciated
Rosa M Peraro
Fabio C Peraro
6048 De La Rosa Lane
Oceanside, CA 92057

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L86 PERARO, ROSA AND FABIO

Comment Letter L86

April 29, 2019

City of Oceanside – via email
Mayor Office - City Council
300 N Coast Highway
Oceanside, CA 92054

It is with great concern that we are sending this letter to oppose the NRF project. The density that will be created by this project will have everlasting effects on the area. Such as loss of prime agricultural land that provides jobs and yes food. We are in the middle of adopting a plan to develop agritourism and with complete disregard to our community they will create conflicts between farmers and residents because of inadequate buffers, we still remember when the San Luis Rey River overflowed North River Road, destroying part of the road.

When we were told to evacuate because of the proximity of the fire in 2017, it took us almost two hours to reach Vanderbird intersection with more than 600 homes to build plus a hotel etc. etc. What chance would we have to reach safety?

Realize that eventually development may come, but NRF completely ignores Oceanside General Plan that promotes community values, aesthetics, character, and safety.

NRS project will impact in a negative manner the image of Oceanside as a safe well balanced community.

Your time and attention is appreciated.

Rosa M Peraro
Fabio C Peraro
6048 De La Rosa Lane, Oceanside, CA 92057

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L87 DUBOIS, STEVE

Comment Letter L87

From: stevedubois1@aol.com
Sent: Monday, April 29, 2019 2:42 PM
To: Robert Dinohowski

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Please say NO to the NRF project.

We have no water (always complaining about our water use and that we must conserve...adding more homes does not do this)

We have no electrical power (SDG&E complaining about use and raising the rates as well as asking us to use power during the day when no one is home)

We have no streets (Moving the bottle neck to the next street light does not fix the issue)

We have no schools (where are all these kids going to go to school when Oceanside and Bonsall schools are already over crowded)

We have no Fire Station to support this (the Temporary idea is a joke)

We have no Police Station to support this

We have no sewage treatment

We have no way to clean the polluted air

We have no way to control the noise pollution

We, the people of Oceanside don't want this.

Regards,

Steve duBois
1133 Village Dr
Oceanside, Ca
92057

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Late Comment Letters for North River Farms Environmental Impact Report

L88 DISAHROON, DALE AND LOFFTUS, MARIA

Comment Letter L88

May 1, 2019

City of Oceanside Planning Commission
300 North Coast Hwy
Oceanside, CA 92054

Re: Public Hearing on the North River Farms Planned Development Project Monday, May 6, 2019.

Dear Planning Commission Members:

First, we would like to again take this opportunity to thank you for your time and efforts while serving on our City's Planning Commission.

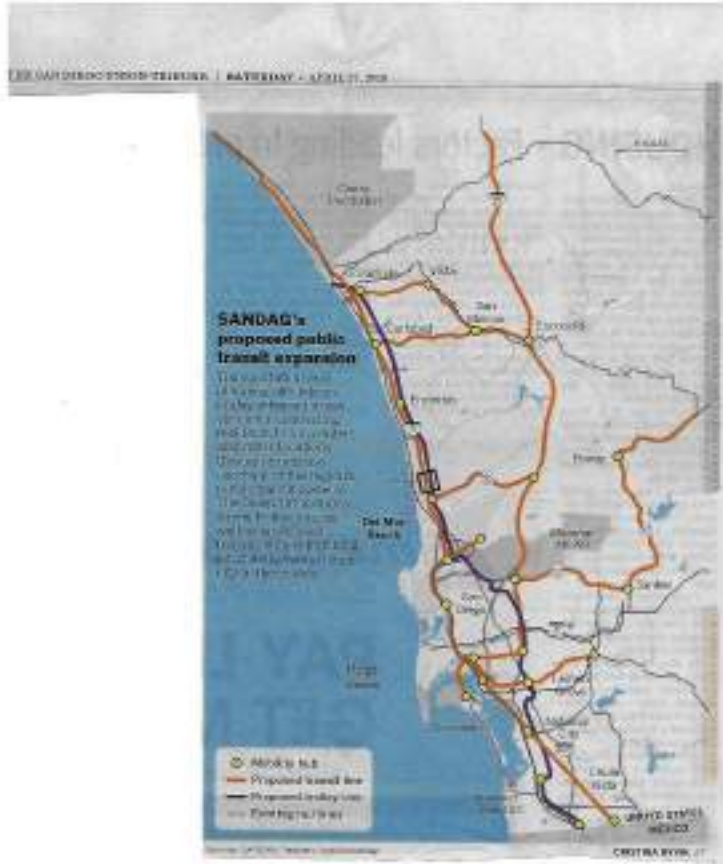
This coming Monday you'll again be reviewing one of Oceanside's more important development projects. Not only will the North River Farms Planned Development Project (NRFPPD) have immediate near term impacts for the adjacent Oceanside communities, it will also have far-reaching long-term development impacts for the City of Oceanside as a whole. While the applicant has provided project mitigation funds for future transit projects that may, or may not, be built, little to no other traffic or land-use impact mitigation efforts have been made by the applicant since the Planning Commission last reviewed and rejected this project proposal.

The following comments will be focused on significant traffic, transit, and infrastructure impacts this project will have in and around our local and surrounding Oceanside communities.

In the fall of 2015 my wife and I moved to the Arrowood Homeowners Association from the La Jolla area. At that time, we routinely experienced daily commutes times of 15-20 minutes to access either the I-5 and I-15 freeways or the downtown Oceanside Transit Station. Today, those same commutes, regularly take, or exceed, 30-40+ minutes. In the time we've lived here, State Route 76 (SR-76) has become increasingly impacted by additional developments along its route. It has also seen a significant increase in traffic loads and flows related to CALTRAN's completion of the SR-76 highway improvements leading east to the I-15. It's not surprising that SR-76 has been dubbed the "76 Crawlway." During peak traffic times, it can routinely take two, and sometimes three, signal light changes to advance through the signal.

Over the past five years CALTRAN's has also added needed safety features to the SR-76 corridor, although and unfortunately they stopped short of making the significant investments to aid in traffic flow mitigations. Equally disappointing is SANDAG's recent publication of their proposed public transit expansions vision, Union Tribune April, 27, 2019 – see attached map page 2, that potentially leaves our part of North County communities out of the loop for future transit investments. This transit planning omission should be concerning to the Oceanside Planning Commission, City Council, and Mayor as it impacts future proposed projects that will come before you and them. If changes to this proposed vision are not addressed directly with SANDAG, we will all have to live in-perpetuity with the local transit infrastructures currently in place.

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The NRRFDP will directly impose further traffic and transit impacts while straining the already inadequate roadway infrastructure currently in place. We're already experiencing level "E-F" intersection and roadway impacts at the required access routes to the proposed project. Even with the proposed developer paid "FairShare" project infrastructure funds, the proposed traffic mitigation measures including a turn lane addition onto North River Road from Vandergrift Boulevard, lane restriping, signal light readjustments, etc., will be insufficient to resolve these and future traffic and transit issues.

This project will hasten the proposed level "D-E" intersections and roadways to become level "E-F" sooner rather than later. Furthermore, these increased roadway traffic and transit impacts will directly impact "decreased" levels in emergency services response times while increasing wildfire and other disaster evacuation times.

As a past University Community Planning Group member, San Diego District 1, it was always important for us to consider requiring that the infrastructure and Facility Benefit Assessment funds be available, as outlined in the University Community General Plan, before allowing a major development to go forward to the San Diego City Council for a vote. It's unfortunate that the City of Oceanside has an outdated General Plan for current and future proposed developments. I urge you not to compound the problem by not requiring developers to deposit development funds necessary to implement any and all required infrastructure upgrades associated with each project.

At this time NRRFDP may be a "before-its-time" development for the City of Oceanside. Without the necessary and required infrastructures in place, the immediate and future community impacts will be immeasurable. For instance, to support a project of this size and at this location, it may take the full development of North River Road into a four-lane roadway to safely mitigate the expected traffic loads from Vandergrift Boulevard to SR-76. Already, this roadway has become a very busy alternative two-lane bypass that unfortunately has experienced several vehicular accidents in just the past few months. It would be naive to accept that traffic traveling east and west along this roadway will not be additionally impacted should this project be approved. The City has an obligation to first update and implement its long overdue General Plan for development while determining and solidifying its future agriculture and agritourism plans for South Morro Hills Agricultural Area (South Morro Hills Vision Plan). Additionally have the required funding available to complete the widening of the College Boulevard bridge to Vandergrift Boulevard for future traffic mitigation, and all other infrastructure additions required to support current and future growth in our area such as the NRRFDP. It is also critical to predetermine and publish the long-term City taxpayer's obligations for the proposed on-site fire station after the NRRFDP support funding ends.

We are asking the Planning Commission to carefully review these and the many other related NRRFDP impacts that it will bring to Oceanside. Your rejection of this plan amendment will send a message to our City Council that as a matter of policy, it is essential that the approval of all future project developments be linked to the financing and implementation of all associated supporting infrastructure and transit needs. Perpetuating development policies of density first have proven themselves to benefit the developer at the expense of the community members and the quality of life we all strive for.

Thank you for your time in reviewing this response.

Regards,

Dale Disheroon/Maria Lofftus
1105 Village Drive
Oceanside, CA 92057

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L89 JOHNSON, JOAN

Comment Letter L89

From: Joan Johnson <jonjohnson@mac.com>
Sent: Wednesday, May 01, 2019 3:50 PM
To: Robert Dmohowski
Subject: Re: North River Farms May 6, 2019 Planning Commission Hearing

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

May 1, 2019
To: Oceanside Planning Commission Chairperson, Planning Commission Members,
and Robert Dmohowski, Planner
From: Joan Johnson

RE: NORTH RIVER FARMS PROJECT

Dear Planning Commission Chairperson, Planning Commission Members, and Robert Dmohowski,
Planner;

I am opposed to this project. I support first undertaking an update of the Oceanside General Plan to include residential densities/ land uses suitable for the South Morro Hills in order to protect the area's prime AG land use and the protect the Oceanside community as a whole from the assorted fire dangers presented by wildland fires, residential/ commercial/ industrial fuel threats when near wildland, and the "Blow Torch-like Effect" (CALFIRE term for the river's severe fire threat during the Lilac Fire) inherent in the fire mechanics of the San Luis Rey River which lies along its southern border and through the rest of northern Oceanside all the way to the Pacific Ocean.

Doing the above would allow you to make sure all that could be learned from the 1,000,000 California Acres burned in 2018 could be used to develop appropriate land uses, defensible space policies, a Fire Protection Engineering Plan, etc. into your Updated General Plan to safely protect all of Oceanside's citizens and property. And there is much to be learned by the studies made of the Santa Rosa area and all of Paradise's vast residential and commercial areas that burned to the ground killing scores of people with it. These were non-wildland fire fuels that were totally destroyed...Nothing left standing, but they exacerbated the fire's intensity. Why is this important...because Dudek's Conceptual Wildland Fire Evacuation Plan for the North River Farms Community in the DEIR only assesses Wildland fire Exposure Rating as LOW to MODERATE along the fire evacuation routes. It does not learn from what happened in Santa Rosa and Paradise 2018 fires. This is a major DEIR assessment fault based on the phony fact that residential and commercial uses along evacuation routes are not classified as contributing wildland fuels; if they were, as showed in Santa Rosa/ Paradise 2018 fires, Wildland Fire Exposure ratings would need to be much higher than Dudek's use of :

MODERATE Wildland Fire Exposure Rating for NORTH RIVER ROAD (which just happens to run along the "Blow Torch- Like Effect" San Luis Rey River, choked bank to bank by wildland fuel vegetation);

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LOW Wildland Fire Exposure Rating for COLLEGE BOULEVARD (which just happens to **cross over** the **"Blow Torch-Like Effect"** San Louis Rey River choked bank to bank by wildland vegetation) and is bordered by many residential and commercial uses that we discovered burn in wildfires like Santa Rosa/Paradise of the NEW NORMAL California, but, according to Dudek, one could find temporary roadside refuge in the Walmart Superstore at RTE.76 **providing you could get across College Blvd. bridge at the San Louis Rey River before or after the bridge is fire involved;**

and LOW Wildland Fire Exposure Rating for N River Road -Douglas Drive even though it starts out lying in close proximity to the "BlowTorch-like Effect" of the San Louis Rey River and is declared safe further on because residential and commercial uses line the remaining route, contrary to the conflagration shown in the Santa Rosa/Paradise 2018 Fires by these same exact fire fuels, and then crosses the San Louis Rey River which is the **"Blow Torch-like Effect"** itself.

Seems like there needs to be a new WildLand Fire Exposure Rating System for the Oceanside General Plan: One that includes residential and commercial/Industrial uses as fuel for wildland fires...For your proof of that , look no further than the Santa Rosa and Paradise fires in 2018.

In addition, according to the DEIR their **evacuation routes shockingly are only available where fire is not in the immediate area or encroaching the roadways.** If one or more roads are not considered safe for evacuation, contingency options were said to be available but were **not included (!)** in this DEIR section. As an area neighbor who sat in a vehicle for 4 hours on Douglas during the Lilac Fire mandatory evacuation, I can tell you from frightening experience it is all too clear that there are no contingency options available. We need to do better as a community. We were saved because a field was plowed and the Santa Ana winds driving the Lilac Fire along the San Luis Rey River bottom came to a blessed and unexpected sudden end.

If the city undertook a new General Plan Update including the South Morro Hills, we could develop a Fire Protection Engineering Plan for Oceanside to protect people, property, and the environment . According to fire protection specialists and scientists part of the Problem is how houses have been built. **TO BUILD IN A WAY THAT REDUCES FIRE DAMAGE, EXPERTS SAY WE SHOULD BUILD HOUSES FARTHER APART***** (AG density of 2.5 acre lots or larger would accomplish that in this project, but prime AG use is much preferable as it's the current goal and a common sensical one), keep vegetation from touching houses, prune dry vegetation, leave a fire break, consider the flammability of housing materials, and screen the venting areas in attics, eaves and walls so burning embers can't blow inside homes, etc.

We have not been smart in the past about putting homes, commerce, and industry in areas prone to wildfire. Wildfires do not need to be so devastating to human life and property. We can minimize the damage through the application of science and the ability for publicly elected officials to just say NO to projects like this one and then go on to develop a LAND USES/ DENSITY/ Protect Prime AG, etc. General Plan Update that is FIRE SMART.

***Albert Simeon, Professor at Worcester Polytechnic Institute, as written by Kristin Hugo in Newsweek article, " Fires in California: how to stop the destruction and create better neighborhoods"

The developers can throw all the last minute money in the world at this project and over represent the total amount of income for the city due to the project's 10 year pipe dream hotel, but 2 very real undeniable facts remain:

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1- it still remains a terrible fire safety idea for neighbors and Oceanside at large (too many houses, too close together in the fire endangered foothills side by side to a river bottom that acts like a "Blow Torch-like Effect" for fire through Oceanside to the Pacific Ocean.

2- the project's "10 year hotel reserve" is unenforceable and taxes from that phantom amount must be deducted from the total which makes the deal a financial purple cow for the city in comparison to the project's detrimental effects

Thank you.

Sincerely,

Joan Johnson
1057 Village Drive
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L90 MILLER, JULIA

Comment Letter L90

From: Julia Miller <juliamiller@yahoo.com>
Sent: Wednesday, May 01, 2019 11:03 AM
To: Robert Dmohowski
Subject: STOP the North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmohowski,

I am currently living in the beautiful Oceanside area of South Morro Hills. I am opposed to the North River Farms (NRFs) Project. This is an irresponsible high-density development plan on Oceanside's pristine farmland. NRFs project is too dense, the farm plots are too small to be successfully farmed, and the hotel and commercial space will not likely come to fruition.

One of the biggest gems in Oceanside is our agricultural neighborhood. The residents cherish our crops, our space, and sense of community. Allowing NRFs to build is a detriment to our city.

- NRFs will result in the permanent loss of prime agricultural land that generates jobs and local food.
- NRFs will negatively impact efforts to increase agritourism and its related jobs and income. NRFs should be denied until an updated SMHs Vision Plan is in place.
- NRFs is inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability, and improve citizen's quality of life.

Our rural community is already seeing increased traffic and congestion. Building over 600 homes off of North River Road will be a disaster. Traffic and evacuation routes will be a serious safety issue.

- NRFs will result in significant and unavoidable impacts to population, housing, transportation, and traffic.
- NRFs will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.

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- NRP is a sprawl project that will result in higher taxes for existing residents to finance services away from existing facilities and services.

Another block of houses will overcrowd this small space, diminish agritourism, and destroy valuable farmland forever. Please do not allow the North River Farms Project to continue.

Sincerely,

Julia Heczko

Late Comment Letters for North River Farms Environmental Impact Report

L91 CARBONE, KATHI

Comment Letter L91

From: Kathi Carbone <kathicarbono@gmail.com>
Sent: Wednesday, May 01, 2019 2:02 PM
To: Jeff Hunt; Amy Fousekis; Richard Greenbauer; Russ Cunningham; Sergio Madena; Scott Nightingale; Robert Dmohowski; Tiffany Chert; svitale@coceansideca.org; Stefanie Cervantes
Subject: North River Farms - URGENT
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

REQUEST FOR ACTION

Dear Oceanside City Planners,

I am a current Fallbrook resident (2012 to present) and a previous Oceanside resident (2003 to 2012). I am writing to request that you vote "NO" on the North River Farms development project.

The mostly rural area of South Morro Hills that is being proposed for this development butts up against Bonsall, and will affect both Bonsall and Fallbrook. We are your neighbors, but get no say-so in this matter, yet the effects for us will be damaging, detrimental, and far-reaching if this project is given a green light.

We have a fire evacuation issue that is not being addressed by the developers, who have simply stated that "traffic is sensitive and will be studied extensively." How nice. Traffic clogging up highway 76 at rush hour will be frustrating yes, but frankly that is the least of our concerns.

The people living here in Bonsall and Fallbrook understand and have accepted the risk of, elevated fire danger.

We talk about it in our community groups, and we plan by having important documents in a container by the front door, as well as our family's and pet's needs ready to leave on the fly. We have emergency radios, and we keep our gas tanks full when there's any notice of an upcoming possible evacuation. We talk to our neighbors to see who might need extra help.

We have evacuated dogs, cats, goats, chickens, and horses; and people work together to make sure that everyone gets out when necessary.

There is a level of difficulty involved due to the unique needs of this community for evacuation, not only because of the rural area and population, but also because there is a glaring shortage of evacuation routes currently. If either 76 or 15 becomes blocked due to fire or smoke, we have little other choice but to ask Camp Pendleton to allow us access through. That's a single file line, of everyone in Fallbrook.

The last thing we need is another dense housing community of newcomers going into neighboring South Morro Hills who don't understand the gravity and speed of a fire moving from the eastlands to the ocean propelled by

Late Comment Letters for North River Farms Environmental Impact Report

Santa Ana winds; newcomers who don't understand that if you don't have your items ready to go at all times, or if your car doesn't start, or if you wait too long, you could die.

When pushed on this issue recently, the developer has said "North River Farms residents should shelter in place rather than try to evacuate." Please know that this advice from them is a potential death sentence, and they are absolutely negligent in making that statement to anyone.

I'm sure you are aware that there are many reasons to oppose this project.

You'll be allowing for the paving over farmland, and letting an out of town developer "buy" in because they spent \$1.2 million on opposing the SOAR measure in 2018, because they funded campaigns to get "the right people" elected into positions on the city council, and because they are now offering almost another \$800,000 to the city to fund additional studies.

That's a great poker move, buying the pot; but in this case it works at the expense not of "other poker players" but rather at the expense of the people in your community long-term, and at the expense of the entire communities of Bonsall and Fallbrook.

I am writing to implore you to oppose this project not just because this out of town developer is currently dangling money at the city to get their way; while that is problematic for sure, it's not why I'm writing to you today.

I'm asking you to vote 'no' because it will save the lives of Oceanside residents, as well as the lives of residents in your neighboring communities to leave that land as it is.

On behalf of your neighbors to the east in Bonsall and Fallbrook, I thank you for your consideration. Please do the right thing and vote "NO" on North River Farms.

I request that this letter be made part of the permanent record for this project.

Sincerely,

Kathryn Carbone

kathcarbone@gmail.com

(442) 245-0688

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L92 HAAS, TERRY

Comment Letter L92

From: Terry Haas <thaas123@gmail.com>
Date: May 1, 2019 at 11:29:03 AM PDT
To: Council@oceasidaca.org
Subject: North River Farms Project

Warning: External Source

Members of the Council: I am writing again as a long-time homeowner in South Morro Hills and as a concerned citizen very worried about the negative impact of this project. I have included a list of concerns that have been accumulated over the many months of discussion on this controversial development. In addition, I'd like to add my personal concern about the added danger in case another wildfire occurs in the area. Our property was severely damaged in the Lilac fire and we know how difficult the single road egress made our evacuation.

- NRFs is inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability, and improve citizens quality of life.
- NRFs is a sprawl project that will result in higher taxes for existing residents to finance services away from existing facilities and services.
- NRFs will further distortion of Oceanside's Jobs/Housing Ratio which is already way below average in San Diego County.
- NRFs will result in the permanent loss of prime agricultural land that generates jobs and local food.
- NRFs will negatively impact efforts to increase agritourism and its related jobs and income.
- NRFs will result in significant and unavoidable impacts to population, housing, transportation, and traffic.
- NRFs will hurt the image of Oceanside as a safe and well-balanced community.
- NRFs will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
- NRFs will result in conflicts between farmers and residents because of inadequate buffers.
- NRFs conflicts with Oceanside's General Plan that promotes community values, aesthetics, character, and safety.
- NRFs should be denied until an updated SMHs Vision Plan is in place.
- North River Farms will have irreversible, long-term and cumulative impacts in SMHs on

Late Comment Letters for North River Farms Environmental Impact Report

our environment, our safety, and long-term jobs related to agriculture and agritourism.

- Sincerely,
- Terry A. Bass, M.D. 31030 Via Puerta del Sol, Bonsall 92003

Late Comment Letters for North River Farms Environmental Impact Report

L93 SIMONS, ANITA

Comment Letter L93

From: anita simons <asimonsays@gmail.com>
Date: May 1, 2019 at 8:56:36 PM PDT
To: Council@ci.oceanside.ca.us
Subject: North River Farms

Warning: External Source

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to agriculture and agritourism. I urge the Oceanside City Council to think of the future environment of Oceanside and vote NO on the North River Farms development.

thank you

anita simons

4764 Miletus Way, Oceanside, CA 92056

—

Anita Simons

"You must do the things you think you cannot do,"
Eleanor Roosevelt

A message from my talented and recently deceased friend Joan Kurland
<http://www.youtube.com/watch?v=6QqE9edrp1s&cauthuser=0>
cc: 619-884-6482

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L94 SKJARSTAD, ERIC AND HUI, JULIE

Comment Letter L94

Date: 5/2/19

TO:

Mr. Robert Dmohowski, Planning Dept.
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

Subject:

Against North River Farm Project

From:

Residents of South Morro Hills
Eric Skjarstad and Julie Hui
575 Precious Hills Road/PO Box 1072
Bonsall, CA 92003

Dear Mr. Dmohowski,

We are residents of South Morro Hills and are against the North River Farm Project (NRFs). We moved from Los Angeles County over two years ago to escape city sprawl and choking traffic congestions. North River Road is our main entry and exit road to and from our property and we already see heavy traffic buildup on North River Road and at both ends to HWY 76 and to Vandergrift. Traffic condition is especially bad during the morning and afternoon commute. In addition the entire length North River Road is a narrow fast-speed two-lane country road, it is old and dangerous as it is. With added traffic and no major improvements eastbound toward HWY 76 will be even more dangerous and congested. Adding hundreds of new homes will surely drastically worsen the situation. For this and the following reasons we wish to express our strong opposition to NRFs:

Late Comment Letters for North River Farms Environmental Impact Report

1. NRFs will result in significant negative impacts to population, housing, transportation, and traffic.
2. NRFs will convert agricultural land into a sprawl development which will have many long-term negative impacts including but not limiting to higher taxes for existing residents to finance services away from existing facilities and services.
3. NRFs will result in the permanent loss of prime agricultural land that generates jobs and local food.
4. NRFs is a sprawl project NRFs will have irreversible, long-term and cumulative impacts in SMHs on our environment, our safety, and long-term jobs related to agriculture and agritourism.
5. NRFs is inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability, and improve citizens quality of life.
6. NRFs will further distortion of Oceanside's Jobs/Housing Ratio which is already way below average in San Diego County.
7. NRFs will negatively impact efforts to increase agritourism and its related jobs and income.
8. NRFs will hurt the image of Oceanside as a safe and well-balanced community.
9. NRFs will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
10. NRFs will result in conflicts between farmers and residents because of inadequate buffers.
11. NRFs conflicts with Oceanside's General Plan that promotes community values, aesthetics, character, and safety.
12. NRFs should be denied until an updated SMHs Vision Plan is in place.

Thank you for your consideration.

Sincerely,

Eric Skjarstad and Julie Hui

cc.

Planning Staff planningstaff@oceansideca.org; Planning Commission
PlanningCommission@oceansideca.org; Mayor and City Council Council@oceansideca.org

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L95 LATASA, FRED

Comment Letter L95

From: fred latasa <fjlatasa@hotmail.com>
Sent: Thursday, May 02, 2019 11:53 AM
To: Robert Dimichowski
Subject: "Please vote NO against turning Oceanside farmland into high density housing."
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

"Please vote NO against turning Oceanside farmland into high density housing."

Thank you
Fred Latasa
Fleet Manager
Huntington Beach Dodge Chrysler Jeep

Office 714 794 3375

cell 760 672 4044

fax 714 842 7408

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L96 HAWTHRON, GUS

Comment Letter L96

From: Gus Hawthorn <gushawthorn@gmail.com>
Date: May 2, 2019 at 7:44:40 AM PDT
To: council@ci.oceanside.ca.us
Cc: Terri Hawthorn <terrihawthorn@gmail.com>
Subject: Please Stop North River Farms

Warning: External Source

Dear Mayor and City Council,

We have written to you before in opposition to the proposed North River Farms development and do so again today. Please preserve and protect Morro Hills. Vote against the development. Can we count on you to do that?

Respectfully,

Henry (Gus) and Terri Hawthorn
Oceanside

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L97 JOHNSTON, KAREN

Comment Letter L97

From: Karen Johnston <karejohnston@gmail.com>
Sent: Thursday, May 02, 2019 1:15 AM
To: Planning-Planning Commission; Robert Dmochowski; City Clerk
Subject: North River Farms Planned Development; Overload of Fire Evacuation Routes

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Please do NOT approve the North River Farms Development Plan

Most of North River Road is a narrow, rural 2-lane road. The San Diego County Sheriff's Department and the North County Fire Protection District have designated it as a "main evacuation road" for the communities east of Oceanside (See Evacuation Map:

<https://www.ncfire.org/files/6a2602b8a/evacuation+Map+Fallbrook+2018.pdf>).

"Santa Ana winds are strong, dry offshore winds that blow from the east or northeast." Page 43 The Weather Guide, A Weather Information Companion for the Forecast Area of the National Weather Service in San Diego; 2012; National Weather Service, San Diego; Prepared by Miguel Miller, Forecaster (https://www.weather.gov/media/sdx/documents/The_Weather_Guide.pdf).

There is always a high fire danger during Santa Ana wind conditions in California. According to the Cal Fire 'Fire Hazard Severity Zones', many of the areas to the northeast and east of Oceanside are classified as High and Very High Fire Severity (http://map.fire.ca.gov/webdata/maps/san_diego/hszs_map_37.pdf).

Wildfires that progress from those areas towards Oceanside during Santa Ana wind conditions will force communities such as Fallbrook, Bonsall and East Oceanside (particularly the Morro Hills) to evacuate on North River Road.

The Draft Conceptual Wildland Fire Evacuation Plan for The North River Farms Community [17 Appendix J2- Evacuation Plan](#) states in section 1:

"In the event that one or more roads are not considered safe for evacuation, contingency options are available to the North River Farms Community."

This is **not** true. During the Lilac Fire 2017, the only evacuation route open to residents in that area was one way on North River Road, towards the Vandegrift intersection.

As noted in the comments of the Draft Environmental Impact Report, many residents of Oceanside were stuck in slow-to-stopped traffic on North River Road, Vandegrift Boulevard, and College Boulevard while evacuating due to the Lilac Fire. Please keep in mind that North River Road has only one exit (onto Vandegrift) in the event of a Santa Ana driven wildfire coming from the east through the San Luis Rey Riverbed.

It would be highly irresponsible for the City of Oceanside to approve the 656 residences, plus hotel and onsite businesses that are included in the North River Farms Development Plan. This would add more evacuees and traffic to an already overloaded evacuation route.

Late Comment Letters for North River Farms Environmental Impact Report

Please consider the safety of Oceanside residents and neighboring communities and DENY the North River Farms Development Plan.

Sincerely,
Karen Johnston
Oceanside Resident
1544 Sleeping Indian Road

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L98 NIELSEN, KAREN

Comment Letter L98

From: Karen Nielsen <karenhome9@hotmail.com>
Sent: Thursday, May 02, 2019 4:28 PM
To: Robert Orzechowski; Planning Web; PlanningCommission@coעדנסideca.org
Cc: City Council
Subject: Please vote NO on May 6

Warning: External Source

I am writing today to request that you please vote NO regarding turning Oceanside farmland into high-density housing, which would raise taxes and also worsen already congested traffic on Highway 76.

Please, please vote NO!

Respectfully,
Karen Nielsen
4072 Mira Costa Street
Oceanside, CA 92056

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L99 BALMA, LARRY

Comment Letter L99

From: Larry Balma <lb1122@hotmail.com>
Sent: Thursday, May 02, 2019 9:02 AM
To: Tom Rosales; Curtis Busk; Robin Goodkind; PC19 Tom Morrissey; PC19 Susan Custer; Kyle Kahal
Cc: Robert Ornochowski; Louise Balma
Subject: NRFs Benefits

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

All Planning Commissioners

North River Farms Planned Development - Integral Communities

Overview

The Oceanside Planning Commission recommended denial of the NRFs project once again at the January 28, 2019 meeting. NRFs vacated their project from the Council meeting because it did not look like they would be approved. They are trying to answer some of the concerns about their subdivision brought up by Staff, Council and Public comments. However, they are missing the point that the project is too dense, the farm plots are too small to be successfully farmed, and the hotel and commercial space may never see daylight.

The SMHA is working together with Staff on our AgriVision Plan that includes the Agritourism opportunities that have already been approved by Council. Staff is laying a foundation for a "Specific Plan" that encompasses the entire 3500 acres of SMHs. This Specific Plan vision will be adopted into the City General Plan.

An updated vision plan will consider additional infrastructure necessary for future development balance between Agritourism, possible clustered home-sites, and agriculture. Right now, our infrastructure is based on the current 2.5-acre zoning. There are no projections of costs for additional infrastructure that may be required. Any development should pay into the future infrastructure needed for the area.

Integral is trying to push their NRFs project through to entitlement before our Vision is in place, before the City knows what the future infrastructure costs will be. They are proposing to use over half of the infrastructure available for the entire 3500 acres of SMHs. The improvements they propose are only sized to serve their parcel. This leaves any future development to pay the bill.

March 22, 2019 Memorandum to City of Oceanside Planning – SMHA Review

1. Open Space / Ag Land

The Bree property north of the NRFs PD is approximately 34 acres. The Bree parcel has been entitled to build 27 high end estate homes one-acre parcels. The land was a chicken ranch during the 1960s, but just one home-site has been on the property since and has not been farmed. The elevation is higher than most of the surrounding land and is a perfect site for some higher end homes. However, the Bree property may have trouble building high end homes next to a high-density subdivision.

Late Comment Letters for North River Farms Environmental Impact Report

Integral's suggestion to take the adjoining Bree property that is already entitled for 27 high quality homes and to not build confirms our concern that NRFs will cause a negative cumulative effect on other nearby acreage.

The Mayor said that NRFs needs to have a real farm element. The current proposed farm elements in the project are small plots or strips of land scattered about the subdivision. The plots do not connect and there is no way to move equipment from one plot to another making any type of commercial farming infeasible.

If the Bree property were to be added to the PD the entire project needs to be redesigned and the additional ag acreage placed alongside North River Road and Wilshire Road. This would move the housing element with walls and buildings away from the major roadways, buffer the subdivision and add enhancement to Oceanside and SMHs AgriVision. This could result in an actual "Agricultural Gateway" to South Morro Hills that could be farmed successfully. It would be an attempt to follow our SMHs AgriVision which includes agritourism opportunities.

Adding the Bree property as open space will not enhance the NRFs project. Joining all the projects farmland along the roadways will. A portion of the lower part of the Bree property where it connects to the Arrowood Golf Course can remain as a riparian flyway and also enhance the project.

I doubt that the other 10 acres of agricultural zoned land somewhere in SMHs is actually being farmed. Purchasing other actual "farmland" in SMHs and perpetually preserving it as farmland is better than purchasing mitigation credits elsewhere even in some third world country. However, no amount of required mitigation land can be used to reduce the DUs/acre in NRFs.

2. Hotel Site

I asked Integral Communities during our first meeting and successive meetings to bring me a business plan of their farming operation and their commercial buildings. Integral finally admitted they were not used to commercial projects; they designed housing subdivisions. The commercial developers I have known begin by marketing their project to "Anchor" tenants and then sign a contract and design a project that will be a success.

Integral has thrown in the hotel idea because their neighbor, Paradise Falls wedding venue first had the idea for a boutique hotel to enhance their wedding experience. SMHA added the boutique hotel idea to our Agritourism plans that was ultimately adopted by the City. Integral added the hotel so they could state TOT income for their project. They did speak to a hotel owner who had no desire to operate a hotel in the subdivision they have proposed. They obviously don't have a tenant and by stalling the building of the hotel for 10 years they are merely setting up for some future condos that will bring in no TOT income. The hotel is merely another marketing ploy from Integral.

Integral's Benefits as stated:

- The hotel "allows for the Village / Commercial Core concepts to take place"????
- This 10-year hold "will allow for a higher probability of their boutique hotel concept becoming real." Seriously????

Is this how confident they are that their Commercial Core Village and hotel will ever happen...?

Integral's marketing pressure with all the pretty drawings and animations may excite some of the lay people but anyone familiar with planning, building, commercial business or common sense can certainly see through this smoke and mirrors marketing.

In the development community often times terms like Mixed Use, or in this case Boutique Hotel, Commercial, Maker Space and Farming are considered "Throwaways." Basically, spaces that are never built, or are built and never sold and are only used to obtain entitlement in order to increase the number of DUs.

3. South Morro Hills Vision Plan

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The SMHA has been working on our Agrivision plan for the entire 3500 acres of South Morro Hills long before Integral came along with the NRFs project. Integral was told at their first Council meeting in 2017 to work with SMHA and come back with something between 100 and 400 homes. Integral fought with City Staff and with SMHA. We had dozens of meetings with them and they open every meeting by saying, "Density is not on the table." All they have done at our meetings is to glean our Agrivision ideas and drop the names into their marketing proposal with no plan for success. They don't care if any of this works, they just want to receive the entitlement. The builder who they sell to will come back to the City and say he can't make this plan work, he needs more DUs. At that point the Agricultural zone has been broken by Integral and they are gone, paid by the builder and now the builder is the loser.

Integral is not the property owner. SRF did not have the property for sale. SRF receives lease payments from West Coast Tomato's that takes care of the expenses plus income.

Until we have our Agrivision Specific Plan in place we don't know how much each new development should be contributing to the future infrastructure needed in SMHs. Integral wants to push their project through before any vision plan exists and use up more than half of the infrastructure that is currently planned for the entire 3500 acres of SMHs.

Integral says they will offer up to a \$200,000 toward our Vision plan but exclude all internal costs from that number. Just more pandering. Smoke and Mirrors.

4. North River Road at Vandergrift

The addition of building two right turn lanes eastbound onto North River Road only to funnel down to one lane.. One lane eastbound North River road is already insufficient as it connects with Highway 76.

5. Traffic Community Benefit Contribution

If NRFs would wait for the Agrivision Specific Plan completion, we would be able to accurately assess every future development the proper amount for a future four lane North River Road. Do we trust that Integral's offer today will be a fair amount? Especially after they exclude their internal costs. They say "this starts the planning of a circulation element.

The City already has a circulation element that is planned for a total build-out in SMHs at 2.5 acres. NRFs is trying to take over half of the infrastructure that has been planned for All of the 3500 acres. SMHA has been working on an updated Vision Plan that includes a circulation element long before Integral proposed their PD. Integral is just trying to use up every bit of infrastructure for their own NRFs project. They are trying to snow us by offering dollars which they say are benefiting the City.. when in fact they may not even be paying enough for the infrastructure that they are proposing to use.

We will not know how to assess the cost of future infrastructure until the Agrivision plan is complete. They should be realistically contributing to a future Melrose Bridge.

6. Local Emission Reduction

The City Staff has worked over three years preparing a Climate Action Plan and has used many outside consultants in the process. The plan is completed but is not considering that NRFs subdivision and the cumulative effects which would most certainly add greenhouse gases to SMHs. Will \$100,000 be even close to the amount to completely redo our Climate Action Plan? Another cumulative effect from NRFs project. This is not a benefit to the City. An updated Vision specific plan for SMHs is a benefit and will fit within our CAP.

Integral's Public Benefits as Stated

- "The Project will be a catalyst for investment in the agritourism business." They are unable to find a Boutique Hotel operator. The local farmers along with Cyclops Farm and Farmer D have rejected the idea of farming the plots of ground in NRFs. The farmer from the Ecology Center in San Juan Capistrano has never farmed more than an acre and his operation has been

Late Comment Letters for North River Farms Environmental Impact Report

subsidized by the City of San Juan for over 15 years. They have found no commercial anchor or restaurant to sign on for commercial space. More smoke and mirrors.

- "Critical infrastructure improvements...the gateway location is the start of these improvements." In other words, the improvements only help NRFs PD.
- "The Project will be up-sizing the existing 18" sewer line west of the site to a 21" sewer line to create more than sufficient capacity for the projects sewer flows." Once again Integral states that they are only concerned with servicing their NRFs project. The City Staff confirms that a 21" pipe will not support any other development in SMHs. Even if new home-sites on 2.5 acres could not perk, they would not be able to be hooked up to sewer and could not be built. The Sewer pipe would need to be sized to 24" from Wilshire Road all the way to Vandegrift merely to allow for the existing zoning. The sewer pipe that exists on North River Road carries Rainbow utilities sewage for treatment by Oceanside. This pipe was never considered for use by SMHs.
- "NRFs will expand the College Bridge from an existing 4 lane facility to an expanded 6 lane facility." The existing two lanes on the bridge are currently 12' and 11' wide. Turning cars and trucks regularly cross over the painted lines and into the bike lane. Narrowing the cushion from the concrete center barrier to the outboard concrete wall in order to crowd three 11' wide lanes seems very unsafe to me. If this lane crowding leads to future accidents the City could be held liable. The logical alternative is to think about a Melrose Bridge.
- "The tax revenue from the proposed project would provide an economic benefit to the City." The property tax from the home-sites will result in a negative after a few years as the City is required to upgrade and maintain the infrastructure and services. The TOT tax from the "throwaway" hotel and commercial will never materialize. Why do they not have an anchor agritourism client signed on to the project? Other development projects have the agritourism client signed on from day one. NRFs does not have a suitable design for substantial agritourism, they are merely a subdivision.

Summary

Most developments spend at least five years going through the planning process. Arrowood took ten years to plan their 600 acre project, three quarters of the land was being commercially farmed.. They began asking for 4000 DUs and were finally entitled to build 1006 along with a Park, a School and a Golf Course.

Integral has spent two and a half years in the planning process. They asked for 985 DUs and are down to 658 on 177 acres. Using the Arrowood standard, Integral should be at 290 DUs with huge farmable land between North River and Wilshire Roads and the actual home-sites.

Integral is trying to push their project through before the General Plan update and the Agrivision Specific Plan for SMHs is in place. Agritourism will enhance the City, our agricultural heritage and add economic benefit to the farmers and to the City.

I am not an expert on development or on the City's rules on development. I am merely the spokesperson for the South Momo Hills Association trying to uphold our goal of orderly development of South Momo Hills agricultural area. I bow to our intelligent City Staff and their independent consultants for their interpretations considering the benefits offered by NRFs project. Staff, from day one, has never found reason to approve any of NRFs project. NRFs has not listened to Staffs recommendations and has not changed their project at all during the process. NRFs continues to have their paid consultants to try and justify their original plan.. The question is, who is working for the betterment of the City of Oceanside... Our Staff, or Integra's marketing push to build their North River Farms project?

Late Comment Letters for North River Farms Environmental Impact Report

The NRFs project should be denied as designed and integral should be directed to actually work with City Staff and design something that will work within Agr/Vision.

Respectively,

Larry Balma
President
South Morro Hills Association
760-419-2211

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L100 MARIA

Comment Letter L100

—Original Message—

From: Maria <maria0808@yahoo.com>
Sent: Thursday, May 02, 2019 5:46 AM
To: City Clerk <CityClerk@oceansideca.org>
Subject: North River Farms Project

Warning: External Source

As a native Oceansider I am asking that you: Please deny/stop this project. This area is just fine as it is. I have seen my hometown go through my phases over the years but this project needs to be denied. Downtown is already being destroyed with all the high rises leave the farms alone. We don't want this project or need it for that matter.

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L101 **LIEBES, SUSAN**

Comment Letter L101

From: Susan Liebes <sliebes@hotmail.com>
Sent: Wednesday, May 01, 2019 8:56 PM
To: Planning Planning Commission; City Council; City Clerk; Robert Dmohowski
Subject: I Oppose North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I am writing to let you know that I oppose North River Farms, due to the destruction of valuable farmland and the addition of sprawl in an area where traffic is already terrible. Please do what you can to stop this development.

Thank you,

Susan J. Liebes
sliebes@hotmail.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L102 MITCHELL, TINA

Comment Letter L102

From: Zell Lundberg <tina.mitchell@outlook.com>
Date: May 2, 2019 at 1:31:47 PM PDT
To: "PlanningCommission@oceansideca.org" <PlanningCommission@oceansideca.org>,
"Council@oceansideca.org" <Council@oceansideca.org>, "cityclerk@oceansideca.org" <cityclerk@oceansideca.org>
Subject: **NO on North River Farms**

Warning: External Source

I encourage all members to vote "no" on the North River Farms project. I concur with the staff's findings when they recommended not supporting this project.

- This project is not consistent with the Land Use Element of the City's General Plan.
- The site isn't located within a Smart Growth area and is inconsistent with the General Plan's anti-sprawl policies.
- The project doesn't fit with the agricultural use policies of the General Plan.

Tina Mitchell
1419 Belmont Park Rd.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L103 NIELSEN, MARTIN

Comment Letter L102

From: Zell Lundberg <tina.mitchell@outlook.com>
Date: May 2, 2019 at 1:31:47 PM PDT
To: "PlanningCommission@oceansideca.org" <PlanningCommission@oceansideca.org>,
"Council@oceansideca.org" <Council@oceansideca.org>, "cityclerk@oceansideca.org" <cityclerk@oceansideca.org>
Subject: **NO on North River Farms**

Warning: External Source

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- The project doesn't fit with the agricultural use policies of the General Plan.

Tina Mitchell
1419 Belmont Park Rd.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L104 OCHS, MARK

Comment Letter L104

From: ochs.m@kbcglobal.net
Sent: Wednesday, May 01, 2019 2:49 PM
To: Robert Dmohowski
Cc: 'Larry Balma'
Subject: RE: North River Farms Comments for Denial
Attachments: P.C. responseMark Ochs 5-1-19.docx; footer.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Subject: Re: North River Farms Comments for Denial

Mr. Dmohowski,
Please find attached my response and comments for the 5/6/2019 North River Farms Proposal.
Thank you for forwarding this to the Planning Commission and your city staff.
Mark Ochs

Late Comment Letters for North River Farms Environmental Impact Report

Honorable Planning Commission,

The proposed North river farms project being considered should be denied. The project continues to be non-conforming and lacks any attributes overriding the original concerns brought forth by the City Planning Commission in their recommendation to deny the original application to the city of Oceanside. This request for an approval as submitted, provides no additional offer or benefit to the City of Oceanside and its residents beyond the mitigation efforts that will be part of the findings and requirement disclosed based on the F.E.I.R.!

The unsurmountable conflict, negative resulting impacts (infrastructure, traffic and precedential effects) and lack of need for this project, clearly provides the Council obvious direction and responsibility to deny this premature development agreement request.

Areas within the D.E.I.R. still requiring attention and revision are, but not limited to, the listing below.

1. The Air Quality Baseline for the Project is Not Set Out Accurately.

2. The EIR's Air Quality Thresholds Were Set for Industrial Projects, and Do Not Provide Substantial Evidence that the Project's Pollutant Emissions Are Not Significant.

3. Provide Substantial Evidence that the Project's Pollutant Emissions Are Not Significant.

4. Mitigation for Exposure to Carcinogens During Project Construction is Not Assured.

5. Greenhouse Gas Emissions Have Not Been Shown to Be Not Significant by a Valid Significance Threshold, and Have Not Been Shown to be Adequately Mitigated, in That Mitigation Proposed by the EIR Has Not Been Shown to Be Real, Enforceable, Permanent, Additional, Verifiable, and Feasible.

6. The underlying root cause for many of the project's impacts is increased VMT caused by its location and design.

7. The DEIR failed to identify if the project will meet the edge effect standards for lights near to the protected SLR River corridor.

8. Failure to evaluate or comply with requirements related to conversion of agricultural lands in the draft Oceanside Sub Area Plan (SAP)

Late Comment Letters for North River Farms Environmental Impact Report

9. Figure 4.4-1 fails to show the regional wildlife corridor links between the San Luis Rey River and "other habitat areas inside or outside of the city."
10. Failure to evaluate potential impacts on migratory birds associated with the San Luis Rey (SLR) River.
11. Inadequate testing of soil and water for hazardous materials.
12. Emergency evacuation plan arbitrarily limited the analysis to focus on the project site and within the site on the HOA.
13. Evaluation required for the Evacuation impacts of piecemeal roadway widening.
14. Cost of required additional flood control systems not identified or evaluated.
15. Analysis fails to evaluate compliance with Regional Housing Needs Assessment (RHNA) allocations by income level.
16. Evacuation impacts of piecemeal roadway widening.
17. Failure to mitigate for projected water supply shortfall.
18. Oceanside Unified School District will not have sufficient staff and facilities to serve the proposed project if it were approved.

I would think that Integral Management would bring the City of Oceanside a much more compelling proposal that would offer much more.

- A. Traffic impacts heading east from the project have been completely ignored. North river road should be improved, widened until reaching Highway 76. "Cal Trans endeavors that any direct and cumulative impacts to the state highway system be eliminated or reduced to a level of insignificance pursuant to CEQA and NEPA standards" As identified in the Department of Transportation response to the Draft E.I.R. "21 additional intersections are impacted and not disclosed and 20 existing Draft E.I.R. impact findings that require correction, revision, substantiation or justification.
- B. Infrastructure improvements (Sewer, reclaimed water, storm drain and offsite improvements) should be solely the burden of the developer without the suggested repayment by future downstream development.
- C. The "Community Facility District" and "Temporary Fire facilities" should be solely the burden of the Developer. Insurance and management of these concessions should remain in place much longer than proposed and never become the burden of the City of Oceanside.
- D. Affordable housing should be included in the project. No consideration should be given to alternative options.
- E. Green House Gases should be mitigated by design and reduced by building limitations, not solely by purchase of carbon off sets.

Late Comment Letters for North River Farms Environmental Impact Report

- F. Agricultural mitigation should not be achieved through purchase of agricultural conservation easements in other county locations. Mitigation should replace the 176.64 acres within the Oceanside city limits.
- G. Vested rights duration. If and when a Development agreement is considered viable, it should be limited to a maximum term of five years, as projected by the developer in the estimated timeline to complete the phasing. Going beyond this duration restricts the City of Oceanside of it right to review all projects completely with unrestricted discretion.

Again, please deny the request for any movement forward on the proposed North River Farms development. To do otherwise would be premature and may/will have negative long-term consequences regarding this project as well as similar submittals to City staff and Council.

Respectfully,

Mark Ochs

Sleeping Indian Road

Late Comment Letters for North River Farms Environmental Impact Report

L105 SCOTT, NADINE

Comment Letter L105



550 Hoover St.
Oceanside CA 92054
nadia550@sbcglobal.net
760-803-6813

Kindly make part of the official record.

May 6, 2019

To: Planning Commission via email and copy to City Clerk

PlanningCommission@ci.oceanside.ca.us and cityclerk@ci.oceanside.ca.us

Re: N River Farms project, Planning Commission hearing May 6, 2019

To whom it may concern,

We strongly support staff's recommendation to DENY this project. Friends of Loma Alta Creek (FOLAC) cannot support conversion of farmland for high density, unaffordable market-rate housing that will not contribute to the fiscal sustainability of the city.

We are strong proponents of following the General Plan and zoning ordinances *balanced* with good environmental practices. That is what creates a good, prosperous city: a balanced approach to zoning, housing and business types and uses, including preserving Oceanside's very important agricultural sector and reducing impacts to the environment. This can be done with good projects in the appropriately zoned locations with good designs and consultants who understand the value of the environment as part of the overall project and protect it. For instance, we strongly supported the project Arroyo Verde @ RDO precisely because they achieved that intelligent balance.

Continuing Issues:

1. Public benefits: The new document from NRF purports to add public benefits. It's irrational to consider that the hotel, a fire station, various roadway improvements *would ever be built*. There is no phasing plan for the housing, commercial or maker's market, and the "promise" to market the hotel for 10 years, but then request another use, completely defeats any revenue benefits this project could generate. The fact that some of these so-called benefits would not occur until the "last certificate of occupancy" (if ever) is absurd and expensive and potentially dangerous to the residents in the area. The impacts from the development start with the first homes, not after they are all built!

Late Comment Letters for North River Farms Environmental Impact Report

2. Farmland Conversion: Adding more acreage of open space to bring down the request for 10 times the allowable density is a maneuver that is not appropriate or sustainable. The so-called Brees property added to this 'pay to play' public benefit letter is zoned agricultural and those farmland acres will be lost forever.

3. Fiscal issues: The fiscal analysis relies heavily on TOT from a hotel- we doubt this will get built because of the location and a near certain downturn in the economy due to the massively accumulating public deficit. Funders will look at only the most desirable locations; being surrounded by high density homes would not fit that goal, particularly in a predictably congested and unsafe in the event of fire road system.

4. Roadway issues:
 - a. The promise to widen certain roadways relies on the city negotiating purchase of rights-of-way. We doubt this will ever happen, at least in the near future out 10 years or so which would encompass the time that the houses would be built. In the meantime, traffic impacts will over burden the area. An estimated 8000 car trips per day pencils out at over \$2.2million per year added to a 2 lane local use road. This area simply is NOT designed for those impacts.
 - b. The promise to contribute to the Melrose Bridge is so unreasonable we shouldn't even have to mention it but we will. You undoubtedly are aware that the major funder for such a project, SANDAG, is overly extended by billions and will not be seeking to build local roadways. Rather they have stated they will focus on public transit instead. They are so in the RED, \$10 billion at least, they are strongly also considering not funding the rest of the I-5 freeway widening projects. <https://timesofsan-diego.com/politics/2019/04/26/sandag-offers-held-vision-for-future-transportation-in-san-diego-region/> and <https://www.sandiegocountytimes.com/news/environment/5d-rte-revenue-shortfall-sandag-201906-cicvy.html> It's 100% certainty a roadway in the interior of a city would never make the list of improvements from SANDAG, particularly when it would be growth inducing and contribute to sprawl, as well as defeat the SANDAG concept of smart growth corridors and proper development near transit. The focus will be on transit development, NOT farmland conversion sprawl.

5. Housing Stock:
 - a. NONE of these dwellings could technically be labelled as affordable homes based on accepted formulas and tables of low and very low incomes as specified by the Housing Department. We'd refer you to the head of the department, Margery Pierce, to confirm this. ¹ (Table for San Diego County in footnote)
 - b. It's also highly likely that no ADUs could be built due to the very small size of the lots in the majority of the project. That's another lost opportunity for creating housing stock in Oceanside.

¹ <https://www.sandiegocounty.gov/content/sdc/edc/rental-assistance/income-limits-are.html>

Late Comment Letters for North River Farms Environmental Impact Report

- c. Adding in Mello-Roos fees, property taxes, a farm and agriculture fee, HOA fees and finally the CSD (Community Services District) fees for fire protection makes these homes VERY UNAFFORDABLE. Don't be fooled by outsiders and lobbyists who come to our city and say they would "like to buy a house" in this Fake Farming Community. They came to the last meeting and were later identified as part of the Building Industry's Green Light action alert participants, construction/developer PR firms, and firms associated with Integral developers, and the like. FEW in Oceanside could afford these homes, even the cheapest ones that will predictably cost \$700-800K by the time one adds in all the fees and taxes; Oceanside's income demographics simply do not support such a product - a recipe for a traffic and public services drain disaster. We can estimate that all the fees will bring the monthly payment up to \$8,000 monthly income for a very small home that is distant from services and transit.

6. Floodway & Flooding.

- a. The Southern part of the property is in the San Luis Rey FEMA floodplain and floodway and will require immense amounts of fill which is also very costly. Additionally Transport trucks will overburden the two lane roadway of N River Farms during hauling and we do not recall this being analyzed. Anytime a floodplain gets filled, either purposefully or with invasive plants like *arundo* and *neofolium*, the hydrological dynamics of the area are greatly changed. People downstream already have to meet an increased flooding burden on the San Luis Rey and pay extra for flood insurance. It's a certainty that any homes in the floodplain will have this same burden to say nothing of the increased flooding risk. We have documented this problem in Loma Alta Creek when NCTD split the floodplain in half and elevated the railroad tracks. In spite of the city's denials that flooding would not happen, they have been forced to spend millions of taxpayer funds for multiple detention basins upstream! And the Industry Area still floods based on our personal observations with the last large storms in 2019.
- b. Part of the property is also in the Lake Henshaw inundation zone. Even if the dwellings are 'inundated' we are sure a steep flood insurance policy would be required which makes these dwellings unaffordable and unprofitable to build.

Conclusion:

To make a more complete and adequate record for denial we urge the following:

1. No overriding considerations should be part of this record, it is clear this project has too many unmitigable impacts from traffic, fire evacuation/safety, conversion of farmland, flooding, air quality, sprawl, and greenhouse gases issues.
2. It is also crystal clear that this project will be a major drain on city services and current taxpayers due to the defective fiscal analysis that makes multiple, unjustifiable assumptions about hotel tax revenues, bonds issuance percentages, etc. This project, using proper assumptions, would be a net negative rather than the Disneyland figures that were presented in the latest 'analysis.'

Late Comment Letters for North River Farms Environmental Impact Report

3. This project, as depicted in nice pretty pictures, will significantly add to the jobs-to-housing imbalance in Occochee which is far below 1:1.
4. We urge you NOT to certify the EIR, accept staff's recommendations and approve the Resolution to Deny this project.

Thank you for considering our comments.

Friends of Loma Alta Creek



Nadine L. Scott, Attorney at Law
Friends of Loma Alta Creek

Late Comment Letters for North River Farms Environmental Impact Report

L106 MARIANO, PAMELA

Comment Letter L106

From: Pamela Mariano <pamela.mariano55@gmail.com>
Sent: Friday, May 03, 2019 3:47 PM
To: Planning-Planning Commission
Subject: NO on North River Farms Project

Warning: External Source

I urge you to vote NO on the North River Farms Project.

Respectfully,
Pamela D. Mariano

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L107 HERNANDEZ, ALICIA AND JOHN

Comment Letter L107

From: humana4@att.net
Sent: Friday, May 03, 2019 9:02 AM
To: Robert Drichowski
Subject: Fw: Opposition to North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Forwarding to correct email address as I had wrong email address initially.

----- Forwarded Message -----
From: hernandez@outlook.com
To: council@ci.oceanside.ca.us ; cityclerk@oceansideca.org ; rdriehowski@oceansideca.org ; christopher.christopherson@madisonva.com
CC: John Hernandez
Sent: Friday, May 3, 2019, 8:58:01 AM PDT
Subject: Opposition to North River Farms Project

To: City of Oceanside Planning Commission, et al

We are in opposition to the North River Farms project and feel that we must voice our opinion in order to protect our neighborhood and the surrounding environment. We retired and relocated from L.A. County to Oceanside (Arrowood Community) last year. We chose this location because of the low traffic congestion and neighboring peaceful farming community and beautiful views.

The main reasons we are in opposition to the project are as follows:

1. The existing fire danger and evacuation in the event of a major wildfire will be compromised. Some residents took over three hours to vacate Arrowood during the Lilac fire. This could have been catastrophic for Oceanside. We all saw what happened in Paradise and hopefully you have the same safety concerns about placing our residents in a precarious and deadly situation by overbuilding without having the infrastructure to support a mass evacuation, if the need should arise.
2. Traffic congestion will be compounded dramatically. As we know the rush hour traffic on College Street and North River Road is already heavy. By adding more vehicles - 2-3 per household on average, this will become a commuting nightmare. Even if the College Street Bridge is expanded, the congestion during the construction phase will be extremely increased and should an emergency evacuation be required during the building phase, God be with us all!
3. Addition of a hotel or public event venue at North River Farms will draw even more people to the area which will also dramatically increase congestion. Not only will the 76 experience an increased amount of traffic, North River Road will be impossible to use as an alternate route since the planned round-about will decrease the speed of the vehicles driving through that area. Summer months are extremely congested already with inland residents flocking to the beach to escape the heat on 100+ degree days.

Late Comment Letters for North River Farms Environmental Impact Report

4. With the additional hotels being constructed on Coast highway, we will already have an increase in tourists/vehicles which will add to the traffic, especially during summer and holiday weekends.

Please seriously consider what this will mean for Oceanside, Guahome and Bonsall. There are NO benefits for the existing residents! The only benefits are for the developer who will make extreme profits while jeopardizing our safety and quality of life.

Thank you for listening and making the right decision for Oceanside!

Alicia Hernandez
John Hernandez
1312 Bellingham Drive
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

L108 REDER, BARRY

Comment Letter L108

From: barry reder <b.reder@sbcglobal.net>
Sent: Tuesday, April 30, 2019 10:15 AM
To: Planning-Planning Commission
Subject: North River Farms

Warning: External Source

Kudos to you for rejecting North River Farms. Only the developers and City Council will gain financially for this poorly conceived project.

-Barry Reider

"The night isn't black if you know that it's green." -Neil Young

"Have you ever noticed that anybody driving slower than you is an idiot, and anyone going faster than you is a maniac?" -- George Carlin

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L109 WEBER, BILL

Comment Letter L109

From: bill weber <billwpi@gmail.com>
Sent: Thursday, May 02, 2019 5:24 AM
To: Planning-Planning Commission
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Good morning,
I am opposed to the North River Farms project. We live in this area because it is rural and we enjoy it that way. The only positive of this project is to the developers that profit from it.

--
Thank You
Bill Weber

714 335 5065

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L110 OSLUND, BRAD

Comment Letter L110

From: Brad Oslund <beradicalone@yahoo.com>
Sent: Thursday, May 30, 2019 7:31 AM
To: Planning Planning Commission
Subject: North River Farms Project
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hi
I live pretty close to where this project might take place and the traffic now at busy times is already a NIGHTMARE!! Douglas is backed up all the way from Northriver to ElCarrizo. That's not that you would add another 600 or so homes and a hotel to that mess. Jam moving in a couple years because North County is no longer North County. There is a reason its Zoned the way it is. Its sad but its obvious its all about the money and not the quality of life for the people that live her now.

Thanks Brad

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L111 WOLSHON, BRIAN

Comment Letter L111

Brian Wolshon, Ph.D., P.E., P.T.O.E.

May 3, 2019

City of Oceanside Planning Commission
Development Services Department
Planning Division
City Hall South Building
1st Floor
300 North Coast Highway
Oceanside, California 92054

RE: Review of the North River Farms Project Evacuation Plan

Dear Planning Commission Members,

Pursuant to a request by Preserve Calavera, I have undertaken a review of the Evacuation Plan document for the North River Farms Project. This letter summarizes my understanding of the report and the plan and is submitted for your consideration prior to Planning Commission hearing for this project currently scheduled for May 6, 2019.

The findings and opinions expressed in this letter are based on the online version of this report dated June 2018 (Dudek 2018) as well as a brief telephone conversation that I had with a representative of the Preserve Calavera organization. During this conversation I was provided some additional background on the characteristics of local area and the history of development in the surrounding vicinity.

The opinions expressed here also reflect my career of research and review of evacuation planning, management and operational principles, policies, and practices as well as the application and interpretation of relevant and appropriate emergency planning. My experience also encompasses work as a practitioner and a designer of transportation facilities related to evacuation; a researcher who has studied, developed, and interpreted design, safety, and operational conditions of transportation facilities under emergencies, evacuation and other disruptive events, and as an instructor of transportation theory and application of evacuation-related principles in undergraduate, graduate, and professional development courses. This review was also undertaken within the context of wildfire emergency plans for other areas of California as well as evacuation plans for other hazards in locations throughout the United States.

I have included a very brief, summarized version of my CV that contains a small, representative cross-section of my work, experience, and products related to evacuation. Among the items of particular relevance to this letter are my leadership positions as an advisor and researcher on topics related to evacuation; reviews and evaluations of evacuation practices nationwide; the writing of federal evacuation guidance documents for the United States Nuclear Regulatory Commission, Department of Homeland Security, and Department of Transportation; my work as an expert witness in legal testimony related to evacuation; the writing of a textbook on evacuation theory and practice; and over 100 media interviews for local, national and international newspapers, magazines, radio, and television outlets.

Page 1

Consultant, Baton Rouge, Louisiana

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

Scope of Involvement

The scope of work for this review was established to examine concerns about the traffic impacts during times of emergency in the vicinity of the proposed North River Farms Project that would likely be exacerbated by the project and create threats to public safety.

It is my understanding that, within the past year, at least one wildfire has threatened this area, precipitating an evacuation. During this event, evacuees were delayed by traffic congestion for over two hours within areas vulnerable to the fire threat. Given that this proposed project will add significant levels of traffic to the same network, there are amplified concerns about public safety. The recent history of wildfires elsewhere in the state as well as the often variable and unpredictable nature of wildfires also add to the level of unease.

As a result of these conditions, there are clear concerns that although the developer of the North River Farms project has prepared an evacuation plan, it does not adequately address community concerns. More specifically, it is felt that the full range of potential hazard-response conditions have not been thoroughly nor adequately reviewed, analyzed or planned for such emergencies. Combined, these facts lead to a basic question:

"Is the plan that has been submitted adequate to to ensure safe and timely evacuation of the entire Morro Hills area of Oceanside (not just the project site) during wildfire conditions?"

The intent of this review was to help Preserve Calavera answer that question.

Report and Content

The "DRAFT Conceptual Wildland Fire Evacuation Plan for the North River Farms Community" document was prepared for the Oceanside Fire Department in June 2018. The plan, as its title indicates, is conceptual. As such, it tends to be a high-level discussion of the key needs and concepts that should be considered in developing a more detailed operational-level evacuation plan. According to the document, the plan was prepared based on the City of Oceanside (City) Emergency Operations Procedures, which themselves are based largely on the "Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP), including its Evacuation Annex."

The plan contains seven primary sections. The first is a "plan" that would be given to each homeowner within the proposed development at change of property. This includes important actionable information about available evacuation routes, their potential vulnerability to wildfires, and contingency refuge areas along the evacuation routes. This resident information section also provides information of the location of hospitals; how to register for emergency alerts; and other key emergency-related information. It should also be noted that as there are likely to be non-english speakers within and near the proposed development, all information should be communicated in appropriate non-english languages. Guidance on emergency transportation communications, including the distribution of such information to non-resident populations (transient, visitors, tourists, workers, pass-through traffic, etc. which is also not addressed in the draft plan), can also be found in Transit Cooperative Research Program Report 150 (TCRP 2011).

Page 2

Consultant, Baton Rouge, Louisiana

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

The remainder of the document provides more specific background and supporting information "intended for review by emergency management agencies, including this plan's consistency with Oceanside's Emergency Plan and standard San Diego County Office of Emergency Services evacuation planning." The plan incorporates much of the most current approaches to emergency planning for evacuations. For example, the document recognizes the multi-agency, multi-stakeholder, multi-jurisdictional nature of evacuations and the need to maintain cooperation and coordination between all of them; both for planning and actual operations. It also acknowledges the "unique challenges, constraints, and fluid conditions that require interpretation, fast decision making, and alternatives" that are also a part of all evacuations as well as the need to update plans based on lessons learned from other evacuations, for wildfires in California or for other hazards in other locations. As part of its broad discussion the report also explains various aspects of emergency management command and coordination structure, including the California incident command hierarchy and how it supports the coordination of personnel and resources during emergencies.

Among the other key areas discussion include animal evacuations; shelter-in-place concepts; evacuation timing; the need for and use of safety zones; the evacuation of special needs populations; animal evacuations; and the management of post-event reentry. In Section 4 of the report, the plan covers more location- and condition-specific information related directly to the proposed development. This includes its location, level of threat, road network, and how the areas road system could be used during and emergency evacuation. This section also includes several maps to illustrate the location of the development relative to prior fire events and "trigger points" for potential fires that would necessitate an evacuation notice.

The report also includes a discussion of hazard awareness and the need for residents of the proposed community to be aware of potential hazards and have personal readiness plans in the event of an emergency. These are further supported by the supplementary documents in Appendices A and B. This is vitally important information and reflects lessons-learned in recent past history in evacuations. Ultimately, the decision to evacuate (or not) as well as the decisions of when to make it, where to go, and what routes to take are personal/household decisions. Because of this individual residents and households must take a leading role to insure their personal safety in times of emergency.

Findings

Based on my review of the plan it clearly documents many of the key topics and issues that are necessary to develop and support an evacuation plan. However, this document does not represent a "plan" per se. Rather, as the title suggests it is "conceptual" and it discusses many of the important concepts and needs of evacuations and presents a general framework for it, from which, a plan (with additional analyses and planning) could be developed. Additionally, the document states that:

"this Emergency Evacuation Plan is to be considered a tool that supports existing pre-plans and provides for citizens who are familiar with the evacuation protocol, but is subservient to emergency event-specific directives provided by agencies managing the event."

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

Relative to the specific issues of concern to the Preserve Calavera organization, there no way to determine whether or not the plan is adequate to ensure safe and timely evacuation of the area under a wildfire condition. This is true both for the Morro Hills area of Oceanside as well as the project site. In fact, there is no evidence within the report to suggest that an evacuation traffic study of any kind was conducted for the development itself or, more comprehensively, for the greater region surrounding it. Such form the foundation of evacuation assessments.

Obviously, one of the fundamental factors in determining the adequacy and effectiveness of an evacuation for conditions such as this is to understand the route travel times and delay conditions expected during the event. From a traffic/transportation perspective this is commonly done using traffic modeling and simulation under certain sets of behavioral response assumptions. The results of these assessment are used to estimate of evacuation clearance time, another fundamental component of evacuation planning. They also support protective action decision-making and often are used for the development of traffic management plans, including the assignment of traffic control points and estimating resources needed for the development of plans for transportation-dependent populations.

Evacuation plan development for other hazards, particularly point source hazards like nuclear power plants, must follow regulatory guidance (Jones et al 2011) including the development of evacuation time estimates that require analyses that reflect of a range of possible conditions (weather, participation rate, response time, direction of travel, etc.) that would impact evacuation clearance times. Hurricane evacuation planning, as another hazard of note, follows similar a similar structure.

This report does not show any quantification or analysis of traffic conditions, nor factors of the other key factors that would govern the scope and scale of an evacuation, nor its timeliness. This includes, for example, an estimate of the number of people and vehicles involved in an evacuation, nor the timing at which they would respond to a notice to evacuate and enter the road network. Similarly, there is no assessment or discussion of the traffic conditions on the area road network. As the proposed development is in a highly populated region, it would be expected that the area road network would be carrying other evacuating traffic as well as background and or "pass through" traffic that would normally be in the area at any time of day. Finally, while the document mentions the need to plan for special needs populations, there are no specifics in terms of the resources, procedures, and management required for evacuating these individuals.

Conclusions

No plan or plan document is ever able to account for all conditions that might be encountered during an evacuation event associated with a major emergency. However, there many sets of assumptions that could be used to estimate clearance times and assess how an evacuation process might take place under ranges of conditions on a road network at different times of the day/week/year. However, these assessment were not included in this report. Similarly, there was no discussion of the resources needed and or available to manage an evacuation. This includes, most notably, the people and agencies that would need to coordinate and direct critical elements of the plan, including the movement and/or accommodation of special needs populations, pets, etc.

Page 4

Consultant, Baton Rouge, Louisiana

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

Broadly, this report has similarities to other county wildfire emergency plans that I have reviewed. While they contain useful information, they often do not include "evacuation plans" as such. The non-inclusion of evacuation-specific traffic analysis in emergency plans is not uncommon, however. The past history of major emergencies across the work has consistently and repeatedly shown that truly detailed and effective planning rarely takes place before an emergency happens. More commonly, it takes place after a major disaster has occurred – and often after significant loss of life.

If you have any questions or require additional information with regard to this matter, please contact me.

Sincerely,



P. Brian Wolshon, Ph.D., P.E., P.T.O.E.
Consultant
10741 Spring Fest Lane
Baton Rouge, Louisiana 70810

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

REFERENCES

- Dudek, 2018. "DRAFT Conceptual Wildland Fire Evacuation Plan for the North River Farms Community." Escondido, CA. 86pp.
- Jones, J.A., F. Walton, and B. Wolshon. "Criteria for the Development of Evacuation Time Estimate Studies." United States Nuclear Regulatory Commission, Division of Preparedness and Response, NRC Report No. NUREG/CR-7002, Sandia National Laboratories Report No. SAND2010-0016P, Washington, DC, November, 2011.
- Transit Cooperative Research Program, 2011. "Communication with Vulnerable Populations: A Transportation and Emergency Management Toolkit." TCRP Report 150, National Academies of Sciences, Engineering, and Medicine. Washington, DC.

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

Brian Wolshon, Ph.D., P.E., P.T.O.E.

Edward A. and Karen Wax Schmitt Distinguished Professor
Director, Gulf Coast Research Center for Evacuation and Transportation Resiliency
Department of Civil and Environmental Engineering
Louisiana State University
Baton Rouge, Louisiana 70803-6405

Bio

Brian Wolshon, Ph.D., P.E., P.T.O.E., is the Edward A. and Karen Wax Schmitt Distinguished Professor of Civil Engineering at Louisiana State University and the founding Director of the US DOT sponsored Gulf Coast Research Center for Evacuation and Transportation Resiliency. Dr. Wolshon is an internationally recognized expert on evacuation, emergency, and resilient traffic planning and management. For 20 years, he also chaired the Transportation Research Board's Committee on Emergency Evacuation. Over his career Dr. Wolshon has served as an expert consultant to dozens of federal, state, and local government agencies; national laboratories; and engineering firms throughout the United States and abroad. He has authored scores of federal reports and guidance documents as well as book chapters and more than 70 scientific journal papers on topics related to transportation planning and engineering. Among the most notable of these are *Large-scale Evacuation: The Analysis, Modeling, and Management of Emergency Relocation from Hazardous Areas* and the 7th Edition of the *Institute of Transportation Engineers' Traffic Engineering Handbook*.

1. Key leadership and policy roles:

- a) Director of the Gulf Coast Center for Evacuation and Transportation Resiliency
- b) Chair of the National Academy of Science's Transportation Research Board Committee on Emergency Evacuations

2. Author/co-author of more than 100 peer-reviewed publications, including:

- a) *Large-Scale Evacuation: The Analysis, Modeling, and Management of Emergency Relocation from Hazardous Areas*, ISBN: 978-1-482-25985-8, CRC Press, Taylor and Francis Publishing Group, LLC, November 2018.
- b) *A Guide to Regional Transportation Planning for Disasters, Emergencies, and Significant Events*, National Cooperative Highway Research Program, Report 777, ISBN: 978-0-309-07023-2, Transportation Research Board, National Research Council, Washington DC, 2014.
- c) *A Transportation Guide for All-Hazards Emergency Evacuation*, Strategic Highway Research Program, Report 740, ISBN: 978-0-309-25901-9, Transportation Research Board, National Research Council, Washington DC, 2013.
- d) *Transportation's Role in Emergency Evacuation and Reentry*, National Cooperative Highway Research Program, Synthesis 392, ISBN: 978-0-309-09831-1, Transportation Research Board, National Research Council, Washington DC, 2009.

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Consultant, Baton Rouge, Louisiana

Late Comment Letters for North River Farms Environmental Impact Report

Brian Wolshon, Ph.D., P.E., P.T.O.E.

- e) *Convertible Lanes and Roadways*, National Cooperative Highway Research Program, Synthesis 340, ISBN: 978-0-309-07023-2, Transportation Research Board, National Research Council, Washington DC, 2004.
- 3. Evacuation-related research work appointments:**
- a) International Visiting Professor, Beihang University (Beijing, China), 2017 and 2018.
 - b) Visiting Professor, National Disaster Preparedness Training Center at the University of Hawaii, 2016.
 - c) Visiting Professorial Fellow, University of New South Wales (Sydney, Australia), 2016.
 - d) Visiting Research Professor, Radiological Consequence Management and Response Technologies Department, Sandia National Laboratories, 2008.
 - e) Affiliate Researcher, Energy & Infrastructure Analysis Laboratory, Los Alamos National Laboratory, 2006.
- 4. Consultant in support of evacuation, resilience, and emergency transportation in:**
- a) Louisiana
 - b) Florida
 - c) Ontario, Canada
 - d) New York, NY
 - e) Philadelphia, PA
 - f) Gothenburg, Sweden
 - g) Houston, TX
- 5. Editor and reviewer of research works that include:**
- a) Co-editor - "Disasters & Resilience" Section of *Transportation Research Part D: Transport and Environment*.
 - b) Guest Editor - Special Issue on "Evacuation and Sheltering: Modelling, Management and Policy to Promote Resilience," *International Journal of Disaster Risk Reduction*.
 - c) Guest Editor - Special Issue on "Catastrophic Event Management," *International Journal of Transportation*, Vol. 4, No. 2, 2016.
 - d) Guest Editor - Special Issue on "Planning, Modeling, and Evaluating Transportation Systems for Emergency Evacuations" *Journal of Emergency Management*, March/April 2015, Vol. 13, No. 2.
 - e) Guest Editor - Special Issue on "Interdisciplinary and Multimodal Nature of Evacuations: Nexus of Research and Practice," *Natural Hazards Review*, American Society of Civil Engineers, Vol. 14, No. 3.
 - f) Guest Editor - Special issue on "Emerging Developments in Evacuation Methods, Planning, and Analysis" *International Journal of Mass Emergencies*, Vol. 31, No. 1.
 - g) Guest Editor - Special Edition "Emergency Evacuation Modeling" of the *Journal of Transportation Safety and Security*, Vol. 2, No. 2.
 - h) Editorial Advisory Board - *Journal of Advanced Transportation*, 2009 - Present.
 - i) Area Editor for "*Highway Transportation System Security & Emergency Response* for the *Journal of Transportation Safety and Security*."
 - j) Guest Editor - Special Edition "Emergency Transportation Preparedness, Management, and Response in Urban Planning and Development" of the *Journal of Urban Planning and Development*, American Society of Civil Engineers, Vol. 133, No. 1.

Late Comment Letters for North River Farms Environmental Impact Report

L112 HERSKOWITZ, JOAN

Comment Letter L112

From: Joan Herskowitz <jmherskowitz@yahoo.com>
Sent: Friday, May 03, 2019 9:07 AM
To: Robert Dmohowski; Planning Planning Commission
Subject: Comments - North River Farms Project on PC Agenda May 6, 2019
Attachments: North River Farms PC ltr 1-28-19.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commissioners,

We have reviewed the staff report for the North River Farms development which you will be considering on Monday, May 6th. In our attached letter dated January 24, 2019, we requested that you deny approval of this project and deny certification of the EIR. We find that the developer's recent revisions do not change our recommendation. This project is the epitome of urban sprawl which is not consistent with good planning principles, and is discouraged in the Oceanside General Plan.

The project would have significant environmental impacts that are only partially mitigated. The EIR finds that there would be significant and unmitigated impacts relating to growth inducement on agriculturally zoned land, and would have significant and unmitigated impacts on traffic and circulation. In addition, the mitigation of greenhouse gas emissions is based on out of area offsets which can be questionable and only is required for 30 years. It doesn't appear that climate change issues will go away in that time period but will be an ongoing concern.

We don't believe development projects should be approved with significant impacts on the environment and the life of City residents when there is no compelling reason to do so. Staff reports that Oceanside can meet its state housing mandate by development in the more urbanized parts of Oceanside. Therefore, new projects should comply with the City's General Plan, and its stated goal of retaining agricultural lands in the Moro Hills region and building where infrastructure and services are more easily accessible.

Therefore, we agree with the staff recommendation and urge you to deny approval of this project. A denial will send a clear message that new development should comply with the Oceanside General Plan that was compiled with substantial community input and includes guidelines for the type of development that minimizes impacts on the environment and quality of life for City residents.

Thank you for your consideration of our views on this important matter. Please confirm receipt of this email.

Joan Herskowitz
Conservation Committee
Buena Vista Audubon Society

Late Comment Letters for North River Farms Environmental Impact Report



Buena Vista Audubon Society
PO Box 480
Oceanside, CA 92049-0480

January 24, 2019

City of Oceanside Planning Commission
Oceanside, CA

Sent by Email

Dear Commissioners:

We are writing in opposition to the proposed North River Farms development that will be heard by your Commission on January 28th. This development is not consistent with the Oceanside General Plan and policies, and will have environmental impacts that are either not adequately mitigated or are described as unavoidable in the EIR. Environmental impacts relate to the following:

GHG: It is sprawl development that changes the community character and increases greenhouse gas emissions. It thwarts efforts to reduce emissions and achieve the carbon emission goals called out in the Oceanside Climate Action Plan, adding to global warming.

Traffic: It would result in unacceptable level of traffic congestion which is an unavoidable project impact, as is the related potentially unsafe conditions for wildfire evacuations.

Agriculture: It is inconsistent with the Oceanside Land Use Element agricultural policy that includes a statement to "assure the integrity and viability of remaining agriculturally zoned properties in South Mero Hills and prevent land use conflicts between agricultural and non-agricultural uses". It will convert the last remaining farmland in Oceanside to a dense housing development, and discourage any other serious agricultural operations.

Biology: The draft Oceanside Habitat Conservation Plan, which designates this property as an Agricultural Exclusion Zone, indicates that when converted to nonagricultural uses it invokes additional conservation guidelines. In this case, there should be consideration of the adjacent San Luis Rey River wildlife and habitat linkages, as the current open farmland has habitat value for local species that forage and nest there.

Conclusion: It is clear to us that environmental impacts have not been fully mitigated. In addition, the EIR affirms that traffic circulation impacts are unavoidable, and that the project is growth inducing. Because of these issues, the developer should be directed to redesign the project or select EIR Alternatives that reduce environmental impacts. A revised plan is needed to ensure Oceanside residents that all environmental impacts are either eliminated or mitigated.

Thank you for your consideration of our views on this important matter to Oceanside and the region.

Joan Henskovitz
Conservation Committee
Buena Vista Audubon

Late Comment Letters for North River Farms Environmental Impact Report

L113 KELLY, CRISTEN

Comment Letter L113

From: Cristen Kelly <ckelly33@gmail.com>
Sent: Friday, May 03, 2019 8:48 AM
To: Robert Dmochowski
Subject: No on North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmochowski,

Since there is yet another planning commission hearing for the North River Farms project i'm emailing AGAIN to say I am against this project for the for the following reasons:

- It doesn't work for the area - City Staff has opposed the project each time they bring minor revisions..
- It creates huge public safety issues with putting homes and families in known flood and fire zones - who will be responsible when people can not evacuate or their homes are under several feet of water?
- Integral, the developer's own traffic studies make it clear this project is adding vehicles trips way above the capacity of local roads yet does not propose to fix it!
- Once this project and change of zoning is approved, there are multiple projects waiting for to build.
- These projects will irreversibly changing our community and put citizens in danger of fires, floods without proper evacuation and increase all of our taxes to help pay for these required city services!

Sincerely,
Cristen
Oceanside Resident

--
Cristen Kelly
Cell: (760) 525-2224

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L114 KELLY, CRISTEN

Comment Letter L114

Subject: FW: No on North River Farms

From: Cristen Kelly <ckelly33@gmail.com>
Sent: Friday, May 03, 2019 8:51 AM
To: Planning-Planning Commission <PlanningCommission@ocountsideca.org>
Subject: No on North River Farms

Warning: External Source

Dear Planning Commission,

Since there is yet another planning commission hearing for the North River Farms project I'm emailing to show my objection for this project. Why is this developer allowed to keep submitting a revised final environmental impact report and revised plan when the planning commission has repeatedly voted against this project? How much our city's resources will they be allowed to waste?

Below are some of the reasons I am against this development.

1. NRF is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.
2. NRF is a **sprawl** project that will result in higher taxes for existing residents to finance services away from existing facilities and services.
3. NRF will result in **further distortion of Oceanside's Jobs/Housing Ratio** which is already one of the worst in San Diego County.
4. NRF will result in the **permanent loss of prime agricultural land** that generates jobs and local food.
5. NRF will **negatively impact efforts to increase agritourism** and its related jobs and income.
6. NRF will result in **significant and unavoidable impacts to population, housing, transportation, and traffic.**
7. NRF will **hurt the image of Oceanside** as a safe and well-balanced community.
8. NRF will result in **future liability for the City for allowing the building of houses and other structures in a flood plain** that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
9. NRF will result in **conflicts between farmers and residents** because of inadequate buffers.

Late Comment Letters for North River Farms Environmental Impact Report

III. NRF conflicts with Oceanside's
General Plan that promotes community
values, aesthetics, character, and safety.

Sincerely,
Cristen

—
Cristen Kelly
Cell: (760) 525-2224

Late Comment Letters for North River Farms Environmental Impact Report

L115 HAMILTON, DAVID

Comment Letter L115

From: Dave Hamilton <dhamilton@ntecusa.com>
Sent: Thursday, May 02, 2019 5:32 PM
To: Planning-Planning Commission
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Honorable Commissioners:

I am writing in regards to the hearing you will be having on May 5th concerning the North River Farms Project.

It is to my understanding that the project planner is resubmitting plans concerning the traffic environmental impact on the Northeast side of our city. I have read their proposal, and find it not in the best interest of the city. This area is already overburdened with traffic and the lane addition on each side may appear to fix the problem but it is a temporary patch. This is not a long term solution for a problem that has plagued our city for the last 20 years that I have been a resident. The surrounding area are heavily affected as there will be no growth in the arterial roads that need to support the ongoing increase in traffic. The problem then will increase additional noise and smog pollution from cars as idles. The supporting intersections are already at a low grade in handling traffic volume.

Even though I believe this project is not in the best interest of the city because of the extra demands of city services that are already in short supply, this project will require more which will not be reimbursed adequately. Should you decide to consider this project, the only truly possible way to help this city with the above problems is to have the developer put through the Melrose Extension bridge from just south of the River by the Mission Vista High School to connect to North River road. This is divert traffic in the area away from an intersection already overburdened. This will also create a safety element in evacuation routes. Also have the developer put in a Fire Station at this corner which would properly serve this part of our city. These changes will cut down noise pollution and smog pollution as it will help with congestion which is the primary source of the two.

To further this would be the city to complete the traffic element and connect Melrose from Spur Ave in Jeffries Ranch to N. Sante Fe Rd. This would divert traffic on that overburdened intersection of 76 and North Sante Fe Rd.

Thank you for your time.

Regards,

David Hamilton
1664 Del Mar Rd.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L116 MASTRO, DEBBIE

Comment Letter L116

From: Debbie Mastro <bunnee321@aol.com>
Sent: Thursday, May 02, 2019 8:46 PM
To: Planning-Planning Commission
Subject: PLEASE VOTE NO ON NORTH RIVER FARMS PROJECT

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I am opposed to the North River Farms project. North River Farms is a sprawl project that will result in higher taxes for Oceanside residents and will further distort our jobs/housing ratio. It is inconsistent with smart growth and will increase the risk from wildfires and evacuations. I believe this is the third time for this project to come before the planning commission and it has not improved with time. Please say no to this project.

Thank you,
Debbie Mastro

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L117 COLE, DIANA

Comment Letter L117

From: Diana Cole <soosnake@hotmail.com>
Sent: Wednesday, May 01, 2019 7:12 PM
To: Planning-Planning Commission
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to agriculture and agritourism. Please reconsider say NO!!!!

Thank you
Diana Cole Arrowood resident

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L118 LOCKHART, DIANE

Comment Letter L118

From: Diane Lockhart <dlock760@outlook.com>
Sent: Thursday, May 02, 2019 11:08 AM
To: Planning-Planning Commission
Subject: North River Farms proposal

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I strongly opposed to approval of the North River Farms development because it will contribute to heavier traffic congestion, will not solve middle income or low income or homelessness housing problems. More importantly it damages the environment, that is fragile and is endangered by short term profit motives, against long term local needs. We need infill to solve housing and commute problems, and to avoid increased air pollution. Developers prefer outlying urban sprawl purely because they get more profit, and public officials also take a short term credit for adding housing. Never mind the damage it does for the next generations.

Please DO NOT APPROVE THIS CLIMATE DAMAGING GET RICH QUICK PROJECT.

Diane Lockhart
dlock760@outlook.com
(760) 994-7891

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L119 DOVEATT, DON AND DEANNA

Comment Letter L119

From: Don Doveatt: <lagereclon@yahoo.com>
Sent: Friday, May 03, 2019 10:07 AM
To: Robert Dmohowski
Subject: Comments Concerning NRF Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

To whom it may concern,

I write today to express my concerns over the proposed North River Farms Development project. A big part of the allure of moving to this area almost 5 years ago was the wonderful wide open spaces that still exist here in the Northeastern portion of Oceanside. My Wife and I moved from Orange County to escape the ever increasing hoards of traffic congestion, polluted air and the building of structures after structure seemingly right on top of each other. We found a wonderful place to live in the Arrowood development which borders upon farms, open land and a beautiful environment, as yet untouched by ever aggressive development.

As we moved here, our plans were to make this particular area our final retirement destination. The planned development of North River Farms however would throw that seriously in doubt.

Among my concerns are the following:

1. The development would add an untold number of cars/traffic/people/congestion on North River Road, College Blvd and the 76 as well as surrounding support roads. It is already EXTREMELY difficult and traffic laden to navigate the 76 East from the 5 towards College in rush hour. Sometimes it can take me 3-4 cycles just to get through one light. The NRF project, as far as I can see, offers NO new bridges for crossing the San Luis Rey River nor does it make ANY road improvements on North River Road as it goes East beyond Melba Bishop Park. The traffic situation here would be an absolute nightmare.
2. A few years ago we had to evacuate due to the fire that raged from Fallbrook going West towards Oceanside. All roads leading out of the back gate area of Panflation were absolutely gridlocked making everyone sitting ducks if the fire had reached that area. Without massive road widening of North River, anybody in this proposed development would be quite seriously impacted and in danger should another fire occur.
3. Part of the beauty of this area is the as yet undeveloped lands that exist in the East and Northern parts of our city. I feel that would need to maintain a balance of homes and structures and leave those farm lands as a buffer/natural break to the impact of man.
4. This development would cause the removal of many local farms, thereby reducing the availability of locally grown food. My Wife and I buy most of our produce from these locally grown farms.
5. The San Luis Rey River is a flood control channel and as such it has seen flooding before. What happens if a major flooding event happens again? With no real infrastructure improvements on North River, this development could in effect be isolated.
6. I feel Oceanside would lose some of its allure if this project were to go ahead. Personally, I'd much rather tour an area with wide open lands amongst the homes versus houses, condos, businesses, etc. stacked one upon the other. If I want to see that, I can do so downtown Los Angeles. And quite frankly, that kind of urban sprawl is something I don't care to see...anywhere.
7. This development would impact the city's ability to promote agro-tourism. I and my neighbors would much rather see working farms that as part of their farm operations, offer eateries on the farm properties themselves, utilizing that which they grow. I'd love to see some of the farms begin to grow grapes and setup winery operations. One need only to look to Yuma/California to see how many tourism dollars land in their wineries.
8. I have concern over whether or not there are even enough jobs available in the area to support all of the bodies that would be resident in this new development.

Late Comment Letters for North River Farms Environmental Impact Report

9. Ocean side already suffers from inadequate infrastructure. Drive down Vandegriff lately? When was the last time that road had a resurfacing? I would champion revitalization of existing neighborhoods and business centers with refurbished \$\$\$ over green lighting a project that is only going to add to congestion and frustration

In closing I think we need to stick to a plan which promotes our city's diverse lands, maintains our farming communities and a balance between development and that which is wild. Our traffic situation in the city is already nightmarish at times and this project would further exacerbate that problem.

I wish to live in an environment that maintains its beauty and allure and a city which strives to care of its citizens, keep them safe and happy.

Thank you,

Don and Deanna Doyvatt
1814 Village Dr.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

L120 CEFOLA, ELAINE

Comment Letter L120

From: ecefolaf7 <ecefolaf7@att.net>
Sent: Saturday, April 27, 2019 12:25 AM
To: Planning-Planning Commission; City Council
Subject: 4.27 Please read this on fires

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Here's the missing attachment. Sorry about that. Please page down to article.
Thank you,
Elaine Cefola, Saran Ct., Oceanside 92056

Sent via the Samsung Galaxy S8 6, an AT&T 4G LTE smartphone

----- Original message -----

From: ecefolaf7 <ecefolaf7@att.net>
Date: 4/26/19 10:34 PM (GMT-08:00)
To: PlanningCommission@ci.oceanside.ca.us
Subject: 4.27 Please read this on fires

In San Diego Union Tribune paper.
Please keep on mind not to approve any building East of Guajome Lake Rd.
Aka North River Farms on agricultural land.
Elaine Cefola
1528 Saran Ct.
Oceanside 92056

Sent via the Samsung Galaxy S8 6, an AT&T 4G LTE smartphone

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SB50 PASSES FINANCE COMMITTEE – WITH AMENDMENTS

PUBLISHED ON [APRIL 24, 2019](#) BY [JITHBERGE](#)

Late Comment Letters for North River Farms Environmental Impact Report



Photo courtesy of [Joe Wolf](#)

2

Late Comment Letters for North River Farms Environmental Impact Report



SB50 passes another hurdle and incorporates elements of SB4 (McGuire's housing bill), which will pretty much disappear. For more on SB50 and how it will affect San Diego County, click [here](#). There will likely be more hearings before the bill gets voted on by the Senate. SF Chronicle [briefly summarizes](#) the amendments to SB50 which were introduced today in the Finance committee hearing. The bill passes but will undergo some additional revisions before it makes it to the Senate floor.

Staff Summary and our brief analysis:

The following is a summary by the staff of the Senate Committee on Governance and Finance. The marked up legislation with the most recent changes is not yet available. I've added some notes in italics.

SB 50 will be amended to do all of the below. SB 4 will be held in committee.

Statewide provisions:

- Sensitive communities agreement with housing advocates:
 - Include at a minimum these areas: designated high segregation and poverty and low-resource in TCAC opportunity maps; top 25% Cal EnviroScreen scores; 2019 HUD qualified census tracts; potentially others. *Will need to research exactly what this means. Hopefully will be elaborated in the revised bill shortly.*
 - COGs run process to identify sensitive communities with minimum requirements for outreach to disadvantaged populations
 - Opt in before July 1, 2025 to planning process based on petition with 20% population in census tract signing and specified outreach requirements
- Changes to ensure offsite affordable housing is actually built: no certificate of occupancy on market rate without building permit, and has to be near transit and within half mile of original project site. *This is promising. In lieu fees do not go very far compared to onsite or at least "near-site" units.*
- Technical amendments to clarify how density bonus works. *Yes, it is quite confusing and the density bonus + SB50 requirements could bring another set of unintended consequences.*
- Commitment to include inclusionary percentages that are worked out with housing advocates and agreeable to SGF committee. *Which housing advocates?*

Late Comment Letters for North River Farms Environmental Impact Report

- Creation of fourplexes by right (regardless of jurisdiction population) in residential areas on vacant land and allows conversions of existing structure—but no demolition, as follows:
 - 75% of exterior walls must be intact and no more than +15% increase square footage. Also has to abide by all other local regulations (setbacks, lot coverage, FAR, height, etc). I assume duplexes and triplexes are ok? Personally, I would advocate for duplexes for a certain period of time (10-15 years) and then open it up to triplex/fourplexes.
 - Must include SB 35 limitations on eligible parcels. Need to research this some more, but SB35 is very specific as to what qualifies.
- Exempt very high fire hazard severity zones. Devil here is in the details. SB4's language states that a parcel can be eligible if it is on "a site that has adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development." so this could be a weak protection.
- Exempt coastal zone in cities with populations less than 50,000. Exempts only the coastal zones and only in Del Mar, Solana Beach, Imperial Beach, Coronado would be exempt. All other cities including La Mesa, Encinitas, Escondido, Vista, San Marcos, Oceanside, City of San Diego.
- Restrict bill to infill parcels in coastal zone regardless of jurisdiction size. Seems reasonable, but again, how is infill defined?

In counties over 600,000 population:

- In other words, San Diego County and most large coastal counties.
- SB 50 zoning provisions regarding rail, ferry, job rich, and bus stop (as modified below):
 - Exempt contributing parcels in legislatively-adopted historic districts in existence as of 2010, and density bonus language going forward
 - Bus stops: Shorten headways to 10 minutes during peak times to qualify. Clarify that it's each line going in each direction. Must have met the headway standard for the past 5 years. This makes the transit definition a little more concrete and not subject to political whims.
- SB 50 parking (no parking around rail, 0.5 spaces per unit minimum elsewhere)

In counties 600,000 population or less, modify equitable communities incentive to:

- Grant waiver from density (with minimum of 30 units/acre in urban jurisdictions and 20/units acre in suburban jurisdictions, as defined in existing law), height limits of zoning on the parcel plus one story, and floor area ratio of 0.6 times the # of stories for projects within half-mile around rail/ferry in cities over 50,000
- Continue to work with Senate EQ on identifying a definition of "infill" that doesn't induce sprawl.
- Exempt floodplains per SB4
- SB 4 parking applies: no parking minimum within ¼ mile of rail in cities over 100,000, 0.5 spaces per unit minimum elsewhere

[LAND USE, ZONING/DENSITY, MINE/MOURE, SB35, SCOTT WILNER](#)

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Late Comment Letters for North River Farms Environmental Impact Report

L121 OSBORNE, ELIZABETH

Comment Letter L121

From: Lizz Osborne <greenknight@cox.net>
Sent: Wednesday, May 02, 2019 10:09 PM
To: Planning-Planning Commission
Subject: PW: "No" On North River Farms Monstrosity!

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission Members,

Please vote "no" on the North River Farms project. During the last election, a lot of false propaganda came out against SOAR/ Voting "No" was supposed to save farms not create ugly tract housing. This deeply saddens me because we have enough tract-type hive homes and strip malls all over Southern California. We do not need more traffic, sprawl and/ or any form of dense people pods in Oceanside. Let's be original and embrace protecting the final few spaces of open land, parks and old farms. San Diego is getting as bad or worse than Los Angeles when it comes to congestion and homogeny. Not too long ago I spoke out about this happening in what used to be a sweet little community called Scripps Ranch. Most people laughed when I spoke about what it would all soon like and function like and now it is even worse than I initially said it would be. It is horrible - ugly, crowded and unattractive. I do not want to live in an asphalt world where the Grand Canyon becomes the Grand Landfill and developments cover every inch of land like nasty ant hills just so a few developers can make a ton of money off of over-priced mansions. Look at what has happened all over in the past 50 years. Today we have a chance to make this stop and to take a different course of action within our community. Open land is not a waste of land. It is not a luxury. It is necessary for our own collective relief here and now and survival in the longer-term bigger-picture. Please make sure to vote this nastiness down and chase it out of Oceanside forever!

Thank you,

Elizabeth Osborne
200 N. El Camino Real #83
Oceanside, CA 92058
PHONE: (760) 672-8017
SKYPE ID: lizz.osborne

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L122 RYAN, GAIL

Comment Letter L122

From: Gail Ryan <gailryan@cox.net>
Sent: Wednesday, May 01, 2019 3:58 PM
To: Planning-Planning Commission
Subject: North River Farms planned development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

My name is Gail M. Ryan, I live at 62 Avenida Descanso, Oceanside, CA. 92057

With regard to the Hearing of the O'side Planning Commission [on Monday, May 6th at 6pm](#) I support staff's recommendation to DENY the North River Farms dense housing development in S Morro Hills.

Gail M. Ryan

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L123 KNOSP, GLENN

Comment Letter L123

From: knosp@aol.com
Sent: Friday, May 03, 2019 12:06 PM
To: Planning-Planning Commission
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

This now the third time that the North River Farms project has been brought to the Planning Commission. The company running the project keeps on trying to do the minimal amount of changes to receive your approval, saving themselves as much money as possible. These band aid changes show their disregard for the community. Instead of offering a plan that truly addresses the traffic, environmental, and safety issues, they are focused on how much profit they can make.

The latest changes are still band aids to the overall congestion problem. Adding another right hand turn lane at Vandergrift and North River Road doesn't alleviate the traffic congestion each morning, when 1,000 cars need to leave the community and head to Highway 76 to get to work.

I would hope that the Planning Commission recognizes the negative impact the this project still represents to the community and continue to not approve the project.

Thank you,

Glenn Knosp
1308 Bellingham Drive
Oceanside

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L124 KNOSP, ROXANNA

Comment Letter L124

From: knosps@aol.com
Sent: Friday, May 03, 2019 12:18 PM
To: Planning-Planning Commission
Subject: Proposed Changes to North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission Members,

I am writing this to you as a voter who asks that you continue to vote NO on this project. Widening a few streets will not alleviate the traffic noise, pollution, and congestion of 1,000 plus cars that would be unable to exit to Hwy 78 going the other way. Most traffic will have to drive up to Vandergrift only to go back down College to get to that highway. This is a very bad plan.

The sound echoing upward from a proposed amphitheater is also a matter for consideration. gone will be our quiet weekend evenings that are the reason many residents chose our area to work and live and relax. I am not against new housing, but it must be done with care and concern for neighboring residents. I do not see that happening here.

Also, do we seriously think a few fruit and vegetable stands will be the draw that we want for agritourism?

Again, this voter asks that you continue to vote against this ill conceived project.

Respectfully,
Roxanna Knosp
1308 Bellingham Drive
Oceanside 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L125 HECZKO, JAMES

Comment Letter L125

From: james.heczko@opusadv.com
Sent: Friday, May 03, 2019 10:27 AM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmohowski,

I live in the South Morro Hills region of Oceanside, and I am writing to you to voice my strong opposition of the North River Farms (NRF) project.

I believe the project is ill conceived and will have profoundly adverse effects on the City and its residents, for example:

- 1 NRF is fiscally irresponsible. The plan woefully understates NRF's impact on traffic, schools, and other city services. In the short term it will create traffic and strain the education system, and in the long term it will deplete city resources and require additional taxes.
- 2 The project will make Oceanside a worse place. Currently, Oceanside is a wonderful balance of beaches, residential communities, industry and agriculture. The NRF project significantly reduces Oceanside's agricultural base and will likely make agriculture more difficult for the remaining farms to operate and survive in the City.
- 3 There are other areas on Oceanside that are more appropriate for residential development. Simply drive around the city or look at an aerial map ... it is obvious that there is vacant land that is more appropriate for development. This includes in-fill parcels that are currently not being used for other purposes and blighted areas that are ripe for renewal.
- 4 NRF will increase the land value of one land owner, but will decrease the value of virtually all of the other residences in Oceanside. This not only hurts the citizens of the City, but will result in a net lower tax base for the city (robbing Peter to pay Paul).
- 5 The project goes against City policies and jeopardizes the region's vision and agritourism plans. City staff and local residents have been working together to create a comprehensive plan for the South Morro Hills community. This process is seeking to balance the needs of large and small farmers and to provide a means for the reasonable development while preserving agriculture. The NRF project is an attempt to circumvent this process and it should be tabled until the process is completed.

In short the project will make a few (non-Oceanside) people rich, while diminishing the city of Oceanside, saddling Oceanside residents with future taxes and lowering the quality of life of Oceanside residents.

Thus I encourage you to work against the project.
Respectfully submitted,
James Heczko

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L126 GILLIGAN, JANE

Comment Letter L126

From: Gilligan Groves <gilligangroves@gmail.com>
Sent: Friday, May 03, 2019 11:09 AM
To: Robert Dmochewski; Planning-Planning Commission; Planning Web; City Council
Subject: North River Farms Proposed Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

My late husband Phil Gilligan and I started farming in So. Morro Hills in 1971 and are one of the largest landowners. North River Farms will have irreversible, long-term and cumulative impacts in SMHs on our environment, our safety, and long-term jobs related to agriculture and agritourism. The impacts on the community will be irreversible if this project goes forward. The location is inappropriate and unsupported by the infrastructure but even more troubling is the risk to public safety in light of the fire evacuation we all experienced in December 2017 - most likely it will not be our last evacuation. So. Morro Hills and our agritourism vision we've worked on with the city of Oceanside will be tainted. Simply said it's the wrong location and not worth the risk. The permanent loss of farmland in one of the most perfect growing regions in the world would be a tragedy. Once again I encourage you to DENY the NRF project. Stay on the right side of history for our city and the potential this community will gain when the SMH's agritourism comes to life.

Sincerely,
Jane Gilligan

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L127 MARSHALL, JANE

Comment Letter L127

From: Jane Marshall <jmarshall@bps.net>
Sent: Tuesday, April 30, 2019 3:29 PM
To: Planning-Planning Commission
Subject: Staff & Community say "No on North River Farms"

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commissioners,

Please take the well vetted Staff recommendation and community response to say No to the latest version of the North River Farms project. The modifications they present are so insignificant, it takes several reads to figure out what has changed since their attempts.

This project is in the wrong place for Oceanside and directly conflicts with our zoning, agritourism, and climate action state mandates! Their request for zoning change will set in motion irreversible damages to our community, while endangering the public and residents by building in a known flood zone. **This project will put the City and citizens at tremendous risk when the next fire sweeps through the valley. Then, who will be responsible?**

Let's encourage Integral development to better utilize its expertise and creative resourcefulness to help with some of our infill projects that will provide affordable housing near transit and will cost the city less in support services. Lets do what's right for Oceanside!

Respectfully,

Jane Marshall
1350 Crestview Dr
Oceanside, CA 92056

 Virus-free. www.avnet.com

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L128 WHITE, JANET

Comment Letter L128

From: J W <janwhite3@yahoo.com>
Sent: Wednesday, May 01, 2019 7:17 PM
To: Planning-Planning Commission
Subject: North river "farms"

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I am writing in opposition to the above named project. We do not need more sprawl development in our city. We must not let developers influence city officials into giving away our precious open space and farmland. Please do not approve this terrible use of land in Oceanside.

Sincerely,
Janet White
Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L129 MCDONALD, JAROM

Comment Letter L129

From: Jarom McDonald <jarom2011@gmail.com>
Sent: Thursday, May 02, 2019 6:43 PM
To: Robert Dmohowski
Subject: Comments Submission for Proposed North River Farms Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Mr. Dmohowski,

Below are my comments in opposition to the North River Farms development:

Oceanside is a unique town with several intersecting landscapes and cultures that don't usually coexist. We have a military base, agriculture, beach culture, and we have a strong middle class and working class tradition, since Oceanside is one of the last affordable Southern California beach towns. Connected to this, many families come here to vacation because of the unique affordability, but also the welcoming culture and accessible nature of Oceanside—it still feels like a small town in many positive ways. I know this because I was one of those tourists for many years before coming to live here permanently.

My point in bringing all this up is that if you take away any one of those pillars of Oceanside I mentioned, the rest are affected. More poorly located, upper middle class suburban developments like North River Farms move Oceanside further toward the ubiquitous gentrification of Orange County, add to unpleasant sprawl and traffic (taking away that charming small town, accessible feel that makes Oceanside an appealing destination), and move us closer and closer to snuffing out our rich agricultural heritage, something we can never get back if it's lost.

When you replace farmland with a sprawling development, it creates a dead zone that will gradually creep out to affect the whole city. And in more ways than one. Obviously, paving over farmland creates an ecological dead zone of wholly artificial landscapes. This detracts from Oceanside's natural beauty and biodiversity, adds large amounts of greenhouse gases to the environment, and it makes Oceanside less appealing to visitors, thus creating a tourism dead zone. Whereas before, there was the possibility of agri-tourism, great views, and drives along country roads, once a big development eliminates that, Oceanside loses much of its unique potential for tourists, not to mention its appeal for tax-paying residents. No one wants to drive around a development on their day off. Finally, and connected to this, bad development creates economic dead zones. Not only is tourism and future tourism potential lost, but all the jobs generated by agriculture would be lost as well, along with Oceanside's role in the local produce and produce export economy.

Late Comment Letters for North River Farms Environmental Impact Report

In addition to all of the above, the drains that the proposed development would put on Oceanside's economy and heritage are made worse by the added cost to the City to get sewer, electricity, and emergency services to another community, and one that's difficult to access, at that. The developer will cash in while the City and the taxpayers foot the bill, both in terms of money and in terms of lost potential.

In the end, rather than helping the City advance its goals and be a leader in the future, we would move backward, taking on more of the sprawl, more of the wildfire safety hazards, more of the pollution, and more of the gentrification that so many cities across the country are trying to get rid of after making unwise development decisions, like I believe North River Farms would be. Also, a word on gentrification and affordable housing: Though this project has been pitched as a way to alleviate the housing crisis, nothing that has been reported about it leads one to believe that will be the case. Not only is it far from public transportation centers, which many working class families rely on, but it sounds positively unaffordable. It's a master planned community that appears identical to the other ones in the area, where homes are upwards of \$600,000 on the low end. This is a way for a developer to make a lot of money, not to make the City better and not to get housing to people who really need it. There are much better locations and styles of building available to the City for affordable housing. This is not the place, nor the kind of development that will benefit the economically disadvantaged.

Lastly, and to speak briefly to the new offer that the developer proposed to "sweeten the deal", \$500,000 for a bridge and \$100,000 for a climate action plan are tiny drops in the bucket, if past experience is any indication. As I'm sure you know, that's just a fraction of the millions commonly needed for a traffic bridge (not to mention maintenance) and a fraction of a fraction of the millions and billions that will need to be invested over years to fight climate change. Such a paltry sum can hardly compare to the above-detailed losses Oceanside would experience, tangibly and intangibly, over decades, if we re-zone our farmland to turn it into more quick cash for developers.

In Solidarity,

Jeram McDonald

Late Comment Letters for North River Farms Environmental Impact Report

L130 GRAFFIUS, JEAN

Comment Letter L130

From: JEAN GRAFFIUS <jema321@aol.com>
Date: May 2, 2019 at 6:11:08 PM PDT
To: council@oceansideca.org
Subject: No on river farms

Warning: External Source

Please vote no on River Farms
Jean Graffius
1794 Polo Ct
Oceanside, Ca
92057
805-796-5490
jema321@aol.com

Late Comment Letters for North River Farms Environmental Impact Report

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L131 HILL, JOE

Comment Letter L131

From: Joe Hill <oceansidejoejr@gmail.com>
Sent: Friday, May 03, 2019 1:56 PM
To: Planning-Planning Commission
Cc: Zeb Navarro
Subject: North River Farms- For The Record

Warning: External Source

I am writing to you about "The latest NRF Benefit Letter", and economic risks to the taxpayers of Oceanside

All NRF financial reports assume most of the revenue from a boutique hotel with no assurances that will ever get built. Their latest letter says they will reserve the hotel site for 10 years, and will permit alternative uses that would create "acceptable" revenue to the city. There are **No** other uses that create the local TOT revenue comparable to a hotel. And when the words probable and conceptual are used, doesn't that make it even more doubtful? That is no guarantee of anything, yet the taxpayers will be on the hook for infrastructure costs forever. Housing is a net negative to the lifelong requirement of public services and infrastructure.

There are no real public benefits in their latest added conditions. It's like putting lipstick on a pig. It's prettier, but the taste of the bacon, ham and other meat by products is no better. For example:

- The Bree land is now 100% Ag, so saying 20 acres will be kept for Ag is a loss of farm acres, not a gain.
- Per above, there is no guarantee the hotel will ever be built.
- To actually funding an Agrivision study, after they get entitlements for 656 homes is not real Agrivision for that area.
- Constructing the intersection improvements, only after they get entitlements for a certain number homes, is not a public benefit. It is just addressing an impact caused by their project. It is one of many things they should have done in the initial project first house entitlement, not after the fact. Absolutely no guarantee these will be completed.?)
- Contributing \$500k toward a new possible \$40 million plus bridge project does nothing to ensure anything is built. We know SANDAG is broke and likely will not fund any local projects like this again
- And a one time contribution of \$100k to GHG (Green House Gas) reduction is a joke, since the project alone is contributing over 900 tons of GHG/pp/ per yr, regardless of the BS, Carbon Credit Offsets. The overall health ramifications will cost all of us millions to address over the lifetime of this project.

Thank you all for reading my concerns. Please try to understand that I and almost all Oceanside residents "Still believe in the right developments, in the right places, in our city." No Way is this suburban Sprawl Project even close to that.

Joe Hill
2855 Rutgers Place
Oceanside, 92056, CA

Late Comment Letters for North River Farms Environmental Impact Report

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L132 SMITH, JOLENE

Comment Letter L132

From: Jolene Smith <drumcozy@sbcglobal.net>
Sent: Thursday, May 02, 2019 7:30 AM
To: Planning-Planning Commission
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission:

Please reject Integral Communities request to change the General Plan and Zoning for 177 acres of land designated as Agricultural for their North River Farms project.

We must protect our farmland. NRF is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.

Thank you,

Jolene Smith
104 Edgewood Dr.
Oceanside, Ca 92054

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L133 FLINN, LAURA

Comment Letter L133

From: David Flinn <flinn_david@yahoo.com>
Sent: Thursday, May 02, 2019 8:50 AM
To: Planning-Planning Commission <PlanningCommission@ocotnaindca.org>
Subject: No on North River Farms

Warning: External Source

To: Oceanside Planning Commission Members

I am an Oceanside resident and property owner. My family has lived in South Morro Hills for 28 years. We purchased our home in South Morro Hills because of the large properties. We DO NOT SUPPORT North River Farms high density development or the change of the current 2.5 acre zoning. For the following reasons, we hope that you do not support North River Farms (NRF) high density development.

NRF is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.

NRF is a **sprawl** project that will result in higher taxes for existing residents to finance services away from existing facilities and services.

NRF will result in **further distortion of Oceanside's Jobs/Housing Ratio** which is already one of the worst in San Diego County.

NRF will result in the **permanent loss of prime agricultural land** that generates jobs and local food.

NRF will **negatively impact efforts to increase agritourism** and its related jobs and income.

NRF will result in **significant and unavoidable impacts to population, housing, transportation, and traffic.**

NRF will **hurt the image of Oceanside as a safe and well-balanced community.**

Late Comment Letters for North River Farms Environmental Impact Report

NRF will result in **future liability for the City for allowing the building of houses and other structures in a flood plain** that has experienced flooding of the San Luis Rey River and serious damage to North River flood and facilities at Melba Bishop Park.

NRF will result in **conflicts between farmers and residents** because of inadequate buffers.

NRF **conflicts with Oceanside's General Plan** that promotes community values, aesthetics, character, and safety.

Respectfully,

Laura Finn

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to agriculture and agritourism.

Late Comment Letters for North River Farms Environmental Impact Report

L134 SPANSKI, LINDA

Comment Letter L134

From: linda spanski <lspanski@sbcglobal.net>
Sent: Thursday, May 02, 2019 11:07 AM
To: Planning Planning Commission
Subject: say no to North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Council Members:

Once again I ask you to vote NO on this development project. This area is a fire trap with its limited access. Agriculture benefits us all. Urban sprawl creates traffic and pollution and benefits the developers.

Thank you.

Linda Spanski
2154 S Coast Hwy
Oceanside, CA 92054

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L135 BEAUDIN, LISA

Comment Letter L135



May 2, 2019

City of Oceanside Planning Commission
300 N. Coast Highway
Oceanside, CA 92064

Via Electronic Mail
PlanningCommission@oceansideca.org

RE: Public Comment on North River Farms Project

Dear City of Oceanside Planning Commission:

The Coastal Environmental Rights Foundation (CERF) is strongly opposed to the potential amendment to the General Plan that would accommodate the North River Farms Project. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. Our organization is dedicated to the enforcement of environmental laws and raising public awareness about coastal environmental issues. CERF asks that you favor the concerns of citizens and Oceanside residents, and to reject any amendment to the General Plan that will accommodate the North River Farms Project.

While the North River Farms Project purports that it will reimagine Oceanside's "quality of life by building a multigenerational neighborhood that honors traditions, protects and grows natural resources, fosters imagination, and enhances the beauty and purpose of Oceanside," the Environmental Impact Report evidences the untenability of the Project's goals, and illuminates the myriad negative impacts North River Farms will have on the City of Oceanside.

Notably, the EIR shows that the Project would cause "significant and unavoidable impacts" to traffic congestion. Oceanside's leaders should promote projects that improve the city's transit infrastructure, not projects that will conflict with Smart Growth development and result in unnecessary increases in greenhouse gas emissions and air pollution. Additionally, the NRF Project conflicts with the City's existing General Plan, which encourages a balance of land uses. It would also set a precedent for other housing developments in Oceanside's agricultural area.

Oceanside residents and visitors alike deserve improvements that align with the City's existing General Plan, not amendments that threaten the City's fragile infrastructure, ecosystem, and agricultural land. We implore the City to keep the interests of its constituents – not developers – at the forefront of its decision-making process.

Sincerely,

Coastal Environmental Rights Foundation

Livia B. Beaudin
Legal Advisor

1140 South Coast Hwy 101 Encinitas, CA 92024 760.942.8505 www.cerf.org



Late Comment Letters for North River Farms Environmental Impact Report

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L136 REESE, MARY ELLEN

Comment Letter L136

From: Mary Ellen Reese <mary_ellen_reese@yahoo.com>
Sent: Wednesday, May 01, 2019 10:28 PM
To: Planning-Planning Commission
Subject: North River Farms project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I urge you not to approve residential building on agricultural zoned land. Please do not pave over and build on land where food can be grown! For one thing, that land provides a buffer between the fire zone and residential areas to the west and south. For another, there is already far too much traffic on Hwy 76. While the State of California is forcing cities to take in more residents, they do not want it on agricultural land! They show this by not including projects that build there in their fast-track approval process.

The over one million dollars spent to defeat the SOAR initiative succeeded by misrepresenting themselves and conning people into voting the opposite of what they intended. The most active landowner completely misrepresented himself and his intentions, nothing new to voters here. So that vote is not an expression of the will of the people of Oceanside. Instead it's evidence that they need to do more research before they vote, but that's true all over the country.

Mary Ellen Reese
1229 Saint Helena Ct
Oceanside

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L137 KELLY, MARY KATHRYN

Comment Letter L137

From: Kathryn Kelly <kathryn_kelly@cox.net>
Sent: Thursday, May 02, 2019 2:15 PM
To: Planning-Planning Commission
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I am a 36 year resident of Oceanside and a homeowner. I have seen many changes to our fair city, some positive, others ill-advised.

If the recent fires imparted any lesson, it should be that we must plan and build accordingly and stop burdening already congested arterial streets with more car trips per day, more air pollution and more noise.

With regard to the Hearing of the O'side Planning Commission on Monday, May 6th @ 6 PM I support staff's recommendation to DENY the North River Farms housing development in S. Morro Hills.

Respectfully,

Mary Kathryn Kelly

3394 Golfers Drive Oceanside 92056

(760) 505-9606

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L138 GAMBLE, MARY

Comment Letter L138

From: Megan Gamble <docmegan2@gmail.com>
Sent: Friday, May 03, 2019 7:59 AM
To: Robert Dmohowski <RDmohowski@oceansideca.org>; planningcommission@oceansideca.org; City Council <Council@oceansideca.org>
Subject: Protect Our Agriculture Zoned Farmlands

Warning: External Source

Hello Ori and All,

As a native Californian and 40 year resident of Fallbrook, Ca., I am writing to implore you to oppose the Integral proposal to develop South Morro Hills with its North River Farms project. This pristine area is much like Camp Pendleton in that its agricultural buffer protects this entire North County area from Orange County style suburban sprawl. It provides for clean air, beautiful vistas, locally grown food supply, employment for lower/middle income families, just to name a few assets!

We are all sick and tired of these developers somehow getting around thoughtfully developed zoning plans, done by and for people who have the **best interests, not the self interests**, of our way of life! Stand up to them now, please!

Thank you for reading this...

--
Megan Gamble

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L139 TAYLOR, MICHELE

Comment Letter L139

From: Michele Taylor <michele@wrsitll.com>
Sent: Thursday, May 02, 2019 12:21 PM
To: City Clerk
Cc: Planning-Planning Commission
Subject: DENY THIS PROJECT - North River Farms
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission,

Please oppose the North River Farms Project.

This is not the place to build a high-density + commercial (hotel) project.

Reasons to deny:

- Bad Location (no infrastructure)
- Inappropriate for high-density housing, hotel project.
- Creates bad traffic. (The base let's out thousands of cars).
- Conflicts with our existing plan.

The South Morro Hills Association has been working hard and should have the opportunity to plan it's future.

Thank you,

Michele Taylor
S. Freeman St.
Oceanside, Ca

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Late Comment Letters for North River Farms Environmental Impact Report

L140 COMBS, MONIQUE

Comment Letter L140

From: Monique L.C. <teacher10910@gmail.com>
Sent: Thursday, May 02, 2019 7:50 AM
To: Planning-Planning Commission
Subject: NRF
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission

I am writing to encourage you to please deny the updated application for Integral's North River Farms.

NRF is a project that will forever change the zoning of agricultural land here in Oceanside. The open space and rural feel of our unique town is what draws so many people here.

NRF also does not meet smart growth requirements, which is something we should be encouraging as a growing city.

NRF will impact traffic congestion and create conflicts between farmers and residents, as the area is not intended to house hundreds of people. It will also place hundreds of homes in a flood plain area.

Please protect zoning in Oceanside. We need smart growth, which includes affordable housing along public transit corridors. Oceanside is currently a very appealing city but unfortunately is out of reach in terms of affordability for most people. We should be calling the shots with developers and demanding affordable housing in appropriate areas.

Thank you for your time, consideration and service.

Monique Combs
Fire Mountain Resident

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L141 SUBLETTE, NANCY

Comment Letter L141

From: William Loftus <blofus98@gmail.com>
Subject: North River Farms planned development
Date: May 1, 2019 at 3:12:44 PM PDT
To: "PlanningCommission@ci.coastside.ca.us"

My name is Nancy Sublette and I reside at 1520 Goldrush Way, Oceanside, CA 92057.

With regard to the Hearing of the O'side Planning Commission on Monday, May 6th @6pm I support staff's recommendation to DENY the North River Farms dense housing development in S Morro Hills.

Nancy Sublette

314-365-7074

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L142 DECINO, PAIDE

Comment Letter L142

From: Paige DeCino <pdicino@hotmail.com>
Sent: Friday, May 03, 2019 2:21 PM
To: Planning-Planning Commission
Subject: North River Farms Project

Warning: External Source

Dear Commissioners,

You will be hearing about the latest version of the NRF development which even with its changes is a BAD idea. Greenhouse gas emissions will increase with development on the periphery of the city. Access and egress during fires is limited. And it will erode the limited, remaining ag land in Oceanside. I encourage you to continue to vote NO on this project.

Respectfully,
Paige DeCino

Late Comment Letters for North River Farms Environmental Impact Report

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L143 JOHNSTON, PHIL

Comment Letter L143

From: Phil Johnston <pjohnston@runbox.com>
Sent: Friday, May 03, 2019 8:59 AM
To: City Council
Cc: Robert Dmochowski
Subject: Proposed North River Farms Floodplain Changes - 2nd FEIR Deficiency

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

03 May, 2019

Dear City Council Member-

Floodplains contain risks from extreme weather events. The proposed North River Farms (NRF) Revised Final Environmental Impact Report (FEIR) is not acceptable in its current form. It does not address risks associated with the 100-year storms in a transparent and proper manner.

During extreme weather, there is a risk that developments will be flooded. Additionally, if extensive grading is done which modifies the floodplain, previously safe neighboring areas could be placed at risk of flooding.

The Federal Emergency Management Agency (FEMA) requires these two risks be tracked using a "100-year Flood Boundary" and a "Floodway Boundary". The City of Oceanside has the responsibility of managing the Floodplain, and reporting modifications to FEMA.

The FEMA map Floodway Boundary was significantly modified in a specific small area centered on the NRF proposed project in 2017. This was not mentioned in the FEIR. The map modifications facilitate significant grading, which is needed to elevate construction above the 100-year flood level. But will this grading significantly encroach on the river channel, elevating the risk to other areas? The city of Oceanside was not provided the basic topographic data on which the modifications were based. This seems highly irregular and improper. The City, which has floodplain management responsibility, has approved Floodway boundary changes without having an opportunity to review the underlying data. Without examining the data, it is not possible to determine if the data evaluation is reasonable, or if the resulting Floodway Boundary changes are acceptable.

To rectify this situation, section 4.10, page 4.10.16 (including the supporting appendix K) require complete rework and replacement ("Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?").

The necessary forward path is a fully transparent and modern evaluation of the proposed NRF grading and construction in the floodplain. This should use as input the very-recent, excellent quality USGS LIDAR topographic data that is publicly available. Modern fully 3D flow analysis methods should be required in this complex area, rather than the simplistic methods previously used. Software to do this properly is readily available.

Late Comment Letters for North River Farms Environmental Impact Report

Important Details are:

FEMA maps dated 2012 are posted on the City website. These maps show that both the 100-year flood area and the Floodway area include significant parts of the proposed North River Farms (NRF) Residential Development.

However, the NRF FEIR shows the Floodway boundary in a different position, well south of the proposed residential construction.

How is this possible? The FEMA maps were significantly modified in 2017, in a very small area centered on the proposed project. This was requested by the property owner. The technical work was done by the same engineering consultant used by the project promoter. This work is not presented or discussed in the FEIR.

The reason given for requesting the changes is "New Topographic Data".

To understand how New Topographic Data could cause a significant change in the Floodway boundary, I made a Public Records Request to the City of Oceanside, which has responsibility for managing the floodplain. The City responded they DO NOT have the New Topographic Data.

Floodway characterization was altered in a major way in advance of this proposed project. This was done without any mention in the FEIR. This was also done without the underlying data being provided. No one in the City of Oceanside, which is the responsible agency- would have been able to check either the data, or the analysis, or the results. This situation is not acceptable and requires corrective action.

Respectfully,

Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report

L144 JOHNSTON, PHIL

Comment Letter L144

From: Phil Johnston <pjohnston@runbox.com>
Sent: Friday, May 03, 2019 7:15 AM
To: City Council
Cc: Robert Dinahowski
Subject: Proposed North River Farms FEIR Deficiency - Flood Risk
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

03 May, 2019

Dear City Council Member-

The Proposed North River Farms project is located on the floodplain of the San Luis Rey River. Floods can cause damage and death on a large scale. The word "Flood" in floodplain should give everyone pause.

The Division of Safety of Dams has recently approved a new high-quality Inundation Map, showing the flooding that would occur if Henshaw Dam were to fail.

This map shows that most of the proposed development south of North River Road would be flooded. Many residential areas would be flooded by greater than 10 feet of water. In a flood event, this flow would be fast moving, turbulent, and loaded with debris. This map is based on excellent-quality USGS topographic data defining the shape of the floodplain, and modern flow analysis methods.

In the Final Environmental Impact Report (FEIR) the applicant stated "The project site would not be located within a dam inundation zone... No impact would occur". In the Revised FEIR the applicant states "it appears that the southern-most portion of the proposed site, which would retained in agricultural use, may be located within the Henshaw Dam inundation area. Notably, the southern-most portion of the site is proposed for retention in agricultural uses". Both attempts by the applicant to evaluate this risk were completely in error and seriously misleading.

In the applicant's defense, the Division of Safety of Dams data was not available at the time.

However, the excellent quality Division of Safety of Dams data is now available. The current gross misrepresentation of Dam Failure Risk in the FEIR needs to be corrected. It would be irresponsible and negligent to allow this project to advance without doing so.

Respectfully,

Phil Johnston

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L145 KOGAN, PHIL

Comment Letter L145

From: Phil Kogan <koganpk@gmail.com>
Sent: Wednesday, May 01, 2019 8:32 PM
To: Planning-Planning Commission <PlanningCommission@oceansideca.org>
Subject: North River Farms

Warning: External Source

Hi

I am writing this in an effort to persuade you to overturn and reject the North River Farms project on North River Road. I am very concerned about the planned North River Farm plan to develop farmland that exists on North River Road.

Oceanside is currently going through some uncontrolled growth in the downtown Beach area that is forever going to change the desired Beach atmosphere to a big city.. never see the sun high pressure environment. PLEASE do not let this happen on North River Road and Morro Hills.

This area is the gateway to Morro Hills which is the last bastion of farmland in Oceanside and North San Diego County.

I live at the top of sleeping Indian and have seen first hand what additional growth and it's traffic does to a fragile infrastructure area such as this.

1. North River Farms is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.
2. North River Farms is a **spread** project that will result in higher taxes for existing residents to finance services away from existing facilities and services.

Emergency services will be negatively impacted in the region due to this project.

3. North River Farms will result in **further distortion of Oceanside's Jobs/Housing Ratio** which is already one of the worst in San Diego County.

4. North River Farms will result in the **permanent loss of prime agricultural land** that generates jobs and local food.

Please do not let this tragedy occur.

5. North River Farms will **negatively impact efforts to increase agribourism** and its related jobs and income.
6. North River Farms will result in **significant and unavoidable impacts to population, housing, transportation, and traffic along**

4

Late Comment Letters for North River Farms Environmental Impact Report

with an increase in crime caused by high density housing.

7. North River Farms will **hurt the image of Oceanside** as a safe and well-balanced community.

8. North River Farms will result in **future liability for the City for allowing the building of houses and other structures in a flood plain** that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.

9. North River Farms will result in **conflicts between farmers and residents** because of inadequate buffers.

10. North River Farms **conflicts with Oceanside's General Plan** that promotes community values, aesthetics, character, and safety.

11. North River Farms will negatively impact fire evacuation of the entire Morro Hills area. The Lilac fire evacuation times from Sleeping Indian Road and Morro Hills was an hour plus. Imagine being in a car stopped because of traffic while a fire burns around and over you.

In short...

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to agriculture and agritourism.

Thank you.

Phil Kogan

Kogank@gmail.com

617-306-7312

Late Comment Letters for North River Farms Environmental Impact Report

L146 BURTON, RICHARD

Comment Letter L146

From: M.Mas-Burton & R.Burton <catalana@sbcglobal.net>
Sent: Tuesday, April 30, 2019 3:01 PM
To: Planning-Planning Commission
Subject: North River Farms Development Planning

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

The current developer in play and their (new) plan continues to be a bad fit for this city.

I urge you to not approve the current iteration of this bad plan, one which will forever change the nature of the area in question.

The Morro Hills and farm lands areas should remain as currently defined, five (5) acre minimum lots.

The zoning should remain as is. Agricultural, equestrian, and etc.

On the other hand, should another different kind of developer present a plan to create a community of small boutique farm/equestrian properties and estate type homes within existing parameters, then I should think that would be a perfect fit, huh?

Bring some more "country" class to this city, not more city crowds!!

Thanks for reading,

Richard Burton
Resident homeowner, tax payer, and registered voter

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L147 SINCLAIR, RICHARD

Comment Letter L147

From: Richard L Sinclair <rsinclair@mindspring.com>
Sent: Thursday, May 02, 2019 4:51 PM
To: Planning Planning Commission
Cc: Sharon Ochs; 'Jann Sinclair'; Preserve_Calavera@mail.vnetp.com; 'Mark Ochs'
Subject: FW: Action Alert: North River (Fake) Farms Project - Mon May 6

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

To: Oceanside Planning Commission

Subject: North River Farms Project - Mon May 6

Unfortunately I will be out of town and therefore unable to attend this very important May 6th meeting. However my daughter and son-in-law (Sharon and Mark Ochs) are planning to attend and represent the Sinclair family property at 480 Sleeping Indian Road, Oceanside on this matter.

We purchased this property in 1984, when Sleeping Indian Rd was really sleepy. As you know, it is no longer, having been awakened by all the traffic created by rural development work over the past 35 years. This has already impacted the area's desirability and property values and if the City of Oceanside approves this current project proposal it will have effectively destroyed the only remaining truly rural agricultural community within its perimeter.

Over the decades, I have seen this same scenario play out in many parts of Southern California. Is the short term money that might possibly be derived over a quick "sale" really in the best interests of one of California's few remaining beautiful communities?

I hope and pray the history of this beautiful area will not be trampled by the few who fail to see this and the long term implications that will result.

Thanking you for your considerations, I remain,

Richard L. Sinclair

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L148 HAAS, TERRY AND SANDRA

Comment Letter L148

From: sanhaas1@yahoo.com
Sent: Thursday, May 02, 2019 12:39 PM
To: Planning-Planning Commission
Subject: NORTH RIVER FARMS

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear gentle persons,

My husband and I are once again writing to oppose the zoning change and building of the North River Farms project. We have poured our hearts out to the city again and again on this issue and to have to continue to do so because of this company is egregious.

We oppose this project because it will:

- Start the conversion of our last remaining farmland to more dense housing
- Increase risk from wildfires/evacuations.
- We will all pay for this sprawl development – loss of community character, traffic congestion, air pollution, greenhouse gasses and higher taxes/fees for service.

Please send the message to this company that not EVERYTHING IS FOR SALE!!!

I pray that you continue to stay strong.

Terry and Sandra Haas
31030 Via Puerta Del Sol
92003

Sent from my iPhone
Sandra Haas

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L149 ZELASKO, SANDY

Comment Letter L149

From: Sandra Zelasko <slzphoto@nbcglobal.net>
Sent: Thursday, May 02, 2019 12:26 PM
To: Planning-Planning Commission
Subject: This will impact the entire city -- not just Morro Hills!

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

North River (Fake) Farms Project! VOTE NO!

Oceanside is one of the few North County cities that still has zoning in place to protect agricultural lands. The 3400 acres of ag zone land in the Morro Hills is a healthy, local food production operation which benefits everyone.

Sprawl development hurts everyone with more air pollution, wildfire risks, infrastructure costs and traffic congestion.

North River Farms Project is taking us down the wrong path!

OPPOSE North River Farms Project PLEASE.

Sandy Zelasko
Valley Center, CA 92082

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Late Comment Letters for North River Farms Environmental Impact Report

L150 COBAS, SUSAN

Comment Letter L150

From: Susan Cobas <scobas@aol.com>
Sent: Thursday, May 02, 2019 7:59 AM
To: Planning-Planning Commission
Cc: Larry Balma; dimartinek@palomar.edu
Subject: Opposition to NRF project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

City officials need to remember that they represent the residents of Oceanside NOT Integral.

This money chasing scheme has gotten way too far down the process already.

Integral has been allowed blatant disregard of policy, regulation, public safety, and due process. Who is liable for this?

Integral is determined to fast track this project in order to obtain permits before their contract with the Self Realization Fellowship expires. There is no benefit to the constituents of Oceanside to make decisions based on this timeline. We should not allow Integral to coerce our City.

This proposal has caused disruption, confusion, discord, corruption, and an enormous waste of resources amongst our community.

Please vote to end the NRF project once and for all.

Susan Cobas
1539 Sleeping Indian Road

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L151 SACK, URSULA

Comment Letter L151

From: Ursula Sack & Joe Kreml <sackkrem@ccknet>
Sent: Thursday, May 02, 2019 7:23 PM
To: Planning-Planning Commission
Subject: No on North River Farms
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Planning Commission,

Please do NOT approve the North River Farms project. Oceanside's agricultural land is a precious resource and should not be sacrificed for sprawl development. This project is far too dense for the area, and is the beginning of a domino effect of destroying Oceanside's wonderful agricultural area.

Important Reasons WHY:

- It doesn't work for the area - City Staff has opposed the project each time they bring minor revisions..
- It creates huge public safety issues with putting homes and families in known flood and fire zones - who will be responsible when people can not evacuate or their homes are under several feet of water?
- Integral, the developer's own traffic studies make it clear this project is adding vehicles trips way above the capacity of local roads yet does not propose to fix it!
- Once this project and change of zoning is approved, there are multiple projects waiting for to build.
- These projects will irreversibly changing our community and put citizens in danger of fires, floods without proper evacuation and increase all of our taxes to help pay for these required city services!

The point is that this project is wrong for Oceanside. Integral is smart savvy, resourceful (spending over \$1.25 MILLION to stop SOAR) and should use their expertise to focus on helping Oceanside with infill projects, not pillaging and plundering our best agricultural resources!

Thank you,
Ursula Sack
(760) 691-0964

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L152 LOFTUS, WILLIAM

Comment Letter L152

From: William Loftus <bloftus98@gmail.com>
Sent: Wednesday, May 01, 2019 3:13 PM
To: Planning-Planning Commission
Subject: North River Farms planned development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

My name is William Loftus and I reside at 3890 Vista Campana S, Unit 32, Oceanside, Ca, 92057.

With regard to the Hearing of the O'side Planning Commission on Monday, May 6th @6pm I support staff's recommendation to DENY the North River Farms dense housing development in S Morro Hills.

William Loftus
760-727-2929

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L153 Hammerschmidt, Arleen

Comment Letter L153

May 3, 2019

Arleen Hammerschmidt
2390 Ivy Rd.
Oceanside, CA 92054

Planning Commission
City of Oceanside
300 N. Coast Hwy.
Oceanside, CA 92054

RE: NRF, Agenda Item #4 on May 6, 2019 (GPA 16-00002), (ZA 16-00005, (T16-00002), (D16-00012), FEIR

Dear Planning Commissioners,

Please support our Development Services' Staff recommendation:

- Deny (GPA 16-00002), (ZA 16-00005, (T16-00002), (D16-00012)
- Adopt Planning Commission Resolution No. 2019-P20
- Take no action on certifying the Final Environmental Impact Report (FEIR)

Because:

- Let's get our impending updates to the City's General Plan Elements of "Housing" and "Land Use" BEFORE even considering a project of this scale with so much potential to influence urban development into South Morrow Hills area.
- The proposed General Plan amendment essentially allows this developer, and those that follow, to make long range planning decisions that effect all residents of Oceanside.
 - This is what our taxes pay Development Services Staff to do, and why we employ them.
- Staff makes objective recommendations and decisions.
 - I support all Staff's rationale and concerns listed on pg. 10 of the Staff Report.
- Staff makes the ethical recommendation to **deny** this project.
 - Staff has zero economic interest in this decision, only the community's long-term best interests.
- Proponents of this project have plenty economic interest in the outcome.
 - Some have testified before you previously as if they had no economic ties to the project.
 - In fact 2 do/did: Public Relations Team member and Hydrologist.
 - Only 27% of form (click a button) letters came from actual Oceanside residents.
- Keep the 'Horse in front of the Cart'.
 - Approving this project would be 'The Cart Before the Horse'.

Sincerely,
Arleen Hammerschmidt

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L154 GILMORE, BRENDA

Comment Letter L154

From: KEN GILMORE <brendaken@cox.net>
Sent: Monday, May 6, 2019 9:41 AM
To: Planning-Planning Commission
Subject: No to North River Farms project!

Warning: External Source

No to North River Farms project!

Thank you.

Brenda Gilmore

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L155 SETTLE, ROBERT

Comment Letter L155

From: Settle, Robert H (US) <robert.settle@baesystems.com>
Sent: Monday, May 6, 2019 10:38 AM
To: Planning-Planning Commission
Subject: NO to North River Farms Project
Importance: High

Warning: External Source

I have been Oceanside resident since 1973. We already have WAY TOO MUCH TRAFFIC!!!

ABSOLUTELY NO --- to NRF project that has no farms but is a high density development in prime farmland.
Thank you

Bob Settle
Mission Systems
858-229-1667
robert.settle@baesystems.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L156 MOLLER, DAVID AND ALLA

Comment Letter L156

From: Alla Moller <allamoller1@gmail.com>
Sent: Monday, May 6, 2019 10:43 AM
To: Planning-Planning Commission
Subject: Vote Against High Density Housing

Warning: External Source

We respectfully request that you vote against converting farmland to high density housing at tonight's vote.

Thank you.

David C. & Alla Moller
3313 Golfers Dr.
Oceanside, CA 92056

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Late Comment Letters for North River Farms Environmental Impact Report

L157 TALAVERA, STEPHANIE

Comment Letter L157



NEUMEYER & DILLION LLP
ATTORNEYS AT LAW

STEPHANIE L. TALAVERA
Stephanie.Talavera@ndf.com

File No.:
4002.143

May 6, 2019

VIA IN-PERSON DELIVERY & E-MAIL
PLANNINGCOMMISSION@CLOCEANSIDE.CA.US
RDMOHOWSKI@CLOCEANSIDE.CA.US

City of Oceanside Planning Commission &
Robert Dmohowski
300 N. Coast Highway
Oceanside, CA 92054

Re: Comment on Agenda Item No. 4, Planning Commission Review of the Proposed Entitlements and the Final Environmental Impact Report for the North River Farms Planned Development Plan (SCH # 2017111069)

Dear Members of the Planning Commission:

On behalf of the South Morro Hills Association and in accordance with the California Environmental Quality Act ("CEQA"), we submit this comment for consideration and inclusion in the administrative record in advance of the City of Oceanside (the "City") Planning Commission ("Planning Commission") hearing on Agenda Item No. 4. Agenda Item No. 4 asks the Planning Commission to consider and recommend a course of action to the City Council of the City of Oceanside ("City Council") with respect to the Proposed Entitlements ("Proposed Entitlements") and the second revised Final Environmental Impact Report (the "Revised Final EIR") for the proposed North River Farms Planned Development Plan project (the "Project"), submitted to the City by applicant North River Farms LLC ("Applicant"). The South Morro Hills Association respectfully requests that the Planning Commission recommend that the City Council deny the Project and take no action with respect to the legally insufficient Final EIR, consistent with the staff report on the same.¹

Again, it is the City's responsibility to independently ensure that the Revised Final EIR meets the requirements of CEQA and sufficiently identifies and mitigates for the Project's significant environmental impacts. There is no excuse for the City's failure to do so. As such, the Planning Commission should recommend denial of the Project's Proposed Entitlements, the General Plan Amendment (GPA16-00002) ("Proposed General Plan Amendment"), Zone Amendment (ZA16-00005) ("Proposed Zone Amendment"), Vesting Tentative Map (T16-00002) ("Proposed Vesting TM"), and Development Plan (D16-000012) ("Proposed

¹ The staff report is incorporated by reference herein.

1375 N. CALIFORNIA BLVD
SUITE 200
WILMINGTON, CA 94094
T 408.908.1000
F 408.908.1000
4002.017/0161300.2

885 DOVE STREET
5TH FLOOR
NEWPORT BEACH, CA 92660
T 949.654.7000
F 949.654.7000

1000 HENNING HENRICH DRIVE
SUITE 700
LAS VEGAS, NV 89169
T 702.737.7000
F 702.737.7000

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City of Oceanside Planning Commission
May 6, 2019
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Development Plan”), as they are inconsistent with the policies of the City’s General Plan (“General Plan”) and are not supported by a legally adequate EIR.³

Likewise, the Planning Commission should recommend that the City Council take no action on the second submission of this deficient Revised Final EIR. The Revised Final EIR is insufficient in a myriad of ways, many of which were problematic in the Draft EIR and the Final EIR as well. The Revised Final EIR, like the Final EIR and the Draft EIR before it, is legally inadequate because it incorporates significant new information without providing an opportunity for meaningful public review and comment. At the same time, the Revised Final EIR still fails to meaningfully address or respond to many of the over 200 written comments submitted on the Draft EIR. As a result, the Revised Final EIR, like the Final EIR and Draft EIR before it, suffers from many of the same problems while introducing new information improperly withheld from public review. Thus, the Planning Commission should recommend that the City take no action on the Revised Final EIR, prepare its own, independent Final EIR, and, at the very least, recirculate the Revised Final EIR to allow an opportunity for truly meaningful public comment.

As we warned in our extensive comments to the Draft EIR and Final EIR, if the City certifies this similarly problematic Revised Final EIR as-is, it will remain subject to significant challenge. The City may refuse to certify the Revised Final EIR on the basis that the Revised Final EIR is inadequate. The City may base its decision not to certify the Revised Final EIR on its failure to comply with standards governing the legal adequacy of EIRs generally. **It may also determine that the EIR is inadequate because revisions to the Revised Final EIR are required to respond to changes to the Project, changes in circumstances, or new information arising after the Revised Final EIR was completed.** If the City decides the Revised Final EIR must be further reviewed, the Revised Final EIR should be recirculated for public comment before it is certified. For these reasons, among others, the Planning Commission must recommend that the City Council deny the Project’s Proposed Entitlements and take no action on the Revised Final EIR.

I. Background.

This is not the first time this Project and its inadequate Final EIR have made its way to the Planning Commission. On or about January 28, 2019, the Planning Commission conducted a public hearing for the Project and voted 3-1-1 recommending that the City Council deny the Project and take no further action on the Final EIR. The City then advertised the Project for public hearing on March 13, 2019. Prior to that hearing, the Project Applicant advised that it would be providing additional Project information and modifications, thus requesting that the March 13, 2019, hearing be vacated.

On or about March 22, 2019, the Applicant submitted a memorandum proposing additional modifications to the Project. The proposed modifications included the following:

³ The staff report discusses the inconsistencies with the General Plan in great detail and are incorporated herein by reference.

4802381 / 0000063

Late Comment Letters for North River Farms Environmental Impact Report

City of Oceanside Planning Commission
May 6, 2019
Page 3

- Withdrawing the request to amend the Circulation Element of the General Plan to reclassify North River Road from Stallion Drive to Sleeping Indian Road from a four-lane major arterial to a four-lane secondary collector;
- Revising the Final EIR, on February and April of 2019 to include memoranda addressing the proposed College Boulevard bridge widening, the proposed temporary on-site fire station, further analysis regarding proposed greenhouse gas (“GHG”) mitigation, and additional, new changes;
- Recording a perpetual use restriction of 42 additional acres of off-site open space/agricultural land, including no less than 20 acres of the Bree Property located immediately northwest of the Project site), and/or other agriculturally zoned land within one mile of the Project site;
- Reserving a 1.5 acre site within the Village Core (PA-2) for a future hotel site for a period of 10 years from the date of the first final map recordation;
- Retaining and preparing a cost allocation study as part of the pending vision plan that would assess and allocate all applicable public infrastructure costs and associated plans for the area, not to exceed \$200,000;
- Constructing a second northbound right turn lane on North River Road at Vandegriff, with the Applicant fully funding the acquisition and intersection improvement;
- Contributing \$500,000 to assist the City in scoping the preliminary design, engineering, cost estimate, and financing for complete project implementation of the Melrose Bridge and road connection between North River Road and SR 76; and
- Contributing \$100,000 to the City to fund Climate Action Plan implementation measures, such as the installation of EV charging stations, subsidizing solar panel installations, and other programs to achieve carbon reduction.⁵

The Applicant presented the last six as Project enhancements that would be implemented as conditions of approval. Ultimately, just like these belated concessions, more about the Project has changed and still the Project description, the underlying environmental analysis, and thus, the Revised Final EIR remains inadequate. Thus, the Planning Commission should follow the City staff’s recommendation and recommend denial of the Proposed Entitlements and that it take no further action on the Revised Final EIR.

⁵ (City of Oceanside Planning Commission, Staff Rept., Agenda Item No. 4, at pp. 2-4 (May 6, 2019) (“Revised Final EIR Staff Rept.”))

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2. The Project Violates the Planning and Zoning Law as it Remains Inconsistent with the City's General Plan.

If the City approved the Project, it would amount to an abuse of discretion because the Project is inconsistent with the City's General Plan. "A general plan is a 'charter for future development' within a city or county. It embodies fundamental policy decisions to guide further growth and development. Virtually all local decisions affecting land use and development must be consistent with the general plan."⁴ Government Code section 65300 requires counties to adopt a comprehensive, long-term general plan for the use and physical development of land within the county. Government Code section 65400 directs that the general plan is to serve "as a pattern and guide for the orderly physical growth and development and the preservation and conservation of open space land of the county or city, and as a basis for the efficient expenditure of [the city's or county's] funds relating to the subjects of the general plan..."⁵ A general plan is, in short, a constitution for all further development within the county.

Here, the City's General Plan aims to focus development in existing urbanized areas, while preserving existing agricultural land and resources.⁶ This Project perverts that aim by doing the opposite—targeting existing agricultural land and resources as opposed to focusing development toward existing urbanized areas.⁷ Indeed, this is in part why the Project requires General Plan and Zone Amendments changing the land use designation from Agricultural (A) and the existing zone designations from Agricultural A and Agricultural – Scenic Park Overlay (A – SP) to Planned Development (PD). The General Plan consistency requirement applies with particular force to approvals that affect agricultural resources. Government Code section 65566 directs that "[a]ny action by a county or city by which open-space land or any interest therein is acquired or disposed of or its use restricted or regulated, whether or not pursuant to this part, must be consistent with the local-space plan."⁸

This inconsistency is further evidenced by the fact that the Project is not located in a "Smart Growth area" in accordance with the County's Regional Smart Growth Concept Map.⁹ This is also inconsistent with the General Plan's anti-sprawl policies, directing higher density development toward infill areas and along transit corridors in order to reduce traffic, natural resources, and agricultural impacts, as well as ongoing efforts to encourage the same.¹⁰ As a factual matter, the Project would reduce the agricultural productivity of South Morro Hills and could negatively impact efforts outlined in the City's Agritourism Strategic Plan and result in land use compatibility issues.

⁴ (*Federation of Hillside & Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1260.)

⁵ (Gov. Code, § 65400.)

⁶ (Revised Final EIR Staff Rept. at p. 9.)

⁷ (*Id.* [noting inconsistencies with General Plan].)

⁸ (Gov. Code, § 65566.)

⁹ (Revised Final EIR Staff Rept. at p. 10.)

¹⁰ (*Id.*)

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The Project also is not consistent with objectives and policies articulated in Section 2.5 of the Land Use Element of the General Plan and the City's adopted, state-certified 2013-2020 Housing Element. Section 2.5 of the General Plan includes the aims to preserve agricultural activities and the character of South Moor hills, while avoiding new land uses that conflict with existing agricultural operations.¹¹ Re-designating an agricultural area for high-density residential and mixed use commercial would conflict with existing agricultural operations—one cannot have commercial agricultural operations and flower fields in a high-density subdivision.¹² Moreover, City staff believes the City may demonstrate capacity for the next housing element without relying on the proposed Project.¹³

As a result of this inconsistency, the proposed PD Plan and Development Plan cannot meet the requisite findings required under Articles 17 and 43 of the City's Zoning Ordinance.¹⁴ Because approval of the PD Plan and associated Development Plan is contingent on a finding that the PD Plan and the Development Plan are consistent with the adopted Land Use Element of the General Plan—the Project cannot be approved because that finding of consistency cannot be made.¹⁵

For these reasons, among others, the Planning Commission should recommend denial of the Project given its inconsistency with the City's General Plan.

3. The City is Responsible for an Inadequate EIR.

CEQA compliance must occur before the City approves the Project because when a public agency gives a project "approval" it "commits to a definite course of action in regard to a project."¹⁶ In *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 130-132, the Court struck down a project, finding that the city violated CEQA because it had impermissibly committed itself to the project before completing an adequate CEQA review. While an applicant's consultant may prepare an EIR, that does not relieve the City from its independent duty to review and exercise judgment over the document. Indeed, the City must independently review, evaluate, and exercise judgment over the document and the issues it raises and addresses.¹⁷ **Ultimately, the City is responsible for the failure to prepare an adequate EIR.**¹⁸

¹¹ (Id.)

¹² (Id. at pp. 9-10 [summarizing Project description].)

¹³ (Id. at p. 10.)

¹⁴ (Id. at p. 11.)

¹⁵ (Id.)

¹⁶ (CEQA Guidelines, 14 Cal. Code Regs., § 1532, subd. (a).)

¹⁷ (*Friends of La Brea v. County of Los Angeles* (1991) 232 Cal.App.3d 1446, 1452, Pub. Res. Code, § 21082.1.)

¹⁸ (*Mission Oaks Ranch, Ltd. v. County of Santa Barbara* (1998) 65 Cal.App.4th 713, 723-724.)

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a. The Revised Final EIR Must Be Recirculated for Public Comment Because it, for the Second Time, Introduces Significant New Information.

An EIR must be recirculated if significant new information is added, in which case, further public and agency review is required.¹⁹ Indeed, as the Public Resources Code makes clear:

When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 and consultation has occurred pursuant to Sections 21104 and 21153, but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report.²⁰

Here, notice and consultation has occurred as to the Draft EIR, but the Revised Final EIR still has not been certified, which is why it is before the Planning Commission for a second time, for recommendation tonight. Because the Draft EIR was fundamentally inadequate due to an inaccurate, inconsistent, and poor project description as to the density of the Project, the resulting environmental analyses were likewise flawed. Now, for the second time, the Revised Final EIR incorporates significant new analyses and mitigation measures that must be subject to further public review. **If an applicant cannot piecemeal a project under CEQA—it certainly cannot piecemeal a related EIR.**

For reasons discussed more fully below, the Revised Final EIR is legally inadequate and must be recirculated for meaningful agency and public review.

i. The Revised Final EIR, for the Second Time, Includes Additional Significant New Information Improperly Withheld from Meaningful Public Review and Comment.

New information in an EIR is “significant” where the EIR is changed in a way that deprives the public of a meaningful opportunity to comment.²¹ For example, the *Spring Valley* Court found revisions to the air quality impacts analysis, as well as the hydrology and water quality impacts analyses “problematic,” as the new analyses constituted significant new information requiring recirculation under Section 21092.1.²² As to the air quality impacts

¹⁹ (Pub. Resources Code, § 21092.1, 14 Cal. Code Regs., § 15088.5.)

²⁰ (Pub. Resources Code, § 21092.1.)

²¹ (See *Spring Valley Lake Area v. City of Victorville* (2016) 248 Cal.App.4th 91, 106–109 [finding the revisions to the air quality analysis and hydrology and water quality impact analysis “problematic”] (hereafter “*Spring Valley*”)) [citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1129 (hereafter “*Laurel Heights II*”)] [“the California Supreme Court] held that new information is ‘significant,’ within the meaning of section 21092.1, only if as a result of the additional information ‘the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.’ (Accord, [Guidelines], § 15088.5, subd. (a).)”).

²² (*Spring Valley*, *supra*, 248 Cal.App.4th at pp. 108–109.)

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analysis, the revisions analyzed the project's consistency with several general plan air quality policies and implementation measures. The Court found as follows with respect to the new information on air quality:

As there is insufficient evidence to support the City's finding the project is consistent with these two implementation measures (see pt. 1, *ante*), the information discloses a substantial adverse environmental effect.²³

Moreover, the above information was omitted from the draft EIR.²⁴ Accordingly, the *Spring Valley* Court found the revisions to the hydrology and water quality impacts analyses to be further problematic because it consisted of a complete redesign of the project's stormwater management plan.²⁵ Unlike the other provisions, the changes were not provided in redline showing the specific amendments; instead, those portions of the EIR were globally amended to reflect current designs, information, and analyses, essentially replacing "26 pages of the EIR's text with 350 pages of technical reports and bald assurance the new design is an environmentally superior alternative for addressing the project's hydrology and water quality impacts."²⁶ Ultimately, the Court found that the revisions constituted significant new information requiring recirculation because their "breadth, complexity, and purpose" deprived the public of a meaningful opportunity to comment on an ostensibly feasible way to mitigate a substantial, adverse environmental effect.²⁷

Similarly here, the second iteration of the Revised Final EIR incorporates substantial and significant new information and analyses that must be allowed to undergo further public review. For the first time in this Revised Final EIR, the Applicant has formally withdrawn its request to amend the Circulation Element of the General Plan to reclassify North River Road from Stallion Drive to Sleeping Indian Road to a four-lane secondary collector.²⁸ Relatedly, the Revised Final EIR also includes a new, significant mitigation measure (MM-TRA-15). The mitigation measure would widen the College Boulevard Bridge, which would purportedly reduce the long-term cumulative traffic impacts although the "bridge improvements are not guaranteed to be completed at the time that initial significant traffic impacts are generated[.]"²⁹

These late additions affect the Project's most significant and unavoidable impacts to traffic and circulation in what the City's General Plan lists as the primary evacuation routes.

²³ (*Id.* at p. 108.)

²⁴ (*Id.*)

²⁵ (*Id.*)

²⁶ (*Id.*)

²⁷ (*Id.* at pp. 108-109; see also *Save our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 107 (hereafter "*Save our Peninsula*") ["We conclude that the EIR in this case did not comply with CEQA in its treatment of several critical water issues. Because of these inadequacies, the Board's action certifying the EIR and approving the project constituted an abuse of discretion."]; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 421, as modified (Apr. 18, 2007) [finding that the Draft EIR must be revised and recirculated for public comment].)

²⁸ (Revised Final EIR Staff Rept. at p. 2.)

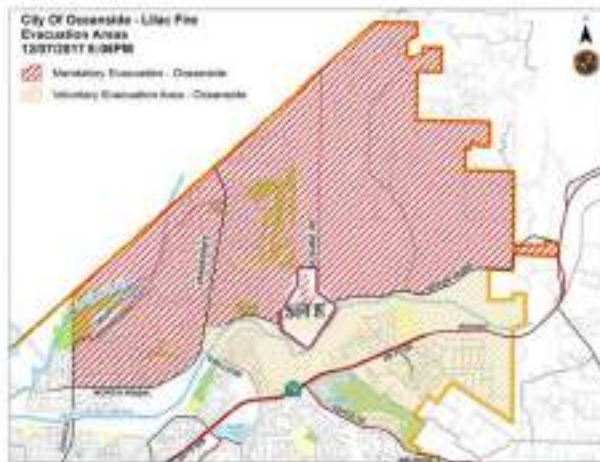
²⁹ (*Id.* at p. 14.)

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(North River Road, SR-76, and College Boulevard).²⁰ Specifically, the Project would result in direct and cumulative impacts to traffic and circulation at the Vandegrift Boulevard/North River Road Intersection, the North River Road/College Boulevard Intersection, and College Boulevard from North River Road to Adams Street Segment. These traffic and circulation impacts center on North River Road because it bisects the Project site and would be the primary access to the site and evacuation routes through SR-76 and College Boulevard.²¹ We modified the City's Lilac Fire evacuation map as a demonstrative aid for the Project's location relative to the evacuation routes, below.



Demonstrative Figure 1. ~~Revised~~ City of Oceanside Lilac Fire Evacuation Map to Depict Site Location

Given the status of these roads as primary evacuation routes, failure to publicly consider this new mitigation measure renders the Revised Final EIR inadequate. The impacts could be devastating in the event of a wildfire. As depicted in the modified evacuation map above, the Lilac Fire resulted in the evacuation of a significant portion of what would now include the proposed Project site.

Significantly, the County of San Diego acknowledged in its "After Action Report" that the conditions at the Lilac Fire's start were "exceptionally dangerous."²² The Lilac Fire "seriously injured two people who suffered burns; destroyed 114 houses and damaged 55; and killed more than 45 horses."²³ Particularly notable was the Lilac Fire's rapid acceleration. The

²⁰ *Ibid.*

²¹ (Revised Final EIR at 4-9-19.)

²² (San Diego City, 2017 Lilac Fire After Action Rept. 5, available at <http://www.reach.sandiego.org/sites/lilac-fire/docs/after-2017> (last accessed May 3, 2019 at 11:21 a.m.) ("Lilac Fire Rept.")).²³

²³ *Ibid.*

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fire was reported at 11:15 a.m., just west of Interstate 15 and south of Highway 76.²⁴ By 5:49 p.m. the Oceanside Police Department issued mandatory evacuation for everything east of Wilshire and North of North River Road, which it had closed for eastbound traffic. According to contemporaneous reports and updates in an article in the Los Angeles Times, “[t]raffic was thick in the area” and a California Highway Patrol Officer reported that “miles of traffic on the 76, so if you don’t need to be on the 76, stay off it[.]”²⁵

Failing to recirculate given these changes to the most significant and unavoidable impacts would result in an inability of the public or agencies to meaningfully comment on the Project’s environmental impacts. The City must allow the Revised Final EIR to be recirculated and evaluated, particularly given CalFIRE’s recent response to Executive Order N-05-19, which identifies a new methodology for evaluating the communities most vulnerable to wildfire.²⁶

II. The Revised Final EIR, for the Second Time, Identifies New Potentially Significant Impacts from the Project and Its New Mitigation Measures.

Although the above is just one example of the significant new information provided for the first time in the Revised Final EIR, other new information was included and must be subject to further public comment and review via recirculation. Such new information includes, but is not limited to, the purportedly minor modifications made to the following appendices:

- Appendix B – North River Farms Planned Development Plan;
- Appendix D1 – Air Quality Analysis Technical Report;
- Appendix E – Biological Resources Technical Report;
- Appendix H – Greenhouse Gas Emissions Technical Report;
- Appendix J1 – North River Farms Fire Protection Plan;
- Appendix J2 – Conceptual Wildland Fire Evacuation Plan; and,
- Appendix N – Transportation Impact Analysis.²⁷

Entirely new appendices, information, and analyses include the following, which were only added to the Final EIR and not made available for public comment in the Draft EIR:

²⁴ (ibid.)

²⁵ (Lyndsey Winkley & Keres Kucher, San Diego County’s Lilaic fire explodes to 4,100 Acres (Dec. 7, 2017, at 8:35 p.m.), available at <https://www.latimes.com/local/lanow/la-me-ln-san-diego-county-fire-20171207-story.html>.)

²⁶ (Cal. Dep’t Forestry & Fire Prot., Community Wildfire Prev. & Mitigation Rept. (Feb. 22, 2019), available at <http://www.fire.ca.gov/projects/commw/brader/>.)

²⁷ (Final EIR, at 10-9.)

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NEW Appendix T1 – Purchase of Agricultural Conservation Easement (PACE) Program;

NEW Appendix T2 – Purchase of Agricultural Conservation Easement (PACE) Program Fact Sheet;

NEW Appendix T3 – South Morro Hills Visions Plan;

NEW Appendix T4 – City of Oceanside Agritourism Strategic Plan;

NEW Appendix T5 – California's 2017 Climate Change Scoping Plan;

NEW Appendix T6 – California Natural Resources Agency Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97;

NEW Appendix T7 – Fire/Medical Response Analysis;

NEW Appendix T8 – Additional and Re-Analyzed Intersections and Street Segments and Revised Trip Generation Table; and;

NEW Appendix T9 – SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.³⁹

Likewise, the Revised Final EIR, for the first time, included two additional legislative acts: a Proposed Development Agreement and a new Zoning Ordinance Amendment, without allowing for public comment on the same.³⁹ When approval of a development agreement is proposed, it should be identified in the EIR or negative declaration. In addition, any mitigation measures imposed on the project and any mitigation monitoring required under Public Resources Code section 21081.6 should be coordinated with the terms of a development agreement.

Now, the Project includes even further measures that have not been subject to public review. In the Revised Final EIR, the Project now includes an entirely new Mitigation Monitoring and Reporting Program and various additional new appendices:

006 NEW Appendix T13 College Bridge and On-Site Fire Station Memo;

007 NEW Appendix T14 Vandegriff Blvd / North River Rd. Intersection Memo;

008 NEW Appendix T15 Air Quality Health Effects Memo; and;

³⁹(Final EIR, at 10-9-10-10)

³⁹(Final EIR, at ES-6 [underlining the inclusion of a "Development Agreement is proposed in conjunction with the proposed project," as new in the Final EIR].)

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009 NEW Appendix H1 Newhall Ranch GHG Reduction Plan.

Accordingly, the Revised Final EIR remains inadequate as it includes significant new information that must be subject to meaningful public review and comment.

b. The Revised Final EIR, like the Draft EIR, Must Be Revised and Recirculated Because it Remains Fundamentally Inadequate Due to an Incorrect and Inconsistent Project Description and Resulting Environmental Analyses.⁴⁶

Overall, the Revised Final EIR reveals that the City has still failed to undertake the type of thorough analysis that CEQA requires before approving the Project. Instead, and as set forth below, the Revised Final EIR minimizes the real and significant environmental harms that will result from build-out of this high-density development in an agricultural, scenic park space. Unfortunately, and despite the extensive comments received in advance of the Draft EIR, the Revised Final EIR still suffers from the same deficiencies.

i. The Revised Final EIR, like the Draft EIR, Still Fails to Evaluate Reasonably Foreseeable Project Density, Resulting in an Equally Tainted Environmental Analysis.

As discussed in detail in our written comment to the Draft EIR and incorporated by reference herein, the Draft EIR was fundamentally flawed. Specifically, the Project Description was often inconsistent, inaccurate, or vague as to the anticipated Project density. As a result, much of the environmental analysis was similarly problematic.⁴⁷

Again, an EIR is at the heart of the environmental control process established by CEQA.⁴⁸ A proper EIR provides the public and governmental decision makers with detailed information on a project's likely environmental effects, describes the ways of minimizing such effects, and considers potential alternatives to a project.⁴⁹ An accurate project description "is the *sine qua non* of an informative and legally sufficient EIR."⁵⁰ When a proposed project is accompanied by an inaccurate or incomplete description, it undermines CEQA by drawing "a red herring across the path of public input."⁵¹

⁴⁶(See *Lansel Heights II, supra*, 6 Cal.4th at p. 1130.)

⁴⁷Attached to this letter submitted in advance of the Planning Commission hearing on the Final EIR is the comment letter provided during the period for public review on the Draft EIR. Because the Final EIR fails to meaningfully respond to the over 200 comments provided, including the attached, the Final EIR suffers from the same flaws.

⁴⁸(*Ibid.*; see also 14 Cal. Code Regs., § 15124.)

⁴⁹(Pub. Resources Code, §§ 21002.1, 21061, 21100.)

⁵⁰(*County of Inyo v. City of L.A.* (1977) 71 Cal.App.3d 185, 193, 199 (hereinafter "*County of Inyo*").)

⁵¹(*Ibid.* at pp. 193, 199.)

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CEQA defines “project” as “the whole of an action”⁴⁶ and an EIR must also describe the entire proposed project and all of its required approvals—not a piecemeal version.⁴⁷ The action subject to CEQA review must encompass all components of the activity being approved, **as well as reasonably foreseeable consequences**. Relatedly, a project description must include future expansion or later phases of a project that will foreseeably result from project approval.⁴⁸ **Additionally, the EIR’s project description must be internally consistent. If not, it cannot provide a vehicle for informed public participation in the decision-making process.**⁴⁹

A court will reject an EIR with an incomplete or inaccurate project description because, as the court stated in *County of Inyo v. City of L.A.*:

Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefits against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the “no project alternative”) and weigh other alternatives in the balance.⁵⁰

As discussed in detail in our written comment on the Draft EIR, the Project proposed a 689 (again, it still remains unclear whether the Revised Final EIR proposes 656 units, 689 units, or approximately 4.4 units per acre or 777.04 units) unit development, but clearly has a planned development footprint that will include a much higher density.

As also stated in our prior written comment, the likelihood that the planned development footprint will include a higher density than that currently being evaluated is more than reasonably foreseeable and beyond speculative. Aside from being consistent with the Project as originally proposed, these higher-density estimates align with similar projects constructed by the same developer in the area. For example, the developer’s Palomar Station in nearby San Marcos plans for 370 apartments on 15 acres.⁵¹ Likewise, the developer’s Mission Lane master-planned community, also in Oceanside, “calls for up to 420 homes on 35.5 acres.”⁵² The boutique hotel proposed in the current Project iteration is unlikely to remain within the range estimated and evaluated in the current Draft EIR. It will likely result in a hotel that will never be built and will likely transform into three story condominiums, similar to the Villas Storin project.

⁴⁶ (14 Cal. Code Regs., § 15378; see *Habitat & Watershed Constraints v. City of Santa Cruz* (2013) 211 Cal.App.4th 1277, 1297; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1220 (hereinafter “*Banning Ranch*”).)

⁴⁷ (*East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 293; *Banning Ranch*, 211 Cal.App.4th at p. 1222; *Communities for a Better East v. City of Richmond* (2010) 184 Cal.App.4th 70, 98.)

⁴⁸ (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376 (hereinafter “*Laurel Heights*”); 14 Cal. Code Regs., § 15126 [EIR’s impact analysis must consider all phases of project].)

⁴⁹ (*County of Inyo*, 71 Cal.App.3d at p. 197 [shifting EIR description from groundwater pumping to replacing the entire aqueduct system].)

⁵⁰ (*Id.* at p. 198.)

⁵¹ (*Ibid.*)

⁵² (*Ibid.*)

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Even the City was confused as to the nature of the Project, on the same webpage that it hosted the Draft EIR, it listed a "Project Description" that set out an entirely different, and denser, maximum build-out:

Project Description: The North River Farms project application represents a request for a General Plan Amendment, Zone Amendment, Tentative Map and Development Plan for the North River Farms Planned Development Plan. Located on a 177-acre site on North River Road between Stallion Drive and Wiltshire Road, the project proposes to construct 725 dwelling units with associated agricultural, commercial, and recreational uses. The Planned Development would constitute the zoning, use regulations, and development criteria for future development of the property. The project area would be divided into four planning areas supporting different housing types and farm plots.

The Riverside Village would consist of 45.1 acres of medium density residential (RMA and RMB) uses. This area includes 12.9 acres of agricultural uses, and 4.2 acres of open space/recreational. Residential densities in the Riverside Village would range from 6.0 to 15.0 dwelling units to the acre.

The Village Core would consist of 25.0 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers market venue, collaborative work spaces, a park, farm facilities, and an education pavilion. Residential densities in the core would range from 15.1 – 20.0 dwelling units to the acre.

The North Village would consist of 51.8 acres of single-family and medium density residential (RS, RMA) uses. Residential densities in the North Village would range from 3.6 to 9.9 dwelling units to the acre.

The Hilltop Village would consist of 41.4 acres of single-family detached homes. The base density would range from 3.6 dwelling units per acre to a maximum density of 5.9 dwelling units per acre.⁵⁹

The Revised Final EIR still suffers from the same problems. As further detailed below, the Revised Final EIR includes deficient responses to comments that waffle back and forth on the planned development footprint as it relates to density and other factors. On one hand, the Revised Final EIR asserts that an entirely new, temporary onsite fire station can be subsumed within the "planned development footprint" because Village Core is identified as a "mixed use" area. Moreover, in response to the comment from the California Department of Transportation, the Revised Final EIR asserts a lower unit count of 656 units. But, in response to our comment, the Revised Final EIR still asserts the same 689 unit count, along with the concurrent and ambiguous description of the same as "approximately 4 units per gross acre".

⁵⁹ (City of Oceanside, North River Farm Planned Development Project, available at https://www.ci.oceanside.ca.us/sites/default/files/ndr/ndr_nrfhp.pdf (last accessed Sept. 6, 2018 at 6:10 p.m. PST).)

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Thus, and as further detailed below, the Revised Final EIR still suffers from the same fundamental flaws due to its failure in describing its own development footprint at the outset.

ii. The Revised Final EIR, like the Draft EIR, Still Assumes a Post-Development Baseline.

In addition to the major problem identified above, the Revised Final EIR, like the Draft EIR before it, still suffers from the adoption of a post-development baseline. Again, here, the NOP for the project was published in 2017 and the Project site was, and still is, currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road.⁵⁴ Therefore, baseline conditions should reflect the existing conditions, applicable plan designations, and zoning for the Project area in effect at the time. Yet, the Revised Final EIR's impacts analyses and conclusions are based on the assumed approval of the underlying entitlements it purports to evaluate.⁵⁵

For example, in its evaluation of change in aesthetics, the Draft EIR answered the question of whether the Project would adversely impact the scenic vista as though the approval had already occurred:

Would the project have a substantial adverse effect on a scenic vista? [...] With the future approval and adoption of the rezone from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning) [...] Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant.⁵⁶

Similar issues exist throughout the Draft EIR and were not meaningfully corrected in the Revised Final EIR. Thus, because the Revised Final EIR evaluates the Project against a false or shifting baseline that is inconsistent with existing baseline conditions, the resulting analysis likewise fails.

iii. The Revised Final EIR, like the Draft EIR, Still Fails to Evaluate the Project in Its Existing Environmental Setting.

⁵⁴ (Notice of Preparation (NOP), Environmental Impact Report (Nov. 22, 2017), available at <https://www.ci.oceanside.ca.us/sites/default/files/2017-11/2017-11-22-nop-06170>.) Unsurprisingly, the possible density unit range identified in the NOP is 985-1,955. Again, note above the density evaluated in the Draft EIR. (See *id.*, at TM-1 North River Farms Development Plan, at p. 2.)

⁵⁵ In addition to the example above, the Sierra Club's comment, dated September 7, 2018, identifies and discusses issues regarding the baseline with respect to air quality impacts, among other issues identified that are important for consideration in revising this Draft EIR.

⁵⁶ (Draft EIR, at 4.1-14-4.1-15, 4.1-16.)

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Separately, the Revised Final EIR still fails to properly consider its impacts relative to the applicable general, regional, and specific plans.³⁷ This also renders the Revised Final EIR legally inadequate, as CEQA guidelines require an evaluation of the Project in its existing environmental and regulatory setting—not in a vacuum. Accordingly, an EIR must discuss and evaluate inconsistencies between the proposed Project and its applicable general, specific, and regional plans.³⁸

Here, existing land use designations allow for a maximum density of 61 dwelling units for the entire Project area. This is consistent with the applicable general, regional, and specific plans, but entirely inconsistent with the development proposed by this Project. Another example of this inconsistency is that the City's General Plan permits residential development only where such development does not interfere with existing agricultural resources. Although the Draft EIR acknowledged that the entire Project site will be considered a significant agricultural resource based on the Land Evaluation and Site Assessment Model ("LESA"), it still failed to properly consider the significant impacts or mitigation thereof in accordance with the same.

The Revised Final EIR likewise fails for declining to meaningfully evaluate the above-mentioned inconsistencies, among others, in accordance with CEQA.

c. The Revised Final EIR Still Fails to Meaningfully Address and Respond to Major Issues Identified in the Draft EIR through Public Comment.

Failure to meaningfully respond to written comments independently renders the Revised Final EIR legally inadequate. Here, the Revised Final EIR includes responses to comments that are cursory, conclusory, self-serving, unsupported by facts, and, at times, wholly arbitrary. For example, the Revised Final EIR makes frequent reference to the use of "speculative" and "undue speculation" without acknowledging the careful line must be drawn between Project impacts which are reasonably foreseeable and speculation. As we discussed in great detail in our comment to the Draft EIR and again as incorporated herein, the vague and inconsistent Project description, along with extrinsic facts easily available to the public, suggest that the likelihood of future, higher than presently anticipated density of the Project is far more than reasonably foreseeable and certainly not speculative. The Revised Final EIR still fails to account for that reasonable foreseeability.

In response to our written comment that the vague, inconsistent Project description allows for a density and, consequently, planned development footprint much higher than that anticipated by the current environmental review, the response says, in entirety:

The comment states that although the Draft EIR evaluates the development of up to 689 dwelling units, within 4 planning areas, the original project proposal would have involved the construction of 1,000 dwelling units. In response, as described,

³⁷ (14 Cal. Code Regs., §15125, subd. (d).)

³⁸ (Id. ("applicable" plans have been adopted and legally apply to a proposed project).)

482301/8161983

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in the Draft EIR, **the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre.** Any previous proposals are not relevant to the discussion of the Draft EIR. The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response is provided to this comment.²⁹

Yet, by responding with **"the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre"** the Revised Final EIR reveals itself as suffering from the same problems as the Draft EIR. First, the use of both "689 units" and "approximately 4 dwelling units per gross acre" is, in and of itself, so vague and ambiguous as to allow for a significantly increased density. Given the size of the Project, the ambiguity would allow for an increased density of up to 777.04 dwelling units (176.6 acres multiplied by "approximately" 4.4 dwelling units per acre). One must ask, why is 689 dwelling units not specific enough, alone?

Second, and in the very same set of responses, the Project waffles back and forth on density, reducing it so as to assuage specific comments which rely in large part on density as a base value for evaluating environmental impacts. For example, in response to a comment from the California Department of Transportation regarding inaccurate or improper trip generation, the Revised Final EIR asserts an entirely different proposed Project density:

In response to this comment, the project residential trip generation has been revised as shown in the table below. It should be noted that trip generation from other proposed land uses within the project have been revised. **In order to account for this change in trip generation rates for the residential portion of the proposed project, the total dwelling units have been reduced from 689 to 656 units, in order to maintain a similar total project trip generation.** Please refer to Section 10.2 of the Final EIR for a full explanation regarding the change in dwelling unit total.

The project trip generation was calculated using SANDAG trip rates from the (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002, which is incorporated in Appendix T8 to the Final EIR (also available at https://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf). SANDAG categorizes trip generation rates based on density and housing type. Residential densities correspond to the following trip rates:

- Condominium (or any multifamily 6–20 DU per acre) = 8 ADT per DU
- Single Family Detached (average 3–6 DU per acre) = 10 ADT per DU

²⁹ (Final EIR, at T8-15L, C6-5.)

4082101 | 8162983

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Based on the proposed development densities, the Final EIR correctly applies the condominium (6-20 DU per acre) and single-family detached (average 3-6 DU per acre) trip rates to the trip generation calculations shown below, with a reduction to a total 656 units. Based on this evaluation, there is a reduction in the overall trip generation reported in the Draft EIR; no new or more severe impacts would result. Refer below and Appendix T8 for a revised project trip generation table reflecting 656 units.⁴⁹

In response to our written comment, by contrast, the Revised Final EIR asserts not a total of 656 units, but 689: **“the proposed project would allow for the development of up to 689 dwelling units for an overall density of approximately 4 dwelling units per gross acre”**. Even further, because of the use of both 689 units and the phrase “overall density of approximately 4 dwelling units per gross acre,” the actual resulting density could potentially include 777.04 dwelling units. An entirely new total from the various inconsistent totals referenced in the Revised Final EIR in response to comments on the Draft EIR.

Third, the Revised Final EIR also responded to this unsettling problem as outlined in our comment by simply stating that this inconsistency and ambiguity is “not an environmental issue”. **If the Revised Final EIR truly takes the position that proposed development density is not an “environmental issue”, then it must explain how it can also respond to the California Department of Transportation’s comment on traffic impacts by using a value calculated “[b]ased on the proposed development densities”**. As we made clear in our written comment, proposed development density affects transportation impacts, water impacts, and any other such environmental analysis that relies on proposed development density, growth inducement, or any other such measure related to an increased population in the area, as a base value. As just one example, in response to a variety of comments that addressed issues related to the Project’s description and consequently, its cumulative growth inducing impacts, the Revised Final EIR casually responds as follows:

Even though there is no specific number or percentage available to determine whether this estimated growth would be considered a substantial increase in population, the proposed project would nevertheless increase the population of the area and exceed the planned population growth under the site’s current General Plan land use designation. Sections 6.1 and 4.14 of the Draft EIR acknowledge that, as the project site is developed and eventually built out as proposed, existing adjacent and nearby land may be encouraged to intensify uses as a result of property owners in the area being encouraged to propose additional community serving retail uses based on the new residences. In other words, construction of the proposed project would generate an economic stimulus from the operation of the proposed project’s commercial and agricultural facilities, and introduction of new consumer demand in the area. Additionally, the proposed land use intensification could potentially result in growth

⁴⁹(Final EIR, at TB-70, A3-5.)

4002101 / 00419843

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inducement due to potential for unplanned infrastructure improvements
Accordingly, the Draft EIR concluded the project would be considered growth inducing.

However, an EIR is not required to provide a detailed analysis of a project's effects on growth, and is not required to engage in speculation (CEQA Guidelines Section 15126.2(d) (2); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369; *Federation of Hillside & Canyon Homeowners v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1265). The particular growth that can be attributed to a project can be difficult to predict, given the large number of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the project. As a result, the court in *Napa Citizens* concluded that it would not be reasonable to require the EIR to "undertake a detailed analysis of the results of such growth." The court concluded that nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth. (91 Cal. App. 4th at p. 369).⁶³

The topical response LU-1 is similarly unavailing. In response to "Comments on the Draft EIR state that the project conflicts with a number of the City's General Plan policies" the Revised Final EIR responds in a similarly conclusory fashion:

Under CEQA, a conflict or inconsistency with an applicable plan is not, by itself, considered a significant environmental impact. Instead, **the inconsistency must result in a significant physical impact for there to be a significant impact under CEQA.**⁶⁴

4. Conclusion.

The adequacy of an EIR's project description is inextricably linked to the adequacy of its analysis of environmental effects. If the description, baseline, and consistency requirements are not met, the resulting environmental analysis will likely reflect the same mistakes.⁶⁵ For example, if an EIR bases its cumulative impact analyses on general plan projections, it must explain why these projections function as a realistic predictor of related impacts.⁶⁶ Moreover, a general plan's projections of future growth and related impacts are an inadequate basis for an EIR's cumulative impact analysis if the plan's projections do not cover a sufficiently wide area or exclude relevant data.⁶⁷

⁶¹ (Final EIR, TD-9.)

⁶² (Final EIR, TD-38.)

⁶³ (See *Loveri Heights*, *supra*, 47 Cal. 3d 370 [EIR failed to describe or analyze project accurately].)

⁶⁴ (See 14 Cal. Code Regs. § 15130, subd. (b)(1)(B).)

⁶⁵ (See *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692 [no explanation of why analysis of cumulative air quality impacts was limited to Central Valley]; *Citizens to Preserve the Ojai v. County of Ventura* (1985) 176 Cal.App.3d 421 [air quality analysis defective for failure to include contribution to pollution from offshore oil operations].)

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This is particularly true in situations like those at issue here, where the Project as originally envisioned was a higher density development and the Revised Final EIR's statements regarding Project density are inconsistent, vague, and often incomplete. Because the Draft and Final EIRs both rely on inaccurate and inconsistent estimates of projected development density, the analysis that follows is similarly flawed. In sum, limiting each analysis on a whim to a projected density of 689 units or 656 units, while still including a qualifying statement that allows for an "overall density at approximately 4 dwelling units per gross acre" or 777.04 units, qualifies as impermissible CEQA piecemealing. It follows that the other specific environmental analyses related to traffic, air quality, public resources, etc., should have been likewise revised to adequately consider the potential for full build-out relative to the existing environmental conditions at the time of the NOP. Because they were not, the Revised Final EIR remains insufficient.

Once a new EIR is prepared, then additional substantive issues may be raised and addressed. South Morro Hills Association reserves its right to submit supplemental information and evidence up to the public hearing on the Project.⁶⁶ Please do not hesitate to contact either of the undersigned should you have any questions, comments, or concerns regarding the above.

Sincerely,



Stephanie L. Talavera, Esq.
On Behalf of South Morro Hills Association

SLT

cc: Charles S. Krolikowski, Esq.
South Morro Hills Association

⁶⁶ (See, e.g., *Galante Vineyards v. Monterey Peninsula Water Management* (1997) 60 Cal.App.4th 1109, 1119-1120 [applicant has right to present comments "prior to the close of the public hearing on the project."]; *Coal for Students Action v. City of Fullerton* (1984) 153 Cal.App.3d 1194, 1197 [same principle].)

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L158 ROTH, BILL

Comment Letter L158

From: Bill Roth <william_roth@icloud.com>
Sent: Monday, May 06, 2019 8:56 AM
To: Planning-Planning Commission
Subject: NO on North River Farms

Warning: External Source

Please vote NO on the proposed North River Farms.

This project is not in the best interests of Oceanside because:

1. It converts North County's last concentration of farmland into high density housing 2. It will raise all of our taxes to the benefit of a developer and a few land owners 3. It will make Highway 76 traffic even worse, turning it into a rush hour parking lot 4. It will dramatically increase green house emissions and create a huge, future problem for Oceanside when the day comes that State law mandates reduced GHG emissions.
5. Oceanside is blessed with many infill developable lots for high density housing. We do not need to destroy farmland to realize the goal of affordable, attractive housing in Oceanside.

Thank you.

Bill and Patty Roth
3377 Gollers Drive

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L159 LITTLE, CHUCK

Comment Letter L159

From: Chuck Little <charleslittle@coconet>
Sent: Sunday, May 05, 2019 3:06 PM
To: Planning-Planning Commission
Cc: Usha Little; Manisha Little; Rasmii Little
Subject: "No" on the North River Farm Development Project

Warning: External Source

Please vote "NO" on the North River Farm Development Project. There are too many issues that need to be either resolved or mitigated before this development project is approved. These issues are well documented in the Public Correspondence 5-16-19 PC that has been received after publication of the staff report. The Planning Department must heed to the concerns of the citizens and adhere to "Smart Growth" concepts and protect the last vestige of agriculture use within the City of Oceanside.

Thank you for your service and consideration regarding this matter.

Chuck Little
(858) 449-3133

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L160 BALCH, COLLEEN

Comment Letter L160

From: Colleen Balch <mschieff24@gmail.com>
Sent: Sunday, May 05, 2019 12:23 PM
To: Planning-Planning Commission
Subject: North River Farms

Warning: External Source

Chair and Commissioners,

Please follow staffs recommendation to deny this project. I will not list all of the problems with this project as there are too many.

Just to name a few, Fire Station, evacuation routes and infrastructure.

The Fire Station is temporarily paid for.

There has not been any studies done to determine if the roads we have can evacuate the people who live there now. It was an epic failure during the recent fires. Until the Fire Marshal has had these studies done no homes should be built at this time.

Infrastructure is a huge concern. The developers should be paying 100% of cost of installing any and all of the infrastructure needed for this project.

Please just say NO

Respectfully,

Colleen Balch

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L161 FISCHER, BILL

Comment Letter L161

From: Bill Fischer <wcfischer@yahoo.com>
Sent: Sunday, May 05, 2019 7:25 PM
To: Planning-Planning Commission
Subject: Proposed North River Farms Development

Warning: External Source

Dear Planning Commissioners,

I want to register strong and heartfelt opposition to Integral Communities' proposal for a project deceptively named North River Farms. It is a project that requires an amendment to the General Plan. And it will permanently subtract agricultural land from the precious 3400 acres in Morro Hills currently zoned for agriculture. It is anything but a "Farm".

My main objection is that any reduction of agricultural land, no matter the location, threatens environmental sustainability at a time when the clock is running out on the planet's ability to sustain life. Agricultural growth, like forest or grasslands growth, bolsters the capacity of the Earth to support animal, human and plant life at a time when all signs indicate we are dramatically doing just the opposite: choking the oceans with plastic and other debris, assaulting the soil and human health with agricultural chemicals and the unfettered exploitation of unrenueable natural resources. To say nothing of recklessly converting open land to housing and commercial enterprise in the pursuit of profit and capital growth. Unless we act smartly now, we will soon be in irreversible environmental peril.

You are well acquainted with the litany of local arguments against Integral's project: 1) added cost to Oceanside taxpayers to provide required infrastructure for Integral's project; 2) the very real danger of insufficient escape routes for the increased residential and commercial population should there be a sudden fire emergency (as with the Lilac fire), especially one fueled by untamed growth in the San Luis Rey River Valley; and 3) the degradation of Oceanside's promising Agri-Tourism plan—despite Integral's dubious claim their project will boost Agri-Tourism. Oh yes, it also doesn't provide any truly affordable housing stock at a time when Oceanside—and the State of California—truly needs it.

Please present your strongest recommendation to City Council to reject Integral's unhealthy and dangerous project.

Thanks for hearing me out,

Bill Fischer

Dr. William C. Fischer
510 Estromoz Ct.
Oceanside 92057
760.585.8899

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L162 FISCHER, BILL

Comment Letter L162

From: William Fischer <wcfischer@yahoo.com>
Sent: Sunday, May 05, 2019 11:11 PM
To: Planning Planning Commission
Subject: Integral Communities Revised Proposal for NRF

Warning: External Source

Dear Planning Commissioners:

I am adamantly opposed to the high-density residential/commercial project being resubmitted to you by Integral Communities. It is to be located in the Morro Hills area originally zoned for agricultural land. They have misleadingly named the project North River Farms, when it will in fact subtract agriculture acreage from that area. I ask you to reject this revised proposal as you have the preceding ones.

My opposition principally rests on the fact that we already face disastrous environmental encroachment on a global scale, let alone locally. What forests, plains, natural habitats, green open spaces, productive agricultural lands and water resources we have left are under severe pressure. Oceans and freshwater bodies have become convenient dumping grounds for trash that destroys sea life; agricultural lands are besieged by toxic fertilizers and other chemical products hazardous to human and animal health; non-renewable natural resources are being plundered for quick profit, the consequences be damned. This is not environmentally sustainable. Nor is life as we know it. Integral's persistent proposal is part of the problem, in effect destroying sustainable agricultural land.

There are well known and convincing local reasons for opposing the project: 1) it will cost O'side taxpayers a lot of money to build the infrastructure necessary to support Integral's project and profits; 2) it will create a serious evacuation safety hazard in event of a threat like the recent Ulaic Fire—the current road system is entirely inadequate to handle the volume of traffic such an event would produce; and 3) it will seriously undercut the City's thoughtful plan for Agritourism, despite Integral's claim to the contrary.

Please make a powerful recommendation to City Council NOT to approve Integral's amended proposal.

Thanks for hearing me out,

Bill Fischer

Dr. William C. Fischer
519 Estremoz Ct.
Oceanside 92057
760.585.8899

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L163 CALVETTI, GABE

Comment Letter L163

From: Gabe Calvetti <gcalvetti@yahoo.com>
Sent: Sunday, May 05, 2019 11:35 AM
To: Planning-Planning-Commission
Subject: Please vote NO!

Warning: External Source

I am a resident of Bonsall and the thought of allowing this high density housing is ridiculous...the 2.5 acre min was put into place for a reason and shouldn't be changed because of some developer's grand vision for what "we" want...

Gabe Calvetti
1110 Vista de Lomas
Bonsall, CA 92003

This affects many Fallbrook residents: North River Farms Project will be heard for the third (and last) time by Oceanside City Council.

May 6 at 6PM

This project will:

1. Increase risk from wildfires/evacuations
2. Start the conversion of our last remaining farmland to more dense housing
3. We will all pay for this sprawl development – loss of community character, traffic congestion, air pollution, greenhouse gasses and higher taxes/fees for service.

What Can You Do?

1. Attend Hearing on Monday, May 6.
Oceanside City Hall, 300 N. Coast Hwy

5:00 PM Rally outside City Hall
6:00 PM Planning Commission hearing

2. Call/email the Commissioners.

Send to PlanningCommission@oceansidaca.org or call 760-435-3065. Tell them why you oppose the project and ask them to vote no.

3. Spread the word to everyone you know.

This will impact the entire city – not just Morro Hills!

Oceanside is one of the few north county cities that still has zoning in place to protect agricultural lands- but what will we have tomorrow? The 3400 acres of ag zone land in the Morro Hills. Healthy, local food production benefits everyone. Sprawl development hurts everyone- with more air pollution, wildfire risks, infrastructure costs, traffic congestion and GHG. One project taking us down the wrong path, North River Farms.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L164 DOTEN, JANET

Comment Letter L164

From: Janet Doten <jdoten51@gmail.com>
Sent: Saturday, May 04, 2019 12:43 PM
To: Planning-Planning Commission
Subject: Oppose project.

Warning: External Source

I am a registered voter and resident in Oceanside, please do not approve building in the last farmland and precious area in Oceanside, California. Don't be greedy if there were a very severe firestorm traffic evacuation masses could be devastation to say the least.

Sincerely
Janet Doten
4829 Yuma Avenue
Apt B
Oceanside, CA 92057
760-979-3781

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L165 CHICK, JEANNE

Comment Letter L165

From: Jeanne <janwista@yahoo.com>
Sent: Monday, May 06, 2019 7:30 AM
To: Planning-Planning Commission
Subject: marro hills

Warning: External Source

We need more open space!

Jeanne Chick

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L166 JP

Comment Letter L166

From: J P <oceanside4jp@gmail.com>
Sent: Sunday, May 05, 2019 6:00 PM
To: Planning Planning Commission
Subject: No to North River Farm project!

Warning: External Source

We need to slow down!

You don't even know what the impact of adding thousands of homes along the 78, Oceanside Boulevard, Vista Way, Mission Avenue Etc is yet

Stop this madness. What is the hurry? I see vacancies everywhere if there was such a demand for housing new developments wouldn't be sitting empty and for rent signs everywhere.

Once you rip up beautiful land it will never be the same again. Traffic is unbearable on the five, El Camino, Melrose Etc already!

We are told our natural resources are limited so be careful not to run our washers or dryers or sprinklers at certain times and yet you continue this massive gross thoughtless development.

How is it that you have water and energy for these developments and not for existing taxpayers?

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L167 BUSWELL, JUSTIN

Comment Letter L167

From: Justin Buswell <justin.buswell@gmail.com>
Sent: Sunday, May 05, 2019 1:45 PM
To: Planning-Planning Commission
Subject: Just say no to North river farms project

Warning: External Source

I'm writing to voice opposition to any large scale development in the farming zones of Oceanside.

Important Reasons WHY:

- It creates huge public safety issues with putting homes and families in known flood and fire zones. Who will be responsible when people can not evacuate or their homes are under several feet of water? Us, the taxpayers, because Integral will be long gone! - Integral's own traffic studies make it clear this project is adding vehicles trips way above the capacity of local roads and yet does not propose adequate road updates?! The 76 is already a Parking lot during commuting hours and the project will eliminate the country feel of northriver road and morro hills.
- this change of zoning is wrong for th character and managed growth of Oceanside.

Please oppose this project.

Justin Buswell
1720 Loreffa st Oceanside

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L168 JOHNSTON, KAREN

Comment Letter L168

From: Karen Johnston <karejohnston@gmail.com>
Sent: Monday, May 06, 2019 8:46 AM
To: Planning-Planning Commission; Robert Dmochowski; City Clerk
Subject: Traffic Concerns in the North River Farms Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Please DENY approval of The North River Farms Development Plan as it will heavily impact traffic flow on already congested Oceanside streets.

A. This project shows an unacceptable amount of significant impacts on local traffic. According to the FEIR, Appendix N Transportation Impact Analysis, many local intersections that are already significantly delayed will show additional delays with the increase of traffic from this area.

<https://www.ci.oceanside.ca.us/civicas/filebank/blobdownload.aspx?BlobID=48745>

Section 8.0 ANALYSIS OF EXISTING + PROJECT SCENARIOS
pages 34-39

Note: There is no mention of the impact on the intersection of North River Road and Highway 76.

B. There are NO mitigations being considered for the two bottleneck intersection problems on North River Road:

1. Traffic heading west on North River Road and turning left onto Vandegrift.
2. The intersection of North River Road and Highway 76 (entering highway)

Both intersections are excluded from FEIR Chapter 2 MITIGATION MONITORING AND REPORTING PROGRAM

<https://www.ci.oceanside.ca.us/civicas/filebank/blobdownload.aspx?BlobID=48863>

page 13, 14

C. California Department of Transportation concerns, clarification requests and errors in the Draft EIR.

In the Final Environmental Impact Report- Comments from the Community, the letter from the California Department of Transportation expressed many concerns, requests for clarification, and also noted errors on over 20 items in the DEIR. I was unable to find clarifications and/or mitigation for many of the comments. Below are some of the most notable.

FEIR Appendix to Volume I Comment Letters, A3, page 5

California Department of Transportation

<https://www.ci.oceanside.ca.us/civicas/filebank/blobdownload.aspx?BlobID=48751>

*Comment 5. The trip distribution that uses SR-76 appears low and unreasonable. Only 13% of the project traffic is shown on SR-76 east of North River Road, and only 12% of the project traffic is shown on SR-76 west of Douglas Drive. Please substantiate trip distribution."

Late Comment Letters for North River Farms Environmental Impact Report

Comment 10. For the intersection of SR-76 and North River Road, using the Synchro methodology the existing AM LOS is F and the increased delay with the projects is 28.4 seconds. In Sim Traffic there is an issue with westbound SR-76 queuing at North River Road. Please clarify impact findings at this location.

Comment 11. For the intersection of SR-76 and Douglas Drive, the increase in delay in table 8-1 is greater than 2 seconds. In Sim Traffic there are issues with queuing for the SB left on Douglas Drive and on WB SR-76 in the PM. Please Clarify impact findings at this location.

12. For the intersection of SR-76 and Old Grove road, using the Synchro methodology the existing AMLOS is E and increased delay with the project is 7.9 seconds. In Sim Traffic, there is an issue with the westbound SR-76 queuing at Old Grove Road in the AM. Please clarify impact findings at this location.

14. For the intersection of SR-76 and North Santa Fe Avenue, using the Synchro methodology the existing PM LOS is F with a delay of 95.1 seconds and the increased delay with the project is 2.1 seconds. In Sim traffic there is an issue with queuing on NB North Santa Fe Avenue and EB SR-76. Please clarify impact findings at this location.

15. At the intersection of SR-76 and East Vista Way, there is an issue with queuing on EB 76 in SIM Traffic for the existing project plus project PM. Please clarify impact findings at this location

D. There is no copy of the Draft EIR available online, so it is not possible to see if the agency and community concerns were addressed in the FEIR.

The bottom line is that traffic in North County will be heavily impacted by this project. The traffic mitigations noted in the Development Plan will not help traffic flow on the 76 or in the surrounding area. This project should be denied.

Sincerely,
Karen Johnston
Oceanside Resident
1544 Sleeping Indian Road.

Late Comment Letters for North River Farms Environmental Impact Report

L169 BENDER, KEVIN

Comment Letter L169

From: Kevin Bender <kevinlanbender@gmail.com>
Sent: Sunday, May 05, 2019 5:36 AM
To: Planning-Planning Commission
Subject: No on North River Farms Project

Warning: External Source

Commissioners,

I oppose the North River Farms Project and I would like you to vote "NO" on it at Monday's meeting.

I will be at the meeting.

My family came to Oceanside in 1925 and started in the real estate business in 1929. Despite being in this business myself, I oppose the North River Farms development for several reasons:

It would:

- Start the conversion of our last remaining farmland to more dense housing.
- Increase risk from wildfires/ evacuations
- We will all pay for this sprawl development – loss of community character, traffic congestion, air pollution, greenhouse gasses, and higher taxes/fees for service.

Please vote NO on Monday.

Regards,

--

Kevin Bender
Property owner in Oceanside
(760) 710-1422
kevinlanbender@gmail.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L170 PASSIN, LISA

Comment Letter L170

From: Lisa Passin <lisapassin00@gmail.com>
Sent: Monday, May 06, 2019 7:51 AM
To: Planning-Planning Commission
Subject: No to North River Farms Project

Warning: External Source

Planning Commission;

I own two homes in Plumas Heights.
ENOUGH!!! Leave the farmland alone!
The traffic is so congested in Oceanside, a drive that was once 5 minutes is now 30 to reach my home.
Once all the resorts are filled we won't be able to get a blanket on the beach.

NO TO NORTH RIVER FARMS PROJECT

Lisa Passin

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L171 DALE, ELIZABETH AND ANDREW

Comment Letter L171

From: Liz Dale <lizbethdale@gmail.com>
Sent: Friday, May 03, 2019 3:19 PM
To: City Council; City Clerk; Robert Dmohowski;
christopher.christopherodrig@mailservices7.com
Subject: North River proposed development, opposed
Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

To: City of Oceanside Planning Commission, et al

We are in opposition to the North River Farms project and want to voice our opinion in order to protect our neighborhood. We have lived in Oceanside for almost seven years. We chose to stay in Oceanside and move to Arrowood when we could have moved to Carlsbad. We chose this location because of the hard to locate excellent school, low traffic, farming community, and unobstructed views.

We oppose this development:

1. The existing fire danger and evacuation in the event of a major wildfire will be compromised. You should have safety concerns about placing our residents in a deadly situation by overbuilding without having the infrastructure to support a mass evacuation, if needed.
2. Traffic congestion will be compounded dramatically. Rush hour traffic on College Street and North River Road is heavy, lately not even at rush hour. This development will add at least 2 vehicles per home! Even if the College Street Bridge is expanded, the congestion during the construction phase will be extremely increased. What if an emergency evacuation arises? How will this be handled during the building phase?
3. Adding hotel or public event venue at North River Farms will bring a great deal of people to our area which as a result will dramatically increase traffic. Drive the 76 anytime after 2:30, it's already ridiculous, add more people, it will be a parking lot. North River Road will be impossible to use as an alternate route since the proposed round-about will decrease the speed of the vehicles driving through that area. I would love to receive an address that shows a round about that decreases traffic. Summer is already extremely congested already with inland residents visiting the beach.
4. With more hotels being constructed on Coast highway, we are going to have an increase in tourists/vehicles which will add to the traffic, especially during summer and holiday weekends.

Please consider how this will effect our lives and our children's lives. Traffic here is already bad and schools already so poor, so what is there to keep us in this city without the natural beauty we love so much about living here? What are the benefits for the existing residents? The benefits are for the developer, so where do your loyalties lie?

Thank you for listening.

Late Comment Letters for North River Farms Environmental Impact Report

Sincerely,
Elizabeth and Andrew Dale
1304 Bellingham Dr
Oceanside CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

L172 KORST, MARY

Comment Letter L172

From: Mary Korst <mmkorst@aol.com>
Date: May 5, 2019 at 4:35:50 PM PDT
To: Undisclosed recipients;
Subject: "NO to North River Farms Project"

Warning: External Source

"NO to North River Farms Project"

Resident of N Freeman Street 02054

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L173 SULLIVAN, MELISSA

Comment Letter L173

From: melissa sullivan <55samuel55@gmail.com>
Sent: Sunday, May 05, 2019 4:16 PM
To: Planning-Planning Commission
Subject: North River Farms Project

Warning: External Source

I have reviewed the details of the North River Farms Project and I vote No.

Warmly,
Melissa Sullivan

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L174 MARTIN, MICHAEL

Comment Letter L174

From: Buck Fairbanks <buckfairbanks@hotmail.com>
Sent: Sunday, May 05, 2019 11:55 AM
To: Planning-Planning Commission
Subject: North river farms

Warning: External Source

Just say "NO" Support your planning staff and the citizens of Oceanside, not developers.

Michael Martin
Oceanside, CA
Sent from my iPad

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L175 HUGHES, PATTE

Comment Letter L175

From: pattehughes@gmail.com
Date: May 5, 2019 at 9:55:41 PM PDT
To: "To: Robert Dmohowski <RDmohowski@oceansideca.org>; Planning-Planning
Commission <PlanningCommission@oceansideca.org>; Planning Web
<Planning_Web@oceansideca.org>; City Council" <Council@oceansideca.org>
Subject: NRF

Warning: External Source

Allowing high density housing on farmland would be an irreversible and concrete mistake.
Please DENY the NRF project from moving forward on this precious fertile land.

Sincerely,
Patte Hughes
3446 Elderberry Way
Oceanside 92057

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L176 JONTE, RACHEL

Comment Letter L176

Rachel A. Jonte ~ 4329 La Paloma Lane, Oceanside, CA 92037 ~ Rachel@mozfamilyfarms.org

May 2, 2019

Dear Members of the Oceanside Planning Commission:

I am writing to express my opposition to the proposal for rezoning and development of 177 acres in South Morro Hills by the applicant Integral/North River Farms. I am a resident of SMH and have lived here for 4 years. I have a deep connection with the land here and a lot of pride in the City of Oceanside. The City of Oceanside was fortunate to have founders with great vision who set aside acreage for agriculture, protecting beauty, balance, quality, and character in our City. They enshrined a symbol of farming on the City Crest. They protected this area from moments like this one because connection to land, growing things, the potential for food sovereignty, for escape to nature and open space, these things are important for human thriving. And most cities don't have these assets, so for this, I thank our city founders.

I am opposed to the project proposed by Integral/North River Farms, not because I am opposed to change or to development in South Morro Hills, but because this proposal is wrong for Oceanside in so many ways. This proposal would drastically change this precious gem of the city in irrevocable ways that compromise safety, quality of life, and the future of farming in Oceanside, and I don't believe that level of dramatic change should be imposed upon citizens by a business who has no connection to the land, the city, and has the sole objective of profit for their company.

Oceanside AgriVision is working on a plan that includes smart development in South Morro Hills while preserving farming and a rural spacious character, protecting vistas, and keeping all the forefront safety and traffic concerns. AgriVision is going about this the smart way, working with the City, with the citizens, the farmers, and the neighbors as well as engaging creative landscape and housing designers who are working with a comprehensive topographical map of South Morro Hills to create a beautiful plan for the future. This plan will include housing and neighborhoods that are more dense than the current zoning, and they will be located in strategic places in the area that make sense. Oceanside AgriVision deserves the time to complete this plan and adopt it with and for the city, by citizens and farmers who live here, love here, have invested their time, talents, and treasure here. The applicant is a disconnected company with no ties to this area, trying to rush through a project that would decimate prime land in South Morro Hills that is key to the Oceanside AgriVision plan. Please give AgriVision time to craft the future of this area, not a developer.

Safety is my main concern here. There are currently 178 residences in the whole of South Morro Hills. This developer plans to pack in 659 residences into the gateway and main roadway that supplies this entire region. As it stands now, this roadway is insufficient for evacuation of current residents in the event of an emergency, which we all have experienced in the past two years. Add 1200 cars to this roadway and the danger is obvious and terrifying for me as a resident. A closer fire department does nothing to help all of these cars get out. There is a fire department not even a mile from there. A new bridge from North River Road to the 76 is needed and would be absolutely necessary for this project to even begin to offset the threats their plan poses to our safety.

Late Comment Letters for North River Farms Environmental Impact Report

Rachel A. Jonte - 4329 La Palma Lane, Oceanside, CA 92057 - Rachel@mrazfamilyfarms.org

Packing in so many homes in that **density** right up against a farming area is also potentially the beginning of the end for farming in Oceanside. Farming is loud, dusty, it disturbs the air and clogs the roadways with slow trucks. The wildlife including birds, small mammals, insects, and coyotes share this region with us. High density housing residents are inevitably going to complain and their quantity of voices would outweigh the farmers if this proposal went through, eventually at a great cost to the city. This has happened all over the country in places where development pushes up too closely to farming to make the most profit possible, without considering the long term impact.

Oceanside has a precious resource in the agricultural zone of South Morro Hills and has a unique opportunity to create a smart community plan that celebrates and encourages agriculture while creating more opportunities for people to live, work, and enjoy this rare and precious space. Few cities in the world have this kind of land and this type of opportunity to create something sustainable that engages and brings vitality to the region.

Smart community design can avoid development that causes congestion, proposes high density housing that destroys the rural atmosphere, and actually threatens residents safety and farming beyond just the loss of farming acreage already proposed.

I have attended the meetings and it is clear that Oceanside citizens are NOT for this development. The arguments proposed for the project are extremely weak in the face of the hundreds of people who oppose selling off this prime area, specially zoned for agriculture to forever change this city. Listen to the citizens. Their concerns are real and they have brought up dozens of important points. Oceanside Agr/Vision will help this area find the path forward with development, agritourism, and safety. Give them time to complete the process and adopt a comprehensive plan for South Morro Hills. Then and only then, let's engage developers to create beautiful neighborhoods that make sense within the plan.

Please vote NO on this development project. Please allow the vision plan to continue. Please listen to the hardworking staff that are in touch with the Oceanside community and their needs. Please don't give the power of determining the future of Oceanside's farming region to a greedy developer who cares only about profit. This development does nothing to improve life in South Morro Hills and many things to decrease the safety and quality of life of current residents, and diminish the character of our beautiful city.

Respectfully,

Rachel Jonte
Mraz Family Farms

Late Comment Letters for North River Farms Environmental Impact Report

L177 FRANCIS, RICHARD

Comment Letter L177

From: Richard Francis <surfpotts51@gmail.com>
Sent: Monday, May 06, 2019 8:45 AM
To: Planning-Planning Commission
Subject: River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

I would ask that you please vote against the River Farms project. WE don't need more traffic in that area its already terrible. We don't need the housing either.

lets keep at least some open space in Oceanside .

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L178 GLEISBERG, ROBERT

Comment Letter L178

From: Robert Gleisberg <bobsbag@cox.net>
Sent: Sunday, May 05, 2019 3:58 PM
To: Planning Planning Commission
Subject: SOAR - An Economic Failure in Ventura County
Attachments: SOAR Initiative_HBEI - OCC June 2018.pdf
Importance: High

Warning: External Source

Chairman and Members of the Oceanside Planning Commission:

Please read **"The Impact of The Proposed SOAR Initiative on The City of Oceanside"** authored by Lynn Rasser, PH.D., CBE – Chief Economist for the Hermanian Business and Economic Institute (HBEI).

If you only read the EXECUTIVE SUMMARY, you will understand the well-researched and documented **facts** about Oceanside's SOAR initiative developed and presented by a nationally acclaimed economist. **Oceanside voters did not approve the Oceanside SOAR initiative** in last November's election.

Concomitantly, Dan Walters' Report on Ventura County's economic stagnation has provided a separate, independent perspective upon SOAR's negative impacts upon a once vibrant California county: <https://www.davisenterprise.com/forum/opinion/columns/dan-walters-housing-shortage-will-hit-californias-economy/>

(NOTE: His article is focused upon California's growing housing shortage.)

A quote from the cited Walters report:

"Ventura is one of several California counties and cities that have adopted **Save Open Space and Agricultural Resources (SOAR)** restrictions that make it virtually impossible to build housing on agricultural land.

SOAR is the most virulent form of local not-in-my-backyard (NIMBY) policies that are the major impediments to expanding housing construction needed to keep up with population growth, replace housing lost to fires and begin closing a shortage that now is several million units."

In my opinion, **Oceanside SOAR proponents are the most outspoken opponents to the North River Farms development proposal.**

Our local Oceanside officials need to effectively communicate a **better, united vision** for the direction of Oceanside's future commercial and residential "evolution."

They can choose to lead and guide "Oceanside's future evolution" or let it evolve on its own . . . thus relegating the final decision to others by default.

Your forthcoming decision regarding the **North River Farms** development is a bellwether for Oceanside's future direction and growth.

Respectfully,

1

Late Comment Letters for North River Farms Environmental Impact Report

Robert "Camo" Giesberg
40+ year Oceanside Resident

Late Comment Letters for North River Farms
Environmental Impact Report

JUNE 2018

THE IMPACT OF THE
PROPOSED SOAR INITIATIVE ON
THE CITY OF OCEANSIDE



FERMANIAN BUSINESS &
ECONOMIC INSTITUTE

Late Comment Letters for North River Farms Environmental Impact Report

THE FERMANIAN BUSINESS & ECONOMIC INSTITUTE (FBEI)

The FBEI specializes in providing a variety of business and economic consulting services to employers, for profit and nonprofit companies, individuals, organizations, government entities, and others throughout the San Diego Region, as well as nationally and internationally. Consulting services include economic analysis and forecasting, economic impact studies, business plans, customer and consumer trends, market research, feasibility studies, expert opinion, and many other contemporary needs of the business and economic community, public and private, for-profit and non-profit. The Institute also has extensive experience in presenting materials to government officials at all levels and in conducting interviews with local and national media outlets.

FBEI Authors

Lynn Reaser, PH.D., CBE – *Chief Economist*

Thomas Hale - *Senior Research Associate*

Sarah DiSalvo, Nathaniel Hosmer, Ben Miller
PLNU Undergraduate Student Researchers

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Late Comment Letters for North River Farms Environmental Impact Report

THE IMPACT OF THE PROPOSED SOAR INITIATIVE ON THE CITY OF OCEANSIDE

EXECUTIVE SUMMARY

Voters in the City of Oceanside will be asked in November 2018 to consider an initiative, commonly known as the SOAR Initiative, which would require public approval for any change in the zoning of land currently designated for agriculture or open space. Because most open space used for parks and recreational activities is City-owned and already requires a vote of the people for any zoning change, the Initiative primarily involves the future of the 3,340 acres of agriculturally-zoned land in the northeast part of the City known as South Morro Hills.

The SOAR Initiative has many worthy goals, including protecting the environment, helping agriculture, and creating a City with a high quality of life. This study analyzes the direct and indirect effects the Initiative would produce, including some of the unintended consequences. The results would likely be very different from those envisioned by the individuals who drafted the initiative and those who have supported it.

Key takeaways include the following:

- Other communities adopting a SOAR Initiative or similar policies have suffered slower job gains and rising home prices. Ventura County, which has been the template for Oceanside's Initiative, has shifted from a region outperforming the State to one of underperformance. Companies have departed the County in record numbers.
- Oceanside faces a housing crisis, as home prices have been rising at a 10% pace during the past five years while wages have increased by less than 2.5% per year.
- The City has achieved less than 15% of its State-mandated housing target for 2021, whereas it should be at more than 50% of its goal by now. The Initiative would make it exceedingly difficult for the City to achieve its future housing goals.
- Companies' primary constraint now involves the supply of workers, which in turn depends on the availability of housing. Without adequate housing businesses will be forced to either downsize or leave the City.

Late Comment Letters for North River Farms Environmental Impact Report

EXECUTIVE SUMMARY (Continued)

- The initiative would shut off avenues for farmers in Oceanside to remain viable at a time when they are being squeezed between rising labor, water, and financing costs and increasing competition from imports.
- The Initiative would prevent the creation of a vibrant agritourism cluster in Oceanside, including a mix of wineries, lodging, restaurants, and small retailers. In contrast, it would be restricted to a few roadside farm stands.
- The Initiative would likely lead to the eventual demise of active farms in Oceanside, with land either being left to go fallow or sold into large estates for the wealthy.
- Allowing development of a true agritourism cluster with additional housing on 1/6 (limited development) to 1/3 (moderate development) of the land currently zoned exclusively for agriculture would produce significantly greater economic gains than if current uses are frozen in place. These gains would include:
 - About twice the number of jobs
 - \$400 million in gross regional product (GRP) versus \$150 million
- By 2034, the area currently being farmed is likely to contribute nearly \$0.5 million to the City's potential deficit. In contrast, the City could see a surplus of \$1.2 million annually from the area if it allowed very limited development and a \$2.5 million surplus annually from the region if moderate development were allowed.

The initiative could shut off ways for the City to meet its current and future housing demands, generate new jobs, invest in critical infrastructure, support a viable farming sector and agritourism, and fund community priorities such as road improvements, public safety, recreation, and its obligations to public sector retirees.

The eventual outcome of the SOAR Initiative would be much different than envisioned by the initiative's supporters. Rather than fields of flowers and other crops along with a thriving agritourism sector, the 2,250 acres now farmed in South Morro Hills would likely be transformed into areas populated by wealthy owners of large estates buffered from the rest of the City by vacant, barren land.

Late Comment Letters for North River Farms Environmental Impact Report

EXECUTIVE SUMMARY (Continued)

This suggests a picture of widening wealth and income inequality in Oceanside as the population in the northeast part of the City would become dominated by wealthy retired individuals while residents in the rest of the City would struggle with even higher housing costs and rents, escalating maintenance costs, falling infrastructure, and constrained services.

2034 Impact of Alternative Policies on Agricultural Land

	# Total Acres Developed	Share of Ag-Zoned Land*	# Crop Acres	# Retail & Commercial sq. ft.	# Residential Units
Restricted Use	0	0	2,250	0	0
Limited Development	562	1/6	1,688	23,750	991
Moderate Development	1,125	1/3	1,125	47,500	1,982

	Restricted Use	Limited Development	Moderate Development
Jobs	2,356	3,259	4,163
Personal Income (\$ mil)	\$92	\$170	\$248
GRP (\$ mil)	\$157	\$272	\$367
Total Sales (\$ mil)	\$274	\$445	\$616
Net Fiscal Impact (\$ mil)	-\$0.42	\$1.2	\$2.5

* 3,340 Acres

Source: FBEI

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

I. INTRODUCTION AND STUDY PURPOSE

In November 2018, the voters of the City of Oceanside will be asked to consider 'An Initiative Measure Amending the Land Use Element of the Oceanside General Plan to Require Voter Approval of Proposals to Change the Land Use Designation or Zoning of Agricultural or Open Space Land to Any Other Use.' These types of proposals have been commonly termed "SOAR Initiatives," where SOAR stands for "Save Open-Space and Agricultural Resources."

To enable voters to make an informed decision, this study seeks to answer the following questions:

- What would the SOAR initiative change and not change?
- What lessons can be learned from other communities that have adopted SOAR initiatives or similar types of policies?
- What would be the impact on the City's ability to meet its housing goals?
- How would agriculture and the potential for agritourism be affected?
- What would be the impact on the City's economy, including its ability to create new jobs?
- What would be the impact on income and wealth inequality?
- What would be the effect on the City's financial position, including its ability to fund community priorities such as road improvements, public safety, recreation, and its obligations to meet its long-term retirement obligations?

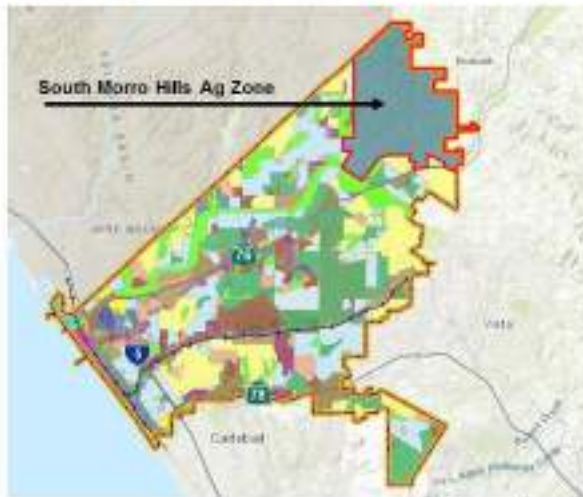
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II. THE MEANING OF THE SOAR INITIATIVE

What the SOAR Initiative Would Do

The SOAR Initiative would primarily impact the 3,340 acres in South Morro Hills in the northeastern part of the City that is currently zoned for agriculture. Landowners in this area currently can build one house per 2-1/2 acres and some wealthy individuals have done so. A total of 2,250 acres is currently farmed with various crops including strawberries, blueberries, cherimoya, avocados, tomatoes, brussel sprouts, cut flowers, and nursery stock. A small wedding venue is also located in the region.

Agriculturally-Zoned Land in South Morro Hills



Source: City of Oceanside, FBI

Under current law, any proposal to change the zoning of this area to anything other than estate homes would require a majority vote of the City Council. Such a process involves an extensive analysis by the City and input from the community but can allow a modification of zoning if considered the best option by the City's elected officials. The SOAR Initiative would essentially freeze or lock in place the status quo as a majority of votes in a city-wide election would be required to approve any zoning change from the current allowable estate housing. The history of such votes is that they are rarely attempted and unlikely to succeed, suggesting that the Initiative would leave Oceanside and property owners with large estate homes as their only alternative.

Late Comment Letters for North River Farms Environmental Impact Report

What the SOAR Initiative Would Not Do

In addition to land currently zoned for agriculture, the SOAR Initiative would prevent the rezoning of open space to another use without a public majority vote. There is a common perception that the SOAR Initiative would thus "protect" public parks or recreational areas from being converted to other purposes. However, current law already requires that public land used for parks and similar purposes must be submitted to a vote by the people before any change can be considered.

"No person, corporation, or city official, on and after the effective date of this article, shall sell all or part of any city-owned real property being used as a public park, public playground, or public recreational area under the authority or operation of such city on such date; or, take any action or do any act that would prevent all or part of such city-owned land from being used as a public park, public playground, or public recreational area, unless such sale, action, or act, is first approved by a majority vote in a municipal election in the City of Oceanside."¹

Since most of the open space in the City of Oceanside is City owned and used for recreational purposes, it would already require a vote of the people for a land use change. The "SOAR" debate should therefore focus on the impact and repercussions for the City's agriculturally-zoned land.

III. LESSONS FROM OTHER AREAS WITH SOAR INITIATIVES OR SIMILAR PROVISIONS

A number of communities in California and throughout the nation have implemented various limits on growth over time. In Southern California, the City of Ventura adopted a SOAR Initiative in 1995, which was modeled after a similar proposal adopted in Napa Valley in 1990. After the SOAR Initiative was approved by voters in the City of Ventura, other cities in Ventura County adopted their own SOAR Initiatives, with the County following in 1998.

A rich body of literature exists regarding the impact of major initiatives to limit growth. Some of the most relevant studies are summarized in the Appendix of this report. Two primary conclusions emerge: Such restrictions dampen economic growth and hurt housing affordability.

An analysis of the impact on the economy in Ventura County is instructive. Although the proportion of land impacted by Ventura's SOAR initiative is a much larger share of the area's total than would be the case in the City of Oceanside, the relevant comparison relates to the amount of potentially developed area in the region. The 3,340 acres

¹ Article XII, Ord. No. 72-26, § 1, 5-24-72.

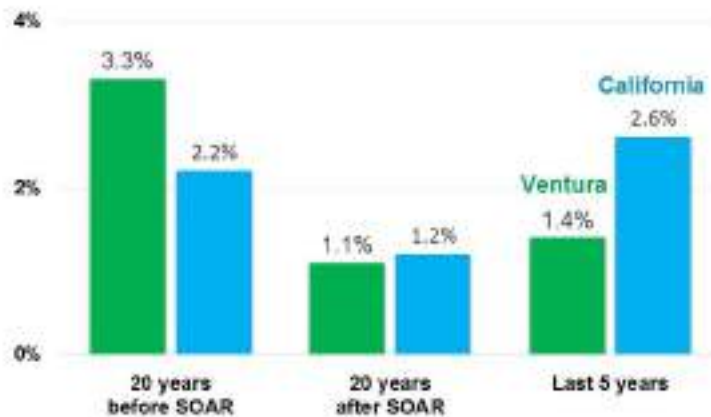
Late Comment Letters for North River Farms Environmental Impact Report

currently zoned for agriculture that would be impacted by the SOAR Initiative represent the remaining undeveloped land in the City of Oceanside. This area could provide forward planning opportunities for the City in the form of housing, tourism, jobs, and tax revenues, which would be effectively precluded by SOAR because of its requirement for a public vote on any land use change.

Ventura County's economy has clearly suffered from some of the impacts of growth restrictions. It took ten years after the 2007-09 recession for the area's employment to fully recover its losses. Of California's 29 major metropolitan areas, Ventura County was the fourth last to recover. It was trailed only by Yuba City, Hanford-Corcoran, and Redding.² Employment currently is up just 2.3% from its pre-recession peak versus a statewide gain of 10.2%.

In the twenty years prior to the SOAR Initiative, Ventura County outperformed California as a whole, with its average annual job growth exceeding that of the State by 50%. In the twenty years since the SOAR initiative, Ventura has barely kept up with the State and in the past five years has trailed the State by 50%. This represents a 100% swing from the positive to the negative side.

SOAR Weighs on Ventura County's Job Growth Average annual percent change in employment



Source: CA Employment Development Department, FBI

² California Employment Development Department, FBI

Late Comment Letters for North River Farms Environmental Impact Report

In 2015-16, Ventura County fell into recession with real GRP declining in both years. This downturn contrasted sharply with the continued expansion in the rest of California and the nation. Companies have either downsized or left the County due to the lack of adequate housing for current or prospective employees. During the past five years, the number of firms that have departed Ventura County for adjacent areas or outside the State has been unprecedented.³

SOAR initiatives or similar measures have exacerbated housing affordability problems in various regions. An examination of cities in California with such limits showed that in seven out of ten cases home prices rose more rapidly relative to the State in the five years after such restrictions were imposed than before.⁴

Various studies on the implications of SOAR initiatives or similar measures also indicate that some of the following effects may occur. Neighborhoods may become more segregated as higher income households compete for housing and drive out lower and middle income households. Urban sprawl may increase as individuals seek lower cost housing in outlying districts. These households may be pushed beyond the city's boundaries, making commutes even longer. Large discrepancies in property values are likely to emerge as landowners with new limits on their sales potential confront steep price declines while owners of property with continued potential reap large gains.

IV. OCEANSIDE'S HOUSING CRISIS

The City of Oceanside, along with regions throughout California, particularly along the coast, faces a housing crisis. San Diego County as a whole is experiencing a net loss of about 14,000 residents a year to lower cost areas in the rest of the State or other parts of the U.S.⁵

Affordability has become a major problem, especially for low and middle-income households. It is common to expect that one-third or more of a household's income will be required to cover the cost of home ownership. The average household in San Diego spends 42% of its income on rent.⁶

Housing is an enormous financial and social issue facing many families in Oceanside. It is also a primary concern of the City's businesses. With the City's unemployment rate falling to just 3.0%⁷, companies are desperately seeking workers. Their ability to recruit and retain employees is closely tied to the availability and cost of housing.

³ Mark Schniepp, "SOAR, The Economic Consequences of Growth Controls in Ventura County (April 30, 2018).

⁴ FBI

⁵ California Department of Finance Demographic Research Unit

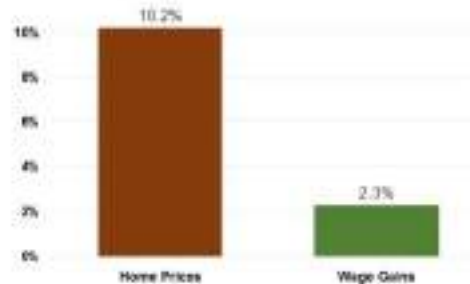
⁶ Zillow

⁷ California Employment Development Department

Late Comment Letters for North River Farms Environmental Impact Report

During the past five years through 2017, the City of Oceanside has seen home prices rise at an average of 10% per year, while wages have increased at a rate of less than 2.5%. The rapid climb in prices is due primarily to the lack of significant increases in new housing.

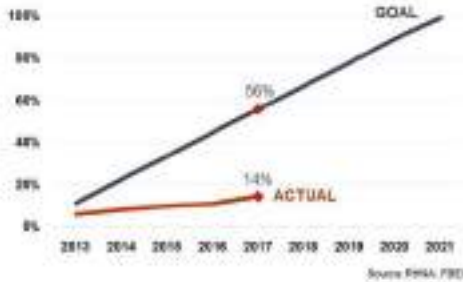
Home Prices* in Oceanside Outpace Wage Gains
Average annual percent change, 2013-2017



* Based on price per square foot

Source: Zillow, Home Analytics, FRED

Housing Permits Fall Short of Goal
Cumulative share of housing target



Source: RHNA, FRED

California sets housing goals for each City under its Regional Needs Allocation (RHNA) program. Cities and counties are required to produce a Regional Housing Needs Assessment that addresses how they will meet this State-mandated target. They must determine their capacity and potential to meet their housing needs under their general plans. This assessment, however, may underestimate the constraints posed from existing uses, topography, environmental issues, pressures on infrastructure, and public opposition.

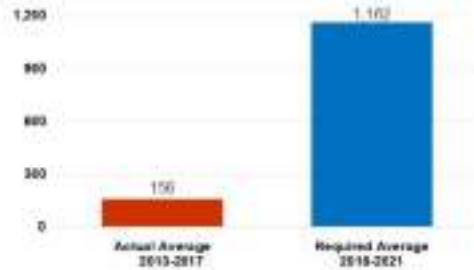
The target for Oceanside was to issue a total of 5,429 housing permits over the nine-year period, 2013-2021.⁵ This amounts to an average of slightly over 600 per year. During the past five years through 2017, the City has only issued an average of about 155 permits per year. To meet its objective, it should be more than half way towards its goal. Instead, it has achieved only about 14% of its target.

⁵ Annual Element Progress Report, Housing Element Implementation (CCR Title 25 §6202), City of Oceanside, 2017

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The catch-up now required to reach its goal over the next four years is formidable. The City would have to issue nearly 1,200 permits each year to reach its target. With the strong likelihood that this will not take place, the shortfall would then have to be made up in future years. While the State does not currently penalize cities for failing to reach their housing goals, that could change in the future. The City critically needs to have the land use inventory available in order to meet those future goals.

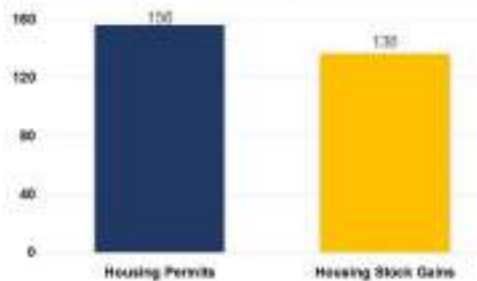
Housing Permits Face Major Catch-Up Challenge
Average annual number of permits



Source: City of Oceanside, PERI

The City's housing situation is actually even greater than that indicated by recent sluggish permit activity. Significant parts of the City's housing stock are old and in need of repair. While an average of 156 housing permits have been issued over the past five years, the City's actual housing stock has expanded by only 136 units per year. The discrepancy reflects delays between the time when permits are issued and the time when the house is finally completed, housing permits that are acquired but never used, and the demolition of older homes.

Housing Stock Gains Trail Permits
Average annual change, 2013-2017



Source: City of Oceanside, CA Department of Finance, Demographic Research Unit, PERI

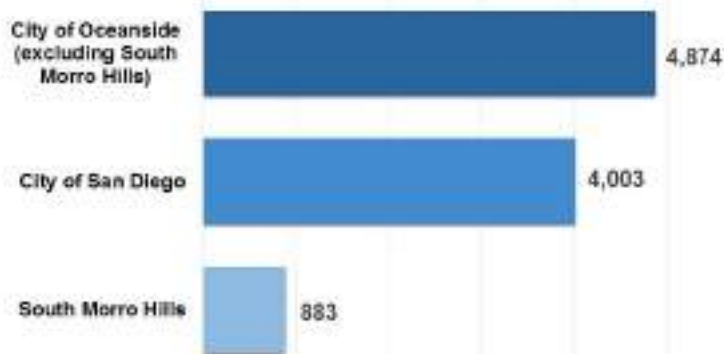
Much of the failure to build more homes reflects the opposition that builders encounter among existing residents when new projects are proposed in close proximity to them (the "Nimby"—"not in my backyard" phenomenon.) Despite incentives and the efforts of planning principals to push housing toward downtown Oceanside, practicality has prevented the area from meeting those housing objectives. The need to assemble parcels from different owners, tear down existing buildings, and displace current tenants has combined with the high costs of land and improvements along the coast to prevent a substantial increase in new housing.

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Other options appear necessary if the City is to solve its housing problem. Outside of the agriculture area, the average density in the City of Oceanside amounts to nearly 5,000 people per square mile. This is even higher than in the City of San Diego, where the density is about 4,000 people per square mile.⁹ This is why restrictions that preclude development options outside of already densely population areas are likely to keep actual homebuilding in Oceanside far short of targets, causing prices to escalate further while affordability worsens.

Escondido's experience with Proposition S, passed in 1998, which requires a public vote for any change in land use, has severely impeded the construction of new housing. The City is sharply short of complying with its State-mandated targets.¹⁰

Population Density Already Elevated Number of people per square mile



Source: Worldpopulationreview.com; Weichert.com; FBEL

⁹ FBEL; Worldpopulationreview.com; Weichert.com

¹⁰ Annual Element Progress Report, Housing Element Implementation (CCR Title 25 §8202), City of Escondido, 2017

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V. IMPACT ON AGRICULTURE IN OCEANSIDE

The viability of the agriculture sector within Oceanside is currently being seriously tested. The availability and cost of both labor and water are major problems. Competition from less expensive imports has intensified. A rising value of the dollar is limiting export potential, which could be exacerbated by international trade frictions and possible trade wars. Higher interest rates add additional pressure on profits.

The SOAR Initiative, rather than protecting agriculture and farmers, would actually harm them by precluding options to help them remain viable. Such options could include investments to make major upgrades in their operations, new ventures in agritourism, or a redeployment of a portion of their land into higher value uses.

Major investments in infrastructure would either be prohibited or might face legal challenges under the SOAR Initiative's restrictions. For example, investment in major new water infrastructure to enable the more effective use of recycled water for growers could be prohibited. Securing bank loans to finance projects facing legal uncertainty would be difficult. Farmers could also see their land values fall substantially as the potential for future development is sharply curtailed. Such reductions could further impair the ability to secure financing.

The SOAR Initiative permits agritourism but only "provided such development does not interfere with existing agricultural operations and that the open space character of the area is preserved."¹¹ Neither the agricultural zoning provision in the City code nor the SOAR Initiative defines what types of agritourism would be permitted, but the language suggests that it would be limited to some of the "Tier 1" type activities identified in the City's Agritourism Strategic Plan.¹² These would involve primarily farm stands and a small number of farm visitors. These options would neither help the viability of agriculture now in the region nor produce a viable agritourism cluster for the City. There would be no infrastructure to support any expansion of uses. The limited opportunities available would not attract any significant numbers of visitors for agritourism nor additional tax dollars.

A robust agritourism cluster would involve the "Tier 2" type of activities in the Strategic Plan and would be prohibited under the SOAR Initiative. Such a vision would see the region develop with a mix of wineries, lodging, restaurants, small retailers, and other agriculturally-themed venues. Because significant public or private investment in infrastructure would be required in the form of roads, sewer, water, and other utilities, the SOAR Initiative would prevent Oceanside from ever realizing a true agritourism sector.

¹¹ The "Voters' Right Initiative to Preserve Open Space and Farmland"

¹² City of Oceanside Agritourism Strategic Plan, Economic Development Office

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Farmers under the SOAR Initiative would be unable to deploy some of their holdings into higher-valued uses. Land restricted to only the growing of crops is currently valued at around \$60,000 an acre. In contrast, such land could receive about \$1.5 million per acre for residential uses and \$1.2-\$1.4 million for commercial uses. Shutting off these alternatives represents a major infringement on the property rights of landowners and their ability to remain in business.

While the intent of the SOAR Initiative is to protect agriculture in the City of Oceanside, it actually is likely to lead to its demise. It would block all three channels that farmers could otherwise pursue to keep their operations viable: (1) major investments to improve operations, such as in new water infrastructure; (2) creation of a meaningful and profitable agritourism ventures; and (3) redeployment of some of their property into higher value uses.

Individuals currently farming their properties could ultimately be forced to abandon operations and let land go fallow or fall into bankruptcy. Many may opt for the only profitable exit strategy, which would entail selling their properties to individuals who can afford 2-1/2 acre or larger homes. The acreage now zoned for agriculture under the SOAR Initiative would neither remain actively farmed nor develop into agritourism. Instead, it would become an area dominated by large estates for the wealthy, along with barren, fallow land, which would be far from the intended vision of SOAR. The creation of additional estate homes also would be accompanied by little increase in infrastructure, leading to increase pressure on the existing infrastructure, including a worsening of traffic congestion.

VI. IMPACT ON JOBS, INCOMES, AND INEQUALITY

The decision whether to approve the SOAR Initiative will dictate the future of the 2,250 acres now actively farmed in South Morro Hills. This study considered three different future paths:

- (1) Restricted Use: The area would continue to be farmed in various crops, the usage implied by the SOAR Initiative.
- (2) Limited Development: 281 acres, amounting to 1/6 of total agriculturally-zoned land, would be developed into agritourism and housing.
- (3) Moderate Development: 562 acres, amounting to 1/3 of total land zoned for agriculture, would be developed.

Development under both of the second (Limited) and third (Moderate) development cases was assumed to begin in 2020 and take place over 10 years. Approximately 1,000 housing units, including both single- and multi-family homes, were assumed for the Limited Development case and 2,000 units under the Moderate Development case.

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Homes would average about 2,500 square feet in size and be initially priced at approximately \$653,000.

2034 South Morro Hills Agriculture Land Use Alternatives

	# Total Acres Developed	Share of Ag-Zoned Land*	# Crop Acres	# Retail & Commercial sq. ft.	# Residential Units
Restricted Use	0	0	2,250	0	0
Limited Development	562	1/6	1,688	23,750	991
Moderate Development	1,125	1/3	1,125	47,500	1,982

* 3,340 Acres

Source: FBEI

The mix of commercial and retail establishments modeled to represent agritourism included the following:

- Learning Center and Museum
- Offices
- Retail Stores
- Industrial Space
- Grocers/Farmers Markets
- Wineries
- Restaurants

Variety of New Retail and Commercial Uses 2034 estimated sales*, thousands of dollars

Learning Center and Museum	\$ 120
Offices	\$ 335
Retail Stores	\$ 851
Industrial Space	\$ 1,076
Grocers / Farmers Markets	\$ 5,177
Wineries	\$ 5,678
Restaurants	\$ 7,288

* Moderate Development

Source: FBEI

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The total economic impact would derive from the spending of new residents and additional money drawn into the City by a new agritourism industry. Some of the new residents (estimated at about 20%) would also represent the net addition of new jobs. Some of the new residents would start their own businesses and companies would be in a better position to expand if there was Oceanside housing available for additional hires.

The sales of retail and commercial activity along with the spending of residents on goods and services would directly impact the City's economy. Additional impacts would accrue from the following:

- (a) business-to-business purchases in supply chains; and
- (b) consumer spending by employees hired by the new retail and commercial ventures as well as purchases by additional individuals hired in supply chains.

These additional impacts would represent the ripple or multiplier effects of new households and businesses in the region.

Development Creates Economic Ripples Business sales in 2034, millions of dollars



Source: FBEL

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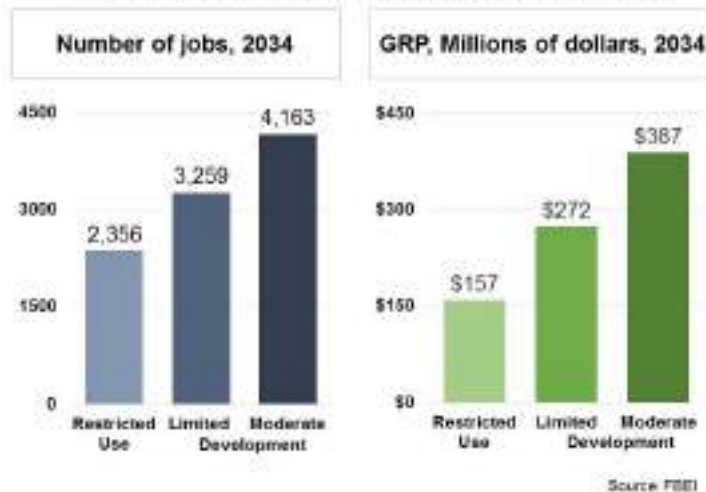
The results that could be achieved by 2034, when all housing has been occupied and all businesses are fully in operation, are significant.

- The Moderate Development case would show the agriculture region generating about 4,200 jobs versus about 2,400 jobs under the status quo or the Restricted Use case.
- Total personal income would equal about \$250 million in contrast to approximately \$90 million under the Restricted Use case.
- The region would generate about \$400 million in GRP versus about \$150 million if current land usage were restricted to existing usages.
- Total business sales could surpass \$600 million vis-à-vis about \$275 million in the Restricted Use case.

The Limited Development case would show smaller economic benefits but ones that would still be significantly more than if the land were exclusively restricted to its current use.

Both alternatives would generate even more jobs than housing units, helping the City to address its goal of increasing the jobs/housing ratio.

SOAR Would Limit Jobs and GRP Potential



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The potential gains in jobs, income, GRP, and business sales between the Limited and Moderate Development cases compared with the existing use of the land represent the opportunity costs that the City would forgo by freezing the options available for individuals currently farming the 2,250 acres in South Morro Hills.

**Alternative Uses Could Boost Economy
Impact, 2034**

	Restricted Use	Limited Development	Moderate Development
Jobs	2,358	3,259	4,163
Personal Income (\$ mil)	\$92	\$170	\$248
GRP (\$ mil)	\$157	\$272	\$387
Total Sales (\$ mil)	\$274	\$445	\$616

Source: FDOT

As discussed in Section V above, the economic impact by 2034 under the Restricted Use case could be lower should farmers abandon their properties or sell with very limited development (a minimum of 2.5 acres per dwelling unit).

This study models the outcome when all development is operational in 2034. It should be noted that significant numbers of jobs and economic growth would also be generated under both development cases as infrastructure is built, homes and buildings are constructed, and houses and new businesses are furnished over the years prior to occupancy and operation.

Whether or not the SOAR Initiative is adopted could also significantly impact income and wealth equality and diversity within the City. Under both the Limited Development and Moderate Development cases, a diversity of households and employees could be accommodated in South Morro Hills. In contrast, the SOAR Initiative could be expected to ultimately make South Morro Hills a primary conclave for wealthy retirees with large estates. The absence of significant increases in the supply of housing would also drive up housing costs in other parts of the City, leading to a concentration of higher income households in desirable locations along the coast and near key transit stops while low and moderate income households would be pushed further out, which could in many cases be totally outside of Oceanside.

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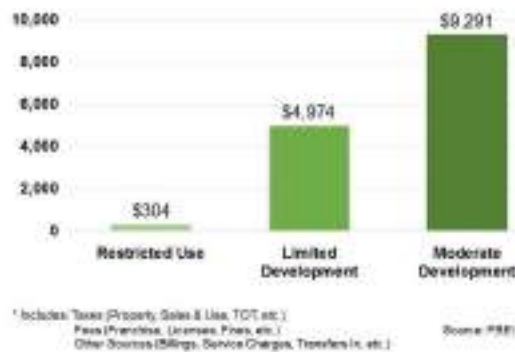
VII. IMPACT ON THE CITY'S FINANCIAL POSITION

The SOAR Initiative would impact the budget outlook for the City of Oceanside. Restricting the 2,250 acres of land to its current usage of growing crops would result in the region generating a deficit of about \$0.5 million in terms of its contribution to the overall budget in 2034. The impact could even be worse should appraised values fall as farming becomes less viable and development opportunities are curtailed.

The SOAR Initiative could create additional costs in terms of the expense of elections as any proposal to modify zoning in agriculture areas would be put to the vote of the people. Such a cost involving a general election would be \$45,000 and \$750,000 if a special election were required.¹³ Additional costs would accrue from election preparation, campaigning, and time devoted to voting. In reality, given the historical failure of such ballot measures to be approved, no one would take the risk of proposing any new development.

In contrast, both of the cases showing some of the crop growing area developed for other purposes would generate surpluses. While more government resources would be required, including police and fire protection, such increases would be more than offset by gains in property taxes, sales taxes, Transient Occupancy Taxes (TOT), and other revenues.

**South Morro Hills Revenue*
Could Expand Substantially**
Thousands of dollars, 2034



The Limited Development case would generate a budget surplus of \$1.2 million annually from the region by 2034 and the Moderate Development case would yield a budget surplus of \$2.5 million annually. These positive contributions to the City's General Fund could become increasingly important as pension benefit costs continue to rise.

¹³ City Clerk, City of Oceanside

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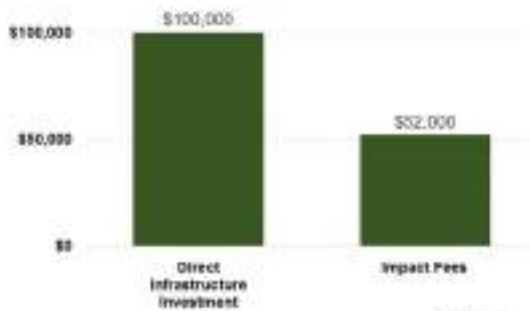
The private developers of residential, commercial, and retail operations would make the critical investments in the infrastructure in terms of road improvements, traffic mitigation, water, sewer, and reclaimed water upgrades, fire stations, and other purposes. This would amount to about \$100,000 per residential unit. Over ten years of development, including expected inflation, this would mean about \$125 million in infrastructure spending under the Limited Development case and \$250 million in the Moderate Development case.

**Farm Region Presents City with
Different Fiscal Outcomes**
Thousands of dollars, 2034

	Restricted Use	Limited Development	Moderate Development
Revenues	\$304	\$4,974	\$9,291
Expenditures	\$723	\$3,726	\$8,771
Surplus / Deficit	-\$419	\$1,248	\$2,520

Source: FBO

Private Investment Would Pay for Infrastructure
Dollars per housing unit



Source: FBO

In addition, developers would pay Impact Fees to the City of about \$52,000 per housing unit for affordable housing, schools, parks and other purposes. Over the ten years of development, that contribution to the City would total to over \$80 million in the Limited Development case and \$120 million in the Moderate Development case.

A conversion of farmland into 2-1/2 acre estates would result in little investment in new infrastructure, leading to more congestion in the region. Allowing alternatives uses for a portion of the land currently being farmed would allow the City to improve and expand its infrastructure, provide more resources for public safety, support additional recreational venues, and better meet its long-term retirement obligations.

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VIII. CONCLUSIONS

Most policy initiatives have admirable goals but can have negative results and unintended side effects. The SOAR Initiative is no different.

The intent is to preserve agriculture in Oceanside and support the development of an agritourism cluster. However, rather than offering ways for agriculture now struggling in the face of rising costs for labor, water, and finance and increasing competition from imports, the Initiative would sharply limit farmers' options. The result is likely to be the demise over time of the 2,250 acres currently actively farmed. Most of this acreage would either be allowed to go fallow or developed into large estates and homes.

The Initiative would prevent the creation of a viable agritourism industry including wineries, lodging, restaurants, small retailing, and other ventures since significant infrastructure would be required.

The City's housing crisis would be exacerbated as potential supply is sharply curtailed. Without conversion of some of the agriculture land, the City would be unable to meet its State housing mandate. The result would be further rapid increases in home prices and rents and decreases in affordability. These conditions would not only have financial and social implications for the City's residents but also adversely affect local businesses desperate to attract and retain workers.

The Initiative would prevent the City's economy from achieving better outcomes in terms of jobs, income, output, and sales. It would add to the City's potential deficit rather than providing options for a healthier financial path.

**Agriculture Region Could Swing
from Fiscal Deficit to Surplus
Millions of dollars, 2034**



Source: FBSI

The eventual outcome of the SOAR Initiative would be much different than envisioned by the Initiative's supporters. Rather than fields of flowers and other crops along with a

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thriving agritourism sector, the 2,250 acres now farmed in South Morro Hills would likely be transformed into areas populated by wealthy owners of large estates buffered from the rest of the City by vacant, barren land.

This suggests a picture of widening inequality of wealth and income in Oceanside as the population in the northeast part of the City would become dominated by wealthy retired individuals while residents in the rest of the City would struggle with even higher housing costs and rents, escalating maintenance costs, failing infrastructure, and constrained services.

On balance, this study concludes that the Initiative would block a way for the City to meet its current and future housing demands, generate new jobs, invest in critical infrastructure, support a viable farming sector and agritourism, and fund community priorities such as road improvements, public safety, recreation, and its obligations to public sector retirees.

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APPENDIX: Methodology

FBEI calculated the economic impacts and the net fiscal impact to Oceanside for the last year of a 15-year period from 2020 to 2034. All calculations were made in terms of current dollars (i.e., including inflation) to be consistent with other budget and economic forecasts used by the City of Oceanside.

The economic impacts included GRP, personal income, total sales, and employment. The net fiscal impact (revenue minus expenses) computation used standard Fiscal Impact Analysis (FIA) with revenue and expense units generally defined as the number of residents plus one-third of the number of employees.

FBEI made these calculations for each of three options for the currently farmed South Morro Hills agriculturally-zoned property:

- The base case consisted of continued farming use only with no commercial or residential development (Restricted Use case)
- The two other cases (Limited and Moderate Use) consisted of continued farming plus a combination of commercial and residential development on either 25% or 50% of the land currently being actively farmed (which would amount to one-sixth to one-third of the total land zoned for agriculture in South Morro Hills.).

Economic Impact Analysis

The economic analysis involved defining and quantifying values for direct spending for 2034 that would result from various uses of the currently farmed South Morro Hills agriculturally-zoned property and then deriving the indirect (business-to-business) and induced (consumer) effects. To calculate the economic indirect and induced effects of this direct spending on the City, FBEI used the widely used and respected IMPLAN input-output model, which incorporates regional multiplier coefficients from the U.S. Bureau of Economic Analysis.

With specific industry classifications assigned to each of the direct spending totals, the IMPLAN platform was used to produce an annual economic impact model for 2034 for the region defined by the Oceanside zip codes 92054, 92056, 92057 and 92058. The model yielded estimates for the supply chain, consumption, and total impacts of the various channels of direct spending in terms of employment, income, GRP, and total sales. FBEI generated similar IMPLAN models to determine the economic impact analysis of all three of the property development options: Restricted Use, Limited Development, and Moderate Development.

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To determine the direct spending inputs for IMPLAN, FBEI began by collecting data from interviews with local growers and from both the U.S. and San Diego County Departments of Agriculture. This process provided detailed information on current and future crop production and sales per acre.

Additional interviews with local landowners and developers provided the most likely potential commercial/retail and residential development options. Types of businesses suggested included a learning center and museum, offices, industrial space, wedding venue, general retail, grocery, farmers markets, wineries, restaurants, and hotels. These interviews, along with supplemental research, provided the associated commercial/retail sales per square foot, residential home sales price, and hotel occupant spending. The Oceanside Conference and Visitors Bureau provided data on the current hotel occupancy rate and average daily room rate.

Using the collected sales data, FBEI applied inflation factors to the 2018 totals to calculate annual sales totals for 2034 related to the IMPLAN classifications for crops (plants, vegetables, and fruits), learning center, offices, industrial space, merchandise retail, food and beverage retail, restaurants, wineries, and tourism (lodging, food and beverage, entertainment, and transportation).

To account for additional homeowner spending created by the residential development, FBEI included the incomes earned by those individuals in two ways. For the 20% of homeowners who were assumed to represent new jobs, those individuals (two per household) were assigned to various industries. The incomes of the other 80% were captured in the model by placing them in the appropriate income brackets. Based on the income necessary to qualify for the purchase of a home priced at \$653,000, this amounted to an income per individual of about \$75,000 or \$150,000 per household.

FBEI conducted careful analysis to ensure that all data collected followed a consistent and reliable accounting method and there was no double counting across spending categories. Also, given that some of the patrons of these new enterprises would already be Oceanside residents, FBEI made percentage adjustments to each of the sales totals (from 17-80% adjusted) in order to only calculate the impact of "new" money spending that would be coming to Oceanside.

Net Fiscal Impact Analysis

As indicated above, the net fiscal impact computations used standard FIA methodology with revenue and expense units defined as the number of residents plus one-third of the number of employees. (The exception was the spending category involving community

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and cultural services, which were assumed to be linked more strictly to just the number of residents.) For FBEI's calculations, the resident population data was obtained from the California Department of Finance Demographics Research Unit and the employee data was secured from IMPLAN. FBEI determined revenue and expense categories based on the City of Oceanside's 2017-18 budget. Revenue categories where FIA calculations were used consisted of taxes, fees, services charges, fines, and other sources. Expense categories consisted of general government, public safety, public works, community development, and community/cultural services.

To calculate the total property tax amount paid to Oceanside in 2034, FBEI estimated the appraised value of the agricultural land under the different development options (retail, hotel, and residential). Next, FBEI calculated the City of Oceanside's share of the 1% ad valorem tax at 17.46% based on the City's share of property taxes allocated in Fiscal Year 2016-17. Then, FBEI calculated Oceanside's additional property tax in lieu of VLF revenue using a factor of .7613 per \$1,000 of assessed value appreciation.

Multiple sources contributed to the sales tax calculations for Oceanside. First, the California State Board of Equalization website indicates that 1.0% of the total sales tax is the amount that goes to the place of sale. Additionally, FBEI attributed 26% of the consumer spending effect derived from the IMPLAN-based models towards taxable items. This 26% resulted from FBEI analysis of consumer expenditure patterns from the U.S. Bureau of Labor Statistics and FBEI's assessment of which types of goods are taxable based on information from the State Board of Equalization. The total sales tax revenue calculated for Oceanside in 2034 equaled 1% of the total amount determined by adding the following amounts:

- The taxable percentage of each of the sales totals of the different enterprises
- Tourism spending on food and beverage
- 26% of the consumer spending effect derived by IMPLAN

To determine Oceanside's Transient Occupancy Tax (TOT) revenue, FBEI calculated 10% of the 2034 total of pre-tax hotel room charges. Factors used to determine the total pre-tax hotel room charges included a 73% occupancy rate and an average daily room rate equivalent to \$114.00 in 2018.

All dollar amounts were adjusted for the years after 2018 to reflected inflation. A 2.0% average annual rise in prices was generally assumed based on the Federal Reserve's current target for price stability and inflation. Different inflation rates were used in some areas like construction where prices have been rising faster than the average inflation rate.

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APPENDIX: Literature Review

- **The state of Ventura County's economy: *Matthew Fienup, October 2017.***

This study looked at Ventura County's economy and the reasons for its underperformance. Despite recently recovering its pre-recession job rate the County GDP has decreased and employers are making the choice to leave. The author states, "The County's accelerating out-migration is a reflection of what businesses and individuals think about the economy that they are leaving behind."

According to the study, local employers say it is difficult to conduct and grow businesses in Ventura County. Amgen, the world's largest independent biotech company announced a nearly 10% reduction of its workforce in Ventura and is building new facilities in Florida because of its "affordable cost of living and potential for growth."

"Thousand Oaks and the surrounding county, where Amgen was founded, boasts the most stringent urban containment policies in the nation. A series of eight City and one County land use measures, known collectively as Save Open Space & Agricultural Resources (SOAR), require voter approval of any expansion of urban areas—and residents have a decidedly one-sided record of rejecting urban expansion. The promise made to the residents of the County, including some 10,000 Amgen employees who then called the area home, was that growth restrictions would ensure a singular quality of life that would attract other leading employers to the area. That promise has proved hollow. People and businesses are voting with their feet and leaving behind a wake of lost economic opportunity."

The author points out that Census Bureau data indicate about 40,000 people cross the county line each day driving into Ventura to work mostly low wage jobs and 80,000 leave the county each day to find work in jobs that allow them to afford ownership in Ventura's extremely supply constrained housing market. He states, "...returning to sustained economic growth would require fundamental changes to policies such as SOAR."

- **Report to the City Council: *Keyser Marston Associates, Inc. April 2016.***

This study was prepared for the Costa Mesa City Council Pursuant to Election Code §9212 and at the Request of the City Council regarding an initiative to "Require Voter Approval on Certain Development Projects." The initiative was put on the ballot in November 2016 as Measure Y.

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The study found that requiring voter approval in proposed developments negatively affects development opportunities. The cause of lower development was found to be increased uncertainty, additional costs incurred in the process, and the low rate at which voters ever approve projects. Development also brings an increase in capital and jobs to the area in addition to increased tax revenue.

The Study cited the following impacts from similar initiatives:

City of Newport Beach: A growth control initiative took effect in 2000 and projects proposed in 2001 and 2004 were voted down. Two other proposed expansion projects were withdrawn. There have been no proposed developments since 2004 due to the voter requirement.

City of Escondido: After the initiative passed in 1998, 16 developers tried to change their zoning. Eight dropped out before the ballot, and voters rejected all of the other eight.

- **Land Use Patterns, Spatial Policies, and the Environment: *JunJie Wu and Walid Oueslati. September 2015.***

This study concluded that the traditional command and control approach to zoning and density regulation are ineffective; often leading to substantial social welfare loss caused by higher housing prices, smaller homes, and inefficient land use patterns. The study suggests that a better alternative would be incentive-based policies that influence land use decisions. This allows for the optimal pace and pattern of land development.

- **Effects of local land use planning on development and disturbance in riparian areas: *Judith A. Dempsey, Andrew J. Plantinga, Jeffrey D. Kline, Joshua J. Lawler, Sebastian Martinuzzi, Volker C. Radeloff, and Daniel P. Bigelow. September 2014.***

This study concluded that creating Urban Growth Bounties (UGB) has almost no impact on preserving the environment. This was because development on sensitive land inside the UGBs was of the same magnitude as the decrease in development on sensitive land outside of the UGBs. This implies that land use by strictly using boundaries in a binary sense does not work. The further implication of the study is that when restrictions are put in place the areas with lower restrictions will see environmental degradation caused by increased compact development.

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- **From Traditional to Reformed: A Review of Land Use Regulations in the Nation's 50 Largest Metropolitan Areas:** *Rolf Pendall, Robert Puentes, and Jonathan Martin. August 2006.*

This study looked at the land use regulations in the largest 50 cities in the United States. One of the key distinctions that the study makes is the difference between growth management and growth control. The study found that growth management is correlated with greater opportunity for people in poverty situations, while growth control seems to cause substantially higher housing prices and rents. Both control and management increase housing prices and rent, but the study found that a growth control is correlated with the largest increase. The authors also found that land use regulation should come from the state to create uniform policies rather than from the local government

- **Government Land-Use Interventions: An Economic Analysis:** *Jan K. Brueckner. November 2006.*

This study provides an economic analysis of the effects of various land-use interventions such as urban growth boundaries, density restrictions, and cost-increasing regulations. The economic analysis demonstrated that the negative effects of such interventions might overwhelm any anticipated benefits, leading to a social loss and harm to businesses as well as consumers.

- **Why Have Housing Prices Gone Up:** *Edward Glaeser, Joseph Gyourko, and Raven E. Saks. May 2005*

This study suggests that zoning and other land-use controls are more responsible for high housing prices than the cost of land. They emphasize that development constraints do not appear to be caused by a declining availability of land, but "rather they are the result of a changing regulatory regime that makes large-scale development increasingly difficult in expensive regions of the country." In their opinion, policy advocates interested in reducing housing costs would do well to start with zoning reform.

- **The Impact of Building Restriction on Housing Affordability:** *Edward L. Glaeser and Joseph Gyourko. June 2003*

This study concluded that there is significant evidence to suggest a high positive correlation between zoning strictness and housing prices. In examining the United States the study suggested that in most areas the cost of construction is close to the eventual home price. However, in the areas where housing prices are higher than the cost of construction by a substantial degree, it is most likely caused by strict zoning. This conclusion implies that there is a direct relation between zoning and home prices, rather than an indirect relation.

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- **Local Land Use Controls and Demographic Outcomes in a Booming Economy:**
John M. Quigley, Steven Raphael, and Larry A. Rosenthal. January 2002

This study was conducted into some of the socioeconomic effects of land use controls. The study found that cities with regulations that reduce sprawl by increasing density caused a demographic shift that increased separation of populations along ethnic lines. The study also found that policies that aimed to reduce development generally reflected a bias toward white communities. The study concluded that proponents of land use regulations should be cautious in view of the potentially disparate effects that they can have on racial and ethnic minorities.

- **Agricultural Land Values and the Value of Rights to Future Land Development:**
Andrew J. Plantinga, and Douglas J. Miller. February 2001

This study found that the only effective deterrent to farmland conversion may be compensation to landowners for forgone development opportunities. Although the study did conclude that agricultural land has social benefits, it cannot be preserved with regulations alone. One common method to preserve farm land has been to grant preferential tax assessment based on current land use rather than on the land's potential development value. The authors show that only compensation for the land's development potential will be effective.

- **Smart Growth in Action: Housing Capacity and Development in Ventura County:**
William Fulton, Chris Williamson, Kathleen Mallory, Jeff Jones, and Samuel R. Staley. December 2001

This study looked at the impacts of the Save Open Space & Agricultural Resources (SOAR) Initiative that was passed in Ventura County. It found that Ventura County development projects are generally falling 20% below zoned capacities and 45% below general plan capacities. In 2001, it was forecasted that Ventura County was likely to need 312,000 housing units by 2020. However, due to the SOAR Initiative, future housing development is forecasted to be 55% below the regional planning agency's housing target for 2020.

The study concluded that there are several definite effects of SOAR. Namely:

- housing values and rent will increase faster than the cost of living;
- equity-rich middle-class homeowners will cash out and move away to be replaced with either high-income households with fewer children, roommate groups, or extended families with several wage earners;
- residential development will be diverted to other areas;
- construction of illegal housing will take place (such as converting garages or adding small units).

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The study also found that pressure will increase for governments to provide housing subsidies and set-asides. This is most likely to occur in areas where local industries employ low and moderate income workers who cannot find nearby affordable housing.

The study also found that most cities in Ventura County will face significant housing shortages and will have no greater than 10 years of housing capacity left under current policies and entitlement practices.

- **The Effects of Local Growth Controls on Regional Housing Production and Population Redistribution in California: Ned Levine. August 1998**

This study concluded that growth controls often have the effect of shifting lower income and consequently minority populations to more peripheral and less controlled jurisdictions. The study also suggests that growth control measures have exacerbated population dispersion putting a stress on the environment.

- **The Interjurisdictional Effects of Growth Controls on Housing Prices: Lawrence Katz and Kenneth T. Rosen. April 1987**

This study found housing prices are between 17% and 38% higher in communities in which growth moratoria or growth controls are present. This study concluded the increase in prices was observed even when taking into account quality factors.

"The traditional asserted purpose of land-use controls is to promote the health, safety, and general welfare of residents of a community. Increasingly stringent land-use regulations and growth controls have been justified in terms of improved environmental quality and the maintenance of "community character." Yet there is a growing recognition that in many communities' land-use regulations may serve to maintain housing costs at a level high enough to prevent moderate- or low-income families from purchasing housing."

The conclusion from the study is that growth controls act to bar moderate and low income families from being able to afford living in that community.

- **The fundamentals of land prices and urban growth: Dennis R. Capozza, Robert W. Helsley. March 1987**

This study found that the growth factor can account for up to 50% of the land value. Because growth can make up such a large premium on the value of the land, implementing restrictions on land use may impair the future value of the land causing a significant decrease in its value.

"In a very simple model in which capital is durable and landowners have perfect foresight, the price of urban land has four additive components: the value of

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agricultural land rent, the cost of conversion, the value of accessibility, and the value of expected future rent increases, a growth premium. In rapidly growing cities, the growth premium may easily account for half of the average price of land, and may create a large gap between the price of land at the boundary (minus conservation cost) and the value of agricultural land rents."

The gap between rents and the value of the land ends up accounting for net economic losses to the farmer if he continues to farm his land rather than develop it.

- **The Effect of Land Use and Environmental Regulations on Housing Costs:**
David E. Dowall. October 1979

This study looked at the possibility that land use controls could create monopolies. Because of the increasing costs that land use controls imposed fewer developers are able to enter the market. Monopoly power is caused as fewer firms have the ability to compete for development in a given area.

"Land-use controls may have other inflationary effect-creating barriers to entry, which facilitate monopoly power in the housing industry. Development restrictions may lead developers to reorient their projects to higher-income customers as cost increases force them to build more expensive dwelling units."

The study concluded that restrictions lead to the creation of monopolies and services that are directed mostly at high-income earners.

- **Alternatives to Zoning: Covenants, Nuisance Rules, and Fines as Land Use Controls:** *Robert C. Elickson. Summer 1973*

This study concluded that regulation can cause urban sprawl by increasing the attractiveness of outlying land with fewer restrictions. This causes development to occur farther from the urban center.

"Public regulation contributes to sprawl by misbalancing the attractiveness of competing areas. For example, differences in land use controls inside and outside of corporate limits make the lesser controlled area more attractive. Perhaps the major problem with respect to public regulation of land use in sprawl is that a regulatory body may not have control over an entire housing market area. City zoning and land use controls may extend only to the corporate limits or, at best, one, two, or three miles depending upon the state regulations...the standards themselves may impel the development of housing units outside of the controlled area and thus contribute to sprawl."

The study found that regulation creates rather than controls sprawl.

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- **The Effect of Zoning on Land Value: James C. Ohls and Richard C. Weisberg.
December 1973**

This study concluded that when a community votes for zoning the effect is often to reduce aggregate land values in the community that approved the restrictions.

"We suggested that fiscal zoning, as it is currently practiced in most areas, probably has the effect of reducing individual municipalities' land values below what they would otherwise be. In support of this contention, we showed that the residents of a community, voting in their economic self-interest, might reject a zoning change which would increase the community's aggregate land value. In the case of externalities zoning, we showed that the effect on land values of Pareto Optimal zoning depends upon the exact nature of consumers' utility functions. This was demonstrated in a model in which not all residential land is affected by externalities and in which different parcels of land, therefore, sells for different prices."

While it may appear that this study is in conflict with others that state home values will increase, it is important to understand the distinction in the studies between land values and home values. The study looked at the aggregate values with included land that can no longer be developed and therefore loses value. The other studies suggest that in relation to the housing already in existence the prices will necessarily rise due to reduced supply. The research would suggest that both conclusions are true.

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APPENDIX: References

- Section 9212 Report: Oceanside SOAR Initiative. *The Natelson Dale Group, Inc.* June 2018
- City of Oceanside Agritourism Strategic Plan. *SMG Consulting*, August 2016
- Annual Element Progress Report Housing Element Implementation (CCR Title 25 §6202). *City of Oceanside*. December 2017
- The Economic Consequence of Growth Controls in Ventura County. *Mark Schniepp*. April 2018
- The State of Ventura County's Economy. *Matthew Fienup*. October 2017
- On A Ballot Initiative Titled: An Initiative to Require Voter Approval on Certain Development Projects. *Keyser Marston Associates, Inc.* April 2016
- Annual Element Progress Report Housing Element Implementation (CCR Title 25 §6202). *City of Escondido*. December 2017
- Land Use Patterns, Spatial Policies and the Environment. *JunJie Wu, and Wald Queslati*. September 2015
- Effects of Local Land Use Planning on Development and Disturbance in Riparian Areas. *Judith A. Dempsey, Andrew J. Plantinga, Jeffrey D. Kline, Joshua J. Lawler, Sebastian Martinuzzi, Volker C. Radeloff, and Daniel P. Bigelow*. September 2014
- The Effects of Land-Use Controls on Urban Sprawl. *Marin Geshkov*. March 2010
- The Effects of Land Use Regulations on Property Values. *William K. Jaeger*. June 2007
- From Traditional to Reformed: A Review of Land Use Regulations in the Nation's 50 Largest Metropolitan Areas. *Rolf Pendall, Robert Puentes, and Jonathan Martin*. August 2006
- Government Land-Use Interventions: An Economic Analysis. *Jan K. Brueckner*. November 2006
- Why Have Housing Prices Gone Up? *Edward Glaeser, Joseph Gyourko, and Raven E. Saks*. May 2005

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- *The Impact of Building Restriction on Housing Affordability. Edward L. Glaeser and Joseph Gyourko. June 2003*
- *Local Land Use Controls and Demographic Outcomes in a Booming Economy. John M. Quigley, Steven Raphael, and Larry A. Rosenthal. January 2002*
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- *The Fundamentals of Land Prices and Urban Growth. Dennis R. Capozza, and Robert W. Helsley. March 1987*
- *The Effect of Land Use and Environmental Regulations on Housing Costs. David E. Dowall. October 1979*
- *Alternatives to Zoning: Covenants, Nuisance Rules, and Fines as Land Use Controls. Robert C. Ellickson. Summer 1973*
- *The Effect of Zoning on Land Value: James C. Ohls, and Richard C. Weisberg. December 1973*
- *Small Winery Investment and Operating Costs. LeAnn A. Fickle, Raymond J. Folwell, Trent Ball, and Carter Clary. Washington State University Extension. 2005*
- *Oceanside Travel Impacts, 2010-2017p. Dean Runyan Associates. May 2018*

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L179 Haggerty, Sally

Comment Letter L179

From: Sally Haggerty <sallyfynn@gmail.com>
Sent: Sunday, May 05, 2019 4:30 PM
To: Planning-Planning Commission
Subject: Farms

Warning: External Source

Please allow Oceanside to keep the current rural zoning. North River Farms project is one more residential development we dont need.
Thank you,
Sally Haggerty

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L180 SERENA

Comment Letter L180

From: Serena <akinaga@aol.com>
Sent: Sunday, May 05, 2019 6:52 AM
To: Planning-Planning Commission
Subject: Just Say No to North River Farms Project

Warning: External Source

Understanding growth will happen, but we need better options that offer smart and safe growth. Thank you.

Sent from my iPhone

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L181 DUBOIS, STEVE

Comment Letter L181

From: stevedubois1@aol.com
Sent: Saturday, May 04, 2019 12:21 PM
To: Planning-Planning Commission

Warning: External Source

Vote NO on NRF

Concerned citizen

Steve duBois
1133 Village Dr
Oceanside
Ca
92066

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L182 COOKE, TIM

Comment Letter L182

From: Tim J. <trcooke2@gmail.com>
Sent: Monday, May 06, 2019 6:37 AM
To: Planning Planning Commission
Subject: North River Farms

Warning: External Source

Dear Sirs,

I strongly oppose this project. This is incredibly poor planning to pave over agriculturally zoned land just to build more suburban sprawl.

Thank you for your consideration,

Tim Cooke
PO Box 511
Bonsall, CA

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L183 MOLLER, DAVID AND ALLA

Comment Letter L183

From: Alla Moller <allamoller1@gmail.com>
Sent: Monday, May 06, 2019 10:43 AM
To: Planning-Planning Commission
Subject: Vote Against High Density Housing

Warning: External Source

We respectfully request that you vote against converting farmland to high density housing at tonight's vote.

Thank you.

David C. & Alla Moller
3313 Golfers Dr.
Oceanside, CA 92056

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L184 JIMENEZ, MATHEW AND CAROL

Comment Letter L184

From: Carol Jimenez <cN11semail@yahoo.com>
Sent: Monday, May 06, 2019 3:09 PM
To: Planning (Planning Commission)
Subject: No to North River Farms!!

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

Dear Oceanside Planning Commission,
How many times do we need to vote against this development! Can they just keep making changes and coming back?! Enough already! I know they spent a lot of money defeating the SOAR initiative and they don't want to walk away empty handed. But this development is all wrong for Oceanside. Can you vote once and for all against this and make it clear to them that it's a no-go?

There is a huge inventory of other land available in Oceanside for them to develop, according to Oceanside's own housing element report. All with pre-existing infrastructure.

Also, wouldn't this whole project fall under "spot" zoning and contribute to sprawl - in direct conflict with regional planning policies? Yes to both.

It's bad enough they jam packed that horrendous Mission Lane development right in the Mission's side yard. (Horrible mistake on Oceanside's part. Should have developed Mission tourism instead like San Juan Capistrano - tourist attractions within walking distance of the mission. Opportunity missed.) Don't make the same mistake with this fake "Farm" housing development. High density housing called "Farms." Send Integral Communities to one of the "adequate sites that are available without Re-zoning" mentioned in the Oceanside RHNA report. What happened to the goal of infill?

Please end this.

Keep REAL agriculture in Oceanside. NO NORTH RIVER (FAKE) FARMS!!

Thank you,

Mathew and Carol Jimenez
5634 Chincoleague Court
Oceanside, CA 92057

30 years in Oceanside and counting

Sent from my iPhone

Sent from my iPhone

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L185 HOGUE, CHERYL

Comment Letter L185

From: Cheryl Hogue <chogue@ccs.net>
Sent: Monday, May 06, 2019 5:48 PM
To: Planning-Planning Commission
Subject: Farmland

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

I moved down to North County from Los Angeles in 1980. Year after year I have watched the very things that make North County special disappear because developers and uncaring politicians are building on every inch of land that can be found. There is not enough water for multiple family dwellings!! Traffic is already horrific. And, our beautiful views are being obscured by buildings. The beautiful rolling hills of farmland are good for us for so many reasons. KEEP NORTH COUNTY AND OCEANSIDE SPECIAL!
Sent from my iPhone

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L186 PRESTON, COLETTE

Comment Letter L186

From: colette Preston <earlybyrdca@gmail.com>
Sent: Tuesday, May 07, 2019 6:19 AM
To: Planning Planning Commission
Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

Do not destroy the farmlands that Oceanside has. We don't want to become another Orange county. Our roads cannot handle the traffic and congestion.

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L187 MCLOUGHLIN, JOSEPH AND DIANA

Comment Letter L187

From: diana caray <dianawc@gmail.com>
Sent: Monday, May 06, 2019 2:17 PM
To: Robert Dmochowski; Planning Web; Planning-Planning Commission; City Council
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

Dear Mr. Weiss, Mr Dmochowski, City Council Members, Staff, et al,
This is a letter protesting the development by Integral Developers of North River Farms.
I was stuck in a traffic jam on Sleeping Indian, as were many of my neighbors, during the evacuation from the Lilac Fire of 2017. If the fire had been as fast moving as the Camp Fire was, we all would have died in our cars.
Fires are becoming more devastating each year. We have one route down and out of area, if that route gets impacted during an evacuation, with additional vehicles and people fleeing, we will have no where to go, and there will be casualties. Allowing this development to proceed without additional access roads off the hill, is signing a death warrant for those of us on the hill, when another fire breaks out (and it will).
Our lives deserve more consideration than to be sold out to developers whose interests are not the safety and well being of existing community members.
Sincerely,
Joseph and Diana McLoughlin
Camino Baja Cerro
South Merro Hills

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L188 FITZJARRELL, ED

Comment Letter L188

From: Ed Fitzjarrell <edfitzjarrell@yahoo.com>
Sent: Monday, May 06, 2019 12:50 PM
To: Planning-Planning Commission
Subject: Converted farm land

Warning: External Source

Dear Planning Commission,

As a Oceanside home owner and resident of 30 years, it's my opinion that it would be a sin to see our green spaces and farmland become developed creating Orange County like traffic and congestion and increased taxes for roads and other infrastructure. Thank you for listening.

Respectfully,

ed fitzjarrell
3357 Par Drive
Oceanside, CA, 92056
Sent from my iPad

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L189 MILLER-POKLETAR, FAYE

Comment Letter L189

From: Faye Pokletar <fayelandscape@gmail.com>
Sent: Monday, May 06, 2019 2:12 PM
To: Planning-Planning Commission
Subject: NRF Project

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

Dear City of Oceanside Planning Commission,

I am writing to you regarding our concern for the quality of life for us and our family should the NRF Project be approved. My husband I are property owners in South Mono Hills. The reason we selected this community over 10 years ago with no curbs, no sidewalks, minimal infrastructure, no high density housing, etc. was to have our little bit of paradise free of all the "Clutter" that goes along with the aforementioned.

We both come from backgrounds where we are first generation college graduates; both worked to put ourselves through college. We didn't have money or property in expensive California handed down to us. We've both worked, and are working hard, for what we have. We're not rich, we live simply. We don't drive new, fancy cars, have the latest audio/video equipment, nor even air conditioning.

What we do have is our dream-now-reality of owning our 2.65 acre property where we live, exercise, and breathe with our two children. Even Grandpa lives with us! That's three generations on one parcel. We did our homework when we purchased this property. We liked the zoning of 2.5 acre minimum knowing that this area we put our hard-earned dollars into would stay special, and not turn into just another development with loads of people, cars, and concrete.

Seeing how the NRF Project would change the character of our community, spoil all our invested time and money, is truly devastating for those of us that chose this lifestyle. We strongly oppose any development in South Mono Hills that alters the zoning of 2.5 acre minimum. In the over 10 years we've lived here, traffic along North River Road, Vandegrift, and College has greatly increased. A lot of cars are traveling to and from Camp Pendleton, with many more cars cutting through trying to avoid the jam on the 76 has led to substantial wait times at the traffic lights. The NRF Project would add to this already frustrating situation. Evacuating the area from the Lilac Fire was a scary experience for many as they sat in traffic. We experienced this with our children, farm animals, Grandpa, and fish in tow!

My family and I embrace farming. We chose to live this lifestyle. We chose to live here, and have our children grow up in a farming community. If the NRF Project is approved, that much farmland is lost forever. There will be that less food produced in California. It will be just one more concrete jungle; affecting our lifestyle and possibly our property's value. It's almost a guarantee that new, dense communities in our area will have conflict with farming buffers, with the smell of, and dust, that comes along with farming, with the "noise" of our rooster and our neighbor's peacocks, thus possibly leading to eventual ruin of our life as we know it.

I can go in detail about the various reasons why we oppose the NRF Project, including the negative impact on our area's efforts to increase agritourism, future liability of building in a flood plain, further distortion of Oceanside's jobs-to-housing ratio, but let's keep it to the point: This is the opportunity of the Planning

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Commission and City Council to make a choice. Do you want to line the pockets of Developers with gold, or do you want to reserve a beautiful community, keep some dirt that people can admire? Please do the right thing. Keep it simple. Let's keep some land that we can look across and see dirt, not houses.

Thank you for your time and consideration.

Faye Miller-Pokletar
6058 De La Rosa Lane
Oceanside, CA 92057

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L190 NARTE, GINO

Comment Letter L190

From: Gino Narte <ginonarte@cox.net>
Sent: Monday, May 06, 2019 4:14 PM
To: City Clerk
Cc: Planning-Planning Commission
Subject: Farm Project

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

I'm in support of the North River Farm Projects. No more housing please.

Gino Narte
Oceanside Resident

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L191 SALKIN, KAREN

Comment Letter L191

From: Karen Salkin <karensalkin@cox.net>
Sent: Monday, May 06, 2019 9:54 PM
To: Planning-Planning Commission
Subject: high density housing

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

You are supposed to be protecting Oceanside instead you are trying to ruin our community. Please stop

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L192 BALLEW-HASKETT, KENICHI AND JEFFREY

Comment Letter L192

From: Keff Ballew-Haskett <ballewhaskett@gmail.com>
Sent: Monday, May 06, 2019 5:23 PM
To: Planning Planning Commission
Subject: North River Farms Development Proposal Up For Final Oceanside City Council Vote May 2019

Follow Up Flag: Follow up
Flag Status: Completed

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Dear Planning Commission Members:

First, we would like to again take this opportunity to thank you for your time and efforts while serving on our City's Planning Commission.

This coming Monday you'll again be reviewing while voting on one of Oceanside's more important development projects. Not only will the North River Farms Planned Development Project (NRFPDP) have immediate near term impacts for the adjacent Oceanside communities, it will also have far-reaching long-term development impacts for the City of Oceanside as a whole. While the applicant has provided project mitigation funds for future transit projects that may, or may not, be built, little or no other traffic or land-use impact mitigation efforts have been made by the applicant since the Planning Commission last reviewed and rejected this project proposal. The following comments will be focused on significant traffic, transit, and infrastructure impacts this project will have in and around our local and surrounding Oceanside communities.

Today, those commutes, regularly take, or exceed, 30-40+ minutes. In the time we've lived here, (the past 2 years) State Route 76 (SR-76) has become increasingly impacted by additional developments along its route. It has also seen a significant increase in traffic loads and flows related to CALTRAN's completion of the SR-76 highway improvements leading east to the I-15. It's not surprising that SR-76 has been dubbed the "76 Crawlsby." During peak traffic times, it can routinely take two, and sometimes three, signal light changes to advance through the signal.

Over the past five years CALTRAN's has also added needed safety features to the SR-76 corridor, although and unfortunately they stopped short of making the significant investments to aid in traffic flow mitigations. Equally disappointing is SANDAG's recent publication of their proposed public transit expansions vision, Union Tribune April, 27, 2019 – see attached map page 2, that potentially leaves our part of North County communities out of the loop for

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future transit investments. This transit planning omission should be concerning to the Oceanside Planning Commission, City Council, and Mayor as it may have long lasting impacts to future proposed development projects that will come before you and them. If changes to this proposed vision are not addressed directly with SANDAG, we will all have to live in-perpetuity with the local transit infrastructures currently in place.

The NRPDP will directly impose further traffic and transit impacts while straining the already inadequate roadway infrastructure currently in place. We're already experiencing level "E-F" intersection and roadway impacts at the required access routes to the proposed project. Even with the proposed developer paid "Fair Share" project infrastructure funds, the proposed traffic mitigation measures including a turn lane addition onto North River Road from Vandergrift Boulevard, lane restriping, signal light readjustments, etc., will be insufficient to resolve these and future traffic and transit issues. This project will hasten the proposed level "D-E" intersections and roadways to become level "E-F" sooner rather than later. Furthermore, these increased roadway traffic and transit impacts will directly impact "decreased" levels in emergency services response times while increasing wildfire and other disaster evacuation times. As a past University Community Planning Group member, San Diego District 1, it was always important for us to consider requiring that the infrastructure and Facility Benefit Assessment funds be available, as outlined in the University Community General Plan, before allowing a major development to go forward to the San Diego City Council for a vote. It's unfortunate that the City of Oceanside has an outdated General Plan for current and future proposed developments. I urge you not to compound the problem by not requiring developers to deposit development funds necessary to implement any and all required infrastructure upgrades associated with each project.

At this time NRPDP may be a "before-its-time" development for the City of Oceanside. Without the necessary and required infrastructures in place, the immediate and future community impacts will be immeasurable. For instance, to support a project of this size and at this location, it may take the full development of North River Road into a four-lane roadway to safely mitigate the expected traffic loads from Vandergrift Boulevard to SR-76. Already, this roadway has become a very busy alternative two-lane bypass that unfortunately has experienced several vehicular accidents in just the past few months. It would be naive to accept that traffic traveling east and west along this roadway will not be additionally impacted should this project be approved. The City has an obligation to first update and implement its long overdue General Plan for development while determining and solidifying its future agriculture and agritourism plans for South Morro Hills Agricultural Area (South Morro Hills Vision Plan). Additionally have the required funding available to

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complete the widening of the College Boulevard bridge to Vandergrift Boulevard for future traffic mitigation, and all other infrastructure additions required to support current and future growth in our area such as the NRPDP. It is also critical to predetermine and publish the long-term City taxpayer's obligations for the proposed on-site fire station after the NRPDP support funding ends.

We are asking the Planning Commission to carefully review and consider these and the many other related NRPDP impacts that it will bring to Oceanside. Your rejection of this plan amendment will send a message to our City Council that as a matter of policy, it is essential that the approval of all future project developments be linked to the financing and implementation of all associated supporting infrastructure and transit needs. Perpetuating development policies of density first have proven themselves to benefit the developer at the expense of the community members and the quality of life we all strive for.

Thank you for your time in reviewing and considering this response.

Kenichi Ballew-Haskett and Jeffrey Ballew-Haskett
1153 Village Dr
Oceanside, CA 92057
Cell: (310) 403-9730

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L193 EARLEY, BILL

Comment Letter L193

Las Palmas Ranch
Bill Earley
May 8, 2019

6508 Morro Heights Road
Oceanside, CA 92057

Office 1-760-726-7488
Cell 1-760-445-4990

Dear City Planning

I'm a property owner in South Morro Hills. I strongly oppose the NRF Project in Oceanside. I purchased my property in this area because of the 2.50 zoning. I grew up in Southern California and have seen development just take over everywhere I lived. I would rather see development go in another direction in South Morro Hills to 10 acres rather than the 2.50 acres. I've heard the argument that people can longer farm due to regulations. People should have the right to develop their property. All I can say is they should have never bought property in an area zoned 2.50 acres. I also heard the argument that they should have the right to optimize the profit they will make from developing their property. For what most of these people bought their property for even if the zoning went to 10 acres they would still make a fortune. Of course not the amount they would make if the property was given a new zoning and could put the amount of housing that NRF Project is proposing. The situation for the investors in the NRF project should not be the any part of mitigating factors or concerns in the decision to approve this project. That's the thing about investments and speculation. Sometimes the profit margin doesn't meet expectations.

It's hard to believe that it would be allowed that this project be built in a flood zone. Also the major problem with traffic already exist. It already takes 3 lights in the afternoon to take College to Hwy 76 and the same with North River Road to Hwy 76. The NRF Project should have to propose major fixes to existing problems if this project is allowed to move forward. Problems with sewage, problem with traffic, problems with lowering property value and problems with people in the area already doing agriculture. If these costs are passed on to the City of Oceanside, just think what the real cost will be. I will just list a few. Widening North River Road, putting in lights on North River Road at Wilshire and also Sleeping Indian, where a problem already exist in the afternoon when Camp Pendleton lets out. The problem with sewage and also the liability for all of us when so much infra-structure if left up to the City.

The County spent a fortune on a master plan and that should be the benchmark. The NRF project completely deviates from that plan with promises of this and that and the other thing over here. The enormous number of environmental issues i.e. traffic, flood plain, North River Road literally being a two lane country road, and the devastation of the agriculture economy that would result from this project demand that it be rejected completely. How does the NRF project plan to compensate someone like me that bought his property not to have to deal with so much congestion. I choose a lifestyle in an area that allowed much open space. Morro Hills is an area that I hope can be left as a reminder of what Southern California was all about. Thank you for your time.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L194 VOSBURG, PEGGY

Comment Letter L194

From: Peggy Vosburg <pvosburg622@gmail.com>
Sent: Monday, May 06, 2019 6:02 PM
To: Planning-Planning Commission
Subject: No

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

On converting farmland to high density farming! No!!!!

Peggy

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L195 SCHWARZE, SHANNA

Comment Letter L195

From: Shanna Schwarze <shannaschwarze@gmail.com>
Sent: Monday, May 06, 2019 12:57 PM
To: Planning-Planning Commission
Subject: North River Farms proposal

Warning: External Source

Hello Planning Commission,

I have previously spoken out against the North River Farms proposal and would like to once again state my opposition, before tonight's new meeting, as a current resident and a voter.

While Integral has made some significant changes - the revised plan still does not change the overall size and impact. This sort of sprawl is inconsistent with other city housing proposals and will destroy the only remaining agricultural land in the region.

In addition, it's against the City's General Plan and I would encourage that to be overhauled before approving something of this magnitude.

I am not against smart growth. There are several developments happening right now in Oceanside! However I property sale should not negatively impact 1000s and destroy multiple farming businesses.

Please, once again, decline your support.

Thank you,
Shanna Schwarze

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L196 KORNBACHER, SUSAN

Comment Letter L196

From: Susan <kskasur@yahoo.com>
Sent: Monday, May 06, 2019 6:13 PM
To: Robert Dmochowski; Planning; Planning Commission; Planning Web
Subject: NRF Project

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

Not sure this went through so resending. S

Dear Mr. Dmochowski and Planning staff,

After reviewing the most recent NRF "proposal / changes", I am writing once again to express our strong and continual opposition to this project. My biggest concern remains the safety and wellbeing of oconstituents, especially the number of additional vehicles generated by the density of this project on an already crowded and overburdened two lane road. It would endanger residents, especially during evacuations, increase traffic and air pollution, and provides inadequate buffers between residents and farmers, who also use this two lane road to move product via trucks. Even our good neighbors at Camp Pendleton expressed concern for the additional traffic traveling the toward the 76 and through the rural community. Also a concern are the tax increases for residents to finance services away from existing facilities, and the liability to the city for building in a flood plain, which would also likely trickle down to taxpayers. The permanent loss of agriculture land will increase as a result of the change in zoning to accommodate this project, totally changing the value and nature of this area. It is very disconcerting that this project continues to be considered after so significant changes to the original plan. I do count on the Planning Committee to make the right decision, as they have in the past, and recommend this project be denied.

PS: I also must register a concern about the "letters of support" which are all the exact same boilerplate response, with no indication they are even legitimate submissions or via people who reside in the area / Oceanaside, unlike the more personal responses from actual constituents.

Thank you,
Susan Kornbacher
Wilshire Rd.

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L197 LETTERS OF SUPPORT

Comment Letter L197

From: Cody Harrison [mailto:charrison@corona-enterprises.com]
Sent: Monday, February 11, 2019 10:21 PM
To: Ninia Hammond
Subject: Re: North River Farms Supporter Event

Dear Mayor and Honorable Council Members:

North River Farms offers a glimmer of hope for the future of community living. Their commitment to create a thriving neighborhood is commendable and they seem to have great plans in place for hyper-local agricultural production in partnership with the esteemed Ecology Center. I've also been told they plan to treat stormwater in grassy swales before feeding it into detention basins that are planted with riparian plantings, which is a wonderful strategy. Each home will have an average of 250 square feet of solar panels which will help in the development of a localized microgrid. They'll even have a makerspace to provide more localized production in addition to food and energy! However, I would recommend that this body pressure the group to improve their plans with regard to the construction methods and materials used for the homes, which will represent the majority of the development's environmental footprint, and the method of wastewater treatment employed. Companies like WASP (www.3Dwasp.com) are making it possible to 3D print homes using locally sourced earth/natural materials like rice husks, clay, sand, hemp, straw etc. These homes can easily be clad inside and out to match the same aesthetic North River Farms' designers have shown in their artistic renderings, while significantly decreasing the homes' environmental footprint. Going one step further there is a huge opportunity for a development like this to change the paradigm with regard to human waste. If they simply specify urine diverting toilets the carbon and nitrogen resources held within our "waste" can be beneficially captured and utilized, again I would highly recommend you pressure the developers to explore this line of thinking.

Oceanside would benefit from the increased tax base, the infrastructure improvements, and the lifestyle and events associated with the agrarian-based community. Oceanside could also put itself squarely on the environmental map nationally and worldwide with just a few moderate additions to the plan for this development and I highly encourage you to go for the home run on this, not just the modest win it already is.

Warm Regards,
Cody Harrison



Cody Harrison
Beyond Sustainability Specialist, Corona Enterprises
434-242-6879 | www.corona-enterprises.com | [Portfolio](#)



Late Comment Letters for North River Farms Environmental Impact Report

F. JAMES GRECO
1017 Village Drive
Oceanside, CA 92057
619.962.6655

fjamesgreco@gmail.com ♦ <http://fjamesgreco.wordpress.com>

February 18, 2019

Sent via e-mail

Mayor and Honorable Members
Oceanside City Council
300 N. Coast Highway
Oceanside, CA 92054
Council@ci.oceanside.ca.us

RE: NORTH RIVER FARMS

Dear Honorable Mayor and Members of the City Council:

At first glance and from a Not-In-My-Back Yard (NIMBY) perspective, North River Farms—to be considered by you later this month—may raise fears of increased traffic and congestion with no plus side for existing residents. As a homeowner in the adjacent community of Arrowood, I think that would be a short-sighted view.

After reviewing the project EIR and a Supplementary Analysis dated February 19, 2019, I believe North River Farms will provide more “roses” than “thorns” for our community and the City in general.

Prior to enumerating those benefits, I must provide full disclosure. I am a retired professional land planner and environmental analyst, who worked for the City of San Diego and my own private planning firm for nearly 30 years. You should know:

- Although the EIR preparers competed directly with my firm, I found Dudek Environmental Consultants to be honest, competent and thorough.
- The developer, Integral Communities, was a long-time, respected and trustworthy client of mine. I have had no relationship—financial or otherwise with the firm or its employees—for over a decade.
- Although financially imprudent, I and my firm declined to serve developers that failed to meet high standards of quality and integrity. Integral met our high standards.

As a professional land planner, I have the benefit of being able to analyze a proposed project's pluses and minuses with a dispassionate view. As a resident of Arrowood, I am bias as it relates to maintaining and retaining our quality of living. From these vantage points, I have discerned the following partial list of benefits for Arrowood:

- North River Farms should generate little or no increased traffic congestion for Arrowood residents, except at the intersection of Vandegrift Boulevard/North River/College and along College to Highway 76. However, the project will mitigate or improve conditions by:
 - a. Widening and improving the College Boulevard Bridge;

Late Comment Letters for North River Farms Environmental Impact Report

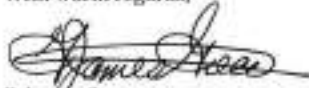
Honorable Mayor & City Council
North River Farms
February 18, 2020
Page 2 of 2

- b. Improving the Vandegrift Boulevard/North River/College intersection to compensate for increased traffic;
 - c. Causing the Highway 76 traffic signals to be synchronized, improving the flow of traffic, which is a significant positive change to me.
- The project will provide Arrowood residents and other nearby communities up to 30,000 square-feet of much needed retail space, consisting of shops, a farmers' market, and possibly a restaurant or two. For comparison sake, the existing San Luis Rey Crossing consists of only about 20,000 square-feet of shops.
 - The developer is required to purchase mitigation credits from an adopted County agricultural conservation program that will result in a net zero loss of agricultural land. In addition, the project will offer a community farm and serve as a corner stone for creation of a Morro Hills agricultural district cultural and commercial attraction.
 - The project will provide a temporary fire station with equipment and staffing, to remain until such time as the City identifies a permanent location.
 - North River Farms residents will create a new pool of potential golfers to financial support the Arrowood Golf Course.

As a planning professional, I know that new development is inevitable, but it should be accommodated only when the project is of high quality, mitigates its impacts, and offers significant benefit to existing surrounding residents. I believe North River Farms meets or exceeds these requirements.

Thank you for your time and consideration. As I write this letter, I understand the hearing for North River Farms is scheduled for February 27, 2019, when I will not be able to attend. I otherwise would have testified in person.

With warm regards,



F. James Greco

Late Comment Letters for North River Farms Environmental Impact Report

March 3, 2019

Honorable Mayor Peter Weiss
Deputy Mayor Jack Feller
Councilman Christopher Rodriguez
Councilman Ryan Keim
Councilwoman Esther Sanchez

RE: Support for North River Farms Project

I would like to express my support for the North River Farms project. I have been hearing about these agriculture based communities around the country, and always thought we should have something like it in our area. This is Oceanside's chance to upgrade our image and help Oceanside attract businesses and visitors. We want the best for Oceanside, so please vote in favor of North River Farms.

Respectfully,

Barbara Miltenberger
Barbara A. Miltenberger
3660 Merced Dr.
Oceanside, CA 92056

Late Comment Letters for North River Farms Environmental Impact Report

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: James K. Chapman

Address: 4863 MARLBOROUGH WAY, OCEANSIDE, CA 92056

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: Steve Schmidt

Address: 1350 Dupine Hills Dr, Vista, 92081

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: Rosemarie Schmidt

Address: 1350 Dupine Hills Dr, Vista 92081

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: JUDITH FULOP Fildberg

Address: 1154 RHODES WAY
OCEANSIDE, CA 92056

Late Comment Letters for North River Farms Environmental Impact Report

Dear Honorable Mayor and OceanSide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of OceanSide.

I support the community wholeheartedly.

Name: George Mozes

Address: 4158 Andrus Way, O'roville 92056

Dear Honorable Mayor and OceanSide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of OceanSide.

I support the community wholeheartedly.

Name: _____

Address: _____

Dear Honorable Mayor and OceanSide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of OceanSide.

I support the community wholeheartedly.

Name: MIRIAM MOZES

Address: 4158 ANDRUS WAY
OCEANSIDE, CA. 92056

Dear Honorable Mayor and OceanSide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of OceanSide.

I support the community wholeheartedly. *I would like information on*

Name: JAMES K. CHAPMAN / JERONICA CHAPMAN

Address: 4863 MARLBOROUGH WAY
OCEANSIDE, CA 92056 760-579-1958

Dear Honorable Mayor and OceanSide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of OceanSide.

I support the community wholeheartedly.

Name: _____

Address: _____

Late Comment Letters for North River Farms Environmental Impact Report

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: Richard Rocha

Address: 4206 CIELO AVE, Oceanside CA 92076

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: David Kussek

Address: 4962 Pylon Way

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: Charles Rogert

Address: 1840 ANDY LANE 92054

Dear Honorable Mayor and Oceanside City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.

I support the community wholeheartedly.

Name: Gregorini Stanislawski

Address: 4111 Galois Way

Oceanside 92056

Late Comment Letters for North River Farms Environmental Impact Report

<p>Dear Honorable Mayor and Oceanside City Council,</p> <p>I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the idea for the farmer's market, concert venue and maker spaces are all something that I would use.</p> <p>The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.</p> <p>I support the community wholeheartedly.</p> <p>Name: <u>Joe Valenti</u></p> <p>Address: <u>714 Point Reyes, Oceanside</u></p>	<p>Dear Honorable Mayor and Oceanside City Council,</p> <p>I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the idea for the farmer's market, concert venue and maker spaces are all something that I would use.</p> <p>The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.</p> <p>I support the community wholeheartedly.</p> <p>Name: <u>Harold Moore</u></p> <p>Address: <u>PO Box 4195, Oceanside, CA 92056</u></p>
<p>Dear Honorable Mayor and Oceanside City Council,</p> <p>I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the idea for the farmer's market, concert venue and maker spaces are all something that I would use.</p> <p>The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.</p> <p>I support the community wholeheartedly.</p> <p>Name: <u>Karrie Valenti</u></p> <p>Address: <u>714 Point Reyes, Oceanside</u></p>	<p>Dear Honorable Mayor and Oceanside City Council,</p> <p><i>I like it and think it's a good idea</i></p> <p>I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the idea for the farmer's market, concert venue and maker spaces are all something that I would use.</p> <p>The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanside.</p> <p>I support the community wholeheartedly.</p> <p>Name: <u>JOANI RAGAN</u></p> <p>Address: <u>4586 Sunrise Ridge, Oceanside, CA 92056</u></p>

Late Comment Letters for North River Farms Environmental Impact Report

Dear Honorable Mayor and Oceanide City Council,

I am writing in support of the North River Farms project planned for South Morro Hills. Although I am not interested in moving to this community, I think the ideas for the farmer's market, concert venue and maker spaces are all something that I would use.

The road and infrastructure improvements benefit the City as a whole and the concept would increase the tax base and public perception of the City of Oceanide.

I support the community wholeheartedly.

Name: Craig Remington

Address: 2306 Sneed Dr. Ojide 92056

Late Comment Letters for North River Farms Environmental Impact Report

March 3, 2019

Honorable Mayor Peter Weiss
Deputy Mayor Jack Feller
Councilman Christopher Rodriguez
Councilman Ryan Keim
Councilwoman Esther Sanchez

RE: North River Farms Project support letter

This letter is to show my support for the North River Farms project. A project like this is innovative where you create a community around a farm, and healthy living. Also we are in a severe housing crisis and having new homes in this area of town would be a good thing.

Respectfully,

Beatrice Willone
3658 Merced Drive
Oklahoma CA 92056

Late Comment Letters for North River Farms Environmental Impact Report

From: Monica Lopez <monicalopez.2016@yahoo.com>
Date: March 5, 2019 at 10:31:40 AM PST
To: Council@ci.oceanside.ca.us
Subject: Please Approve North River Farms!

Warning: External Source

The Honorable Peter Weiss and Members of the City Council
City Hall
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Mayor and Members of the City Council,

I write this letter to urge the Council to approve the North River Farms Project. This project will add to the vibrancy and quality of life of this wonderful community.

As an Oceanside resident only two miles from River Road, I believe that my family and my neighbors will benefit from the innovative design, community opportunities, and sensible planning embodied in this project.

It is well known that Oceanside needs more housing, in particular it is in dire need of progressive innovative housing developments. Growth is necessary and inevitable. Why not embrace a well designed idea? Local contrarians are always there, some folks will never embrace change under any circumstance. Creative solutions however are far and few. Please approve this exciting opportunity.

I have lived in Oceanside for ten years. I'm here for the reasons that we all live here – great location, great weather, great community, and this beautiful setting.

Late Comment Letters for North River Farms Environmental Impact Report

I firmly believe North River Farms will blend well into the landscape and our lifestyle while at the same time bringing new energy. This is an inspirational concept of community and aesthetic that will lift Oceanside's cache as a desired place to live and work.

Sincerely,

Monica Lopez
858-774-5627

Late Comment Letters for North River Farms Environmental Impact Report



March 6, 2019

Mayor Peter Weiss and Councilmembers
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Mayor Weiss and Councilmembers:

I am writing to express the Oceanside Chamber's support of the North River Farms project. First, I want to let you know that the Chamber has the utmost respect for City Staff and we consider them to be important community partners.

However, on this particular project, we do have a different perspective than staff. It is our opinion that much of the objection to the project is based on an outdated Land Use Element of the City's General Plan.

As you know, the Chamber did not rush into support of this project. In February of 2017 we indicated that we would not support any specific development proposals in the South Morro Hills area for 24 months in order to allow a community vision plan to develop. To date, we have not seen a specific plan adopted that would address housing needs or spark a robust agritourism program in Oceanside.

While we support this project for a variety of reasons, including its heavy investment [\$40M] into backbone infrastructure as well as the prospect of it being a catalyst for future agritourism projects in the region, the main issue is workforce housing. In order to attract and maintain quality businesses in Oceanside, we must have a diversity of housing for their employees.

The South Morro Hills Community vision plan has had many years to take shape, and we believe that any further delays would equal lost opportunity to address our housing crisis. We urge you to support the North River Farms project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott M. Ashton', written over a horizontal line.

Scott M. Ashton
Chief Executive Officer

828 North Coast Highway • Oceanside, California 92054

phone (760) 722-1534 • fax (760) 722-8338 • www.oceansidechamber.com

Late Comment Letters for North River Farms Environmental Impact Report

From: Andre Gamache <matt@fresuite.net>
Date: February 11, 2019 at 7:19:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Andre



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Andre Gamache

andreandkays2@gmail.com

92101

Late Comment Letters for North River Farms Environmental Impact Report

From: Ben Mattioda <bmatt@nrfarms.net>
Date: January 31, 2019 at 7:42:54 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Ben



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ben Mattioda

bmattioda@gmail.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Brad Colonna <brad@firesuits.net>
Date: February 12, 2019 at 5:52:27 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Brad



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Brad Colonna

colonnabrad@yahoo.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Cassandra Wolff <cmatt@firesprite.net>
Date: February 11, 2019 at 4:33:07 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Cassandra



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cassandra Wolff

nurs4earth@gmail.com

92089

Late Comment Letters for North River Farms Environmental Impact Report

From: Chuck Atkinson <matt@freesite.net>
Date: May 7, 2019 at 12:38:19 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Chuck

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Chuck Atkinson

chuck@cvinc.com

92056

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Cody Harrison <cmatt@firesuits.net>
Date: February 11, 2019 at 10:02:10 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Cody



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Cody Harrison

charrison@oconia-enterprises.com

92024

Late Comment Letters for North River Farms Environmental Impact Report

From: Craig Balben <craig@fresnoita.net>
Date: February 28, 2019 at 3:43:41 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Craig

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Craig Balben

craig.balben@gmail.com

92057

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Daniell Valdez <mgt@fresno.ca.net>
Date: March 20, 2019 at 11:57:54 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Daniell

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Daniell Valdez

daniellevaldez@yahoo.com

92081

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Darcy Oliver <duo@fresno.net>
Date: February 15, 2019 at 7:56:26 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Darcy



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Darcy Oliver

darcyolivedesign@gmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: David Powell <dmp@nrfarms.net>
Date: February 13, 2019 at 10:08:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from David



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

David Powell

d.a.powell87@gmail.com

92127

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Dyana Springer <nrtf@firsouits.net>
Date: February 11, 2019 at 3:31:28 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Dyana



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Dyana Springer

nrtf@firsouits.net

91911

Late Comment Letters for North River Farms Environmental Impact Report

From: Elizabeth Hurten <ematt@freemove.net>
Date: February 12, 2019 at 1:03:12 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Elizabeth



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Elizabeth Hurten

elizabeth.hurten@gmail.com

92009

Late Comment Letters for North River Farms Environmental Impact Report

From: Emerald Lowe <emlt@fresnoite.net>
Date: February 13, 2019 at 8:07:55 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Emerald



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Emerald Lowe

emmytn372012@gmail.com

92592

Late Comment Letters for North River Farms Environmental Impact Report

From: Fred Custodio <fmatt@fresolife.net>
Date: February 12, 2019 at 9:03:14 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Fred



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Fred Custodio

fredcustodio@gmail.com

92692

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Grace Lovio <mat@fresita.net>
Date: March 4, 2019 at 11:27:54 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Grace

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Grace Lovio

gracedlovio@gmail.com

92590-2855

1

Late Comment Letters for North River Farms Environmental Impact Report

From: haley worsley <matt@firequits.net>
Date: February 27, 2019 at 10:56:55 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from haley



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

haley worsley

haley@ntesa.com

92054

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Jackson Fuller <jman@fireside.net>
Date: January 30, 2019 at 5:33:39 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jackson



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jackson Fuller

jacrfiler@hotmail.com

92058

Late Comment Letters for North River Farms Environmental Impact Report

From: Jake Chambers <jcham@fresuits.net>
Date: February 11, 2019 at 4:09:09 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jake



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jake Chambers

SoCalresidential@gmail.com

92563

Late Comment Letters for North River Farms Environmental Impact Report

From: Jeanne Iman <jiman1@cox.net>
Date: February 27, 2019 at 5:52:58 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jeanne

Warning: This email originated from outside of the City of Oceanside network. Do not click on links or open attachments unless you recognize the sender and are expecting the message.



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jeanne Iman

jiman1@cox.net

92054

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Jerri Starkey <jerri@fresults.net>
Date: February 12, 2019 at 1:01:52 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Jerri



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Jerri Starkey

jerristarkey@cox.net

92056

t

Late Comment Letters for North River Farms Environmental Impact Report

From: Ka Yama <cmatt@fresu.ite.net>
Date: February 12, 2019 at 9:08:47 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Ka



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Ka Yama

ackee0000@gmail.com

92107

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Latisha Coe <lat@finesuite.net>
Date: February 12, 2019 at 5:00:01 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Latisha



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Latisha Coe

latisha_001@hotmail.com

92057

t

Late Comment Letters for North River Farms Environmental Impact Report

From: Matt Fallesen <matt@freemite.net>
Date: February 11, 2019 at 3:58:43 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Matt



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Matt Fallesen

Matthew.Fallesen@EdwardsJones.com

92590

Late Comment Letters for North River Farms Environmental Impact Report

From: Maureen Feehey <matt@firesuits.net>
Date: March 20, 2019 at 7:12:12 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Maureen

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Maureen Feehey

Moms1101@men.com

92056

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Meg Simon <matt@firesite.net>
Date: February 11, 2019 at 4:26:24 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Meg



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Meg Simon

megsimon4@gmail.com

92081

Late Comment Letters for North River Farms Environmental Impact Report

From: Megan McCaffrey <mgt1@firesuite.net>
Date: February 28, 2019 at 10:14:42 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Megan

Warning: External Source



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Megan McCaffrey

mcm536@humboldt.edu

92054

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Michael DeSena <msdt@fresu.its.net>
Date: February 11, 2019 at 8:01:36 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Michael



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Michael DeSena

michaeldesena@outlook.com

92562

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Michelle Hakala-Wolf <mgwt@fresquite.net>
Date: February 12, 2019 at 8:08:13 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Michelle



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Michelle Hakala-Wolf

mihakala@yahoo.com

91203

t

Late Comment Letters for North River Farms Environmental Impact Report

From: Nathan Gonzalez <nmatt@firesite.net>
Date: February 16, 2019 at 4:48:34 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nathan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nathan Gonzalez

nrgonzalez@llu.edu

92508

Late Comment Letters for North River Farms Environmental Impact Report

From: Neka Rae Shamberger <nair@fresita.net>
Date: February 13, 2019 at 2:57:28 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Neka Rae



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Neka Rae Shamberger

nekarasphotograph2@gmail.com

92057

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Nichole Deol <mat0@fresno.net>
Date: February 17, 2019 at 11:40:02 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nichole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nichole Deol

Nhuvcs4f2@gmail.com

92653

Late Comment Letters for North River Farms Environmental Impact Report

From: Nicole Nelson <natt@fireunits.net>
Date: February 11, 2019 at 3:39:09 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Nicole Nelson

naturalhunkie@gmail.com

92069

Late Comment Letters for North River Farms Environmental Impact Report

From: Priscila Carmona <priscila@firesuite.net>
Date: February 17, 2019 at 8:48:27 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Priscila



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Priscila Carmona

priscacarmona@gmail.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Rion Harmon <rmatt@firesuitc.net>
Date: February 15, 2019 at 8:11:22 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Rion



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Rion Harmon

Orion@yahoo.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarah Apke <smat@nrfarmsite.org>
Date: February 26, 2019 at 10:11:58 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Sarah



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarah Apke

smat@gmail.com

92620

1

Late Comment Letters for North River Farms Environmental Impact Report

From: Sarahi Sandoval <smant@firesuitje.net>
Date: February 15, 2019 at 3:15:52 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Sarahi



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Sarahi Sandoval

yvo2259@aol.com

92084

Late Comment Letters for North River Farms Environmental Impact Report

From: Tiana Sterling <cmatt@fresuite.net>
Date: February 13, 2019 at 9:24:29 PM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Tiana



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Tiana Sterling

Tiansigaz@shhsa.com

92021

t

Late Comment Letters for North River Farms Environmental Impact Report

From: trenton wonley <nrft@firesite.net>
Date: February 27, 2019 at 10:57:19 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from trenton



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

trenton wonley

wonleyt@rthco.com

92054

Late Comment Letters for North River Farms Environmental Impact Report

From: Xuan Vu <matt@firesuite.net>
Date: February 12, 2019 at 5:12:36 AM PST
To: Council@ci.oceanside.ca.us
Subject: A message from Xuan



Dear Mayor and Honorable Council Members:

I want to express my support of North River Farms, and I am excited to see these creative ideas come to Oceanside. Farming, education, and creative spaces—as part of this thriving community—is something that appeals to me. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future. North River Farms is a place I would either visit or consider moving to.

Xuan Vu

xuanvu11@gmail.com

92026

Late Comment Letters for North River Farms Environmental Impact Report

L198 KORNIT

Comment Letter L198



Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L199 DISHAROON, DALE & LOFFTUS, MARIA

Comment Letter L199

May 1, 2019

City of Oceanside Mayor and Council Members
300 North Coast Hwy
Oceanside, CA 92054

Re: Planning Commission Public Hearing on the North River Farms Planned Development Project Monday, May 6, 2019,
and City Council Public Hearing Wednesday May 22, 2019.

Dear Mayor and Council Members:

First, we would like to again take this opportunity to thank you for your time and efforts while serving our City.

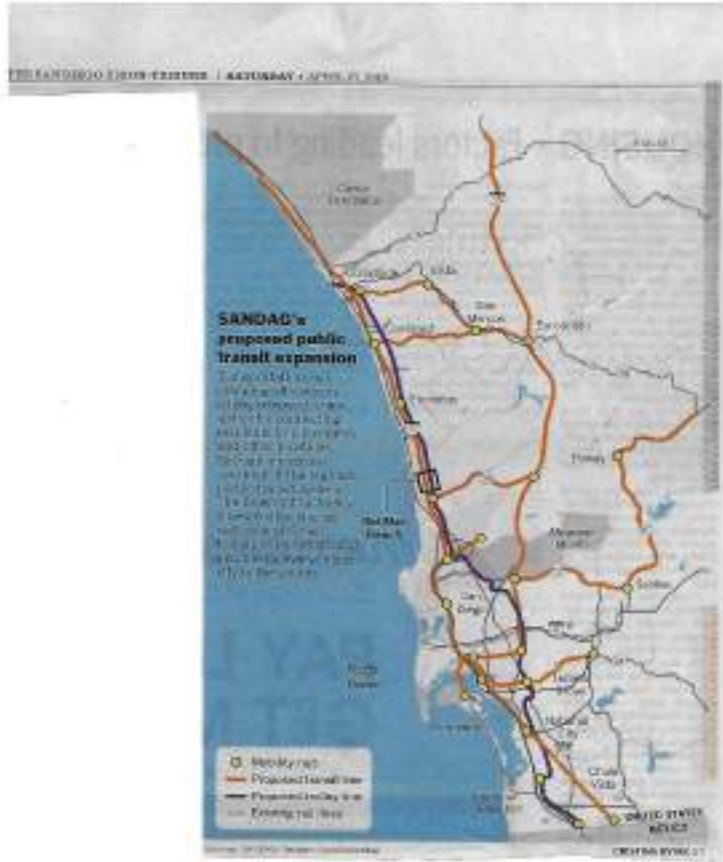
This coming Monday, and upcoming May 22, 2019 City Council meeting, you'll again be reviewing while voting on one of Oceanside's more important development projects. Not only will the North River Farms Planned Development Project (NRFDP) have immediate near term impacts for the adjacent Oceanside communities, it will also have far-reaching long-term development impacts for the City of Oceanside as a whole. While the applicant has provided project mitigation funds for future transit projects that may, or may not, be built, little or no other traffic or land-use impact mitigation efforts have been made by the applicant since the Planning Commission last reviewed and rejected this project proposal.

The following comments will be focused on significant traffic, transit, and infrastructure impacts this project will have in and around our local and surrounding Oceanside communities.

In the fall of 2013 my wife and I moved to the Arrowood Homeowners Association from the La Jolla area. At that time, we routinely experienced daily commutes times of 15-20 minutes to access either the I-5 and I-15 freeways or the downtown Oceanside Transit Station. Today, those same commutes, regularly take, or exceed, 30-40+ minutes. In the time we've lived here, State Route 76 (SR-76) has become increasingly impacted by additional developments along its route. It has also seen a significant increase in traffic loads and flows related to CALTRAN's completion of the SR-76 highway improvements leading east to the I-15. It's not surprising that SR-76 has been dubbed the "76 Crawway." During peak traffic times, it can routinely take two, and sometimes three, signal light changes to advance through the signal.

Over the past five years CALTRAN's has also added needed safety features to the SR-76 corridor, although and unfortunately they stopped short of making the significant investments to aid in traffic flow mitigations. Equally disappointing is SANDAG's recent publication of their proposed public transit expansions vision, Union Tribune April, 27, 2019 – see attached map page 2, that potentially leaves our part of North County communities out of the loop for future transit investments. This transit planning omission should be concerning to the Mayor, Council members, and our Oceanside Planning Commission as it may have long lasting impacts on future proposed development projects. If changes to this proposed vision are not addressed directly with SANDAG, we will all have to live in-perpetuity with the local transit infrastructures currently in place.

Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report

The NRFPDP will directly impose further traffic and transit impacts while straining the already inadequate roadway infrastructure currently in place. We're already experiencing level "E-F" intersection and roadway impacts at the required access routes to the proposed project. Even with the proposed developer paid "Fair Share" project infrastructure funds, the proposed traffic mitigation measures including a turn lane addition onto North River Road from Vandergrift Boulevard, lane restriping, signal light readjustments, etc., will be insufficient to resolve these and future traffic and transit issues.

This project will hasten the proposed level "D-E" intersections and roadways to become level "E-F" sooner rather than later. Furthermore, these increased roadway traffic and transit impacts will directly impact "decreased" levels in emergency services response times while increasing wildfire and other disaster evacuation times.

As a past University Community Planning Group member, San Diego District I, it was always important for us to consider requiring that the Infrastructure and Facility Benefit Assessment funds be available, as outlined in the University Community General Plan, before allowing a major development to go forward to the San Diego City Council for a vote. It's unfortunate that the City of Oceanside has an outdated General Plan for current and future proposed developments. I urge you not to compound the problem by not requiring developers to deposit development funds necessary to implement any and all required infrastructure upgrades associated with each project.

At this time NRFPDP may be a "before-its-time" development for the City of Oceanside. Without the necessary and required infrastructures in place, the immediate and future community impacts will be immeasurable. For instance, to support a project of this size and at this location, it may take the full development of North River Road into a four-lane roadway to safely mitigate the expected traffic loads from Vandergrift Boulevard to SR-78. Already, this roadway has become a very busy alternative two-lane bypass that unfortunately has experienced several vehicular accidents in just the past few months. It would be naive to accept that traffic traveling east and west along this roadway will not be additionally impacted should this project be approved. The City has an obligation to first update and implement its long overdue General Plan for development while determining and solidifying its future agriculture and agritourism plans for South Morro Hills Agricultural Area (South Morro Hills Vision Plan). Additionally, have the required funding available to complete the widening of the College Boulevard bridge to Vandergrift Boulevard for future traffic mitigation, and all other infrastructure additions required to support current and future growth in our area such as the NRFPDP. It is also critical to predetermine and publish the long-term City taxpayer's obligations for the proposed on-site fire station after the NRFPDP support funding ends.

We are asking you to carefully review and consider these and the many other related NRFPDP impacts that it will bring to Oceanside. Your rejection of this plan amendment will send a message to developers that as a matter of policy, it is essential that the approval of all current and future project developments be linked to the financing and implementation of all associated supporting infrastructure and transit needs. Perpetuating development policies of density first have proven themselves to benefit the developer at the expense of the community members and the quality of life we all strive for.

Thank you for your time in reviewing and considering this response.

Regards,

Dale Disharoon/Maria Lofftus
1105 Village Drive
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L200 HECZKO, JULIA

Comment Letter L200

From: Julia Miller <julejean@yahoo.com>
Date: May 1, 2019 at 11:09:55 AM PDT
To: Council@coastsideca.org
Subject: STOP North River Farms Project!

Warning: External Source

Dear Members of the Oceanside City Council,

I am a currently living in the beautiful Oceanside area of South Morro Hills. I am opposed to the North River Farms (NRFs) Project. This is an irresponsible high-density development plan on Oceanside's pristine farmland. NRFs project is too dense, the farm plots are too small to be successfully farmed, and the hotel and commercial space will not likely come to fruition.

One of the biggest gems in Oceanside is our agricultural neighborhood. The residents cherish our crops, our space, and sense of community. Allowing NRFs to build is a detriment to our city.

- NRFs will result in the permanent loss of prime agricultural land that generates jobs and local food.
- NRFs will negatively impact efforts to increase agritourism and its related jobs and income. NRFs should be denied until an updated SMHs Vision Plan is in place.
- NRFs is inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability, and improve citizen's quality of life.

Our rural community is already seeing increased traffic and congestion. Building over 600 homes off of North River Road will be a disaster. Traffic and evacuation routes will be a serious safety issue.

- NRFs will result in significant and unavoidable impacts to population, housing, transportation, and traffic.
- NRFs will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
- NRFs is a sprawl project that will result in higher taxes for existing residents to finance services away from existing facilities and services.

Another block of houses will overcrowd this small space, diminish agritourism, and destroy valuable farmland forever. Please do not allow the North River Farms Project to continue.

Sincerely,

Julia Heczko

Late Comment Letters for North River Farms Environmental Impact Report

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L201 LATASA

Comment Letter L201

From: fred latasa <flatas@hotmai.com>
Date: May 2, 2019 at 11:55:25 AM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: "Please vote NO against turning Oceanside farmland into high density housing."

Warning: External Source

"Please vote NO against turning Oceanside farmland into high density housing."

Thank you
Fred Latasa
Fleet Manager
Huntington Beach Dodge Chrysler Jeep

Office 714 794 3375

cell 760 672 4044

fax 714 842 7408

Late Comment Letters for North River Farms Environmental Impact Report

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L202 BALMA

Comment Letter L202

From: Larry Balma <lb1122@hotmail.com>
Sent: Thursday, May 02, 2019 9:01 AM
To: Peter Weiss; Jack Felker; Esther Sanchez; Christopher Rodriguez; Ryan Keim
Cc: Jeff Hunt; Jonathan Borrego; Russ Cunningham; Robert Dmohowski
Subject: NRFs Benefits?

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Mayor and City Council

North River Farms Planned Development - Integral Communities

Overview

The Oceanside Planning Commission recommended denial of the NRFs project once again at the January 28, 2019 meeting. NRFs vacated their project from the Council meeting because it did not look like they would be approved. They are trying to answer some of the concerns about their subdivision brought up by Staff, Council and Public comments. However, they are missing the point that the project is too dense, the farm plots are too small to be successfully farmed, and the hotel and commercial space may never see daylight.

The SMHA is working together with Staff on our AgriVision Plan that includes the Agritourism opportunities that have already been approved by Council. Staff is laying a foundation for a "Specific Plan" that encompasses the entire 3500 acres of SMHs. This Specific Plan vision will be adopted into the City General Plan.

An updated vision plan will consider additional infrastructure necessary for future development balance between Agritourism, possible clustered home-sites, and agriculture. Right now, our infrastructure is based on the current 2.5-acre zoning. There are no projections of costs for additional infrastructure that may be required. Any development should pay into the future infrastructure needed for the area.

Integral is trying to push their NRFs project through to entitlement before our Vision is in place, before the City knows what the future infrastructure costs will be. They are proposing to use over half of the infrastructure available for the entire 3500-acres of SMHs. The improvements they propose are only sized to serve their parcel. This leaves any future development to pay the bill.

March 22, 2019 Memorandum to City of Oceanside Planning – SMHA Review

1. Open Space / Ag Land

The Bree property north of the NRFs PD is approximately 34 acres. The Bree parcel has been entitled to build 27 high end estate homes one-acre parcels. The land was a chicken ranch during the 1960s, but just one home-site has been on the property since and has not been farmed. The elevation is higher than most of the surrounding land and is a perfect site for some higher end homes. However, the Bree property may have trouble building high end homes next to a high-density subdivision.

Integrals suggestion to take the adjoining Bree property that is already entitled for 27 high quality homes and to not build confirms our concern that NRFs will cause a negative cumulative effect on other nearby acreage.

The Mayor said that NRFs needs to have a real farm element. The current proposed farm elements in the project are small plots or strips of land scattered about the subdivision. The plots do not connect

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and there is no way to move equipment from one plot to another making any type of commercial farming infeasible.

If the Bree property were to be added to the PD the entire project needs to be redesigned and the additional ag acreage placed alongside North River Road and Wilshire Road. This would move the housing element with walls and buildings away from the major roadways, buffer the subdivision and add enhancement to Oceanside and SMHs AgriVision. This could result in an actual "Agricultural Gateway" to South Morro Hills that could be farmed successfully. It would be an attempt to follow our SMHs AgriVision which includes agritourism opportunities.

Adding the Bree property as open space will not enhance the NRFs project. Joining all the projects farmland along the roadways will. A portion of the lower part of the Bree property where it connects to the Arrowood Golf Course can remain as a riparian flyway and also enhance the project.

I doubt that the other 10 acres of agricultural zoned land somewhere in SMHs is actually being farmed. Purchasing other actual "farmland" in SMHs and perpetually preserving it as farmland is better than purchasing mitigation credits elsewhere even in some third world country. However, no amount of required mitigation land can be used to reduce the DUs/acre in NRFs.

2. Hotel Site

I asked Integral Communities during our first meeting and successive meetings to bring me a business plan of their farming operation and their commercial buildings. Integral finally admitted they were not used to commercial projects; they designed housing subdivisions. The commercial developers I have known begin by marketing their project to "Anchor" tenants and then sign a contract and design a project that will be a success.

Integral has thrown in the hotel idea because their neighbor, Paradise Falls wedding venue first had the idea for a boutique hotel to enhance their wedding experience. SMHA added the boutique hotel idea to our Agritourism plans that was ultimately adopted by the City. Integral added the hotel so they could state TOT income for their project. They did speak to a hotel owner who had no desire to operate a hotel in the subdivision they have proposed. They obviously don't have a tenant and by stalling the building of the hotel for 10 years they are merely setting up for some future condos that will bring in no TOT income. The hotel is merely another marketing ploy from Integral.

Integral's Benefits as stated:

- The hotel "allows for the Village / Commercial Core concepts to take place"????
- This 10-year hold "will allow for a higher probability of their boutique hotel concept becoming real." Seriously????

Is this how confident they are that their Commercial Core Village and hotel will ever happen...?

Integral's marketing pressure with all the pretty drawings and animations may excite some of the lay people but anyone familiar with planning, building, commercial business or common sense can certainly see through this smoke and mirrors marketing.

In the development community often times terms like Mixed Use, or in this case Boutique Hotel, Commercial, Maker Space and Farming are considered "Throwaways." Basically, spaces that are never built, or are built and never sold and are only used to obtain entitlement in order to increase the number of DUs.

3. South Morro Hills Vision Plan

The SMHA has been working on our AgriVision plan for the entire 3500 acres of South Morro Hills long before Integral came along with the NRFs project. Integral was told at their first Council meeting in 2017 to work with SMHA and come back with something between 100 and 400 homes. Integral fought with City Staff and with SMHA. We had dozens of meetings with them and they open every meeting by saying, "Density is not on the table." All they have done at our meetings is to glean our AgriVision ideas and drop the names into their marketing proposal with no plan for success. They don't care if any of this works, they just want to receive the entitlement. The builder who they sell to will come back to the City and say he can't make this plan work, he needs more DUs. At that point the

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Agricultural zone has been broken by Integral and they are gone, paid by the builder and now the builder is the loser.

Integral is not the property owner. SRF did not have the property for sale, SRF receives lease payments from West Coast Tomato's that takes care of the expenses plus. Income. Until we have our AgriVision Specific Plan in place we don't know how much each new development should be contributing to the future infrastructure needed in SMHs. Integral wants to push their project through before any vision plan exists and use up more than half of the infrastructure that is currently planned for the entire 3500 acres of SMHs. Integral says they will offer up to a \$200,000 toward our Vision plan but exclude all internal costs from that number. Just more pandering, Smoke and Mirrors.

4. North River Road at Vandergrift

The addition of building two right turn lanes eastbound onto North River Road only to funnel down to one lane... One lane eastbound North River road is already insufficient as it connects with Highway 76.

5. Traffic Community Benefit Contribution

If NRFs would wait for the AgriVision Specific Plan completion, we would be able to accurately assess every future development the proper amount for a future four lane North River Road. Do we trust that Integral's offer today will be a fair amount? Especially after they exclude their internal costs. They say "this starts the planning of a circulation element.

The City already has a circulation element that is planned for a total build-out in SMHs at 2.5 acres. NRFs is trying to take over half of the infrastructure that has been planned for All of the 3500 acres. SMHA has been working on an updated Vision Plan that includes a circulation element long before Integral proposed their PD. Integral is just trying to use up every bit of infrastructure for their own NRFs project. They are trying to snow us by offering dollars which they say are benefiting the City.. when in fact they may not even be paying enough for the infrastructure that they are proposing to use.

We will not know how to assess the cost of future infrastructure until the AgriVision plan is complete. They should be realistically contributing to a future Melrose Bridge.

6. Local Emission Reduction

The City Staff has worked over three years preparing a Climate Action Plan and has used many outside consultants in the process. The plan is completed but is not considering that NRFs subdivision and the cumulative effects which would most certainly add greenhouse gases to SMHs. Will \$100,000 be even close to the amount to completely redo our Climate Action Plan? Another cumulative effect from NRFs project. This is not a benefit to the City. An updated Vision specific plan for SMHs is a benefit and will fit within our CAP.

Integral's Public Benefits as Stated

- "The Project will be a catalyst for investment in the agritourism business." They are unable to find a Boutique Hotel operator. The local farmers along with Cyclops Farm and Farmer D have rejected the idea of farming the plots of ground in NRFs. The farmer from the Ecology Center in San Juan Capistrano has never farmed more than an acre and his operation has been subsidized by the City of San Juan for over 15 years. They have found no commercial anchor or restaurant to sign on for commercial space. More smoke and mirrors.
- "Critical infrastructure improvements... the gateway location is the start of these improvements." In other words, the improvements only help NRFs PD.
- "The Project will be up-sizing the existing 18" sewer line west of the site to a 21" sewer line to create more than sufficient capacity for the projects sewer flows." Once again Integral states that they are only concerned with servicing their NRFs project. The City Staff confirms that a 21" pipe will not support any other development in SMHs. Even if new home-sites on 2.5 acres could not perk, they would not be able to be hooked up to sewer and could not be built. The Sewer pipe would need to be sized to 24" from Wilshire Road all the way to Vandergrift merely

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to allow for the existing zoning. The sewer pipe that exists on North River Road carries Rainbow utilities sewage for treatment by Oceanside. This pipe was never considered for use by SMHs.

- "NRFs will expand the College Bridge from an existing 4 lane facility to an expanded 6 lane facility." The existing two lanes on the bridge are currently 12' and 11' wide. Turning cars and trucks regularly cross over the painted lines and into the bike lane. Narrowing the cushion from the concrete center barrier to the outboard concrete wall in order to crowd three 11' wide lanes seems very unsafe to me. If this lane crowding leads to future accidents the City could be held liable. The logical alternative is to think about a Melrose Bridge.
- "The tax revenue from the proposed project would provide an economic benefit to the City." The property tax from the home-sites will result in a negative after a few years as the City is required to upgrade and maintain the infrastructure and services. The TOT tax from the "throwaway" hotel and commercial will never materialize. Why do they not have an anchor agritourism client signed on to the project? Other development projects have the agritourism client signed on from day one. NRFs does not have a suitable design for substantial agritourism, they are merely a subdivision.

Summary

Most developments spend at least five years going through the planning process. Arrowood took ten years to plan their 600 acre project, three quarters of the land was being commercially farmed.. They began asking for 4000 DUs and were finally entitled to build 1006 along with a Park, a School and a Golf Course.

Integral has spent two and a half years in the planning process. They asked for 985 DUs and are down to 656 on 177 acres. Using the Arrowood standard, Integral should be at 290 DUs with huge farmable land between North River and Wilshire Roads and the actual home-sites.

Integral is trying to push their project through before the General Plan update and the AgriVision Specific Plan for SMHs is in place. Agritourism will enhance the City, our agricultural heritage and add economic benefit to the farmers and to the City.

I am not an expert on development or on the City's rules on development. I am merely the spokesperson for the South Morro Hills Association trying to uphold our goal of orderly development of South Morro Hills agricultural area. I bow to our intelligent City Staff and their independent consultants for their interpretations considering the benefits offered by NRFs project. Staff, from day one, has never found reason to approve any of NRFs project. NRFs has not listened to Staffs recommendations and has not changed their project at all during the process. NRFs continues to have their paid consultants to try and justify their original plan. The question is, who is working for the betterment of the City of Oceanside... Our Staff, or Integral's marketing push to build their North River Farms project?

The NRFs project should be denied as designed and Integral should be directed to actually work with City Staff and design something that will work within AgriVision.

Respectively,

Larry Balma

President

South Morro Hills Association

760-419-2211

Late Comment Letters for North River Farms Environmental Impact Report

L203 DOVEATT

Comment Letter L203

From: Don Doveatt <jaagredon@yahoo.com>
Date: May 3, 2019 at 10:08:26 AM PDT
To: "council@oceasideds.org" <council@oceasideds.org>
Subject: Comments Concerning NRF Development

Warning: External Source

To whom it may concern,

I write today to express my concerns over the proposed North River Farms Development project. A big part of the allure of moving to this area almost 5 years ago was the wonderful wide open spaces that still exist here in the Northeastern portion of Oceanside. My Wife and I moved from Orange County to escape the ever increasing hordes of traffic congestion, polluted air and the building of structure after structure seemingly right on top of each other. We found a wonderful place to live in the Arrowood development which borders upon farms, open land and a beautiful environment, as yet untouched by over aggressive development.

As we moved here, our plans were to make this particular area our final retirement destination. The planned development of North River Farms however would throw that seriously in doubt.

Among my concerns are the following:

1. The development would add an untold number of cars/traffic/people/congestion on North River Road, College Blvd and the 76 as well as surrounding support roads. It is already EXTREMELY difficult and traffic laden to navigate the 76 East from the 5 towards College in rush hour. Sometimes it can take me 3-4 cycles just to get through one light. The NRF project, as far as I can see, offers NO new bridges for crossing the San Luis Rey River nor does it make ANY road improvements on North River Road as it goes East beyond Melba Bishop Park. The traffic situation here would be an absolute nightmare.
2. A few years ago we had to evacuate due to the fire that raged from Fallbrook going West towards Oceanside. All roads leading out of the back gate area of Pendleton were absolutely gridlocked making everyone sitting ducks if the fire had reached that area. Without massive road widening of North River, anybody in this proposed development would be quite seriously impacted and in danger should another fire occur.
3. Part of the beauty of this area is the as yet undeveloped lands that exist in the East and Northern parts of our city. I feel that would need to maintain a balance of homes and structures and leave these farm lands as a buffer/natural break to the impact of man.
4. This development would cause the removal of many local farms, thereby reducing the availability of locally grown food. My Wife and I buy most of our produce from these locally grown farms.
5. The San Luis Rey River is a flood control channel and as such it has seen flooding before. What happens if a major flooding event happens again? With no road infrastructure improvements on North River, this development could in effect be isolated.
6. I feel Oceanside would lose some of its allure if this project were to go ahead. Personally, I'd much rather tour an area with wide open lands amongst the homes versus houses, condos, businesses, etc. stacked one upon the other. If I want to see that, I can do to downtown Los Angeles. And quite frankly,

Late Comment Letters for North River Farms Environmental Impact Report

that kind of urban sprawl is something I don't care to see...anywhere

7. This development would impact the city's ability to promote agro-tourism. I and my neighbors would much rather see working farms that as part of their farm operations, offer eateries on the farm properties themselves, utilizing that which they grow. I'd love to see some of the farms begin to grow grapes and setup winery operations. One need only to look to Temecula to see how many tourism dollars land in their wineries.

8. I have concern over whether or not there are even enough jobs available in the area to support all of the bodies that would be resident in this new development.

9. Oceanside already suffers from inadequate infrastructure. Drive down Vandegrift lately? When was the last time that road had a resurfacing? I would champion revitalization of existing neighborhoods and business centers with refurbish \$\$\$ over green lighting a project that is only going to add to congestion and frustration.

In closing I think we need to stick to a plan which promotes our city's diverse lands, maintains our farming communities and a balance between development and that which is wild. Our traffic situation in the city is already nightmarish at times and this project would further exacerbate that problem.

I wish to live in an environment that maintains its beauty and allure and a city which strives to care of its citizens, keep them safe and happy.

Thanks you.

Don and Deanna Doveatt
1014 Village Cr.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

L204 HECZKO

Comment Letter L204

From: "James heczko@opusadv.com" <james.heczko@opusadv.com>
Date: May 3, 2019 at 10:26:25 AM PDT
To: <Council@oceansideca.org>
Subject: North River Farms

Warning: External Source

Honorable Mayor and City Council,

I live in the South Morro Hills region of Oceanside, and I am writing to you to voice my strong opposition of the North River Farms (NRF) project.

I believe the project is ill conceived and will have profoundly adverse effects on the City and its residents, for example:

1. NRF is fiscally irresponsible. The plan woefully understates NRF's impact on traffic, schools, and other city services. In the short term it will create traffic and strain the education system, and in the long term it will deplete city resources and require additional taxes.

2. The project will make Oceanside a worse place. Currently, Oceanside is a wonderful balance of beaches, residential communities, industry and agriculture. The NRF project significantly reduces Oceanside's agricultural base and will likely make agriculture more difficult for the remaining farms to operate and survive in the City.

3. There are other areas on Oceanside that are more appropriate for residential development. Simply drive around the city or look at an aerial map ... it is obvious that there is vacant land that is more appropriate for development. This includes in-fill parcels that are currently not being used for other purposes and blighted areas that are ripe for renewal.

4. NRF will increase the land value of one land owner, but will decrease the value of virtually all of the other residences in Oceanside. This not only hurts the citizens of the City, but will result in a net lower tax base for the city (robbing Peter to pay Paul).

Late Comment Letters for North River Farms Environmental Impact Report

5 The project goes against City policies and jeopardizes the region's vision and agritourism plans. City staff and local residents have been working together to create a comprehensive plan for the South Morro Hills community. This process is seeking to balance the needs of large and small farmers and to provide a means for the reasonable development while preserving agriculture. The NRF project is an attempt to circumvent this process and it should be tabled until the process is completed.

In short the project will make a few (non-Oceanside) people rich, while diminishing the city of Oceanside, saddling Oceanside residents with future taxes and lowering the quality of life of Oceanside residents.

Thus I encourage you to vote against the project.
Respectfully submitted,
James Heczko

James Heczko
6465 La Paloma Lane
Oceanside, CA 92057
760-732-3121

Late Comment Letters for North River Farms Environmental Impact Report

L205 MCLOUGHLIN, JOSEPH AND DIANA

Comment Letter L205

From: diana cazy <dianarwc@gmail.com>
Sent: Monday, May 06, 2019 2:17 PM
To: Robert Dmochowski; Planning Wells; Planning-Planning Commission; City Council
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Weiss, Mr Dmochowski, City Council Members, Staff, et al,
This is a letter protesting the development by Integral Developers of North River Farms.
I was stuck in a traffic jam on Sleeping Indian, as were many of my neighbors, during the evacuation from the Lilac Fire of 2017. If the fire had been as fast moving as the Camp Fire was, we all would have died in our cars. Fires are becoming more devastating each year. We have one route down and out of area, if that route gets impacted during an evacuation, with additional vehicles and people fleeing, we will have no where to go, and there will be casualties. Allowing this development to proceed without additional access roads off the hill, is signing a death warrant for those of us on the hill, when another fire breaks out (and it will). Our lives deserve more consideration than to be sold out to developers whose interests are not the safety and well being of existing community members.
Sincerely,
Joseph and Diana McLoughlin
Camino Baja Cerro
South Morro Hills

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L206 BALLEW-HASKETT

Comment Letter L206

From: Keff Ballew-Haskett <ballew.hasketts@gmail.com>
Sent: Monday, May 06, 2019 5:06 PM
To: Robert Dmichowski, City Council
Subject: RE: Planning Commission Public Hearing on the North River Farms Planned Development Project Monday, May 6, 2019, and City Council Public Hearing Wednesday, May 22, 2019.

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mayor and Council Members:

First, we would like to again take this opportunity to thank you for your time and efforts while serving our City. This coming Monday, and upcoming May 22, 2019 City Council meeting, you'll again be reviewing while voting on one of Oceanside's more important development projects. Not only will the North River Farms Planned Development Project (NRFPDP) have immediate near term impacts for the adjacent Oceanside communities, it will also have far-reaching long-term development impacts for the City of Oceanside as a whole. While the applicant has provided project mitigation funds for future transit projects that may, or may not, be built, little or no other traffic or land-use impact mitigation efforts have been made by the applicant since the Planning Commission last reviewed and rejected this project proposal.

The following comments will be focused on significant traffic, transit, and infrastructure impacts this project will have in and around our local and surrounding Oceanside communities. In the fall of 2013 my wife and I moved to the Arrowood Homeowners Association from the La Jolla area. At that time, we routinely experienced daily commutes times of 15-20 minutes to access either the I-5 and I-15 freeways or the downtown Oceanside Transit Station. Today, those same commutes, regularly take, or exceed, 30-40+ minutes. In the time we've lived here, State Route 76 (SR-76) has become increasingly impacted by additional developments along its route. It has also seen a significant increase in traffic loads and flows related to CALTRAN's completion of the SR-76 highway improvements leading east to the I-15. It's not surprising that SR-76 has been dubbed the "76 Crawlway." During peak traffic times, it can routinely take two, and sometimes three, signal light changes to advance through the signal. Over the past five years CALTRAN's has also added needed safety features to the SR-76 corridor, although and

Late Comment Letters for North River Farms Environmental Impact Report

unfortunately they stopped short of making the significant investments to aid in traffic flow mitigations. Equally disappointing is SANDAG's recent publication of their proposed public transit expansions vision, Union Tribune April, 27, 2019 – see attached map page 2, that potentially leaves our part of North County communities out of the loop for future transit investments. This transit planning omission should be concerning to the Mayor, Council members, and our Oceanside Planning Commission as it may have long lasting impacts on future proposed development projects. If changes to this proposed vision are not addressed directly with SANDAG, we will all have to live in-perpetuity with the local transit infrastructures currently in place.

The NRFPDP will directly impose further traffic and transit impacts while straining the already inadequate roadway infrastructure currently in place. We're already experiencing level "E-F" intersection and roadway impacts at the required access routes to the proposed project. Even with the proposed developer paid "Fair Share" project infrastructure funds, the proposed traffic mitigation measures including a turn lane addition onto North River Road from Vandergrift Boulevard, lane restriping, signal light readjustments, etc., will be insufficient to resolve these and future traffic and transit issues.

This project will hasten the proposed level "D-E" intersections and roadways to become level "E-F" sooner rather than later. Furthermore, these increased roadway traffic and transit impacts will directly impact "decreased" levels in emergency services response times while increasing wildfire and other disaster evacuation times. As a past University Community Planning Group member, San Diego District 1, it was always important for us to consider requiring that the infrastructure and Facility Benefit Assessment funds be available, as outlined in the University Community General Plan, before allowing a major development to go forward to the San Diego City Council for a vote. It's unfortunate that the City of Oceanside has an outdated General Plan for current and future proposed developments. We urge you not to compound the problem by not requiring developers to deposit development funds necessary to implement any and all required infrastructure upgrades associated with each project.

At this time NRFPDP may be a "before-its-time" development for the City of Oceanside. Without the necessary and required infrastructures in place, the immediate and future community impacts will be immeasurable. For instance, to support a project of this size and at this location, it may take the full development of North River Road into a four-lane roadway to safely mitigate the expected traffic loads from Vandergrift Boulevard to SR-76. Already, this roadway has become a very busy alternative two-lane bypass that unfortunately has experienced several vehicular accidents in just

Late Comment Letters for North River Farms Environmental Impact Report

the past few months. It would be naive to accept that traffic traveling east and west along this roadway will not be additionally impacted should this project be approved. The City has an obligation to first update and implement its long overdue General Plan for development while determining and solidifying its future agriculture and agritourism plans for South Morro Hills Agricultural Area (South Morro Hills Vision Plan). Additionally, have the required funding available to complete the widening of the College Boulevard bridge to Vandergrift Boulevard for future traffic mitigation, and all other infrastructure additions required to support current and future growth in our area such as the NRRFPDP. It is also critical to predetermine and publish the long-term City taxpayer's obligations for the proposed on-site fire station after the NRRFPDP support funding ends.

We are asking you to carefully review and consider these and the many other related NRRFPDP impacts that it will bring to Oceanside. Your rejection of this plan amendment will send a message to developers that as a matter of policy, it is essential that the approval of all current and future project developments be linked to the financing and implementation of all associated supporting infrastructure and transit needs. Perpetuating development policies of density first have proven themselves to benefit the developer at the expense of the community members and the quality of life we all strive for.

Thank you for your time in reviewing and considering this response.

Kenichi Ballew-Haskett
Jeffrey Ballew-Haskett
1153 Village Dr,
Oceanside, CA 92057
Cell (310) 403-9730

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L207 VOSBURG, PEGGY

Comment Letter L207

From: Peggy Vosburg <pvosburg622@gmail.com>
Sent: Monday, May 06, 2019 6:02 PM
To: Planning Planning Commission
Subject: No

Follow Up Flag: Follow up
Flag Status: Completed

Warning: External Source

On converting farmland to high density farming! No!!!!

Peggy

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L208 KORNBAKER, SUSAN

Comment Letter L208

From: Susan <kukasue@yahoo.com>
Sent: Monday, May 06, 2019 6:13 PM
To: Robert Dmochowski; Planning-Planning Commission; Planning Web
Subject: NRF Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Not sure this went through so re-sending. S

Dear Mr. Dmochowski and Planning staff,

After reviewing the most recent NRF 'proposal / changes', I am writing once again to express our strong and continued opposition to this project. My biggest concern remains the safety and wellbeing of constituents, especially the number of additional vehicles generated by the density of this project on an already crowded and overburdened two lane road. It would endanger residents, especially during evacuations, increase traffic and air pollution, and provides inadequate buffers between residents and farmers, who also use this two lane road to move product via trucks. Even our good neighbors at Camp Pendleton expressed concern for the additional traffic traveling the toward the 76 and through the rural community. Also a concern are the tax increases for residents to finance services away from existing facilities, and the liability to the city for building in a flood plain, which would also likely trickle down to taxpayers. The permanent loss of agriculture land will increase as a result of the change in zoning to accommodate this project, totally changing the value and nature of this area. It is very disconcerting that this project continues to be considered after no significant changes to the original plan. I do count on the Planning Committee to make the right decision, as they have in the past, and recommend this project be denied.

PS. I also must register a concern about the "letters of support" which are all the exact same boilerplate response, with no indication they are even legitimate submissions or via people who reside in the area / Oceanside, unlike the more personal responses from actual constituents.

Thank you,
Susan Kornbacher
Wilshire Rd.

Sent from my iPhone.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L209 JARVIS

Comment Letter L209

From: Ann Jarvis <annmarqueritejarvis@gmail.com>
Date: May 7, 2019 at 2:43:01 PM PDT
To: council@oceansideca.org
Subject: Just Say NO to NRF

Warning: External Source

NO!

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L210 DAVIES

Comment Letter L210

From: leslie davies <topupmills59@gmail.com>
Date: May 7, 2019 at 5:26:04 PM PDT
To: Council@oceansideca.org
Subject: Please pay attention to the Planning Commission

Warning: External Source

Dear Oceanside City Council members,
Our city established a planning commission for a reason. Please abide by their recommendation and DO NOT approve the proposed 656 home development in Morro Hills. I am sure you know that many people who voted "NO" on Measure Y, thought a "no" vote meant NO development on that land. I don't think I have to spell out all the other reasons why this development would hurt they residents of Oside.

Thanks,
Leslie Davies
Winchester St.
Oceanside, CA 92054

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L211 LOWE

Comment Letter L211

From: Margot Lowe <margotlowe1@gmail.com>
Date: May 7, 2019 at 4:47:57 PM PDT
To: council@oceansideca.org
Subject: No on North River farms

Warning: External Source

Oceanside City Council; Peter Weiss, Jack Feller, Ester C. Sanchez, Christopher Rodriguez, Ryam Keim.

Please vote 'no' on North River farms.

The EIR for the project is faulty with regard to greenhouse gas offsets, and transportation issues. This puts the City at risk of being successfully sued, as the County of San Diego was.

If that isn't enough, consider the infrastructure problems - water, sewer, schools, roads, fire safety, all a drain on existing taxpayers.

The area considered for North River Farms is wildfire prone, and lies partly in a flood plain.

Oceanside citizens want to conserve agricultural land and maintain the open/semi-rural character of Oceanside - they voted 'no' on the SOAR Initiative because the developer tricked them in to believing that 'no' vote would preserve agricultural lands. Make no mistake, Oceanside voters want to conserve agricultural lands.

I moved to Oceanside from Santa Monica, because it wasn't overdeveloped like Los Angeles and Orange County. Please don't take that away from me.

Margot Lowe

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L212 DUBOIS, STEVE

Comment Letter L212

From: stevedubois1@aol.com
Date: May 7, 2019 at 1:30:09 PM PDT
To: council@oceansideca.org

Warning: External Source

Say **NO** to the NRF project.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L213 DUNBECK

Comment Letter L213

From: David Dunbeck <ddunbeck@cox.net>
Date: May 8, 2019 at 4:55:42 PM PDT
To: <Council@oceasideca.org>
Subject: North River Project

Warning: External Source

I want to express my opposition to the North River Farms Project in its current form. While I support smart development such as most of the downtown design, this project doesn't fit the area geographically, culturally or logically. The planning committee's recommendation hits the nail on the head. It's time to step back and really think about Oceanside's future. As a group you need to stop the hodgepodge development that has dominated our planning and its time to think of the aesthetics of our beautiful terrain which is threatened to become an endangered species. Our canvass is incomplete as EVERYTHING is centered around money, but countless citizens are telling you we want to retain the natural beauty of areas like South Morro Hills. Tell the NRF group that they need to find land in Oceanside that better suits the citizens' desire to protect our last remnants of agricultural beauty. We will NEVER get it back if we give it away. It's part of our city soul; be the guardians of our soul.

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L214 BURLEW

Comment Letter L214

From: Jim Burlew <jim.burlew@bca-inc.com>
Date: May 8, 2019 at 7:15:27 AM PDT
To: council@oceansideca.org
Subject: No on NRF

Warning: External Source

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L215 MIKHAIL

Comment Letter L215

From: Moushira Mikhail <mkamel@aucegypt.edu>
Date: May 8, 2019 at 10:09:38 AM PDT
To: council@oceansafe.ca
Subject: NRF

Warning: External Source

No to NRF

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L216 BALMA

Comment Letter L216

Planning Commission Votes Unanimously to recommend Denial of Integral – NRFs

by Larry Balma, President SMHA

Last night was a battle between billionaire marketing firm Integral and the citizens of Oceanside. The Council Chambers were packed. City Planner Rob Dmohowski was on top of his game as he ran through the staff report. This is the third time that Staff has recommended denial of the NRFs project.

Integral gave a familiar speech and tried to entice the commissioners as well as the public stating how many \$\$\$ they would throw down to obtain approval. They had lengthened their video presentation that is quite impressive. Their full color animated fly over scene showing their village core surrounded by thousands of acres of farmland without a house in sight has no relation to NRFs actual plan. That is marketing without having integrity.

Public comments went on for almost two hours, however, it seemed like twice that amount of time. There may have been an equal amount of speakers for and against. We know or have seen all the people who spoke against NRFs, but I don't recognize hardly anyone who Integral brought.

The need for a General Plan Update and our SMHs AgriVision specific plan were the main positive topics. Many speakers addressed AgriVision. It is only logical that we have an updated blueprint for the entire 3500 acres, Staff makes this clear in their report. The City Staff must work together on this plan and then open it to public input. It would be absurd to allow one developer to come in and change our General Plan so radically without a cohesive plan for the entire SMHs.

When the public comment period was over discussion and questions came from the Commissioners. Commissioner Curtis Busk had read the letter submitted by SMHs Phil Johnston who also made a public comment about homes being built on the San Luis Rey River Floodplain. Ninia introduced Integral's Hydrology Consultant to answer the questions. The Consultant spent a good deal of time stating all of his accolades and degrees and licenses in California, Oregon and Washington state. He also proudly stated that he was one of only three consultants who was accepted to make map changes to rivers and their 100 year floodplains. He stated that the 100 year floodplain only touches the very southern tip of the NRFs project that is only planned for agriculture.

All the maps that we have seen show that the 100 year floodplain extends east of the river almost up to North River Road. Commissioner Busk said that the map was changed in 2017 and he could not find why or how this change came to be. The Consultant answered, "I made that change." This was the "Ahaa"

Late Comment Letters for North River Farms Environmental Impact Report

moment...There was an outburst from the room. Integral's consultant stepped down from the podium.

I stated at the end of my speech, "I bow to our intelligent City Staff and their independent consultants for interpretations considering the problems verses benefits offered by Integral's project. Staff, from day one, has never found reason to approve any of Integral's proposal. Integral continues to pay consultants to try and justify their original plan. The question is, who is working for the betterment of the City of Oceanside... Our City Staff, or Integral's marketing push to entitle their North River Farms project?" "Trust our City Staff and Deny the NRFs Project."

Commissioner Tom Rosales asked the Director of Development Services, Jonathon Borrego, questions about the General Plan and the SMHs AgriVision Specific Plan. Jonathon spoke for several minutes. The outcome was Tom Rosales made a motion, second by Commissioner Tom Morrissey, to include a direction to City Council to add to the Planning Resolution that Council will direct and fund Staff to get busy on the General Plan Amendment and especially on SMHs Specific Plan.

The Commission voted unanimously to recommend City Council denial of Integral's NRFs project.

Thanks to everyone who gave us input along the way, wrote letters, came to the meeting and those who gave public comments. Your efforts are invaluable.

The NRFs project is tentatively scheduled to come before the City Council on Wednesday May 22, 2019.

We will be asking you all for more help and more letters we need them more than ever, thank you.

Late Comment Letters for North River Farms Environmental Impact Report

L217 SATCHER

Comment Letter L217

From: Carol Satcher <carol_satcher@gmail.com>
Date: May 9, 2019 at 6:16:32 PM PDT
To: council@oceansideca.org
Subject: Just say NO to NRF

Warning: External Source

Please do not approve this project.
It will cause terrible traffic congestion in case of fire evacuations.

We, the voters of Oceanside will thank you.

Warmest regards,
Carol Satcher

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L218 EVANS

Comment Letter L218

From: Steven Evans <sevans56@icloud.com>
Date: May 9, 2019 at 8:16:52 PM PDT
To: council@coastalca.org
Subject: No to nrf

Warning: External Source

No to nrf

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L219 BURTON

Comment Letter L219

From: "M.Mas-Burton & R.Burton" <catalana@sbglobal.net>
Date: May 12, 2019 at 4:40:32 PM PDT
To: "Council@oceasidesea.org" <Council@oceasidesea.org>
Subject: NORTH RIVER FARMS PLAN

Warning: External Source

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to the

current agriculture and agri-tourism as it exists today. The current zoning should remain, as has again been advised UNANIMOUSLY by the City Planning Commission. DO NOT IGNORE YOUR PLANNING COMMISSION!

The denial of the Integral Communities North River Farms housing development project is not a case of NIMBY none-sense.

It is a matter of keeping north Oceanside as it has been, a haven for such as Councilman Christopher Rodriguez and his family to live a more natural life in a farm like setting and contribute to the general good of the community at the same time.

Now that a couple of the larger farm landowners want to get out, well fine, but do not allow anyone to build a mass development.

Find a developer who wants to develop and sell 5 acre plus "gentlemans farm" and equestrian properties.

There are many such examples in the state of California, why not in Oceanside, huh?

Late Comment Letters for North River Farms Environmental Impact Report

Have some class folks, don't miss this chance to improve our city by developing something special.....NOT ANOTHER ANT HILL!

Thanks for reading,

Richard Burton
Oceanside resident, taxpayer and registered voter

Late Comment Letters for North River Farms Environmental Impact Report

L220 COLE

Comment Letter L220

From: Diana Cole <csnosnake@hotmail.com>
Date: May 12, 2019 at 11:07:00 PM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: Say NO 🚫 on

Warning: External Source

North River Farms will have irreversible, long-term and cumulative impacts on our environment, our safety, and long-term jobs related to agriculture and agritourism.

Thank you
Mike and Diana Cole
Arrowood Community

Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L221 THURMAN

Comment Letter L221

From: Patrick Thurman <patrickthurman53@gmail.com>
Date: May 12, 2019 at 9:07:06 PM PDT
To: Council@coconosideca.org
Subject: Vote NO

Warning: External Source

Vote NO on North River Farms.

--
Regards,
Patrick

Patrickthurman53@gmail.com
760-707-4620

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L222 HANSON

Comment Letter L222

From: Diane Hanson <ddshanson7@gmail.com>
Date: May 13, 2019 at 8:11:15 AM PDT
To: council@ci.oceanside.ca.us, Peter Weiss <pweiss@ci.oceanside.ca.us>
Subject: North River Farms

Warning: External Source

Please do not approve this project. For months now citizens have protested this... and for those reasons, which you know and I need not repeat. PLEASE DO NOT APPROVE THIS PROJECT.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L223 EARLEY

Comment Letter L223

Las Palmas Ranch
Bill Earley
May 13, 2019

6508 Morro Heights Road
Oceanside, CA 92057

Office 1-760-726-7488
Cell 1-760-445-4990

Dear City Planning

I'm a property owner in South Morro Hills. I strongly oppose the NRF Project in Oceanside. I purchased my property in this area because of the 2.50 zoning. I grew up in Southern California and have seen development just take over everywhere I lived. I would rather see development go in another direction in South Morro Hills to 10 acres rather than the 2.50 acres. I've heard the argument that people can longer farm due to regulations. People should have the right to develop their property. All I can say is they should have never bought property in an area zoned 2.50 acres. I also heard the argument that they should have the right to optimize the profit they will make from developing their property. For what most of these people bought their property for even if the zoning went to 10 acres they would still make a fortune. Of course not the amount they would make if the property was given a new zoning and could put the amount of housing that NRF Project is proposing. The situation for the investors in the NRF project should not be the any part of mitigating factors or concerns in the decision to approve this project. That's the thing about investments and speculation. Sometimes the profit margin doesn't meet expectations.

It's hard to believe that it would be allowed that this project be built in a flood zone. Also the major problem with traffic already exist. It already takes 3 lights in the afternoon to take College to Hwy 76 and the same with North River Road to Hwy 76. The NRF Project should have to propose major fixes to existing problems if this project is allowed to move forward. Problems with sewage, problem with traffic, problems with lowering property value and problems with people in the area already doing agriculture. If these costs are passed on to the City of Oceanside, just think what the real cost will be. I will just list a few. Widening North River Road, putting in lights on North River Road at Wilshire and also Sleeping Indian, where a problem already exist in the afternoon when Camp Pendleton lets out. The problem with sewage and also the liability for all of us when so much infra-structure if left up to the City.

The County spent a fortune on a master plan and that should be the benchmark. The NRF project completely deviates from that plan with promises of this and that and the other thing over here. The enormous number of environmental issues i.e. traffic, flood plain, North River Road literally being a two lane country road, and the devastation of the agriculture economy that would result from this project demand that it be rejected completely. How does the NRF project plan to compensate someone like me that bought his property not to have to deal with so much congestion. I choose a lifestyle in an area that allowed much open space. Morro Hills is an area that I hope can be left as a reminder of what Southern California was all about. Thank you for your time.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L224 GILMAN

Comment Letter L224

From: Mary Gilman <bolddgilman@gmail.com>
Date: May 13, 2019 at 9:13:27 PM PDT
To: council@oceansideca.org
Subject: Please Say No to NRF project. Save our farmlands and open spaces from this development and high density sprawl.

Warning: External Source

Mary Gilman

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L225 FRIENDS OF LOMA ALTA CREEK

Comment Letter L225

From: Rachel Michelle <rachelmfernandes@gmail.com>
Date: May 14, 2019 at 1:31:54 PM PDT
To: council@oceansideca.org
Subject: NO to the North River Farms Project

Warning: External Source

To the Oceanside City Council,

I strongly support the staff's DENIAL of the North River Farms project. I strongly OPPOSE this project and do not think it is by any means even a remotely reasonable solution to the housing crisis. Please preserve this land for agriculture. We do not need more costly housing or traffic or pollution or crowding of our schools. We DO need more coastal farms and locally produced food as well as open spaces.

Thanks,
Rachel (Oceanside resident and voter)
1306 Missouri Ave,
Oceanside, 92054

Rachel Michelle Fernandes
Writer, Producer, Mental Health Advocate
cell: 619.788.0271
<https://strawhutmedia.com/shows/psychicrehab/>
<http://rachelmichellefernandes.tumblr.com/>
<http://sdcitybeat.com/topics/rachel-michelle-fernandes/>

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L226 FRIENDS OF LOMA ALTA CREEK

Comment Letter L226



550 Hoover St.
Oceanside CA 92054
naia550@abcglobal.net
760-803-6813

Dear Sir, re: Hearing, City of Oceanside, May, 22, 2019, 5pm

We are a local group that has worked in the Oceanside area for over 10 years. We advocate for balanced development, in the right places, and ones that don't overly burden and harm the environment.

We would like to respectfully weigh in on the proposed North River Farms. We understand you are considering a permit for them to fill the waterway/floodway/floodplain and elevate it by quite a bit with thousands of yards of fill.

We would like you to be aware that this project has not been approved, with staff consistently recommending denial along with three hearing denials by the Planning Commission. This item goes to the City Council on the 22nd as referenced above. Staff has found this dense housing project to be incompatible with the general plan and also removes valuable, prime agricultural land from the city's inventory. Further it is not on Smart Growth corridor. There is also information in the file about the Hemlock inundation situation that you may wish to be aware of.

We are opposed to this project for many reasons, several of which have to do with the highly unique San Luis Rey waterway and potential for environmental harm.

We have observed how filling in floodplains and floodways creates huge problems. This is particularly noticeable on Loma Alta Creek area, where North County Transit District was allowed to lift the railway and divide the floodplain. Additionally, many heavy industrial businesses have filled the floodplain/way at the southern edges of their properties, most recently Waste Management.

Flooding in that area has been documented as recently as this year during our heavy rains. We observed a complete breach of the fill boundary with the creek actually flowing into the Waste Management property and almost reaching Industry Street. Trash trucks and other equipment containing contaminants like brake dust, hydraulic fluid and so forth were covered with at least 6-8 inches of creek flow. In further Easterly locations, Industry St. itself was flooded.

This flooding carries all types of contaminants, which would include pesticides if the project's planned farm is located in that area, into the creek and down to Buccaneer Beach. Such contaminants and flooding would also affect the endangered and sensitive species present throughout in the San Luis Rey River ecosystem.

1

Friends of Loma Alta Creek, May 15, 2019 re: North River Farms

Late Comment Letters for North River Farms Environmental Impact Report

We understand NRF proposes to fill a substantial portion of the San Luis Rey River Floodplain and part of the floodway. All of the same issues we mention above are highly likely to occur. We simply don't understand why the Army Corp would contemplate granting a permit for this area with these types of consequences.

In addition to pollutants and increased water flows that could likely lead to downstream flooding and damage to the coastline at the mouth of the River, such pollution would make this section of public beach unusable and unsafe. As you may know, Oceanside and Army Corps spend quite a bit of money replenishing the sand on Oceanside Beaches.

Anything that can cause an increase in flooding potential and affect sand deposition is a poor idea with a plethora of foreseen and unforeseen consequences.

No permit should be issued now or in the future.

Thank you for considering our comments.

Sincerely,



Attorney at Law, co-founder Friends of Loma Alta Creek

Friends of Loma Alta Creek, May 15, 2019 re: North River Farms

2

Late Comment Letters for North River Farms Environmental Impact Report

L227 MONTEROS

Comment Letter L227

From: Rosalind Monteros <Rosalind.monteros@gmail.com>
Sent: Friday, May 17, 2019 11:55 AM
To: City Council
Subject: A message from Rosalind

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you,

Rosalind Monteros

Rosalind.monteros@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L228 HERNANDEZ

Comment Letter L228

From: Steve Hernandez <stahandez12@gmail.com>
Sent: Friday, May 17, 2019 12:36 PM
To: City Council
Subject: A message from Steve

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you,

Steve Hernandez

stahandez12@gmail.com

92104

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L229 DE ARMAS

Comment Letter L229

From: angelade armas <newbackspace@hotmail.com>
Date: May 19, 2019 at 1:44:13 AM PDT
To: Council@ci.nccgsi.de.ca.us
Subject: A message from angela
Reply-To: newbackspace@hotmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

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Thank you,

angela de armas

newbackspace@hotmail.com

92563

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L230 AFALAVA, DEANNE

Comment Letter L230

From: Deanne Afalava <deanne.afalava@gmail.com>
Date: May 17, 2019 at 4:15:34 PM PDT
To: Council@ci.eccanside.ca.us
Subject: A message from Deanne
Reply-To: deanne.afalava@gmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

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Thank you.

Deanne Afalava

deanne.afalava@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L231 AFALAVA, DEE

Comment Letter L231

From: Dee Afalava <hidcjtunderabushelno@gmail.com>
Date: May 17, 2019 at 4:19:57 PM PDT
To: Council@ci.occountside.ca.us
Subject: A message from Dee
Reply-To: hidcjtunderabushelno@gmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you.

Dee Afalava

hidcjtunderabushelno@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L232 MURPHY

Comment Letter L232

From: LynnMurphy <murphyncal@cox.net>
Date: May 18, 2019 at 3:31:29 PM PDT
To: Council@ci.occountside.ca.us
Subject: A message from Lynn
Reply-To: murphyncal09@cox.net

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you,

Lynn Murphy

murphyncal@cox.net

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L233 AFALAVA

Comment Letter L233

From: Robert Afalava <afalava@sf@gmail.com>
Date: May 17, 2019 at 4:18:09 PM PDT
To: Council@ci.oceanside.ca.us
Subject: A message from Robert
Reply-To: afalava@sf@gmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you,

Robert Afalava

afalava@sf@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L234 RICHARDSON

Comment Letter L234

From: RobinRichardson <0303robin@gmail.com>
Date: May 20, 2019 at 9:37:40 AM PDT
To: Council@ci.occountside.ca.us
Subject: A message from Robin
Reply-To: 0303robin@gmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you.

Robin Richardson

0303robin@gmail.com

92074

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L235 AFALAVA

Comment Letter L235

From: Saige Afalava <mafusfaak@gmail.com>
Date: May 17, 2019 at 4:19:04 PM PDT
To: Council@ci.occountside.ca.us
Subject: A message from Saige
Reply-To: mafusfaak@gmail.com

Warning: External Source



Dear Mayor Weiss and City Council,

I have taken the time today to send you this letter of support for North River Farms. North River Farms is an exciting idea and it is a place that I would like to live, or shop, or recreate, or stay.

Please consider my support in your review of the North River Farms project.

It is a place that offers a destination for visitors to shop and play, and for families to gather. Please join me in support of North River Farms.

Thank you,

Saige Afalava

mafusfaak@gmail.com

92056

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L236 GLEASON

Comment Letter L236

From: Gigi Gleason <gigica@cox.net>
Date: May 20, 2019 at 12:31:55 AM PDT
To: <Council@oceasidaca.org>
Subject: North River Farms Proposal

Warning: External Source

*Dear Mayor Weiss and Members of the City Council,
As a longtime resident and volunteer in the City of Oceanside I am writing to express my support of North River Farms. I have seen first-hand how this city has evolved throughout the years and the time for a project like this is now. North River Farms will provide ample opportunities for our young children and families, living less fortunately in the surrounding communities, to have access to fresh produce, educational programs, and space for them to gather (for free!). This project preserves over 1/3 of the acreage in what is currently zoned for million dollar estate homes. Please invest in our future and support North River Farms. Thank you.*

Sincerely,

Gigi Gleason
500 N. The Strand #46
Oceanside, CA 92054-1991

gigica@cox.net

gigi@saibulletculters.com



<http://www.craftingcurmbs.blogspot.com>



Virus-free - www.avast.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L237 HALLSTROM

Comment Letter L237

From: Luawanna Hallstrom <luawanna.hallstrom@yahoo.com>
Date: May 20, 2019 at 10:21:23 AM PDT
To: "council@ci.oceanside.ca.us" <council@ci.oceanside.ca.us>
Subject: May 22 City Council Meeting regarding Agricultural Issues and North River Farms

Warning: External Source

May 20th, 2019

Honorable Mayor Peter Weiss

Councilmember Jack Feller

Councilmember Ryan Keim

Councilmember Christopher Rodriguez

Councilmember Esther C Sanchez

Dear Oceanside City Council,

I appreciate the opportunity to advocate for a strong agricultural future on behalf of local and California farmers and landowners. I grew up in Oceanside agriculture, attended Cal Poly School of Agriculture, served on the California Board of Food & Ag, co-chaired the California Ag Vision and have represented agriculture as a national leader in many capacities over the past 30 years.

Late Comment Letters for North River Farms Environmental Impact Report

Agriculture continues to evolve and has always required vision and flexibility within the industry in order to remain economically viable and sustainable. This also includes support from local community and appreciation for its changing landscape.

The Challenges are many and not limited to water, labor, climate, trade, regulation, market competition as well as the challenges of land ownership. Oceanside is home to a variety of long time family farming operations as well as younger agricultural pursuits both large and small.

Faced with the challenges of redefining what shape future business models may look like, it is imperative that Oceanside not adopt land restrictions which only serve to limit and restrict. If we take a look around the country we see that there is a growing concern and interest in agriculture and the part it plays in our lives everyday. While we can't all be involved in agriculture everyday - or perhaps with any regularity - we can enjoy the opportunity to appreciate it in many ways. Today over 200 agrihoods have developed across the country encouraging the creation of farming enterprise and providing much needed access and economic partnership opportunities.

Agrihoods are reconnecting the disconnect to our agricultural roots providing opportunity for those that may otherwise not have it, sharing the importance agriculture plays in society and our daily lives. North River Farms strives to create a viable solution with its inspiring 'farm hub community' bringing area residents and visitors together through agriculture themed programs, education, local commerce and community outreach - also highlighting the importance agriculture has played in this region. Agrihoods can provide access to agriculture in a way that is accessible, useable, tangible and visible.

Please support the future of our agriculturalists by remaining open minded and supporting their ability to change and remain relevant.

Sincerely,

Luawanna Hallstrom, Agricultural and Farm Advocate

Late Comment Letters for North River Farms Environmental Impact Report

L238 HOWE

Comment Letter L238

From: bruce howe <zamaque42@yahoo.com>
Date: May 16, 2019 at 10:52:01 AM PDT
To: "council@ci.oceanside.ca.us" <council@ci.oceanside.ca.us>
Subject: Fw: NORTH RIVER FARMS
Reply-To: bruce howe <zamaque42@yahoo.com>

Warning: External Source

NORTH RIVER FARMS/INTEGRAL DEVELOPMENT/ MANCHESTER is a powerful and extremely wealthy entity. Their hired consultants have outspent your City Staff many times over. This is understandable given the huge profit this project would generate. Your staff has done an excellent job.

I ask the City Council to listen to the people of Oceanside
General Population
Planning Commission
So Morro Hills Assoc
Various HOAs in the area
Agritourism Strategic Plan
Visit Oceanside

and to the City Staff
Planning Division
Public Safety Officials
Traffic Engineer

The 3500 acres in South Morro Hills is a unique and beautiful asset unique to Oceanside. Once the General Plan and Zoning is amended there is no turning back. These changes are being driven in a Rushed Fashion by a Huge Developer without

Late Comment Letters for North River Farms Environmental Impact Report

adequate research and investigation. The changes are inconsistent with current General Plan policies. A comprehensive Land Use Study should be done and the long term Vision Plan completed by the So Morro Hills Assoc.

I urge the City Council to proceed with Recycled Water projects, TIER 1 AGRITOURISM ACTIVITIES, and other projects to enhance and preserve this beautiful area.

That will be a stronger legacy than being known as the Council who commenced turning this beautiful area into a densely populated area with inadequate Public Safety, Traffic Congestion, and a drain on the resources and finances for all of the residents of Oceanside.

Respectfully,

William Howe
686 Sleeping Indian Road

Late Comment Letters for North River Farms Environmental Impact Report

L239 HOWE

Comment Letter L239

From: bruce howe <zumaque42@yahoo.com>
Date: May 16, 2019 at 11:08:48 AM PDT
To: "council@ci.oceanside.ca.us" <council@ci.oceanside.ca.us>
Subject: NORTH RIVER FARMS GENERAL PLAN DEVELOPMENT
Reply-To: bruce howe <zumaque42@yahoo.com>

Warning: External Source

If this project is approved, the City of Oceanside will be allowing Integral Development to take over the City's General Plan. You may as well disband the Planning Commission and terminate everyone in the Planning Department. This savings can go to help subsidize what this development is going to cost the taxpayers in the City of Oceanside.
Respectfully,
William Howe
686 Sleeping Indian Road

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L240 KNOSP

Comment Letter L240

From: knosps@aol.com
Date: May 16, 2019 at 3:12:37 PM PDT
To: Council@oceasidaca.org
Subject: North River Farms Project

Warning: External Source

Now that the Planning Commission, after three reviews, has unanimously rejected the North River Farms project, it is up to the City Council members to recognize that this project is not in the best interests of the city and especially Council District 4. The traffic congestion, pollution, safety and environmental issues outweigh any benefits from adding another 650 homes to the area.

To me, the builder started with a poor plan and then tried to sweeten the deal by offering additional bond aid fixes, such as, reducing the number of houses, widening the San Luis Rey Bridge, and fixing the Vandergriff/North River Road intersection, to win approval. The Planning Commission still recognized that even with these fixes, the plan was not a sound idea for the city.

I hope is that, at the May 22nd meeting, you will heed the Planning Commission recommendation and vote NO on this project.

Sincerely,
Glenn Knosp
1308 Bellingham Drive
Oceanside CA

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L241 CARBONE

Comment Letter L241

From: Kathi Carbone <kathicarbone@gmail.com>
Date: May 16, 2019 at 12:58:41 AM PDT
To: council@oceansideca.org
Subject: North River Farms NO

Warning: External Source

City Councilmembers;

I support Staff's DENIAL of the North River Farms project.

Thank you,
Kathryn Carbone

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L242 CONSER

Comment Letter L242

From: Katy Conser <katy.conser@gmail.com>
Date: May 16, 2019 at 7:42:38 PM PDT
To: "council@oceansideca.org" <council@oceansideca.org>
Subject: NO to North River Farms

Warning: External Source

Hello Council members! Please vote AGAINST the North River Farms development project. It is not a farm, it's not smart growth, and it's not right for Oceanside. As a resident of Rancho del Oro, I ask you to consider this request to oppose. Thank you!
Katy Conser
[858-699-9935](tel:858-699-9935)

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L243 BALMA

Comment Letter L243

Robert Dmohowski

From: louise ravera <louisebalma@sbcglobal.net>
Sent: Thursday, May 16, 2019 1:16 PM
To: Robert Dmohowski
Cc: Jeff Hunt
Subject: Fri May 22, what road to take
Attachments: AgriVision Timeline.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hi Rob;
I sent this to each of the CC but wanted to forward it to you. I put together a matrix on the steps we took along the way with work on a Oceanside AgriVision for South Morro Hills. I sure hope on May 22 we can get back on that road again and work towards the SMH Strategic Plan.
We've all spent far too much time, work and money fighting something instead of building a future.
Cheers
Louise

Louise Ravera Balma
Architect/Artist/Agriculturalist

website trackerhistory.com
cell# (760) 505-4421
home# (760) 945-5454

----- Forwarded Message -----

From: louise ravera
To: Peter Weiss
Sent: Thursday, May 16, 2019, 12:37:24 PM PDT
Subject: May 22, what road to take

Dear Peter;

I sure hope May 22 sets us back on the road South Morro Hills was on before the proposed NRF's was placed in front of us. Then we can start looking ahead to the best and fastest way to complete the Oceanside AgriVision Strategic Plan. I put together a matrix of our progress from the beginning that I know of, mainly for Jack, who made public comments that we began our Vision Plan after Integral's NRF's was submitted, which was sad to hear knowing he was involved along the way with us. The following is the letter and matrix I'm sending to all of the CC. Thanks Peter for listening and understanding just how important this next step will be. I also am not going to respond to Integral's comments on my letter back to Christopher regarding what it would take for my support of NRF's. It was obvious from their response that it would just dig the ditch deeper.

August 18, 2016 was the day that changed our direction in South Morro Hills; it was the day that Integral submitted their proposal for North River Farms. Before this South Morro Hills Association and the large landowners had begun the process of figuring out a vision for the future of agriculture and the area. We all realized that the business of farming was

Late Comment Letters for North River Farms Environmental Impact Report

changing and if we wanted to keep the rural character of SMH and the farmers then we needed to work together and look for other opportunities in order to maintain Oceanside's Agricultural Region. This process began prior to 2009 and has continued to present day. I've attached a matrix of what has gone into the visioning process and the plan we now call Oceanside AgriVision. Some people have said that our visioning process only started when Integral submitted their NRF proposal. I hope this attached matrix sheds light on the work we've put into a plan for the future of Oceanside.

A common thread we've heard from Planning Commissioners, Staff Reports, City Council public hearings, the community, the neighbors and most importantly the farmers/landowners is that we need a Specific plan for South Morro Hills. Without a plan then the future of South Morro Hills will be left to the first project, which is entitled. The first developer asking for zoning changes is North River Farms. Is this the future you see for South Morro Hills? Sprawling subdivisions of housing with little to no farming or agritourism opportunities. The past 10 years of work, time and money that South Morro Hills neighbors, farmers, landowners, Visit Oceanside, the City of Oceanside and the community have put into our vision could be thrown away.

Integral has probably obtained some sort of option on the Bree property. They have probably not included the parcel in their NRF's project. If the NRF's project is entitled Integral next proposal will undoubtedly be to file a PD proposal on the Bree parcel 35 plus acres. This will be a classic example of cumulative effect. Integral told us that Oceanside's Planning staff are ignorant and have no vision. What do they think of our City Council? I ask you to take a breath, step back and see just how important your decision will be. How it will affect a way of life we've enjoyed for many years and more importantly how it will change the future for Oceanside. We need a small amount of time, the same amount of time Integral has spent dividing our city. Trust our intelligent city staff's recommendation and deny NRF's Project. Everything that's important takes time, and this is extremely important.

Thanks for your work in making Oceanside all it can be.
Sincerely and with much respect
Louise

Louise Ravera Balma
Architect/Artist/Agriculturalist

website trackerhistory.com
cell# (760) 505-4421
home# (760) 945-5454

Late Comment Letters for North River Farms Environmental Impact Report

Oceanside AgriVision Timeline				
<small>Previous names: South Mono Hills Specific Plan, South Mono Hills Vision Plan, Agritourism Strategic Plan</small>				
Date	Item	Members	Prepared by	Comments
2009 to 2013				
March 25, 2009	South Mono Hills (SMH) Specific Plan, presented	Large Commercial Farmers	Lighthoot	After months of work, the commercial farmers presented their findings with sewer and water, traffic and circulation, habitat subarea plan, other services that maybe required, land use and density. The plan was tabled for various reasons.
2009 through to present day	South Mono Hills Association (SMHA) Neighborhood Character and Vision committee formed.	SMHA board and neighbors	Karen Green	Set up to address the issues of the commercial farmers while trying to work together to preserve SMH rural character. The committee presented its progress and results of meetings and ideas at monthly SMHA board meetings. Neighborhood corners were formed to share with the neighborhood agriculture, issues and ideas in SMH.
2013 to 2014				
July 2013 to 2014	SMHA formed SMH Vision Plan and Agritourism Strategic Plan	SMHA & Barma, Murray, Mellano, Nagata		Began work on a Vision Plan for SMH taking from where the Commercial Farmers left off back in 2009. The goal to preserve the rural character of SMH while providing more benefits for our commercial farmers, neighbors and landowners. Meetings were held throughout the year, meeting with city, neighbors, and businesses in Oceanside. Educating and spreading the idea of Agritourism in Oceanside. Researching other Agritourism opportunities throughout the USA. Working toward developing a plan for the entire 2500 acres.
September 2013	City Planning Department with city council approval	City Planning Department		Developed a framework for series of General Plan Amendment proposals. Eight screening criteria have been established that any future proposals must follow. City Council approved and this was adopted into the cities zoning code.

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July 2014	South Mono Hills Agricultural Region, OceanSide	SMHA board		Installation of South Mono Hills Signs branding all entrances into OceanSide's Agricultural Region to identify the area clearly, that we are not Fallbrook or Bonsall we are OceanSide.
2015				
General	SMHA Vision Plan and Agritourism Strategic Plan	SMHA, Balma, Murray, Mellano, Nagato		Continuing meetings were held throughout the year, meeting with city, neighbors, and businesses in OceanSide. Educating and spreading the idea of Agritourism in OceanSide. Researching other Agritourism opportunities throughout the USA.
April	Agritourism Stakeholders Committee formed	City, Visit OceanSide, Balma, Murray, Mellano, Nagato, Local restaurants & businesses	Bohan	Work begins on Agritourism in SMH and to develop a plan for the area. Meetings throughout the year
June	San Diego County Farm Tour Day	SD County Farm Bureau, Balma, Gilligan, Peterson		Showcasing SMH farms. Farm Bureau's Friends of Farming organization to bring more public awareness to OceanSide's agricultural region
2016				
General Through out year	SMH Vision Plan and Agritourism Strategic plan	SMHA, Vision Committee		Meetings through out the year with city staff, neighbors, city council. Continuous listening and learning more about what the community wants, what the city needs, and what the landowners need. Pushing back on North River Farms once we heard of their submittal in August that their plan would not complement the work we have done. Meetings with Integral.
March	Coffee in California and OceanSide Coffee Lecture	Jay Ruskey		Presented California coffee concept and meet with other coffee grower in SMH, Fallbrook and Temecula. The goal is to establish California coffee and have it recognized in the coffee business. Mraz and Rodriguez both planted coffee in SMH. New crop for SMH helping with Agritourism.

Late Comment Letters for North River Farms Environmental Impact Report

April	City of Oceanside Agritourism Strategic Plan	Lorson, Bohlen, Gault, Balma, Murray, Mallaro, Nagata	SMG consulting	To develop a stakeholder based agritourism strategic plan that can inform the public in creating an agritourism area in the city. Goal is to form a plan for the city. Visit Oceanside, the community, the neighbors but most importantly the farmers/landowners. We all saw the need to keep the farmer profitable, because without a farmer you have no Agritourism or agricultural farming.
May	SMH Vision	Balma, Mallaro, Murray, Nagata, Blue heron, Green, Mraz, Padden, Rodriguez	Balma	Land use and Vision elements listed in a matrix to be able to better communicate what ideas, uses, densities, development uses, circulation elements etc. we would considered while we developed our Vision plan for SMH.
	City council Public hearing	Economic Development depart City, Visit Oceanside, SMH Stakeholders		Requested by Staff to ask for the \$100,000 Agritourism set Aside funding from 2015/16 budget be included in the 2016/17 budget. Approved
June	Mercato	SMHA		Formed to strengthen the awareness of farming in SMH and add more elements of Agritourism. The goal is to increase farm profits for farmers and keep the rural character in SMH
July	Agritourism Strategic Plan Presented to council	City of Oceanside, Economic Development department	SMG Consulting Carl Roboto	Developed Tier One and Tier Two opportunities. \$20,000 was spent on SMG to complete the initial study on Agritourism
July 28	Agritourism Strategic Plan	City, Visit Oceanside and SMH Stakeholders		Establishing our goals and plans \$100,000 set aside for agritourism, part of the money to be spent on Workshops and on the report from SMG
August 17	City Council workshop	City Council		Received the Agritourism Strategic Plan and authorized implementation of Tier One recommendations
August 18	Application for NRP	Integral	Integral	Submitted to City General Plan Amendment, Zone Amendment, Tentative map and Development Plan to allow 680 to 965 DU's

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Late Comment Letters for North River Farms Environmental Impact Report

Sept. 22	SMHA and Integral meeting	Integral and SMHA board & neighbors		Integral meets with SMHA to ask what we would like to see in their project. Gave us post its and asked us to tell them what we wanted. Our main comment was the density was to high, their response as it beat the entire time is density is not up for discussion. SMHA shared with Integral our Vision Plans elements we had worked on from the beginning.
September	Agritourism Strategic plan & marketing Plan	Visit Oceanside		
October	EIDE, ECAE and CAP Begins	Ross Cunningham		Agricultural land is taken into consideration in these plans
November 2	Agritourism Planning	Penny Leff, Goul, Balina, Murray, Lessor, Cunningham, Bohlen		Study possibilities for Agritourism in SMH, workshops, Mass
Nov	Oceanside Water Department	City, SMH farmers, SDC Farm Bureau, California Avocado Commission		Water rates and recycled water discussed to help farmers farm
December	Cocle Feast begins meetings	Green Oceanside, Visit Oceanside, SMH Stakeholders		
Dec,	First Annual Holiday Markets	Beach House Winery		

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2017				
General	SMH Vision Plan and Agritourism Strategic Plan	SMHA Vision Committee		General meetings throughout the year, with City Staff, City Council, Visit Oceanside, neighbors, community leaders, farmers and landowners. To develop the vision plan. Pushing back on NRF, meeting with Integral and pushing for a SMH Plan list. Educating community on the SOAR option both pros and cons.
Jan. 31	Agritourism Workshop #1	Perry Laff, City, VO, SMH stakeholders		Presentations by City, Beach House, Tamecula, Calkins, Cydops Farms, Tamecula Olive Oil
Jan.	Recycled water	City and stakeholders	City	Continued work on water pricing and the availability to farmers and growers. Water quality, estimated delivery, piping etc.
Feb. 27	NRF Project submitted for input from Planning Commission	Planning Commission		Denial, Commission recommended a need for SMH Vision Plan and recommended resources.
Feb. 28	Agritourism Workshop #2	Perry Laff, UCD, City, VO, SMH Stakeholders		
March 8	NRF Project Submitted to City Council	City Council		No vote was taken to approve, but applicant was asked to further review the project. Reduce density and work with SMHA to develop a Vision Plan.
April	SWA proposal			
April	SMHA Agritourism Community Plan Report			
April	Met with Integral	Hammond, Bama		Toured facilities Ecology center, Rancho Mission Viejo

Late Comment Letters for North River Farms Environmental Impact Report

May 20	Osaka Feast and Mercato	Green Oceanside, Visit Oceanside, SMH Stakeholders		Provide a venue to educate the public on AgriTourism and SMH about the importance of sustaining our agricultural heritage and how it impacts our environment. Farm to Table by local restaurants using locally sourced food, with live music.
2017	City Council Public hearing recycled water	City Council		Approved bringing recycled water to the farmers in SMH
June 15	Workshop #2			How to put together a business plan for an AgriTourism business in SMH
July	Integrate formal submittal of the NRF project	Planning Department	Integral	720 homes, traffic and Biological information
August 12	Mercato	SMHA	Balma	Farmers market in SMH, agri tourism and vision shown. Local crafts, gelato, foods, recycled treasures.
October 15	Economic Development Commission (EDC)	EDC	Deanna Lorson	Agri tourism next steps presented
October	Agri tourism Tier One	Balma City Planning		Getting Tier One into zoning ordinance, and when will NRF's EIR be completed?
November 1	City Council Public hearing	City Council	Deanna Lorson	City council meeting to get approval city staff to move forward on Agri tourism Tier One zoning amendments to the cities zoning regulations. Agri tourism next steps
Dec. 8	Holiday Mercato	Beach House Winery	Murray	Local wine, crafts, foods, and farmers market
2018				
Through out year	SMH Vision Plan and Agri tourism Strategic Plan	SMHA and Vision committee		Many meetings working on both the Vision, setting up social media, pushing back on Integral and educating the public about measure Y pros and cons. Meeting with council, Mainstreet, local restaurants. Visit Oceanside, working with local press to get the word out on the Vision plan. Meeting with City Council and City Staff
May 2018	Elements of Vision Plan refined			

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Late Comment Letters for North River Farms Environmental Impact Report

June 4	KOCT Video Agritourism Premiere	KOCT		Video showcasing agritourism in SD county, public push for a Voice for SMH
June	Vision Plan work plan developed	City, VO, Stakeholders		Press effort, community meetings progress, players, supporters Tier one activities to add into existing zoning
July 31	Agritourism Strategic Plan	City Staff & Planning Department		Presented at Uddy Lake CC, Providing public outreach and information on the zoning amendments on Agritourism Tier One
July	Coastside AgriVision	Mellano, Nagata, Murray, Balma		Established Coastside AgriVision with the three pillars AgriCulture, AgriTourism and AgriVillages. Set up Social Media
August 4 August 8	Market City Council public hearing	SMHA City Council	Balma	Local farmers market, foods, gifts, crafts and recycled treasures Coastside AgriVision presentation to council for direction to approve staff time to be able to work with SMH on developing a matrix of what is needed to implement the AgriVision plan Tier Two
Oct 3	City Council public hearing Agritourism Section	City council		Approved zoning text amendments to introduce agritourism as a permitted use and to facilitate Tier One agritourism activities. First step toward Coastside AgriVoice.
Nov				Measure Y defeated, much work, money and time was devoted to this and not on the progress of Coastside AgriVision
Dec. 1	Holiday Market	Beach House Winery		Local wine, foods, crafts, farmers market
2019				
Through out year	AgriVision Plan	SMHA & AgriVision Committee		Meetings and emails with City Staff, City council, neighbors, landowners and farmers. Pushing back on the NRF project as well as educating and making others aware of the AgriVision Plan
Jan 28	Planning Commission public hearing	Planning Commission		Staff recommended Denial of project and FEIR Denial NRF 3-1, 2 rejected
March	Matrix begins	SMH AgriVision Committee		Complete a matrix of Coastside AgriVoice elements to take the vision to the next step, a Specific Plan for South Morro Hills, and with City council approval begin work to implement this with the City
May 6	Planning Commission public hearing	Planning Commission		Denial, and recommended City council fund the General Plan and Specific Plan for SMH

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Late Comment Letters for North River Farms Environmental Impact Report

May 9	City Council public hearing	City Council		Approved the Economic Development Plan, Energy Climate Action Element Climate Action Plan which depends on South Moma Hills maintaining Agriculture.
May 22	City Council public hearing	City Council		Please follow your staff's recommendation and deny NRF's project 5/16/195/16/19

Late Comment Letters for North River Farms Environmental Impact Report

L244 SCHWARZE, SHANNA

Comment Letter L244

From: Shanna Schwarze <shannaschwarze@gmail.com>
Sent: Thursday, May 16, 2019 11:50 AM
To: City Council
Subject: Just Say NO

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Oceanside City Council,

I have emailed each of you individually but would like to address you as a whole in regards to the North River Farms project.

From an overall standpoint this development violates the current General Plan. The Planning Commission stated that they would like to see an overhaul of the General Plan & not have to approve/deny per project, which they will need to do if this plan goes through.

This is a critical time in the City's future; carefully laid out plans must be made to meet housing and transportation issues. Yes, there is a bus station near the proposal but luxury homeowners will not be taking the bus! It currently takes 30-45 minutes during peak rush times to get from East Oceanside to the 5 or the 15. This will only make that worse!

Furthermore, NRF has spoken of the jobs the development will create. Temporary jobs. The farms already give jobs to hardworking people, many of whom are migrants. Do their fulltime jobs not matter?

The safety impact this will have on that whole area is dangerous and frightening. In 2017 it was horse farms and mobile homes up in flames, with no way to evacuate. What damage will be caused by this massive, sprawling footprint?

Please vote no.

Thank you,
Shanna Schwarze

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L245 LOCKHART

Comment Letter L245

From: Diane Lockhart <dlock760@outlook.com>
Sent: Friday, May 17, 2019 9:38 AM
To: City Council
Subject: North River Farms alternatives

Warning: External Source

I strongly oppose approval of non-affordable homes on farmland. I support in-fill development that provides truly affordable housing without increasing long commutes and damage to the environment. We need to provide housing for the folks already commuting from other counties to their jobs near San Diego, and homeless persons. Public benefit should be served not just PROFIT for developers.

Diane Lockhart
dlock760@outlook.com
(760) 994-7891

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L246 MARSHALL

Comment Letter L246

From: Jane Marshall <jmarshall@bps.net>
Sent: Friday, May 17, 2019 8:14 AM
To: City Council, City Clerk
Subject: North River Farms Project belongs in Infill

Warning: External Source

Good morning Council and staff,

- A project like NRF could be a benefit to Oceanside - but not if its allowed to plunder our limited agricultural, revenue generating resources! Integral is a savvy developer, 9th in the country supposedly, and this is all they can do for us! Taking prime farmland is like taking candy from a baby! Oceanside needs smart, capable, and resourced developers (they spent over \$1.2 Million Dollars to fight SOAR) that HELPS OCEANSIDE grow in a smart, economical way. Why can't they help us with infill projects? We are no longer the "stepchild" of Carlsbad that has to take anything that comes along - let's have a PLAN FIRST!

- It is well known by City staff that projects like this cost our City and Community in support services several hundred thousand dollars each year! Future promises do not outweigh the costs to Oceanside! They promise a bridge widening at the wrong location not supporting evacuations, a hotel and gas station also in the wrong location that is not guaranteed and should never be allowed to be calculated into their return on investment. Do not fall for this bait and switch technique that negatively disrupts our community and puts public safety at flood and fire risk while leaving us taxpayers to pay for services!

- City Staff has thoroughly vetted this project now 3 times and still says DENY.
- Planning Commissioners (your appointees) have unanimously DENIED this project 3 times
- The Community, who has conducted research and polled countless neighborhood voters - all say DENY THIS PROJECT.

- This development is in direct conflict with the State Goals and Community Input- taking us backwards - is that what leaders do? Your recent unanimous adoption of the progressive and community supported Energy and Climate Action Plan and Economic Development Element guides Oceanside leaders and planners to SMART growth concepts to meet State requirements for Green House Gas emissions that utilize current infrastructure.

- Do you really want to be the ones to approve this project that trap Oceanside current and future families when the next fire strikes? The Chamber of Commerce has on its website this mandatory evacuation plan for the 2017 Lilac Fire - why would we allow any development in a know fire and flood zone? NRF feeble attempts to mitigate - a pickup style firetruck with 300 gal of water does nothing to save lives like creating real

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L247 MCDONALD

Comment Letter L247

From: Jason McDonald <jasonmcdonald0804@gmail.com>
Sent: Friday, May 17, 2019 9:56 AM
To: City Council
Subject: North River

Warning: External Source

Please do not allow development in the Morro Hills area. Please vote no on N River Farms.

I believe a 10 year and 50 year plan needs to be started for that area and how it will connect to the Marine base and all the other growth surrounding.

The 76 corridor needs to be drastically improved as a true freeway or Oceanside will have mile-long traffic back ups. We already have half-mile back ups that will get worse from the I-15 over-load. The 76 is the only way to the beach or work from the North.

I believe N River Farms and the long-term plan are directly related. Oceanside is not prepared for any more growth that feeds to the 76.

Late Comment Letters for North River Farms Environmental Impact Report

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L248 KELSEY

Comment Letter L248

From: Linda Kelsey <mlkelsey@me.com>
Sent: Friday, May 17, 2019 7:42 AM
To: City Council
Subject: Stop NRF please!!!

Warning: External Source

Please stop this development. Give the South Morro Hills Agrivision a chance to go forward to preserve and promote Morro Hills agriculture. At a time of global weather uncertainty, NRF's adds just what we cannot sustain: housing density with uncertain water availability, massive increase in pollution and traffic as jobs are elsewhere, fire threat including evacuation traffic impeding emergency vehicles, forever loss of what little local agriculture we have left. Please preserve Morro Hills and give local agriculture a fighting chance to remain a viable business contributor to north county.
Thank you
Linda Kelsey
Resident of Fallbrook

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L249 MCCANN

Comment Letter L249

From: Terry McCann <writing72006@yahoo.com>
Sent: Friday, May 17, 2019 12:08 PM
To: City Council
Subject: North River Farms Project.

Warning: External Source

Dear Sirs,
Greetings from Mons in Belgium: May 17th 2019.
Unfortunately as I'm in Europe at present I cannot attend the Meeting. But I feel very strongly that the North River Farms Project is unsustainable. Why? Well, our home is beside the Marine Base in Arrowood Subdivision. We had to evacuate our home during the last fire outbreak as the fires were within 2 miles of our house. I ran around taking photos of just about everything, in case it burned to the ground and I had to have some evidence of what we had in our home and what it looked like inside for insurance purposes. My husband laughed at me as I took the presents from under the Christmas tree and put them in our car along with our other personal possessions?
One never knows how one will react in similar circumstances. And it gave me a very clear vision of what can happen when our neighbor who waited longer than we did took 2 hours to reach Highway 76 as the roads were so logjammed.
Luckily the fact we had those Farms at the back of us in Morro Hills helped us to avoid a catastrophe! It gave the fire service that break to contain the flames. My husband told me that if they were not there it would have been a very different outcome?
I have driven around all the areas that the developers want to build on and it scares the daylights out of me if a fire should break out there - the infrastructure is just not there to let people flee in their cars should an event like that happen?
The developers have been denied three times - there is a very good reason for this? Anyone who disputes this and allows this project to go ahead will be answerable to the citizens of Oceanside!
Terry McCann, 1117 Breakaway Drive, Oceanside, CA 92057.

Late Comment Letters for North River Farms Environmental Impact Report

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L250 MILLER

Comment Letter L250

From: Bill Tenner <tennerbb@gmail.com>
Date: May 17, 2019 at 7:32:35 PM PDT
To: council@oceansideca.org
Subject: North River Farms project

Warning: External Source

Hello, my name is Andrew Miller and I am a life long Oceanside resident/voter, I am emailing to you to voice my disapproval of North River Farms Project.

I am against the project for the following reasons:

- The NRFP will start the conversion of our last remaining farmland to more dense housing- where it does not belong . We can't eat houses.
- Move us backwards - years have been spent to develop a sustainable future- with a strong economy that includes agriculture.
- Degrades our community with more traffic & people
- I am sick of watching former open space areas & farms turn into houses/ cookie cutter shopping centers all around Oceanside

In closing, I hope you vote against the North River Farms Project.

Andrew Miller
360-672-5703

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L251 EYRE

Comment Letter L251

From: Dana Eyre <danaeyre@yahoo.com>
Sent: Friday, May 17, 2019 2:50 PM
To: City Council
Subject: Opposition to North River Farms

Warning: External Source

Council:

I am writing you on behalf of my wife, my father, and myself, all Oceanside residents (92056, south of 78), and all of whom strongly oppose the North River Farms proposal. We don't need sprawl or pseudo-open space. We need real open space; real, economically viable agriculture; and we need higher density housing closer to transit. NRF is wrong on all counts.

I strongly urge you to condemn this awful idea and end it once and for all.

Sincerely,

Dana P. Eyre,
Marsha Lake
David R. Eyre

Dana Eyre
danaeyre@yahoo.com
760.427.0485

"Nations do not exist for themselves alone, but to promote the welfare and happiness of mankind by benevolent intercourse and example."
Charles Francis Adams 1865
U.S. Ambassador to the United Kingdom, in response to letter from the International Workingman's Association letter congratulating Abraham Lincoln on his re-election

Late Comment Letters for North River Farms Environmental Impact Report

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L252 HAMILTON

Comment Letter L252

From: Dave Hamilton <dhamilton@ntecusa.com>
Sent: Friday, May 17, 2019 3:23 PM
To: City Council
Subject: North River Farms Project

Warning: External Source

Honorable Councilmembers:

I am writing in regards to the hearing you will be having on May 22nd concerning the North River Farms Project.

It is to my understanding that the project planner is resubmitting plans concerning the traffic environmental impact on the Northeast side of our city. I have read their proposal, and find it not in the best interest of the city. This area is already overburdened with traffic and the lane addition on each side may appear to fix the problem but it is a temporary patch. This is not a long term solution for a problem that has plagued our city for the last 20 years that I have been a resident. The surrounding area are heavily affected as there will be no growth in the arterial roads that need to support the ongoing increase in traffic. The problem then will increase additional noise and smog pollution from cars as idle. The supporting intersections are already at a low grade in handling traffic volume.

I believe this project is not in the best interest of the city because of the extra demands of city services that are already in short supply, this project will require more which will not be reimbursed adequately. Should you decide to consider this project, the only truly possible way to help this city with the above problems is to have the developer put through the Melrose Extension bridge from just south of the River by the Mission Vista High School to connect to North River road. This will divert traffic in the area away from an intersection already overburdened. This will also create a safety element in evacuation routes. Also have the developer put in a Fire Station at this corner which would properly serve this part of our city. These changes will cut down noise pollution and smog pollution as it will help with congestion which is the primary source of the two preceding problems listed.

To further this issue, would be the city to complete the traffic element and connect Melrose from Spur Ave in Jeffries Ranch to N. Sante Fe Rd. This would divert traffic on that overburdened intersection of 76 and North Sante Fe Rd to a more eastern part of the city.

Thank you for your time.

Regards,

David Hamilton
1664 DelMar Rd.
Oceanside, CA 92057

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L253 MASTRO, DEBBIE

Comment Letter L253

From: Debbie Mastro <hunnee321@aol.com>
Date: May 18, 2019 at 9:16:33 PM PDT
To: cityclerk@oceanside.ca.us; Council@oceansideca.org
Subject: North River Farms

Warning: External Source

I am opposed to the North River Farms Project. North River Farms is a sprawl project that will result in higher taxes for Oceanside residents and will further distort our jobs/housing ratio. I am not against development but it needs to be in the right place. We should preserve our rural areas and last agricultural farmland. This project is inconsistent with Smart Growth and will increase the risk from wildfires and evacuations, not to mention increasing flood hazards downstream after adding fill to this floodplain area. There is a reason why it has been turned down multiple times. It is not in line with our zoning laws and General Plan. The fact that the developer has to bus in people from other cities to support this project speaks volumes. After weighing the pros and cons I hope you will do the same as our experienced Planning Staff and Commission have done and reject this project.
Please say No to this project.

Thank you for your consideration, time and service to our city,

Debbie Mastro
Proud Oceanside resident and voter

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L254 WHITE

Comment Letter L254

From: J W <janwhite3@yahoo.com>
Date: May 17, 2019 at 3:51:31 PM PDT
To: council@oceasideca.org
Subject: North River Farms

Warning: External Source

Dear Councilmember,

I am very opposed to the above mentioned development. Oceanside does not need this development in our rural areas. There will be more traffic, more pollution and more pressure on city services, even if developers tell you otherwise. Please reject this project and realize that Oceanside can be unique if it protects this special part of our city.

Janet White
Fire Mountain
Sent from my iPhone

Late Comment Letters for North River Farms Environmental Impact Report

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L255 BLACKBURN

Comment Letter L255

From: Jeanette Blackburn <webnet@sbglobal.net>
Sent: Friday, May 17, 2019 2:24 PM
To: City Council
Subject: North River Road Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Please represent me and my neighbors by voting against the zone change on the farms along North River Road. Putting housing in this area is just plain expensive to our city. And it will make traffic even more unbearable here for us already living along North River Road. And what about schools that will be needed for families that buy homes in this proposed development? Our schools are already in terrible shape financially, and hurting for new technology. Please don't make a bad situation worse. Vote against the zone change, please.
Jeanette

"God would not have made me a quilter if He wanted me to cook and clean."

Late Comment Letters for North River Farms Environmental Impact Report

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L256 JOHNSON

Comment Letter L256

From: Joan Johnson <joanjohnson@mac.com>
Date: May 18, 2019 at 12:48:32 PM PDT
To: Council@oceansideca.org
Subject: Fwd: May 22, 2019 North River Farms Project

Warning: External Source

May 19, 2019

To: Oceanside City Mayor, City Council Members, and Robert
Dmohowski, Planner
From: Joan Johnson, 1057 Village Drive , Oceanside, CA 92057

RE: May 22, 2019 Council Agenda Item: NORTH RIVER FARMS
PROJECT

Dear City Council Mayor, City Council Members, and Robert Dmohowski,
Planner:

I am opposed to this project. I support undertaking an update of the
Oceanside General Plan to include residential densities/ land uses suitable for
the South Morro Hills in order to protect the area's prime AG land use and
protect the Oceanside community as a whole from the assorted fire dangers
presented by wildland fires, residential/ commercial/ industrial fuel threats
when near wildland, and the "Blow Torch-like Effect" (CALFIRE term for
the river's severe fire threat during the Lilac Fire) inherent in the fire
mechanics of the San Luis Rey River which lies along its southern border
and through the rest of northern Oceanside all the way to the Pacific Ocean.

Doing the above would allow you to make sure all that could be learned from the
1 million (1,000,000) California Acres burned in 2018 could be used to develop
appropriate land uses, defensible space policies, a Fire Protection Engineering
Plan, etc. into your Updated General Plan to safely protect all of Oceanside's
citizens and property. And there is much to be learned by the studies made of the
Santa Rosa area and all of Paradise's vast residential and commercial areas that
burned to the ground killing scores of people with it. These were non-wildland
fire fuels that were totally destroyed...Nothing left standing, but they exacerbated
the fire's intensity. Why is this important...because Dudek's Conceptual
Wildland Fire Evacuation Plan for the North River Farms Community in the
DEIR only assesses Wildland fire Exposure Rating as LOW to MODERATE
along the fire evacuation routes. It does not learn from what happened in Santa
Rosa and Paradise 2018 fires. This is a major DEIR assessment fault based on the
phony fact that residential and commercial uses along evacuation routes are not
classified as contributing wildland fuels; if they were, as showed in Santa Rosa/

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Late Comment Letters for North River Farms Environmental Impact Report

Paradise 2018 fires, Wildland Fire Exposure ratings would need to be much higher than Dudek's use of :

MODERATE Wildland Fire Exposure Rating for NORTH RIVER ROAD (which just happens to run along the "Blow Torch-Like Effect" San Louis Rey River, choked bank to bank by wildland fuel vegetation);

LOW Wildland Fire Exposure Rating for COLLEGE BOULEVARD (which just happens to cross over the "Blow Torch-Like Effect" San Louis Rey River choked bank to bank by wildland vegetation) and is bordered by many residential and commercial uses that we discovered burn in wildfires like Santa Rosa/Paradise of the NEW NORMAL California, but, according to Dudek, one could find temporary roadside refuge in the Walmart Superstore at RTe.76 providing you could get across College Blvd. bridge at the San Louis Rey River before or after the bridge is fire involved;

and LOW Wildland Fire Exposure Rating for N River Road -Douglas Drive even though it starts out lying in close proximity to the "Blow Torch-like Effect" of the San Louis Rey River and is declared safe further on because residential and commercial uses line the remaining route, contrary to the conflagration shown in the Santa Rosa/Paradise 2018 Fires by these same exact fire fuels, and then crosses the San Louis Rey River which is the "Blow Torch-like Effect" itself.

Seems like there needs to be a new WildLand Fire Exposure Rating System for the Oceanside General Plan: One that includes residential and commercial/industrial uses as fuel for wildland fires...For your proof of that, look no farther than the Santa Rosa and Paradise fires in 2018.

In addition, according to the DEIR their evacuation routes shockingly are only available where fire is not in the immediate area or encroaching the roadways. The sole two fire evacuation routes must cross the vegetation choked "Blow Torch-like Effect" San Louis Rey River, and If one or more roads are not considered safe for evacuation, contingency options were said to be available but were not included (!) in this DEIR section. As an area neighbor who sat in a vehicle for 4 hours on Douglas still needing to cross over the San Louis Rey River to escape during the Lilac Fire mandatory evacuation, I can tell you from frightening experience, it is all too clear that there are no contingency options available. We need to do better as a community. We were saved because a field was plowed and the Santa Ana winds driving the Lilac Fire along the San Luis Rey River bottom came to a blessed and unexpected sudden end.

If the city undertook a new General Plan Update including the South Morro Hills, we could develop a Fire Protection Engineering Plan for Oceanside to protect people, property, and the environment . According to fire protection specialists and scientists part of the Problem is how houses have been built. **TO BUILD IN A WAY THAT REDUCES FIRE DAMAGE, EXPERTS SAY WE SHOULD BUILD HOUSES FARTHER APART***** (AG density of 2.5 acre lots or larger would accomplish that in this project, but prime AG use is much preferable as it's the current goal and a common sensical one), keep vegetation from touching houses, prune dry vegetation, leave a fire break, consider the flammability of housing materials, and screen the venting areas in attics, eaves and walls so burning embers can't blow inside homes, etc.

Late Comment Letters for North River Farms Environmental Impact Report

We have not been smart in the past about putting homes, commerce, and industry in areas prone to wildfire. Wildfires do not need to be so devastating to human life and property. We can minimize the damage through the application of science and the ability for publicly elected officials to just say NO to projects like this one and then go on to develop a LAND USES/ DENSITY/ Protect Prime AG, etc. General Plan Update that is FIRE SMART.

***Albert Simeon, Professor at Worcester Polytechnic Institute, as written by Kristin Hugo in Newsweek article, " Fires in California: how to stop the destruction and create better neighborhoods"

The developers can throw all the last minute money in the world at this project and over represent the total amount of income for the city due to the project's 10 year pipe dream hotel, but 2 very real undeniable facts remain:

1- it still remains a terrible fire safety idea for neighbors and Oceanside at large (too many houses, too close together in the fire endangered foothills side by side to a river bottom that acts like a "Blow Torch- like Effect" for fire through Oceanside to the Pacific Ocean.

2- The project's "10 year hotel reserve" is unenforceable and taxes from that phantom amount must be deducted from the total which makes the deal a financial purple cow for the city in comparison to the project's detrimental effects

Thank you.

Sincerely,
Joan Johnson

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L257 NADINE

Comment Letter L257

From: Nadine <deannie550@sbcglobal.net>
Sent: Friday, May 17, 2019 2:06 PM
To: City Council; City Clerk
Subject: Fire Risk- North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

San Diego County Is Disregarding Fire Risk to an Astonishing Degree

Kindly enter this into the official record of the North River Farms. If Lilac fire had advanced this project would be square in the path. Wind driven ember fires caused the loss of life and thousands of structures in the Camp Fire/Paradise. We don't want that here.

Nadine Scott, Oceanside

California can't solve its housing shortages with homes that are essentially built to burn.

<https://www.osidenews.com/2019/05/17/san-diego-housing-federations-29th-annual-ruby-awards-celebrate-leadership-innovation-and-impact-in-affordable-housing/>

As San Diego County prepares for another wildfire season, California is re-evaluating its approach to fire risk. But have county officials and state leaders drawn the right lessons from last year's tragic conflagrations in Paradise and Malibu?

Fire experts applauded when a new [report](#) from Gov. Gavin Newsom's wildfire strike force rightly noted two key contributors to our state's fire risk: Both climate change and [the construction of more homes in the wildland-urban interface](#) "magnify the wildfire threat and place substantially more people and property at risk than ever before."

A new [University of California study](#) mirrored that report's conclusions, finding that housing and human infrastructure in fire-prone wilderness areas are the main drivers of fire ignitions and structure loss. To reduce this risk, the governor's strike force recommended building homes away from wildfire-prone areas and retrofitting existing homes with fire-reduction features.
<https://d2k78k4kdhbpr.cloudfront.net/media/publications/files/1-c20-S0959378/18313293-main.pdf>

Troublingly, Newsom himself expressed reservations about curbing sprawl development in fire-prone wilderness areas. The governor worried it might violate the "wild and pioneering spirit" of Californians.

Newsom has rightly committed to averting further tragedy from fire, but to do so he must heed his own experts and avoid giving cover to local officials who want to ignore how poorly planned development feeds fire dangers.

Late Comment Letters for North River Farms Environmental Impact Report

In San Diego, the Board of Supervisors has disregarded fire risk to an astonishing degree. Supervisors have recently approved or will soon consider the approval of eight large developments that would collectively build almost [14,000 homes in places naturally prone to fire](#).

These developments, including Newland Sierra and the Otay Ranch Villages, would be located in or near areas where fires have historically burned. State agencies like Cal Fire have identified these areas as posing a very high fire threat to people.

Based on Census Bureau estimates, these eight projects could put about 40,000 new residents at risk, not to mention the risk to firefighters and first responders who will be called on to protect lives and homes when the next fires hit.

County officials aren't alone in approving such risky developments. With the Fanita Ranch project, the city of Santee is considering the construction of about 3,000 homes with almost 9,000 residents within areas designated by Cal Fire as [very high fire hazard zones](#).

Sprawl development has many harmful consequences, from destruction of wildlife habitat to increased air pollution from long commutes. But one of its worst outcomes is heightened fire risk.

The developments in San Diego County would be built in areas dominated by chaparral, sage scrub and grasslands. These native California habitats are adapted to survive fires, but when fires occur too frequently, indigenous plants are replaced by non-native grasses that further increase fire threat.

Putting houses in the heart of fire country doesn't just put people in harm's way. It also increases the risk of fires starting. Studies have found that 97 percent of wildfires in Southern California's Mediterranean landscapes are ignited by human sources like power lines and equipment sparks.

Climate change is ramping up the threat. The state is getting hotter and drier, creating ideal fire conditions, as scientists explained in the federal government's 2018 [National Climate Assessment](#).

None of this should be news to San Diego County officials.

Nearly 1,000 homes have burned every year in Southern California since 2000. The county has seen big fires, including the 2014 Cocos Fire, which burned in and around areas where developers now want to build two of the planned projects — the Valiano development and Harmony Grove Village South.

In their defense, county officials have pointed to fire-mitigation practices built into these projects. But these measures will not be enough to protect the people who move here.

Even the best mitigation can't make a development fire-proof. Homes can add fuel to fires. Even with state-required fire-resistant roofing and vents, property owners must be vigilant by maintaining defensible space and keeping flammable materials a safe distance away from homes.

Despite false claims by the Trump administration, more logging won't stop fires or reduce such threats, and neither will clear-cutting chaparral. Instead, we need better land-use planning that puts community safety first, by recognizing that California ecosystems — including those in San Diego — will continue to experience fires.

Wildfires are natural processes in the state. To protect families, firefighters and native biodiversity, politicians have to stop letting developers build in areas prone to blazes. California can't solve its housing shortages with homes that are essentially built to burn.

Late Comment Letters for North River Farms Environmental Impact Report

Tiffany Yap is a scientist at the Center for Biological Diversity, based in Oakland.

Make Our World Kinder

 Virus-free. www.avast.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L258 WILSON

Comment Letter L258

From: Judi <jjwilson@ccg.net>
Date: May 18, 2019 at 11:05:32 AM PDT
To: <council@oceansideca.org>
Subject: North River Farms project

Warning: External Source

Councilmembers:

On behalf of the many more concerned citizens of Oceanside, I strongly urge you to vote **NO** on the North River Farms project. We all want a healthy, sustainable future for our community. This project violates our city's General Plan, Housing Element, and new plans for Economic Development and Energy and Climate Action. Instead of affordable housing where there is access to jobs and transit, we would get high cost, Mello-Roos housing where it will cause traffic congestion, air pollution and create more greenhouse gasses. **City staff** recommended denial of the project. **The Planning Commission** recommended denial three times. Now it is time for our City Council to do the same.

Thank you,
Ron and Judi Wilson
Oceanside, CA

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L259 PERARO

Comment Letter L259

From: roseflowerstar@aol.com
Sent: Friday, May 17, 2019 2:37 PM
To: City Council
Subject: Attn: Mayor

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mayor, please deny the North River Farms Project, it would hurt our community so much and Oceanside would lose such a precious area, a project of this magnitude would create conflicts between farmers and residents because of inadequate buffers. Still remember the damage to North River Rd when the River experienced a serious flooding. North River Farms would pass their project and leave City of Oceanside with such liability for problems that would surely arise.

Please vote NO on this project.

Rosa Peraro
60r8 De La Rosa Lane
Oceanside, CA

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L260 ZELASKO, SANDY

Comment Letter L260

From: Sandra Zelasko <slzphoto@sbcglobal.net>
Sent: Friday, May 17, 2019 3:32 PM
To: City Council
Subject: North River Farms Project - NO!

Warning: External Source

I oppose the North River Farms Project because it will:

- Start the conversion of our last remaining farmland to more dense housing- where it does not belong .
We can't eat houses.
- Move us backwards - years have been spent to develop a sustainable future- with a strong economy that includes agriculture.
- Puts our health and environment at risk from traffic congestion, air pollution, greenhouse gasses, floods, fire and higher taxes/fees for service.

NO ON THE NORTH RIVER FARMS PROJECT!

Sandy Zelasko
Valley Center, CA 92082

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L261 FERRER

Comment Letter L261

From: Susie Ferrer <susie.ferrer1@gmail.com>
Sent: Friday, May 17, 2019 2:17 PM
To: City Council
Subject: North River Farms project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

As a resident of 12 years I am opposed to this plan.
1. The roads cannot handle the traffic.
2. It cuts out valuable farming land that we need to keep.
3. It will not benefit community

With Gratitude,
Susie Ferrer
949-275-1965
susie.ferrer1@gmail.com

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L262 LUEBE

Comment Letter L262

From: Sydne Luebe <surfiskisydae@yahoo.com>
Date: May 18, 2019 at 8:55:49 PM PDT
To: council@oceansideca.org
Subject: North River Farms

Warning: External Source

Dear Council Mayor and Council Members

I inherited my father's house that he built in 1986 at the top of Sleeping Indian. I loved coming to visit every holiday. Summers were filled working in the grove and orchard. My father was a firm believer in harmony with nature as much as possible. He built the house to accommodate solar water and heat. When it was available he put in some of the first photovoltaic panels to generate home electricity. He served for many years on the Oceanside water Commission. He taught me to think **community first** and do your part to make things better.

Please, **Do Not Approve** the zoning change on North River Farms. Some of the last vital Southern California family agriculture will be lost. The City of Oceanside will lose a vital part of the city and regional history if the agriculture is lost. The public is coming to the understanding that climate change is real, and agriculture produces oxygen, not CO2.

Some one needs to make hard decisions for future generations. Keep Oceanside as it is now and contain the sprawl.

I am not sure how you feel about your grandchildren and the future but I would like to be remembered as the generation who saved the American way of life. **We made the hard choices to preserve** open spaces and rural agriculture when it was so tempting to take the money and run.

North River Farms is **inconsistent with Smart Growth policies** that conserve resources, increase a city's sustainability, and improve citizens quality of life.

North River Farms **conflict with** the Oceanside General Plan that promotes **community values, aesthetics, character, and safety**.

North River Farms is a **sprawl project that will result in higher taxes** for existing residents to finance services away from existing facilities and services.

Those of us that live at the top of Sleeping Indian Hill pay city taxes and receive no road maintenance or repair.

North River Farms will result in **significant and unavoidable impacts** to population, housing, transportation, and traffic.

Late Comment Letters for North River Farms Environmental Impact Report

North River Farms will result in the **permanent loss of prime agricultural land** that generates **jobs and local food**, and will **negatively impact efforts to increase agritourism** and its related jobs and income.

North River Farms will result in **future liability for the City** for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park. **This also conflicts with Oceanside's General Plan** that promotes **community values, aesthetics, character, and safety**.

Please I implore you to make the hard choice and say enough is enough and turn the corner toward a brighter and better future for Oceanside and Southern California.

Or as the Eagles sang in Hotel California "**Call someplace Paradise! Kiss it goodbye**"

Thank you for serving your community. Please do the most you can to benefit the greatest number of your constituents even if it is a hard choice to make.

Growth is never the answer, tempting as it may be temporarily.

Sydne Schurmeier Luabe
6552 Indian Hill Way
Fallbrook, California
92028

Late Comment Letters for North River Farms Environmental Impact Report

L263 BROWN

Comment Letter L263

From: allison.brown@yahoo.com
Date: May 19, 2019 at 8:39:37 AM PDT
To: council@oceassideca.org
Subject: North River Farms - NO

Warning: External Source

I went back & looked for some of the original Nextdoor posts regarding NRF.

On 3/7/17, Louise Balma wrote a quite lengthy reply to one of those early posts, covering a detailed History of the parcel of land that Integral is seeking to develop. (To read her whole reply, use the search function, type in NRF, then look for the 3/7/17 discussion)

A VERY interesting fact, and something I DIDNT know, is how Integral is involved in all of this. SRF was NOT seeking to sell the property, Integral approached THEM! Louise writes:

"A Developer, Integral Communities Real Estate Company, approached the SRF. The SRF did not have the property for sale. Integral made a hard dollar offer to purchase the acreage if they can gain an entitlement from the City. Integral entered into a contract to purchase the land from SRF for a pre-determined price by a future date. The contract provides for the date to be extended if a payment is made much like an option to purchase.

Integral has submitted a proposal to the City to change the current 2 1/2 acre minimum lot size zoning ordinance, with at most 70 homes, in order to build 680 to 885 dwelling units with a mix of multi-unit housing (20-30 dwelling units per acre) and single family homes (3-9 dwelling units per acre) on only 176 acres. This would be an extremely dramatic change to our General Plan Land Use Policy. The City staff report identifies 8 criteria necessary to consider such a land use change request and the Integral proposal fails to satisfy the criteria.

Integral Development is also painting a pretty picture of a retail boutique gathering place and "farming hub" spread out in small strips along North River Rd that may total as much as 20 acres including roads and parking. This Agri-Hub idea is their marketing element to the Oceanside City Staff and Council. They are playing to our current ongoing SMHs joint Agritourism study with the City. The tiny farm plots that Integral is proposing are not commercially feasible and are a recipe for weeds and fire hazard or at best some green space between the condos and retail farm stand. They have no experience and have never built an agri-hub but they are researching the idea. They have found that none of the agri-hubs in California can support themselves and must be subsidized by homeowner fees. This is a recipe for failure because at some point the homeowners will vote to cut the subsidy and lower their fees.

Late Comment Letters for North River Farms Environmental Impact Report

Integral attended one of our SMHA Agritourism meetings last summer and picked up on our idea for a Boutique Hotel and Farm Experience and added it to their proposal. How successful and quaint would a boutique hotel be overlooking a high density housing development?"

I recommend searching out Louise's reply on Nextdoor.com... there is much, much more about that parcel of land that you should know.

BOTTOM LINE:

Integral is a DEVELOPER, not a land owner.

They will buy the land ONLY IF they can persuade the City Council to approve the project in the face of City Planning and City Staff objections and recommendations NOT to approve. They DO NOT own the property. They are opportunists, headquartered in NEWPORT BEACH... !!

They are NOT part of our community!

Don't let them (Integral) be like the Cuckoo Bird, laying their eggs in other bird's nests, only to fly away while the other birds raise the Cuckoo's young at the expense of their own. (pushed out of the nest to die) having to support the little monsters, and deal with the havoc the Cuckoos caused, the demise of their own.
Wrong development, wrong place!

Allison Brown, Jeffries Ranch, Oceanside

[Sent from Yahoo Mail for iPhone](#)

Late Comment Letters for North River Farms Environmental Impact Report

L264 BROWN

Comment Letter L264

From: allison.brown@yahoo.com
Date: May 19, 2019 at 8:44:47 AM PDT
To: council@oceansideca.org
Subject: NO -NRF, #3

Warning: External Source

IF our last fire evacuation didn't prove that 659-885 more homes (with an average of 2 - OR MORE- cars each) trying to evacuate from So Morro Hills was a recipe for deadly disaster, I don't know what would.

The fire evacuation map just underscores the foolishness of the NRF project. Certainly the City Council should see this project for what it is?!

...and that would be sleazy big buck developers from somewhere else, who:
** have the means to throw a lot of money around to distort local interest ballot measures (the money they spent on Y was unreal!)

**bring "locals" (local to where?) in to city meetings to tout the glories of their project (after a training meeting) and to effusively gush how much they want to live in Oceanside, in this project, because it's "affordable" (NOT!)

**paint a pretty picture, but have loopholes for not coming through on many aspects of the plan... loopholes that will leave NRF as simply an expensive, high density housing development.

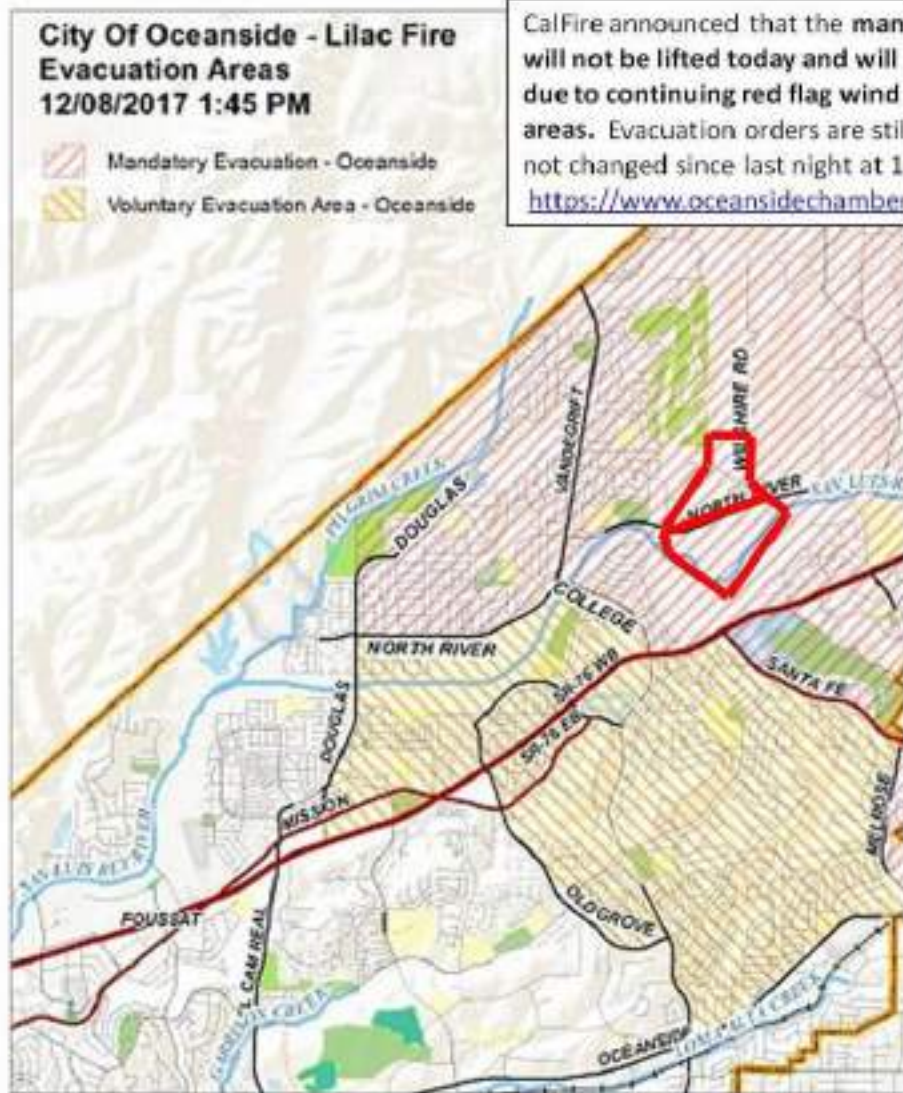
I wonder, if some of those "pretty" elements/amenities don't come to be (or go bust in time) will they be able to put more dwelling units on the property? ...or will NRF residents simply have to suck up the blight in their new urban sprawl neighborhood?
**would put people at deadly bodily risk in a fire evacuation scenario because of their innate developer greed.

Our family lost an Uncle in the fires last year. That should NEVER happen to ANYONE just because a developer wanted to make a buck and the City Council went along with an outrageous development plan! A plan based on greed, manipulation, changed zoning, and loopholes... going against opposition from not only the residents of the area, but against the advice and opposition of their own City Staff AND Planning Commission.

NRF is the wrong project in the wrong place, and the Fire Evacuation map proves that!

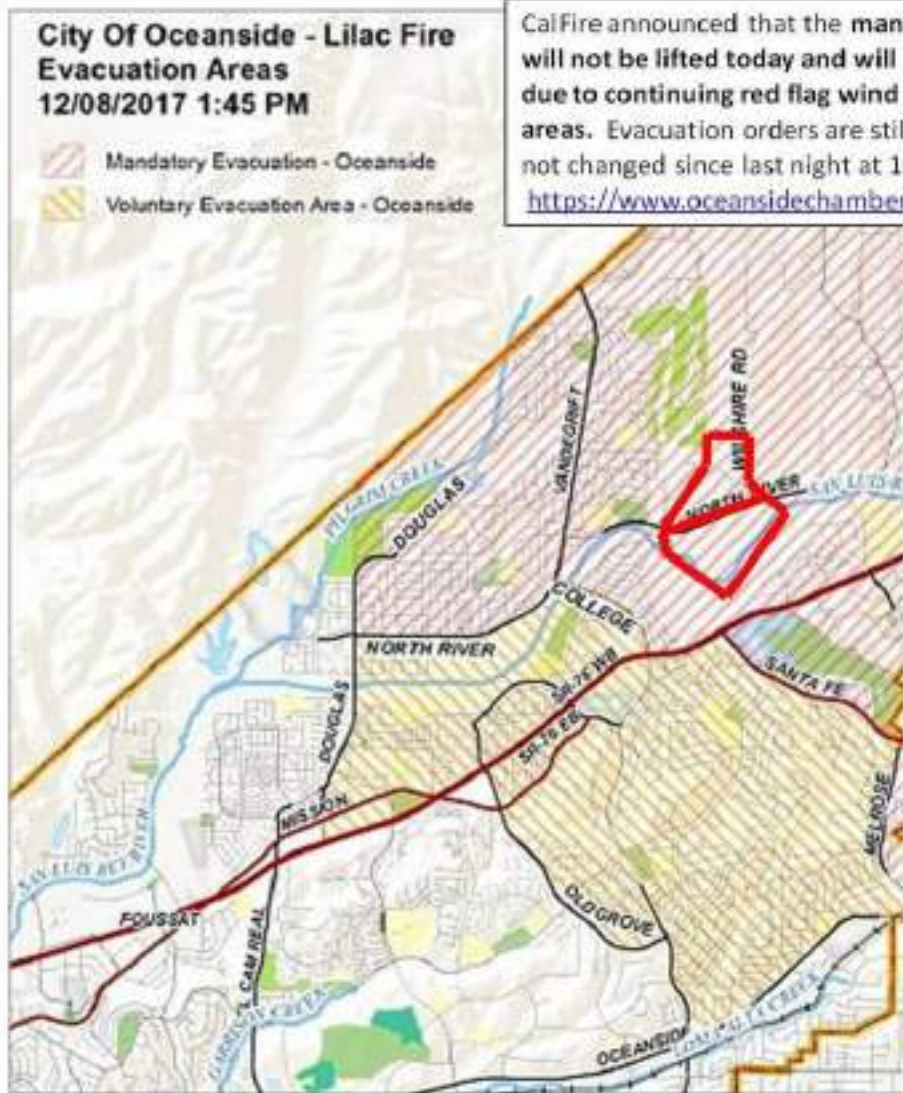
Allison Brown, Jeffries Rasch, Oceanside

Late Comment Letters for North River Farms Environmental Impact Report



[Sent from Yahoo Mail for iPhone](#)

Late Comment Letters for North River Farms Environmental Impact Report



Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L265 BROWN

Comment Letter L265

From: ajlittlbrown@yahoo.com
Date: May 19, 2019 at 8:27:15 AM PDT
To: council@oceansideca.org
Subject: NO North River Farms ... #1

Warning: External Source

I'm SO Very happy that the PC continues to hold the line in denying support for this horrid film-flam project!
Please follow their recommendation to deny the NRF project!
Golly, SO much has been spent by Integral trying to ram through their ill-conceived NRF Project!
From buying "fans/interlopers/stooges" to support their project with lies and half-truths at Council and PC meetings, to their considerable monetary support and disinformation campaign, which was integral to overthrowing and misleading the voters on Y I (See what I did there, and how well it fits?)
Too bad that money wasn't spent on guaranteeing a plan without "Ghost elements" that may or may not actually happen...
or spent on a plan actually consistent with the existing zoning (now THAT's a concept!)
One that won't need dredging a deep channel in the river just at the area NRF encompasses (what happens at the point where the deep channel stops?)
I wonder how many of the "in-favor" supporters know the "hidden" facts we've learned about this "NRFiasco in South Morro Hills"? Certainly not many know the whole story!
I wonder what the going price of a soul is, these days, and have to conclude that - whatever it is- Integral/SRF, can't be compensating these people -shills touting this project as "the best thing since sliced bread" - anywhere near enough!
Integral MAY think they're fighting hard for their client, but this model of doing business is simply diabolical, and the end does NOT justify the means. (I've since found that they've no client... simply an option to buy & develop!)
The NRF Project is just the first of many aimed at completing the urbanization of Oceanside. It will be the lynchpin in a cascade of development that will destroy our last remaining parcels of truly rural land in Oceanside.
Oceanside Council MUST tell Integral/SRF NO! ...allowing those who live in the area to complete THEIR plan, encompassing THEIR vision of the future of Morro Hills.
I guarantee it will look NOTHING like NRF!

Allison Brown, Jeffries Ranch, Oceanside
[Sent from Yahoo Mail for iPhone](#)

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L266 PETERSON

Comment Letter L266

City Council Members, please deny the North River Farm Project.

Arguments for:

1. A very large out of town developer stands to make millions from it, and a few local land owners are expecting to profit from it.
2. There are expectations that the city will profit but other opinions are that in the long run it will cost the City money because of required ongoing services.

Arguments against:

1. There will be future liability for the City for allowing the building of houses and other structures in a flood plain. I was there when the river came to the corner of Melba Bishop Park.
2. The Planning Commission is against it. The Commission is tasked to study an issue and give guidance to the Council.
3. This decision should not be taken without an updated SMHs Vision Plan. Allowing NRF would negatively impact efforts to increase agritourism which potentially could be financially better for the City than another sprawl development that enriches an out of town developer.
4. There is little public support.

There are all the arguments you have heard before, so I won't go over each one but I'd like to share one you might not have considered:

During the last (of many) evacuations we experienced in the years I lived there, I picked up an elderly friend on my way out. She was 95 years old and needed to leave, although it took a little convincing her, while I was scooping up her meds and a few things. It was dark by that time and we slowly joined the procession down Sleeping Indian. We finally got on North River Road and could go no further for hours because of the traffic congestion. As we sat there for what seemed forever, I prayed that the fire wouldn't catch up to us and I wouldn't die in the fire and not even be able to care for my friend, who would be dying a horrible death as well.

I am not being histrionic. People died last year due to road congestion in three fires in Greece and one in California.

It wouldn't matter if North River Road had four lanes if the traffic on the roads it feeds in to are completely congested. It's all very well to talk about future solutions, but since that fire there has been considerable development in Oceanside already so the traffic is even worse. We're way behind solutions. Adding another large development at this time is irresponsible.

There are many compelling arguments against the NRF development. There is so much opposition to it that I ask you NOT to go out on a limb to make a dangerous decision to irresponsibly approve this unnecessary, unwanted, and dangerous plan. It honestly looks to me that Council could be liable for the deaths of residents should they be unable to escape from future fires.

Andrea Peterson
00000 Indian View Dr., Fallbrook, CA 92028

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L267 FISCHER, BILL

Comment Letter L267

Robert Dmohowski

Subject: FW: North River Farms

Begin forwarded message:

From: Bill Fischer <wfis@ecf@yahoo.com>
Date: May 19, 2019 at 9:12:56 PM PDT
To: council@oceasidera.org
Subject: North River Farms

Warning: External Source

19 May 2019

Honorable Councilmembers:

The facts, arguments and recommendations for-and-against Integral's North River Farms Project have long been circulating and carefully reviewed. The salient point is that City Staff and the Planning Commission will now have recommended *three times* that the project be denied. These two entities exist for a sound governance reason: to give elected officials expert guidance in the most informed manner possible for the overall common good of Oceanside.

I urge you to act responsibly on this their third consistent recommendation and to deny the so-called North River Farms project. It is a developer's profitable housing project, not, as the name would imply, a beneficial agricultural initiative. If you continue to disregard the expertise of professional staff and planning commissioners, you will compromise yourselves as being politically motivated rather than civically responsible. It is widely known that two councilmembers are currently appointed, not elected. It is perceived that your votes in particular will weigh heavily in this matter. Oceanside voters will be paying attention.

You're all familiar with the carefully laid out reasons why NRF is an albatross: irretrievable loss of agricultural lands in a manner environmentally damaging to Oceanside; lack of roadway capacity to safely evacuate residents in the event of an emergency like the recent Lilac Fire; Oceanside taxpayers having to bear the maintenance expense of added infrastructure required by the project. Plus the fact that the proposed housing will be well beyond the means of any modest-income Oceansider looking for a home.

North River Farms: a developer's dream, but hopefully not yours.

Bill Fischer

1

Late Comment Letters for North River Farms Environmental Impact Report

William C. Fischer
510 Estremoz Ct.
Oceanside CA 92057
Mobile (760) 585-8899

Late Comment Letters for North River Farms Environmental Impact Report

L268 HERSKOWITZ

Comment Letter L268

From: Joan Herskowitz <jmherskowitz@yahoo.com>
Sent: Sunday, May 19, 2019 7:56 PM
To: City Council
Cc: Robert Demchowski
Subject: BVAS Comments on North River Farms Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Council Members:

We have reviewed the staff report for the North River Farms development which you will be considering on Wednesday, May 22nd. In our original letter to the Planning Commission, we requested that they deny approval of this project and deny certification of the EIR. We find that the developer's recent revisions do not change our recommendation, nor that of the staff or Planning Commission.

This project is the epitome of urban sprawl which is not consistent with good planning principles, and is discouraged in the Oceanside General Plan. The project would have significant environmental impacts that are only partially mitigated. The EIR finds that there would be significant and unmitigated impacts relating to growth inducement on agriculturally zoned land, and would have significant and unmitigated impacts on traffic and circulation. In addition, the mitigation of greenhouse gas emissions is based on out of area offsets which can be questionable and only is required for 30 years. It doesn't appear that climate change issues will go away in that time period but will be an ongoing concern.

We don't believe development projects should be approved with significant impacts on the environment and the life of City residents when there is no compelling reason to do so. Staff reports that Oceanside can meet its state housing mandate by development in the more urbanized parts of Oceanside. Therefore, new projects should comply with the City's General Plan, and its stated goal of retaining agricultural lands in the Mono Hills region and encouraging building where infrastructure and services are more easily accessible.

Therefore, we agree with the recommendation of your professional planning staff and the unanimous vote for denial by the Planning Commission, and urge you to deny approval of this project. A denial will send a clear message that new development should comply with the Oceanside General Plan that was compiled with substantial community input and includes guidelines for the type of development that minimizes impacts on the environment and quality of life for City residents.

Thank you for your consideration of our views on this important matter. Please confirm receipt of this email.

Joan Herskowitz
Conservation Committee
Buena Vista Audubon Society

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L269 SKJARSTAD, ERIC

Comment Letter L269

From: erickj@gmail.com
Sent: Sunday, May 15, 2019 8:51 AM
To: Robert Dmohowski
Cc: City Council
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

City Council Members, please Deny the North River Farms Project.

Rob Dmohowski Planning Department

City Council Members

My wife and I moved to this area years ago to farm Avocados and to be away from traffic and the city. The traffic on North River Road is already bad. We leave our farm and exit Via Puerta Del Sol and then enter North River Road, which is backed up with traffic at different times of the day. To add over a thousand vehicles to North River Road is insane to say the least. Do you think that all vehicles will only exit East towards Vandergrift, that's what it sounds like. Many will go west on an narrow, winding country road that is in poor shape and add to the back up of traffic on the west bound towards Hwy 76. Presently it takes us 15 minutes to go 1/5 of a mile as the traffic is backed up from Via Puerta Del Sol West to the Hwy 76. Emergency evacuation will be a traffic jam on this two lane road. We live in a fire prone area this is a real concern. Why is it that no one understands that once you give the go a head to this project that it opens the door for other developers' to hustle in with their big money and lawyers to invade more of our precious farm land. It's all about MONEY. Please Deny the North River Farms Project. There are plenty of other areas that will not affect the food producing land that is so important to our lives our children and our local economy.

Thank you for listening.

Eric Skjarstad

Oceanside Farmer

• NRRF is inconsistent with Smart Growth policies that conserve resources, increase a city's sustainability, and improve citizens quality of life.

• NRRF is a sprawl project that will result in higher taxes for existing residents to finance services away from existing facilities and services.

• NRRF will further distortion of Oceanside's Jobs/Housing Ratio which is already way below average in San Diego County.

Late Comment Letters for North River Farms Environmental Impact Report

- NRFs will result in the permanent loss of prime agricultural land that generates jobs and local food.
- NRFs will negatively impact efforts to increase agritourism and its related jobs and income.
- NRFs will result in significant and unavoidable impacts to population, housing, transportation, and traffic.
- NRFs will hurt the image of Oceanside as a safe and well-balanced community.
- NRFs will result in future liability for the City for allowing the building of houses and other structures in a flood plain that has experienced flooding of the San Luis Rey River and serious damage to North River Road and facilities at Melba Bishop Park.
- NRFs will result in conflicts between farmers and residents because of inadequate buffers.
- NRFs conflicts with Oceanside's General Plan that promotes community values, aesthetics, character, and safety.
- NRFs should be denied until an updated SMHs Vision Plan is in place.
- North River Farms will have irreversible, long-term and cumulative impacts in SMHs on our environment, our safety, and long-term jobs related to agriculture and agritourism.

Late Comment Letters for North River Farms Environmental Impact Report

L270 MCCREERY

Comment Letter L270

From: Jeanie McCreery <jeanieamc@cox.net>
Date: May 19, 2019 at 2:14:39 PM PDT
To: <council@oceansideca.org>
Subject: Opposition of North River Farms project

Warning: External Source

I'm whole-heartedly opposed to this project! Please do not put homes on this last piece of farmland! The extra traffic and smog is not what I want to leave my beautiful grandchildren, let alone anyone else's!

Sincerely,
Jeanie McCreery

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L271 BOCKMAN

Comment Letter L271

From: joan bockman <joanbockman@sbcglobal.net>
Date: May 18, 2019 at 10:15:11 PM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: Oppose North River Farms

Warning: External Source

Dear Mayor and City Councilmembers,

Please vote NO on NRF on Wednesday. Sprawl is the root of all problems with development. Once sprawl has occurred there is NOTHING that a developer can do to make up for it. NRF is clearly suburban sprawl and is not a farm.

We are blessed to have a real downtown as well as a real buffer from other cities with Camp Pendleton, Buena Vista Lagoon and the rural farming/questrian areas of Morro Hills and Jeffries Ranch. We never want to have a continuous city like LA or Orange County. Stop the sprawl and save our beautiful City!

I cannot attend the hearing because I am picking my son Sam up from the airport. There will be paid representatives from the developer at the hearing. They do not live here and do not share our concerns. Please listen to the actual residents.

Regards,
Joan Bockman

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L272 MONASTERIO

Comment Letter L272

From: Jorge Monasterio <jm@logonpro.com>
Date: May 19, 2019 at 9:35:41 PM PDT
To: Council@co.oceanside.ca.gov
Subject: North River Farms

Warning: External Source

Mayor and City Council :

This letter is regarding the proposed new housing along North River Road in Oceanside. **We are against expansion of additional housing to replace farms in the area.**

We are writing you this letter, even though we're residents of Fallbrook. We live along Sleeping Indian road in Fallbrook, which connects to North River Road. As you may know, plenty of people commute to/from Oceanside to work in the farms and nurseries up in the area. Basically, the Oceanside sections of North River and Sleeping Indian roads are completely inadequate for the existing traffic:

1. Nursery and Farm traffic includes **frequent Semi Trailers on these narrow roads**, 24-hours per day.
2. Please visit these areas during rush hours for farm workers (6:30-7:30AM) or late afternoons. The roads are already inadequate and overcrowded. **Speeding traffic is unsafe.**
3. North River road has no sidewalks, accessibility, or public transport.
4. Sleeping Indian Road (the Oceanside part) has big sections of mud and potholes. Storm damage hasn't been adequately repaired or cleaned for months.
5. Sleeping Indian Road (the Oceanside part) is extremely narrow, and has plants and trees growing into the road.

The City of Oceanside already cannot maintain this area and it is only going to get worse. This entire area of Oceanside is **already** completely underserved and uncared for.

We do not understand how anyone thinks that they can safely increase the housing density and add more traffic to this area.

Improving these roads for the proposed housing will come at **tremendous and unnecessary cost** to tax payers.

Late Comment Letters for North River Farms Environmental Impact Report

Sincerely,

Jorge and Tamara Monasterio
4265 Sleeping Indian Road
Fallbrook, CA 92028

Late Comment Letters for North River Farms Environmental Impact Report

L273 OCHS

Comment Letter L273

From: MARK OCHS <ochs.m@sbcglobal.net>
Sent: Sunday, May 19, 2019 6:02 AM
To: Robert Demchowski
Cc: Lary Balma
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Honorable Mayor and City Council,
Please accept and consider this memo as further testimonial from one of your constituents to deny the proposal before you by North River Farms and the project on North River Road.

Respectfully,

Mark Ochs

- 1.) The project violates the planning and zoning Law as it remains inconsistent with the city's General Plan.
The most recent update to the housing component in 2013 maintained the preservation of Agricultural and Open space lands.
- 2.) Green house gases that will be created by this proposed project are being mitigated by carbon offset credits. Not helping San Diego County and Oceanside meet their responsibilities. Local offsets should be required in the city, county or state.
- 3.) The resulting traffic would add to the already dangerous conditions on North River road. No mitigation has been identified east of the proposed development even though the route is part of a mandatory evacuation route servicing Fallbrook, Bonsall and Oceanside resident safety.
The Melrose bridge extension over the San Luis Rey river should be required now. An alternate to consider would be the widening North River road to four lanes east of the project to the traffic signal at the 76 intersection.
- 4.) Housing proposed for this project continues to be beyond affordable and it's placement in South Momo hills does not meet the need for mass transit corridor proximity.
- 5.) Calculations for the value of Integrals "donations or City support" are suspect in realistic value and duration of support. Giving a false impression of mitigation and generosity (i.e. Hotel and Fire station).

Late Comment Letters for North River Farms Environmental Impact Report

Please cast your vote to deny this proposal and the accompanying FEIR. This is far to ambitious a development in this location of Oceanside.

Late Comment Letters for North River Farms Environmental Impact Report

L274 REESE

Comment Letter L274

From: Mary Ellen Reese <mary_ellen_reese@yahoo.com>
Date: May 19, 2019 at 6:16:40 PM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: North River Farms Development

Warning: External Source

Increased housing development in or near fire-prone wildland areas in the U.S. may intensify wildfire and firefighting problems, as there are more residents to evacuate and houses to protect.

- * [Proceedings of the National Academy of Sciences](#)
- * [Scientific American](#)
- * [Science News](#)

You'll be building kindling instead of residences in North River "Farms." If another Lilac Fire starts, the people who will die while trying to evacuate will have an excellent case against the city. It took you two hours to evacuate them from the fire last year...and they had agricultural land as a buffer! So many people are on the record warning you about this that you won't have any deniability.

Please promote smart growth for Oceanside. You're going to jam more residents into west Oceanside, OK, but don't try to do it with only one lane in and out of South O!

Please don't even try to pretend that you care about affordable housing for residents when you allow short-term rentals...or parking for residents already here either.

Mary Ellen Reese
1229 Saint Helene Ct.

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L275 BALMA

Comment Letter L275

5-17-19

Mayor and City Council Members

SMHA regarding Integral – North River Farms Planned Development

Overview

The Oceanside Planning Commission upheld Staff's analysis and recommended denial of the NRFs project for the third time on May 6, 2019. NRFs are trying to answer some of the concerns about their subdivision brought up by Staff, Council and Public comments. However, they are missing the point that the project is too dense, and the farm plots are too small to be successfully farmed. NRFs suggest that the hotel and commercial space are put on hold for 10 years providing no economic benefit to the City during that time. After 10 years they will ask to build something else, most likely many more DUs with no economic benefit to the City at all. If and when more DUs are approved, then all NRFs proposed TOT and Sales tax income to the city will be lost. North River Farms project will bring no economic benefit to the City.

Staff has not been able to find any of NRFs proposal that meets the City or County criteria to justify the massive deviation in the zoning ordinance that is being proposed.

The SMHA is working together with City Staff and our local farmers and large landowners on our AgriVision Plan that includes the Agritourism opportunities that have already been approved by Council. Staff is laying a foundation for a "Specific Plan" that encompasses the entire 3500 acres of SMHs. This Specific Plan vision will be adopted into the City General Plan and become a blueprint for future orderly development of SMHs

An updated vision plan will consider additional infrastructure necessary for future development balance between Agritourism, clustered homesites, and agriculture. Right now, our infrastructure is based on the current 2.5-acre zoning. There are no projections of costs for additional infrastructure that will be required. Any development, like NRFs, should pay into the future infrastructure needed for the entire SMHs area.

Integral is trying to push their NRFs project through to entitlement before our Vision is in place, before the City knows what the future infrastructure costs will be. They are proposing to use over half of the current infrastructure available for the entire 3500-acres of SMHs. The improvements they propose are only sized to serve their parcel.

Every farmer who supports the NRFs proposal also supports the AgriVision Specific Plan for SMHs. The farmers have been asking the City for an updated vision plan since the '90s. Is it fair to let NRFs scoop the cream and leave all the other farmers and large landowners to pay for the future infrastructure? We should allow all the stakeholders to participate in the updated vision.

SMHA asks that council take the Staff and the Planning Commission recommendation to deny the NRFs PD and to direct staff to continue to work with SMHs and public outreach on a General Plan update and the AgriVision comprehensive Specific Plan for the entire 3500-acres of agricultural land in SMHs.

Trust our City Staff and Deny the Project

Larry Balma, President South Morro Hills Association

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L276 COOKE

Comment Letter L276

From: "Tim ." <tjcooke2@gmail.com>
Date: May 19, 2019 at 9:54:19 PM PDT
To: Council@oceansideca.org
Subject: North River Farms

Warning: External Source

Dear Mayor, Deputy Mayor and Members of the Council:

I am strongly opposed to the North River Farms project and ask that you vote against it. This proposal is incompatible with smart growth policies and represents just more sprawl development and additional traffic congestion clogging our already overburdened roadways. Additionally if approved, this development will set a very bad precedent for any other land owner in the area to similarly demand exemption from existing zoning.

Thank you for your consideration,

Tim Cooke

Late Comment Letters for North River Farms Environmental Impact Report

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Late Comment Letters for North River Farms Environmental Impact Report

L277 NELSON

Comment Letter L277

Mayor and City Council of The City of Oceanside May 16, 2019

RE: The North River Farms Development Plan

This project should NOT be approved as presently proposed due to its intense density, traffic, and flooding and farming impacts, and irreparable damage to the character of the Farming Reserve and Eastern Oceanside.

The following issues came to light at the Planning Commission Meeting on May 8th that you should be aware of for your decision making.

- a) The Developer's Civil/Hydrologic Engineer indicated that he obtained a change in flood maps a year before the project was submitted to the City, purportedly reducing the floodplain impact on the project. This approval is suspect based on historic flooding on the property and the impact on City and County land adjacent to and across the San Luis Rey River from the property. An independent third party review along with an accurate topography survey is needed to clarify the floodplain limits for a 100 year flood.
- b) The latest proposed development plan impacts the floodplain more than the previous plan and in fact indicates a project retention pond within the primary river floodway which had several feet of flowing water within the last few months, when the river was not in flood stage at all. The latest plan indicates the highest density and approximately 60% of the housing within the floodplain.
- c) As an additional traffic mitigation proposal the developer has added a 2nd right turn lane on north bound Vandegrift Road to North River Road by expanding the right-of-way along with removing landscaping at the Townhomes and part of the North County Transit Bus Center and creating a more dangerous bike lane requiring movement across two lanes of turning traffic for bicyclists traveling towards the Arrowwood Community.

If you decide to approve this project that has been denied by the Planning Commission and City Staff three times the following potential changes would make it a less harmful project.

- 1) Require an extension of N. Santa Fe Avenue directly into the project from the 76 Expressway for access, to be constructed before 100 housing units are completed. A two or four lane bridge plus bike lanes and a pedestrian walk over the SLR River would connect the North River Farms project directly to the 76. While the N. Santa Fe Extension would impact Guajome Regional Park it is an area that is primarily leased to farmers to grow tomatoes to supplement the Park's Operation. A widening of N. Santa Fe northbound as it approaches the 76 for more turning and stacking areas and two through lanes would fit within the current right-of-way. Extending N. Santa Fe to North River Road would reduce a lot of traffic on the 76 to College and College to North River Road at Vandegrift Boulevard. This is a major traffic relief for all the existing commuters to the back gate of Camp Pendleton that live in Vista and eastern Oceanside and Bonsall. This would also provide a critical

Late Comment Letters for North River Farms Environmental Impact Report

emergency access option for South Morro Hills Residents reducing delays and the impacts on Vandegrift and College and Douglas.

- 2) Require that the project NOT fill more than three feet within the existing Flood Plain. Currently the project is designed to fill up to 15' within approximately 30+ acres of the floodplain forcing the flood waters to impact Guajome Regional Park, the San Luis River Trail and City Sewer Manholes along the trail by raising the flood level by displacing approximately a half a million cubic yards of floodplain waters and increasing velocity on the river during flood episodes causing more erosion. The flood impact analysis provided in the EIR seeks to meet FEMA standards to raise housing out of the floodplain but this displaces the river flow by this fill. The Army Corps of Engineers may require added river dikes or possible impacts to existing dikes downriver as a result of removing some 30+ acres from the river floodplain. The Army Corps of Engineers and Fish and Wildlife have jurisdiction within the riverbed. Approximately 75% of the property south of North River Road is within the 100 year flood plain.
Remember when North River Road was washed away near Melba Bishop Park during a prior flood event? While farming is allowed within certain floodplain areas the farming is currently planted in portions of the primary river floodway. The floodway has been encroached upon by the farmers over the years, often illegally beyond their property lines into the river. Recent rains have caused the river to run through acres of the existing farm areas that have been planted within the river floodplain.
- 3) Require the commercial aspects of the development to be constructed on the eastern edge of the housing areas to provide a buffer to the adjacent farming areas for the pesticides and fertilizers that are not compatible with housing.
Require that a minimum development of more than the one commercial or community use building proposed be developed before 50% of the homes are constructed rather than being contingent upon demand AFTER all the housing is constructed as now indicated.
- 4) Improve North River Road without turning circles which will impede traffic flow and particularly emergency traffic egress and creates dangerous conditions for cyclists and pedestrians.
- 5) Require minimum 1.5 acre lots with potential for equestrian use and for ADU additions as an appropriate transition from the residential neighborhoods to the west and the remaining South Morro Hills Agricultural Region.
- 6) DO NOT AMEND the Zoning Ordinance to allow PD development as an approved use in the agricultural zone.

Sincerely,

Bob Nelson, Resident
Belmont Park Road, Oceanside, 760-717-8848

Late Comment Letters for North River Farms Environmental Impact Report

L278 PERRY

Comment Letter L278

From: Julie Perry <julie@supacine.ca.com>
Date: May 20, 2019 at 8:35:07 AM PDT
To: council@oceansideca.org
Subject: NRF

Warning: External Source

I do not support the North River Farms development. If you want a sprawling development do it closer to the coast where high density homes are more practical. Also pesticides and fertilizers of been used on that land for the past 50years, you can bury that stuff as deep as you want but they always come up years later along with cancers and lawsuits, not a good long term plan for Oceanside. You can do better! Increase density near the cost and turn Oceanside into the next Manhattan Beach?

Julie Perry
3003 Gusjome Lake Rd.
Oceanside, 92057

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L279 WALKER

Comment Letter L279

From: kevin walker <kjwalker@yahoo.com>
Date: May 28, 2019 at 9:01:46 AM PDT
To: "Council@oceasideca.org" <Council@oceasideca.org>
Subject: VOTE NO

Warning: External Source

Please vote no on the upcoming council vote this Wednesday. Stop these developers who care nothing but the bottom line, MONEY.

We need to keep our beautiful city healthy and under control.

Thank you

Kevin Walker
Oceanside resident

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Late Comment Letters for North River Farms Environmental Impact Report

L280 ROBINSON

Comment Letter L280

From: Shannon Robinson <smcc1010@yahoo.com>
Date: May 20, 2019 at 9:06:45 AM PDT
To: "Council@oceansideca.org" <Council@oceansideca.org>
Subject: No on more growth
Reply-To: "smcc1010@yahoo.com" <smcc1010@yahoo.com>

Warning: External Source

No on more tax & traffic and NO on just 3 votes to over turn planning commission's recommendations!

Sincerely,
Shannon Robinson
274 Diamante Way
Oceanside, CA. 92056

[Sent from Yahoo Mail on Android](#)

Late Comment Letters for North River Farms Environmental Impact Report

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