

**FINAL INITIAL STUDY/ENVIRONMENTAL CHECKLIST AND
MITIGATED NEGATIVE DECLARATION
FOR THE
GARRISON STREET OCEANSIDE PROJECT**

Letters of Comment and Responses

The following letters of comment were received during the Public Review period (June 18 to July 18, 2025) of the Draft Initial Study/Environmental Checklist and Mitigated Negative Declaration (IS/MND) for the Garrison Street Oceanside Project. A copy of each comment letter along with corresponding staff responses is included here. Some of the comments received resulted in changes to the Draft IS/MND text. These text changes are summarized in the Errata to the Final IS/MND. As concluded in the Errata, revisions to the Draft IS/MND are intended to correct minor discrepancies and provide additional clarification. The revisions do not affect the conclusions of the document.

Letter	Author	Page Number
O-1	Diane Nygaard on behalf of Preserve Calavera	RTC-2
O-2	San Diego County Archaeological Society, Inc.	RTC-8
I-1	Cathy Conce	RTC-10
I-2	Nathan Tracy	RTC-12

Comment Letter O1: Diane Nygaard on behalf of Preserve Calavera

From: Diane Nygaard <dnygaard3@gmail.com>
Date: Thursday, July 17, 2025 at 9:20 AM
To: dthompson@oceansideca.org <dthompson@oceansideca.org>
Cc: Michael Torres <MTorres@thetruelifecompanies.com>
Subject: Corrected Comments on Oceanside Garrison Project MND

This message's attachments contains at least one web link. This is often used for phishing attempts. Please only interact with this the legitimacy with the sender by phone.

Ms Thompson

Please reply to confirm timely receipt of these comments.

O1-1 We are pleased to see that this project has done a number of things right and hope that by calling these concerns to the attention of you and the developer that further changes will be made.

Our issues of concern with the MND include:

Energy

O1-2 - in several places it says energy is to be provided by SDG & E. The Project is within the area of CEA who is the default provider of electricity in the city of Oceanside. Since they have a higher renewable energy default than SDG & E it is important to specify that the project will enroll in CEA, at least at the default level of 75% renewable.

O1-3 - We appreciate that this will be an all electric project with no gas hookups- thank you! But we also request consideration of the voluntary energy efficiency standards included in Title 24.

Biological Resources

O1-4 - We saw no discussion of efforts to avoid and minimize impacts to sensitive habitat, particularly CSS which is one of the requirements of the SAP. It says impacts are to be avoided " to the maximum extent feasible without precluding reasonable use of the property." There is a small area of direct CSS impact. It looks like that by eliminating perhaps a single unit these impacts would be avoidedwould be avoided. That would still allow the majority of the site to be developed making this change more than fresonable.

O1-5 - Mitigation Measure Bio-1 did not properly carry forward the language in the BTR into the actual MND. The BTR language correctly summarized the SAP priorities for when mitigation can occur and these details need to be specified in the MND also. (See SAP Section 4.3.1.4 Offsite Mitigation Zone.)

O1-6 - The BTR and MND did not discuss potential indirect impacts on sensitive habitat/species from the edge effects of development. We see that many of the edge effect conditions have been addressed, but not all of them. We have submitted the list of edge effect conditions that were previously standard conditions of approval by the city multiple times and requested that these be reinstated. Please verify that all such edge effect conditions have been properly addressed.

GHG

O1-7 - The threshold for analysis of GHG that was used has never been formally adopted by the city and is invalid.

O1-8 - This project claims to be below the 900 MT/Yr threshold. Further detail is needed to verify the computation of GHG analysis as what has been provided does not make sense. The CalEE Mod calculations on page 41 show unmitigated emissions of 6,457 MT/Yr, but this has been reduced down to only 867 MT/Yr. It also includes only 2 and 8 MT for area emissions for water and sewer which is not consistent with other reports. Furthermore there are zero construction emissions shown for trucks (page 17) in spite of extensive requirements for existing building demolition and site preparation. Please provide full details of each adjustment made to the unmitigated emission calculations, explain these apparent errors and revise these calculations to be consistent with guidelines..

O1-9

O1-10

O1-11

O1-12 - The project relies on the CAP to address its cumulative impacts, but we have documented in prior correspondence that the city has failed to implement the CAP as planned, and has allowed waivers of CAP requirements. Therefore there is no assurance that the city is on target to achieve the state mandated GHG emission reductions and the CAP cannot be relied upon to address cumulative GHG impacts which remain significant. See letter of January 1, 2024 from our Attorney to the city as evidence of this claim (see att.)

O1-13 - Because of these errors, the project was not required to complete the CAP Consistency Checklist. While it appears to have met many of the Checklist conditions, one key item is Tree Canopy Cover. The project details tree replacement and planting plan but has not documented the percentage of TCC or provided assurances that this will be maintained for the life of the project.

O1-14 - Residential projects do not require Transportation Demand Management (TDM) Plans, but we are requesting that this project do so voluntarily. We are happy to provide examples of two other Oceanside multi-family projects that did include such plans. (See Olive Park and Oceanside Transit Center).

Transportation

O1-15 - The LTS failed to include any mention of alternative transportation. The MND should describe existing access to transit, pedestrian and bicycle facilities and describe what

O1-15
cont.

the project is doing to support their use. This is particularly important because the city is near a major transportation corridor and is adding trips to roadway segments and intersections that are already failing, but per City guidelines do not require mitigation.

Thank you for considering these comments.

Diane Nygaard
On Behalf of Preserve Calavera

Att: Letter of January 1,2024

Responses to Comment Letter O1: Diane Nygaard on behalf of Preserve Calavera

Response to Comment O1-1

The comment is an introduction to the letter and does not raise an issue related to the content or adequacy of the environmental document. No response is necessary.

Response to Comment O1-2

It is acknowledged that Clean Energy Alliance launched service in the City of Oceanside (City) on April 24, 2024, when it became the default electricity generation provider. New residential customers are therefore automatically enrolled in the Clean Energy Alliance unless they proactively opt out. For purposes of the California Environmental Quality Act (CEQA), and to provide a conservative assessment of energy use, the analysis used California Emissions Estimator Model (CalEEMod) default inputs for modeling. As no significant energy or greenhouse gas (GHG) impacts were identified in the Initial Study/Environmental Checklist and Mitigated Negative Declaration (IS/MND), additional modeling would not be required.

Response to Comment O1-3

This comment does not raise an issue related to the content or adequacy of the environmental document. The 2022 California Green Building Standards Code provides Tier 1 and Tier 2 voluntary standards for residential and non-residential uses.

Response to Comment O1-4

The project site primarily consists of urban/developed land and disturbed habitat. The proposed building layout is designed to conform to the City's General Plan and support the City's need for housing within a location close to transit with minimal disturbance of sensitive habitat. The proposed number of units, building setbacks, pedestrian and vehicular circulation, ancillary uses, and other design standards are set forth in the Planned Development Plan to ensure consistency with surrounding land uses, uphold visual quality, and maintain community character. As discussed in Section 14.4 of the IS/MND, the project would result in the removal of 0.113 acres of disturbed Diegan coastal sage scrub and 0.001 acres of Diegan coastal sage scrub (0.114 acres total). Following the guidance of the Draft Sub Area Plan, which has never been formally adopted by the City, mitigation measure BIO-1 requires habitat based mitigated at a 3:1 ratio through purchase of off-site mitigation credit at a City-approved mitigation bank and/or the restoration of habitat. The project would meet this requirement through on-site restoration. Through implementation of mitigation measure BIO-1, impacts to Diegan coastal sage scrub and disturbed Diegan coastal sage scrub would be reduced to a less than significant level. The Biological Technical Report prepared for the project (IS/MND Appendix G) noted that it was unlikely that the project site served as an important wildlife movement corridor or habitat linkage because the project site is mostly developed and cut off by roads and developed lands in all directions.

Response to Comment O1-5

While the Biological Technical Report (IS/MND Appendix G) provides additional background and details, which are summarized within the context of the IS/MND, the action required to implement mitigation measure BIO-1 is the same in both documents. No revisions to the IS/MND are required.

Response to Comment O1-6

Potential edge effects, especially during construction activities, are addressed in Section 14.4 of the IS/MND. Specifically, it is stated, “Additionally, potentially significant indirect impacts could occur to off-site sensitive plant species as a result of construction activities.” It additionally states, “the project has the potential to result in off-site habitat impacts from construction activities such as fugitive dust settling on sensitive habitats near the project. This would result in a significant impact without mitigation implemented.” Mitigation measure BIO-2 requires the implementation of general construction measures to avoid and minimize impacts to biological resources based on guidance within the Draft Sub Area Plan. The commenter mentions the submittal of additional-edge effect conditions; however, the general submittal of requests or recommendations for City action is not attributable to this particular project. The inclusion of mitigation measure BIO-2 ensures potentially significant impacts associated with edge effect, especially during construction activities, are reduced to less than significant levels.

Response to Comment O1-7

Section 14.8 of the IS/MND includes a discussion of the City’s 2019 Climate Action Plan (CAP) threshold used for analysis. As mentioned on page 74 of the IS/MND, the City’s 2019 CAP is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5.

Response to Comment O1-8

Based on CalEEMod, the project would result in a total of 844 metric tons (MT) of carbon dioxide equivalent (CO₂E) per year. The commenter’s conclusion that the project would result in unmitigated emissions of 6,457 MT of CO₂E per year incorrectly interprets the CalEEMod calculations. This number, reflected on page 41 of the outputs, is a measurement in pounds per day for mobile sources, as described in the header at the top of the table. The output associated with annual project unmitigated mobile emissions is 1,024 MT of CO₂E. Total project emissions (both unmitigated and mitigated) are calculated by adding together outputs shown throughout Section 4.0 of the CalEEMod outputs. The IS/MND reports the final mitigated annual emissions would be 876 MT of CO₂E.

Response to Comment O1-9

As described on page 77 of the IS/MND, the water and sewer emissions were calculated based on California Air Pollution Control Officers Association guidance and default CalEEMod data. It should be noted that the 2 MT CO₂E per year number as mentioned in the comment would apply to area source emissions (e.g., landscaping equipment), not water or wastewater. Water and wastewater combined would result in 8 MT CO₂E emissions per year.

Response to Comment O1-10

It is assumed that the commenter is referring to the “onsite truck” line item of the CalEEMod outputs in Section 3, Construction Emissions. The emissions related to the demolition, site preparation, and construction of the project site are captured with the “off-road equipment” line item, and the removal of materials from the project site to a solid waste facility would be captured with the “hauling” line item. All construction activities have been captured in the emission outputs.

Response to Comment O1-11

See responses to comments O1-8 through O1-10. As detailed in Section 14.8 of the IS/MND, the project's GHG emissions were calculated using the latest version of CalEEMod for mobile (on-road vehicles), energy (electricity), area (landscape maintenance equipment), water and wastewater, solid waste, and refrigerant sources. Calculations were adjusted to reflect GHG reduction measures with construction emissions amortized over 30 years and added to operational emissions.

Response to Comment O1-12

The commenter's statement regarding City implementation of the CAP is beyond the scope of this project. As required by CEQA, the project evaluated potential GHG related impacts using the City's qualified CAP and is able to support that the project would result in emissions that are less than the screening thresholds for the City's CAP 900 MT CO₂E brightline threshold and the 3.0 MT CO₂E per capita efficiency threshold established in the City's 2023 Policy Directive. Therefore, emissions are considered low enough to conclude that the project would not conflict with the implementation of the City's CAP.

Response to Comment O1-13

Consistent with the City's qualified CAP, because the project is below the screen thresholds of the City's CAP 900 MT CO₂E brightline threshold and the 3.0 MT CO₂E per capita efficiency threshold established in the City's 2023 Policy Directive, it was not required to complete the CAP Consistency Checklist. As shown on the Conceptual Landscape Plan, the project includes 17.9 percent canopy cover. This exceeds the City's requirement of 12 percent.

Response to Comment O1-14

The comment does not raise an issue related to the content or adequacy of the environmental document. No response is necessary.

Response to Comment O1-15

Section 4.2 of the Oceanside Garrison Local Transportation Plan (IS/MND Appendix E) describes the existing active transportation network, which includes pedestrian, bicycle, and transit facilities. In both Appendix E and the IS/MND, existing access to these facilities is described and, when applicable, improvements are proposed. As mentioned in Section 14.16 of the IS/MND, the project proposes crosswalks across Private Drive A, sidewalks within and circling the community, and walkways. No conflicts with bicycle or transit facilities would occur as a result of the project; therefore, no improvements to these facilities are proposed. Nonetheless, residents of the project would have access to both Class II bike lanes and North County Transit District bus stops within the vicinity of the project site.

**Comment Letter O2:
San Diego County Archaeological Society, Inc.**



San Diego County Archaeological Society, Inc.

Environmental Review Committee

July 12, 2025

To: Mr. Dane Thompson, Associate Planner
Planning Division
City of Oceanside
300 North Coast Highway
Oceanside, California 92054

Subject: Draft Mitigated Negative Declaration
Oceanside Garrison Project
GPA24-00002, ZA24-00001, T24-00002, D24-00010

Dear Mr. Thompson:

O2-1 | I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the draft MND and its appendices H and I, we have the following comments:

- O2-2 | 1. The statement on page 6 of Appendix I that the earliest available aerial photograph is from 1938 is incorrect. Since the property was undeveloped in 1938, it does not affect the assessment, but the earliest available aerial photos are the 1928-29 photos shot by the County and available at several locations in the area, including SCIC and the County DPW offices in Kearny Mesa.
- O2-3 | 2. Mitigation Measure CUL-7 is incomplete. As written, it addresses treatment of "tribal cultural resources unearthed" during the monitoring program but not of any non-tribal material. This omission needs to be corrected with definition of the analysis, reporting and curation of non-tribal cultural resources.

O2-4 | Thank you for the opportunity to offer our comments on this project's environmental analysis.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: RECON
Urbana Preservation and Planning
SDCAS President
File

Responses to Comment Letter O2: San Diego County Archaeological Society, Inc.

Response to Comment O2-1

The comment is an introduction to the letter and does not raise an issue related to the content or adequacy of the environmental document. No response is necessary.

Response to Comment O2-2

Comment noted. The comment does not raise an issue related to the content or adequacy of the environmental document. No response is necessary.

Response to Comment O2-3

Procedures for the discovery of historic-era, non-tribal cultural resources were added to mitigation measure CUL-7. This revision clarifies that the mitigation measure would include monitoring for non-tribal, as well as tribal cultural resources.

Response to Comment O2-4

Concluding comment is noted.

Comment Letter I1: Cathy Conce

From: Cathy Cronce <cjcronce@gmail.com>
Sent: Thursday, July 10, 2025 3:24 PM
To: Dane Thompson <dthompson@oceansideca.org>
Subject: Oceanside Garrison Project (IS/MND)

Warning: External Source

Dear Mr. Thompson:

I1-1

I hope the people who purchase these homes are informed that they are built on a site with sinkholes, and adjacent to a future sewer lift station.

I1-2

With people leaving California, I don't understand the need for these high density projects. For example, the monstrosity at Oceanside Blvd and Crouch, 2 projects bordering on the Oceana 55 plus community, Mission Kamp, and now one on Mission Ave and Roymar in my neighborhood alone. Maybe you can enlighten me.

Sincerely,
Cathy Cronce
Resident of Sea Mesa

Responses to Comment Letter I1: Cathy Conce

Response to Comment I1-1

This comment does not raise an issue related to the content or adequacy of the environmental document. No response is required.

Response to Comment I1-2

As described in the Initial Study/Environmental Checklist and Mitigated Negative Declaration, the project would allow for the development of housing in line with the City of Oceanside's Regional Housing Needs Allocation, which is determined by the California Department of Housing and Community Development. The Regional Housing Needs Allocation projection is based on forecasted population growth in the area (see Section 14.14 of the Initial Study/Environmental Checklist and Mitigated Negative Declaration). Long-range planning projects in the City of Oceanside are designed to accommodate planned growth in the area.

Comment Letter I2: Nathan Tracy

Nathan Tracy
304 Bluff Way
Oceanside, CA 92054
ntracy@gmail.com
(714) 614-5061

June 21, 2025

Dane Thompson
Associate Planner
City of Oceanside Planning Division
300 N. Coast Highway
Oceanside, CA 92054

Subject: Public Comment Opposing the Oceanside Garrison Project - GPA24-00002 / Request for Full EIR

Dear Mr. Thompson,

I2-1

I am writing as a concerned Oceanside resident and direct neighbor to the proposed Oceanside Garrison Project at 333 Garrison Street (APN: 162-020-26). I respectfully submit this comment during the public review period to oppose both the rezoning and the adoption of a Mitigated Negative Declaration (MND) for this development.

Summary of Concerns

I2-2

While I recognize the city's need to support housing development, this particular proposal raises several serious concerns that I believe warrant a full Environmental Impact Report (EIR) rather than the abbreviated

12-2
CONT.

MND process. The issues outlined below illustrate that the project may cause significant, unmitigated impacts to the environment, community infrastructure, and neighborhood quality of life:

12-3

1. Zoning Incompatibility & Loss of Public Land

The proposed rezoning would convert land currently designated as Public/Semi-Public (PS) and Civic Institutional (CI) into medium-density residential-eliminating a rare, city-owned civic asset. The former Garrison Elementary School site represents long-term community value that should remain open for future educational, recreational, or civic use.

12-4

2. Inadequate Traffic & Infrastructure Planning

This project will introduce 140 units-potentially adding 280+ vehicles daily to a neighborhood not designed for this traffic volume. Garrison Street and its nearby intersections already serve as school and commuter corridors, and adding this much density without corresponding transportation improvements will lead to congestion, safety concerns, and infrastructure strain.

12-5

3. Lack of Affordable Housing Alignment

The project vaguely claims that a portion of the units will be "affordable to moderate-income households," but provides no binding commitments, no income thresholds, and no alignment with the city's RHNA goals.

12-6

4. Negative Impact on Neighborhood Character

The proposed buildings-ranging up to 2,093 square feet-are oversized relative to the adjacent single-family homes and will materially alter the character of the surrounding neighborhood.

12-7

5. Environmental & Green Space Concerns

This development would permanently remove over 8 acres of potential green space with only a 10,000 sq ft "pocket park" proposed-less than 3% of the site area. There is no significant open-space preservation or meaningful habitat protection.

12-8 | 6. Precedent-Setting for Irreversible Civic Loss
Approving this rezoning sets a dangerous precedent that encourages the sale and privatization of civic land across Oceanside.

12-9 | Conclusion & Request
Due to these unresolved issues, I respectfully request that the City of Oceanside:

- Reject the current Mitigated Negative Declaration, and

- Initiate a full Environmental Impact Report (EIR), in accordance with CEQA.

12-10 | I appreciate the City's responsibility to manage growth, but this proposal is not the right fit-either for the site, the infrastructure, or the community. I urge you and the Planning Commission to reconsider this course of action.

Sincerely,

Nathan Tracy

Responses to Comment Letter I2: Nathan Tracy

Response to Comment I2-1

The comment is an introduction to the letter and does not raise an issue related to the content or adequacy of the environmental document. No response is necessary.

Response to Comment I2-2

As documented throughout the Initial Study/Environmental Checklist and Mitigated Negative Declaration (IS/MND), the proposed mitigation measures would reduce all potentially significant impacts to less than significant levels. Therefore, the preparation of an environmental impact report would not be required.

Response to Comment I2-3

The proposed redesignation of the project site from Civic Institutional (CI) to Medium Density C Residential (MDC-R) and rezoning from Public Semipublic (PS) and Medium Density Residential C (RM-C) to Planned Development (PD) is consistent with the City of Oceanside's (City) vision for expanding opportunities for residential development. Using previously developed land within an urban setting reduces the need to develop housing on greenfield sites, which would likely result in greater potentially significant impacts. Additionally, as discussed in Section 14.16(a) of the IS/MND, the project would pay park impact fees that would contribute to the City's maintenance and expansion of its recreation system per City Code of Ordinances Section 32D and General Plan Community Facilities (CF) Element Policies. This would aid in the development of future recreational facilities.

Response to Comment I2-4

The project's potential transportation impacts are discussed in Section 14.17 of the IS/MND, which includes a summary of the Local Transportation Study prepared for the project (IS/MND Appendix E). Specifically, Section 14.17(a) evaluates the City's transportation policies related to traffic circulation and the City's goals for achieving and maintaining acceptable levels of service. The project would generate a total of 973 additional daily trips on surrounding roadways (IS/MND Appendix E). The Local Transportation Study determines that with the addition of project traffic, the segment of Oceanside Boulevard, between Garrison Street and El Camino Real, would operate below the City's goals for levels of service. Consistent with General Plan CF Policies, the project would be conditioned to contribute funds to be paid into the City's Thoroughfare and Signal Account. These funds would be used at the City's discretion for projects that improve traffic safety and mobility within the City. This payment satisfies only the offsite improvement obligation required to ensure the project does not conflict with City standards related to acceptable levels of service. Through this condition, adequate improvements would be in place prior to the generation of traffic to ensure the project would not conflict with any program, plan, or policy focused on the City's circulation network. For clarity, this project design feature/ off-site improvement has been added to the IS/MND project description and Section 14.17(a) of the IS/MND.

Response to Comment I2-5

The project is designed to meet the 15 percent inclusionary requirement per City Code of Ordinances Chapter 14C, Inclusionary Housing, by reserving 10 percent of the total units (14 units) as affordable- to moderate-income level households as determined by Health and Safety Code Section 50093(b), and

through payment of a prorated Affordable In-Lieu Fee for the balance (5 percent) of the requirement. The project would be consistent with the Regional Housing Needs Allocation assigned to the City by the California Department of Housing and Community Development (see Section 14.14 of the IS/MND). Specifically, the City was assigned a total allocation of 5,443 new residential units: 1,268 very-low-income; 718 low-income; 883 moderate-income; and 2,574 above-moderate-income (City of Oceanside 6th Cycle Regional Housing Needs Allocation). The project would serve to meet the City needs as defined in the City's 2021-2029 Housing Element.

Response to Comment I2-6

The visual character of the developed project is discussed in Section 14.1 of the IS/MND. As described in this section, the project would present a change in the visual character of the project site; however, the project would be consistent with surrounding homes sizes. Specifically, homes at the top of the slope directly west of the project site range in size from 1,356 to 2,418 square feet and average in size at 1,896 square feet. The project proposes a range of home sizes from 1,364 to 2,093 square feet with an average home size of 1,744 square feet. Therefore, the project would be within the character of the surrounding neighborhoods. As determined in the IS/MND, the project would not result in the degradation of the existing visual character of the site and its surroundings.

Response to Comment I2-7

The project site is currently developed with a vacant elementary school. There is neither an existing open space use on the site nor are there existing zoning or land use designations assigned to the site that would allow for open space. Therefore, implementation of the project would not result in the loss of park land or open space in the City. To speculate on other development scenarios for the project site (i.e., the rezoning or re-designation of the site for open space) is not under the purview of the IS/MND.

The proposed development provides a total of 33,300 square feet of common open space (as defined by the City of Oceanside), while providing a total of 141,030 square feet of vegetated area or 39 percent of the site. As described in Section 14.4 of the IS/MND, the project impact area includes a limited amount of sensitive vegetation communities (0.113 acres of disturbed Diegan coastal sage scrub and 0.001 acres of Diegan coastal sage scrub), and the implementation of the project avoids the removal of surrounding sensitive vegetation communities. This loss of habitat is mitigated through mitigation measure BIO-1. Additionally, the placement of the pocket park allows for public use of the project site by neighboring residents.

Response to Comment I2-8

Any future development projects within the City would be reviewed and approved by the City. If a future project includes discretionary action, such as a rezone or land use re-designation, the project would be subject to California Environmental Quality Act review and approval by the Planning Commission and City Council. The project itself does not set a precedent for similar land use changes.

Response to Comment I2-9

See response to comment I2-2.

Response to Comment I2-10

See responses to comments I2-6 and I2-4.