

V1. CHAPTER 2

DEIR – Agency Responses

This chapter contains the comment letters received from public agencies on the proposed Coast Highway Corridor Study Project (project) Draft Environmental Impact Report (DEIR) and the City of Oceanside’s (City’s) responses to comments related to the DEIR and/or issues related to efforts on the environment. Each letter, as well as each individual comment within the letter, has been given an assigned letter and number for cross-referencing. Responses are sequenced to reflect the order of comments within each letter. **Table V1.2-1** lists all public agencies who submitted comments on the DEIR during the public review period.

It should be noted that while the comments below were received on the DEIR, the responses have been crafted based on the most updated information per environmental topic, which could pull from the DEIR or the Partially Recirculated Draft Environmental Impact Report (PRDEIR) or a combination of the two depending on the content of the comment. Specifically, comments related to transportation and traffic, aesthetics, alternatives, and the environmental topics covered by the Errata of the PRDEIR are responded to based on the updated information and revised analyses contained in the PRDEIR. Comments related to all other topic areas are responded to based on the analyses and information included in the DEIR.

**TABLE V1.2-1
LIST OF AGENCY COMMENTERS ON DEIR**

Letter No.	Commenter	Date of Comment	Comment Page Number	Response Page Number
DEIR A1	San Diego Association of Governments (SANDAG) Seth Litchney, Senior Regional Planner	8/17/2017	V1.2-2	V1.2-5
DEIR A2	California Department of Transportation (Caltrans), Roy Abboud, Associate Transportation Planner	8/24/2017	V1.2-8	V1.2-13
DEIR A3	North County Transit District (NCTD), Nedina Facchini, Senior Planner	8/24/2017	V1.2-20	V1.2-23
DEIR A4	California Coastal Commission (CCC), Kaitlin Carney, Coastal Planner	10/5/2017	V1.2-26	V1.2-32



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August 17, 2017

File Number 3300300

Mr. John Amberson
Transportation Planner
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
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- California Department of Transportation
- Metropolitan Transit System
- North County Transit District
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- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

Dear Mr. Amberson:

SUBJECT: Coast Highway Corridor Study Draft Environmental Impact Report

Thank you for the opportunity to comment on the City of Oceanside's Coast Highway Corridor Study Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG's comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Smart Growth & Complete Streets

SANDAG appreciates that the City of Oceanside has prioritized transit-oriented development and land use changes in the project area that support the goals of the Smart Growth Concept Map and Regional Plan. The Coast Highway Corridor Study is also consistent with SANDAG's Regional Complete Streets Policy. A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. This project is located within an Existing/Planned Town Center and Mixed Use Transit Corridor identified on the Smart Growth Concept Map (OC-1 and OC-2, respectively). The proposed project is well-served by a high-frequency bus route (Route 303), as well as COASTER and SPRINTER service. The Coast Highway Corridor Study should continue facilitating access to these important transit services.

Long-Range Transportation

When referencing SANDAG's current Regional Transportation Plan, adopted in October 2015, please refer to "San Diego Forward: The Regional Plan" rather than SANDAG's "2050 Regional Transit Plan."

The City should consider augmenting the "Traffic and Transportation" section of the Draft EIR to include the planned transit improvements as described in the Regional Plan.

DEIR A1-1

DEIR A1-2

Such improvements include:

- SPRINTER efficiency improvements and extension
- COASTER double tracking
- *Rapid* transit route 473
 - Phase I – Solana Beach to UTC/UC San Diego via Highway 101 Coastal Communities, Carmel Valley
 - Phase II – Oceanside to Solana Beach via Highway 101 Coastal Communities

DEIR A1-2

Transportation Demand Management

As previously recommended in SANDAG’s comment letter submitted for the project’s Notice of Preparation, the SANDAG Transportation Demand Management (TDM) division supports the parking and TDM strategies laid out in the Coast Highway Vision Strategic Plan and suggests that they be reflected in the Coast Highway Corridor Study Draft EIR. Additionally, the Oceanside Transit Center, adjacent to the Coast Highway Corridor, has been identified as a mobility hub prototype location as part of the SANDAG Regional Mobility Hub Implementation Strategy. Mobility hubs provide an integrated suite of transportation services and amenities that help facilitate access to high-frequency transit stations. The development of the Coast Highway Corridor Study presents the opportunity to encourage and promote the use of shared mobility services (e.g., bikeshare, on-demand rideshare, carshare) along Coast Highway. The incorporation of TDM strategies that support the mobility hub concept can help mitigate potential traffic impacts that were identified in the Coast Highway Corridor Study Draft EIR.

DEIR A1-3

Please consider the development of a TDM ordinance that encourages developers to incorporate TDM-supportive capital improvements and programs through the entitlement process. Development of a TDM ordinance aligns with policies and objectives in the Circulation Element of the City of Oceanside’s General Plan, adopted in 2012, and supports the City’s commitment to complete streets and pedestrian-oriented investments within the proposed Incentive District.

DEIR A1-4

Please continue partnering with iCommute to promote participation in regional TDM programs and services, including the Regional Vanpool Program, ridematching services, the Guaranteed Ride Home program, and events like Bike to Work Day. More information on these programs can be accessed through iCommuteSD.com.

Other Considerations

SANDAG has a number of additional resources that can be used for additional information or clarification on smart growth and TDM. These can be found on the SANDAG website at sandag.org/igr:

- SANDAG Regional Parking Management Toolbox
- Riding to 2050, the San Diego Regional Bike Plan
- Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region

DEIR A1-5

- Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities
- Trip Generation for Smart Growth
- Parking Strategies for Smart Growth
- Designing for Smart Growth, Creating Great Places in the San Diego Region

DEIR A1-5

When available, please send any additional environmental documents related to this project to:

SANDAG
 Attention: Intergovernmental Review
 401 B Street, Suite 800
 San Diego, CA 92101

DEIR A1-6

SANDAG appreciates the opportunity to comment on the City of Oceanside’s Coast Highway Corridor Study Draft EIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,

SETH LITCHNEY
 Senior Regional Planner

SLI/KHE/pro

**Letter
DEIR A1
Response**

**San Diego Association of Governments (SANDAG)
Seth Litchney, Senior Regional Planner
August 17, 2017**

DEIR A1-001 This comment introduces the comment letter by stating that the following comments are based on the goals and policies of SANDAG’s San Diego Forward: The Regional Plan. This comment also states that Smart Growth is a key goal of the Regional Plan, where the project supports this goal through proposed implementation of transit-oriented development and land use changes and the Complete Streets improvements. This comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the DEIR and does not require a response. The City appreciates SANDAG’s participation in the process and support of the proposed project.

DEIR A1-002 This comment asks that the Regional Plan be referenced as the “San Diego Forward: The Regional Plan” instead of “SANDAG’s 2050 Regional Plan.” In response to this comment, all references in to SANDAG’s San Diego Forward: The Regional Plan have been updated to reflect the preferred name of this plan by the commenter within Volume 3 of this Final EIR (FEIR):

“San Diego Associated Governments *San Diego Forward: The Regional Plan 2050 Regional Transportation Plan*

~~The 2050 Regional Transportation Plan (RTP)~~ SANDAG’s San Diego Forward: The Regional Plan (Regional Plan) acts as a blueprint for maintaining and improving the region’s transportation systems. The plan focuses on building a transportation system that encompasses sustainability, land use patterns, and social equity. The Regional Plan-RTP also outlines plans for maintaining, improving, and developing regional modes of transit, including rail systems, bus rapid transit, and roadways.

San Diego County Congestion Management Program

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP), which is part of SANDAG’s Regional Plan-RTP. SANDAG is the subregional planning agency for San Diego County and is responsible for the preparation and adoption of the county’s CMP. The purpose of the CMP is to monitor the performance of the region’s....”

This comment also states that the traffic analysis included in the DEIR should be augmented to include the planned transportation improvements described in the Regional Plan, which are listed in the comment. Because the traffic analysis for the DEIR and the revised traffic analysis for the PRDIER used the SANDAG Series 12 model, the transit improvements included in the Regional Plan are

reflected in the future traffic forecasts. Therefore, the traffic analysis in both the DEIR and the Partially Recirculated Draft EIR (PRDEIR) adequately accounted for the transit improvements when evaluating the project's traffic impacts.

In addition, while Section 3.14, *Transportation and Traffic*, of the PRDEIR does not specifically list out future planned transit improvement projects in the analysis, inclusion of these transit improvements would not change the determination that project implementation would result in less than significant impacts to alternative transportation, including transit services, as the project would not impact any existing transit services or bus stops. Therefore, no revision to the EIR is required in response to this comment.

DEIR A1-003 This comment suggests that the parking and transportation demand management (TDM) strategies laid out in the Coast Highway Vision Strategic Plan be incorporated into the DEIR. In addition, this comment summarizes the opportunities for shared mobility services between the project and the Oceanside Transit Center, which has been identified as a mobility hub prototype location as part of the SANDAG Regional Mobility Hub Implementation Strategy.

Mitigation measures identified in the DEIR and PRDEIR follow the City of Oceanside guidelines for traffic impact studies and have been coordinated between the City, the traffic engineer, and the CEQA consultant to ensure that all mitigation measures are feasible and reduce impacts to the greatest extent possible. As part of the DEIR and PRDEIR processes, incorporating parking and TDM strategies were not identified as mitigation measures for the project. However, while the proposed project would not have specific TDM measures required as part of its implementation, the City is fully committed to the ongoing and increased implementation of TDM measures, as appropriate, in accordance with City policies established in the Circulation Element of the General Plan and in the City's draft Climate Action Plan (CAP). Specifically, the City has included Policies 4.1 through 4.10 in its Circulation Element that address the City's efforts to promote the integration of TDM programs and the draft CAP calls for the development of a TDM Ordinance and Program.

DEIR A1-004 This comment requests that the City considers the development of a TDM ordinance that encourages developers to incorporate TDM-supportive capital improvements and programs through the entitlement process. This comment also requests that the City continue to partner with iCommute to promote participation in regional TDM programs and services. While this comment does not raise any issue concerning the adequacy of the DEIR, the City supports the iCommute program and will continue to implement TDM programs, as appropriate, in accordance with City policies established in the Circulation Element of the General Plan and in the City's draft CAP as noted above. The City appreciates the commenter for participating in this process. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.

DEIR A1-005 This comment lists additional SANDAG resources on smart growth and TDM and provides the web address to find these resources online. This comment does not raise any issue concerning the adequacy of the DEIR. The City appreciates SANDAG providing the additional references and resources.

DEIR A1-006 This comment is conclusory in nature and provides an address to send future environmental documents related to the project. The City appreciates SANDAG's participation in the planning and environmental review process and will continue to provide any future environmental documentation on this project to the commenter.

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

August 24, 2017

11-SD-5, 76, 78
PM VAR
Coast Highway Corridor Study
SCH# 2016051078

Mr. John Amberson
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

Dear Mr. Amberson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Coast Highway Corridor Study located near Interstate 5 (I-5), State Route 76 (SR-76), and State Route 78 (SR-78). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

DEIR A2-1

Caltrans has the following comments:

Traffic Impact Study

- 1. Comparing the existing condition with the existing plus project, there are two intersections that have been identified as being impacted with the project - Oceanside Boulevard/Coast Highway and Cassidy Street/Coast Highway. Comparing the future condition with the future condition plus project, there are ten intersections that have been identified as being impacted with the project - among them are Oceanside Boulevard/Coast Highway, Cassidy Street/Coast Highway, Vista Way/Coast Highway, Vista Way/Ditmar Street, and Vista Way/Stewart Street. Since the addition of the project may affect the traffic flow in both the existing and future conditions, the State requests to add the following intersections to your analysis in order to determine if these impacts will affect the State's facilities:
(1) I-5/Mission Ave Southbound (SB)& Northbound (NB) ramps
(2) I-5/Oceanside Boulevard SB & NB ramps
(3) I-5/California Street NB On-ramp
(4) I-5/Cassidy Street SB ramps
(5) I-5/Vista Way/SR-78 SB & NB ramps

DEIR A2-2

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2. Synchro output sheets state that the 2000 Highway Capacity Manual (HCM) is being used instead of the 2010 HCM. The TIS report states that the 2010 HCM was used to do the analysis. Synchro output sheets should also be using the 2010 HCM.
3. The Synchro output sheets for the Existing plus Project AM Peak hour are labeled PM Peak hour. Some of the labels, for the Synchro data in the Traffic Study in Appendix F, at the bottom of the sheet are incorrect. Several sheets were mislabeled as “Existing Project-PM Peak Hour”, but are in fact the AM peak hour and/or a different study scenario. These errors need to be corrected for review of this document.
4. The development levels for the Coast Highway Project Corridor are above those currently forecasted and approved in the Regional Transportation Plan (RTP). As stated in volume 3, Appendix F (for more details please refer to the contents on Page 85), the land use changes, which are foundations for modeling and forecasting of future traffic volumes, are admittedly more significant than what was been accepted and approved by the current RTP. The increased project growth is at least partly based on the land use scenario proposed in the Modified Coast Highway Vision and Strategic Plan (CHVSP), which has not yet been formally adopted by the City of Oceanside. The “higher-than-the-expected” land use changes could have negative impacts to traffic metrics, such as vehicle miles traveled (VMT). In turn, it would cause direct traffic impacts on the neighboring freeways, namely I-5, SR-76, and SR-78. Even though the welcoming complete street components are included, the increased traffic volumes have been demonstrated by the Draft Traffic Impact Study when the existing with and without project (2008), and the future with and without project (2035) are compared.
5. In the light of the previous comment, please provide more comprehensive traffic analysis based on the Alternative 1 and 2, and No Build for the following interchange/ intersection locations along I-5 freeway:
 1. SR-76
 2. Mission Avenue
 3. Oceanside Boulevard
 4. SR-78/Vista Way
6. Considering the 20-year design life, would 2040 be more suitable for the future traffic analysis? The latest SANDAG Regional Transportation Models contain Year 2012, 2014, 2016, 2020rc (Revenue Constrained), 2025rc, 2030rc, 2040rc, 2045rc, and 2050rc.
7. Please clarify which version of SANDAG Regional Transportation Models has been used for developing the future traffic data analysis. If the current Activity Based Model (ABM) models are being employed, describe what the Peak Hour Factors are for calculating the Peak Hour Volumes since ABM models in general don’t provide such datasets.

DEIR A2-3

DEIR A2-4

DEIR A2-5

DEIR A2-6

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Interstate 5

The potential impacts to Interstate 5 were not analyzed or discussed in this draft document. Several interchanges are located east of Coast Highway, including those at Harbor Drive, SR-76, Mission Avenue, Oceanside Boulevard, Cassidy Street and SR-78.

DEIR A2-7

A proposed reduction from 4 lanes to 2 lanes along Coast Highway, as well as the introduction of 7-12 roundabouts, would cause changes in traffic patterns and could divert additional traffic towards the I-5 ramp intersections at these six locations.

State Route 76 and Coast Highway

The Traffic analysis included in the Draft EIR for the proposed roundabouts at the SR-76/Coast Highway intersection (600 feet away from the first proposed roundabout) did not include a study of the ramp intersections and/or roadway segments at the I-5/SR-76 interchange. A study is needed to determine the potential impacts to the I-5/SR-76 interchange and its associated ramps as well as the ramp signal's impacts to the roundabout.

DEIR A2-8

Since the Caltrans R/W extends into this intersection and the southbound ramps are located approximately 600 feet east of the intersection, an exhibit displaying the anticipated construction limits of the proposed roundabout would aid in further analysis. Caltrans and the City of Oceanside currently split ownership of the intersection of North Coast Highway and SR-76. Relinquishment of the state's R/W here to the City of Oceanside will be needed to construct the roundabout. More detailed geometrics will need to be provided to evaluate full impacts to the state highway.

DEIR A2-9

Vista Way and State Route 78

The SR-78/Vista Way signalized intersection has not been analyzed to identify the potential traffic impacts from this proposed project. A change in roadway configuration and traffic patterns along Coast Highway could increase traffic congestion along Vista Way, between Coast Highway and I-5.

DEIR A2-10

Caltrans receives complaints from local residents on a regular basis concerning the traffic congestion on Vista Way between Coast Highway and the SR-78 interchange. A queuing analysis is needed to determine any increase to congestion along Vista Way during peak hour periods, as well as the effects of any proposed improvements at Ditmar and Vista Way.

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Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Oceanside, is encouraged.

DEIR A2-11

To reduce greenhouse gas emissions and achieve California’s Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable “smart growth” type land use planning and policies.

DEIR A2-12

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Mitigation

Caltrans is currently in the planning stage for the I-5/ SR-78 interchange project, which would modify the interchange to improve traffic operations and provide better connectivity to the I-5 North Coast Corridor project that would widen Interstate 5 through the City of Oceanside’s city limits. This proposed City project directly effects the I-5/SR-78 interchange project. Mitigation measures should be included in the City’s DEIR for these impacts.

DEIR A2-13

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

DEIR A2-14

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Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements.
<http://www.dot.ca.gov/trafficops/ice.html>

DEIR A2-14

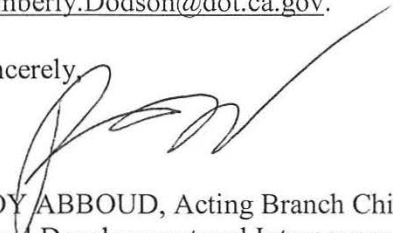
Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.

DEIR A2-15

If you have any questions, please contact IGR Coordinator Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

DEIR A2-16

Sincerely,



ROY ABBOUD, Acting Branch Chief
Local Development and Intergovernmental Review Branch

**Letter
DEIR A2
Response**

**California Department of Transportation (Caltrans)
Roy Abboud, Associate Transportation Planner
August 24, 2017**

- DEIR A2-001 This introductory comment describes the facilities in the project area which are under Caltrans jurisdiction and states that the Local Development-Intergovernmental Reviews Program reviews land use projects, which includes the project. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required.
- DEIR A2-002 This comment requests that the five additional intersections listed in the comment be added to the analysis in the Traffic Impact Analysis (TIA) to evaluate whether the project would impact the traffic flow at these intersections under existing and future conditions. In response to this comment and to subsequent discussions with Caltrans, the TIA (2017) provided with the DEIR was revised as part of the PRDEIR to include a total of nine additional intersections in order to evaluate the project's effect at these locations under both existing and future scenarios. In addition, the revised TIA (2018) prepared for the PRDEIR modeled the existing and future scenarios using the existing configuration of the Vista Way/SR-78 & I-5 interchange. As shown in the revised TIA (2018) and Section 3.14, *Transportation and Traffic*, of the PRDEIR, the project would not impact any of the additional intersections in existing conditions, but would result in significant and unavoidable impacts at two of the nine additional intersections (Oceanside Boulevard & Interstate 5 (I-5) Southbound On-/Off-Ramps (PM peak-hour) and Vista Way & I-5 Southbound On-/Off-Ramps) in the Future Conditions + Project scenario.
- DEIR A2-003 This comment identifies that an older version (2000) of the Highway Capacity Manual (HCM) was used for the Synchro output sheets and that some of the Synchro output files were incorrectly labeled. This comment also recommends that the Synchro output sheets be updated to use the 2010 HCM and the correct labeling. In response to this comment, the Synchro analysis files have been relabeled and corrected in the TIA (2018) prepared in support of the PRDEIR. Per Caltrans requirements, intersections that are controlled by Caltrans were analyzed using the HCM 2010 methodology in the PRDEIR TIA (2018), where the revised traffic analysis was incorporated into Section 3.14, *Transportation and Traffic*, of the PRDEIR.
- DEIR A2-004 This comment states that the development levels projected under the proposed project are greater than what is shown in the current Regional Transportation Plan (RTP) and could have negative effects on traffic metrics. Based on the increased forecasted growth, this comment requests that a more comprehensive traffic analysis be conducted for the four listed I-5 interchanges under Alternatives 1 and 2 as well as the No Project Alternative. In response to this

comment, additional traffic analysis was conducted for the four I-5 interchanges under the No Project Alternative and Alternatives 1 and 2 in the revised TIA (2018) prepared in support of the PRDEIR. However, as discussed in Section 3.11, *Population and Housing*, of the DEIR, while the proposed project could increase the rate and intensity of population growth in Incentive District area, the relative growth that could occur under the Incentive District could also occur with the implementation of current land use regulations, which allow for similar densities and intensities of development. Therefore, the DEIR and PRDEIR properly examines traffic and other impacts based on a projection method which is used to address the anticipated future condition with implementation of the project.

DEIR A2-005 This comment questions the use of year 2035 as the planning horizon for the proposed project and suggests that 2040 would be more suitable for the traffic analysis.

The City selected year 2035 as the horizon year for implementation of the proposed project as this year was identified as the most appropriate horizon year for analysis given the timeline of the proposed project. In response to the PRDEIR, Caltrans provided a similar comment as stated here but suggested the option to justify the use of Year 2035 by including a brief comparison between the Year 2035 in the SANDAG Series 12 with the Year 2040 or 2045 in the SANDAG series 12 or even later series in order to indicate that the current analysis is representative of what is expected to occur with the 2040 to 2045 timeframe.

For response PRDEIR A2-006, a screenline analysis was conducted for the proposed project similar to the I-5 North Coast EIR. The screenline analysis was performed at 10 locations on major roadways and 5 locations on I-5 along the corridor. The analysis was performed using the Series 12 data provided by SANDAG online in the Transportation Forecast Information Center (TFIC) (tfic.sandag.org). When comparing the adjusted Series 12 volumes from 2035 to 2050, there is an average increase of 12 percent and 2 percent at freeway locations and key roadways, respectively. Using these values as a base for interpolation: the average increase from 2035 to 2040 is expected to be 4 percent and 0.67 percent for freeway locations and key roadways, respectively; the average increase from 2035 to 2045 is expected to be 8 percent and 1.33 percent for freeway locations and key roadways, respectively. Considering the small difference in 2035-2045 volumes forecast by the Series 12 model, it is believed that the 2035 volumes used in the traffic analysis are comparable to those which are expected for the years 2040 and 2045. Therefore, the use of year 2035 is justified as an appropriate planning horizon for the project. No revisions to the EIR are required in response to this comment.

DEIR A2-006 This comment requests clarification on which version of the SANDAG Regional Transportation Models was used to develop the future traffic data analysis. In addition, this comment requests a description of the Peak Hour factors used if the current Activity Based Model were used. The SANDAG Series 12 Model was utilized to develop the Year 2035 traffic forecasts, where the SANDAG Series 12 Model is not an activity based model. This comment refers to more recent series of the SANDAG model, which are activity based.

DEIR A2-007 This comment states the proposed reduction from four lanes to two lanes along Coast Highway, as well as the introduction of 7 to 12 roundabouts, would cause changes in traffic patterns and could divert additional traffic towards the 1-5 ramp intersections at the intersections of Coast Highway with Harbor Drive, SR 76, Mission Avenue, Oceanside Boulevard, Cassidy Street, and SR 78.

Given the complexity of the model forecast for the Year 2035 used in the revised TIA (2018), which considers both potential diversion of traffic from Coast Highway to parallel routes such as I-5 and trips generated by anticipated development under the Incentive District, it is difficult to ascertain whether the increases in traffic volumes at the Caltrans ramps are caused more by diversion or more by the increased development/growth assumptions for the future traffic scenarios.

However, through the use of the SANDAG Series 12 model, which incorporates these assumptions about traffic redistribution and development growth, the proposed project and the alternatives analyzed are projected to result in changes to traffic volumes at all I-5 ramp intersections within the City of Oceanside. The revised TIA (2018) assessed these forecasted changes based on the SANDAG Series 12 model, which used the existing configuration of Vista Way/SR-78 & I-5 interchange, and presented the results of those modeled forecast conditions, which are also included in the analysis in Section 3.14, *Transportation and Traffic*, of the PRDEIR. As identified in the revised TIA (2018) and PRDEIR, significant traffic impacts are expected to occur at the following ramp intersections under each scenario:

Year 2035 With Project

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 1

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 2

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 3

- I-5 SB On-/Off-Ramps & Oceanside Boulevard

For these locations where significant impacts are forecasted to occur, mitigation measures have also been identified to reduce traffic impacts to the lowest extent feasible.

DEIR A2-008 This comment states that the TIA (2017) prepared in support of the DEIR did not include a study of the ramp intersection and/or roadway segment of I-5/SR 76 interchange with project implementation, even though the interchange is located 600 feet from a proposed roundabout location. Furthermore, this comment request that additional analysis is conducted to evaluate the project's impact to the I-5/SR 76 interchange, its associated ramps, and the ramp's signal impacts to the proposed roundabout. In response to this comment, the revised TIA (2018) prepared in support of the PRDEIR included the additional analysis of the project's effects to the I-5/SR 76 interchange, which is summarized in Section 3.14, *Transportation and Traffic*, of the PRDEIR. The revised traffic analysis determined that with project implementation impacts to the I-5/SR 76 interchange and its associated ramps would be less than significant and no mitigation measures are required.

DEIR A2-009 This comment states that since the Caltrans' right-of-way (ROW) extends into the intersection of SR 76 and Coast Highway and the southbound ramps are located approximately 600 feet east of this intersection, an exhibit displaying the anticipated construction limits of the proposed roundabout would aid in further analysis. Furthermore, this comment states that both Caltrans and the City currently split ownership of the intersection of North Coast Highway and SR 76, where Caltrans would need more detailed geometrics to relinquish the State's ROW at this intersection. The City has prepared 30 percent preliminary engineering design plans as part of the Coast Highway Corridor Study, separate from the EIR. Design considerations for this location would be finalized as the design phase of the project progresses, where the City would continue to coordinate with Caltrans. Once the engineering design phase has progressed further, the City would provide Caltrans more detailed geometrics and an exhibit showing the construction limits for this intersection to obtain Caltrans' approval of the relinquishment of the ROW to the City at this location.

DEIR A2-010 This comment states that the TIA (2017) prepared in support of the DEIR did not include a study of the SR 78 and Vista Way signalized intersection with project implementation and requests that this additional analysis be conducted. This comment requests that a queueing analysis is conducted for Vista Way between Coast Highway and the SR 78 interchange during the peak hour periods. In response to this comment, the TIA (2017) provided with the DEIR was revised as part of the PRDEIR to include nine additional intersections, including the Vista Way/SR-78 & I-5 interchange, in order to evaluate the project's effect at these

locations under both existing and future scenarios. In addition, the revised TIA (2018) prepared for the PRDEIR modeled the existing and future scenarios using the existing configuration of the Vista Way/SR-78 & I-5 interchange. As shown in the revised TIA (2018) and Section 3.14, *Transportation and Traffic*, of the PRDEIR, the project would not impact any of the additional intersections in existing conditions, but would result in significant and unavoidable impacts at two of the nine additional intersections, which includes Vista Way & I-5 Southbound On-/Off-Ramps, in the Future Conditions + Project scenario.

In addition, the traffic analysis in the revised TIA (2018) was conducted using the HCM 2010 methodology and includes forecasts for queuing on the approaches for the Vista Way/SR-78 & I-5 interchange. No revisions to the EIR are required in response to this comment.

- DEIR A2-011 This comment states that Caltrans views transportation projects as an opportunity improve safety, access, and mobility for all travelers in California and recommends early coordination between the Caltrans and the City to discuss any locations the project may affect that straddle both jurisdictions. In addition, this comment expresses Caltrans' commitment to implementing Complete Streets and Climate Change policies into the State Highway Operations and Protection Program projects to meet multi-modal mobility needs. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City appreciates the commenter for participating in this process. This comment will be included as part of this FEIR for the public record as well as for review and consideration by the decision-makers prior to a final decision on the project.
- DEIR A2-012 This comment states the Caltrans recognizes the connection between transportation and land use, where the pattern of land use can affect local vehicles miles traveled and the number of trips, and reinforces the importance of collaboration between state and local agencies. This comment also states that the City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City would continue to coordinate with Caltrans after approval of the project for the project components that are located in both agencies' jurisdictions. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.
- DEIR A2-013 This comment states that Caltrans is currently in the planning stage of the Vista Way/SR-78 & I-5 Interchange Project, which would modify the interchange to improve traffic operations and provide better connectivity to the I-5 North Coast Corridor project that would widen I-5 through the City of Oceanside's limit. This

comment also states that the proposed project would affect the Vista Way/SR-78 & I-5 interchange and should include mitigation measures for this intersection in the DEIR. As discussed in response DEIR A2-002, the TIA (2017) provided with the DEIR was revised as part of the PRDEIR to include nine additional intersections, including the Vista Way/SR-78 & I-5 interchange, in order to evaluate the project's effect at these locations under both existing and future scenarios. In addition, the revised TIA (2018) prepared for the PRDEIR modeled the existing and future scenarios using the existing configuration of the Vista Way/SR-78 & I-5 interchange. As shown in the revised TIA (2018) and Section 3.14, *Transportation and Traffic*, of the PRDEIR, the project would not impact any of the additional intersections in existing conditions, but would result in significant and unavoidable impacts at two of the nine additional intersections, which includes Vista Way & I-5 Southbound On-/Off-Ramps, in the Future Conditions + Project scenario.

As discussed in Section 3.14, *Transportation and Traffic*, of the PRDEIR, in order to improve impacts to Vista Way and I-5 Southbound On-/Off-Ramps (Intersection 56) to an operating condition that is less than significant under the Future Conditions + Project scenario, lane modifications would be required to construct new through traffic lanes in either the westbound or eastbound directions on Vista Way/SR 78. The addition of a westbound through lane at this location was determined to be infeasible due to the limited right-of-way available on Vista Way west of the intersection. Furthermore, with the recent road diet installed by the City along Vista Way east of this intersection, lane modifications would be inconsistent with the vision and goals of the City. Moreover, the addition of an eastbound through lane was also found to be infeasible. The configuration of the traffic lanes and bridge to the east of the intersection is not compatible with three eastbound through lanes on Vista Way. Caltrans and SANDAG have plans to reconfigure the Vista Way/SR-78 & I-5 interchange in the future, where the proposed reconfiguration would address the significant traffic impact identified for the intersection at Vista Way and I-5 Southbound On-/Off-Ramp. However, while this is currently in Caltrans and SANDAG's long-term plans, funding is not guaranteed with enough certainty to include the improvements in a CEQA-required future analysis scenario. Therefore, project impacts to the intersection of Vista Way and I-5 Southbound On-/Off-Ramps would remain significant and unavoidable under the Future Conditions + Project scenario.

DEIR A2-014 This comment states that direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA and the National Environmental Policy Act (NEPA). As documented in the PRDEIR, all impacts to the State Highway System associated with project implementation would be mitigated the fullest extent possible with adoption of the mitigation measures outlined in the EIR. Prior to approval of the project or any of the project alternatives the City would also need to demonstrate that the

benefits of the project outweigh the environmental consequences of the project (through the Findings of Fact and Statement of Overriding Considerations). While the proposed project is required to undergo environmental review under CEQA due to its location within California, since the project does not include federal land, funds, approval, or permit, the project is not subject to environmental review under NEPA.

- DEIR A2-015 This comment states that any work within Caltrans' ROW for the project would require discretionary review and approval by Caltrans and requires obtaining an encroachment permit prior to construction. Furthermore, this comment states that as part of the encroachment permit process, the City must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within Caltrans' ROW, and any corresponding technical studies. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City will provide the certified EIR after approval of the project by the City Council is obtained and the City is ready to initiate the encroachment permit process with Caltrans. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.
- DEIR A2-016 This comment is conclusory in nature and provides the commenter's contact information. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City appreciates Caltrans' participation in the planning and environmental review process.



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Oceanside, CA 92054
(760) 966-6500
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www.GoNCTD.com

August 24, 2017

Mr. John Amberson
Transportation Planner
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Sent Via Electronic Mail: jamberson@ci.oceanside.ca.us

Re: Draft Environmental Impact Report for Coast Highway Corridor Study

Dear Mr. Amberson:

BOARD OF DIRECTORS

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GENERAL COUNSEL
Lori A. Winfree

The North County Transit District (NCTD) appreciates the opportunity to participate in the review of the Draft Environmental Impact Report (DEIR) for the proposed Coast Highway Corridor Study located between Harbor Drive to the north, and Eaton Street near the city's southern boundary ("Project"). As provided, the Project is 3.5 miles and would convert four traffic lanes to two lanes, with the exception of two southbound lanes between Highway 76 and Surfrider Way, and south of Kelly Street to Eaton Street. Other key elements include a continuous striped bicycle lane, 10 midblock crosswalks, 12 roundabouts, traffic calming measures, and streetscape improvements (landscaping). NCTD has prepared comments, pursuant to the DEIR, regarding potential impacts to bus and rail operations, which are found in the attachment.

NCTD is committed to ensuring safety along its right-of-way (ROW) and is faced with increasing pressure from regulatory agencies to mitigate hazards posed by train and bus transportation. NCTD has multiple fixed bus routes and SPRINTER rail crossings within the proposed project corridor. The enclosed comments have been prepared to ensure public safety and regulatory compliance at the proposed roundabouts, rail and pedestrian crossings, bicycle lane, and streetscape improvements. As noted therein, certain design and location elements will need to be addressed to ensure the safety of the public and compliance with transit related regulations. NCTD respectfully requests that City staff work with NCTD to ensure all comments prepared for the North Coast Highway 101 Streetscape Improvement Project DEIR are considered for updates to the Final EIR for this project.

DEIR A3-1



Re: Draft Environmental Impact Report for Coast Highway Corridor Study
August 24, 2017
Page 2 of 2

It is NCTD's goal to work collaboratively with the City to ensure planned project goals are executed and mutually beneficial. If you have any questions about the comments enclosed with this letter, please feel free to contact me via e-mail at nfacchini@nctd.org, or at (760) 966-6537.

↑
DEIR A3-1

Sincerely,



Nedina Facchini
Senior Planner

Enclosures: Subject Matter Expert Comments on Draft Environmental Impact Report for Coast Highway Corridor Study

cc: Jacob Gould, Senior Legal Counsel, NCTD

Comment Letter DEIR A3

No.	Date	Agency	Category	Summary of Comments
1	8/4/2017	NCTD	ADA Compliance	All bus stops in the project area need to be brought into ADA compliance: a boarding and alighting area with a minimum of an 8'x5' flat, concrete surface that is unobstructed from the curb. Complete specifications are provided in the NCTD Bus Stop Development Handbook.
2	8/4/2017	NCTD	Bus Stops	NCTD has multiple bus routes along Coast Highway, between Seagaze Drive and Vista Way. All bus stops along this corridor should have a minimum of a bench and shelter.
3	8/4/2017	NCTD	Bus Stops	Two options for bus stops located at intersections with proposed roundabouts: 1.) Near-side stops must be constructed with a bus bulb out in order to ensure the bus is not blocked in at the stop by traffic waiting to enter the round-about. 2.) Far-side stops must be constructed with a bus pull out to ensure the bus will not block traffic exiting the roundabout, potentially creating safety hazards.
4	8/4/2017	NCTD	Bus Stops	Make sure all bus stops have a clear path for two 40 foot buses to safely load and unload passengers. Avoid parking spaces or other obstructions at the stop. Bus stop dimensions are found in the NCTD Bus Stop Development Handbook.
5	8/4/2017	NCTD	Bus Stops	Incorporate landscaping and street furniture that does not visually block transit passengers waiting at a bus stop to an approaching bus.
6	8/4/2017	NCTD	Alternative #1	Page 5-6: CPUC G.O. 88-B will need to be filed for altering Coast Hwy from 2 lanes to 4 lanes over Escondido Sub division Sprinter Tracks.
7	8/4/2017	NCTD	Fencing	Fencing cannot interfere with visibility of any railroad warning devices or lights along Coast Highway.
8	8/4/2017	NCTD	Parking	Cross Section showing parking along Coast Highway: General Comment: Parking is illegal within 7-1/2 feet from railroad tracks. Currently there are no Red Curbs painted near the Sprinter Tracks at Coast Highway. Project will need to assume the responsibility of enforcing no parking near railroad tracks.
9	8/4/2017	NCTD	Roundabouts	Roundabouts CA MUTCD Section 8C.12 Grade Crossings Within or In Close Proximity to Circular Intersections Support: At circular intersections, such as roundabouts and traffic circles, that include or are within close proximity to a grade crossing, a queue of vehicular traffic could cause highway vehicles to stop on the grade crossing. Project to assume responsibility for addressing concern.
10	8/4/2017	NCTD	Traffic	Evening Coaster and Sprinter rail transit service results in peaks of automobile traffic exiting the Oceanside Transit Center park and ride to access Coast Highway at Michigan and Missouri. A peak 15 minute traffic analysis should be performed for the PM Peak.
11	8/4/2017	NCTD	Bus Stops	How will the existing NCTD Bus Stops be accommodated in this Streetscape design?
12	8/4/2017	NCTD	Roundabouts	Could transit priority elements be added to the Coast Hwy and Wisconsin Ave roundabout? This intersection is important to both NCTD Bus Routes 101, 302 and 318 and to many of the transit customers driving to the Oceanside Transit Center park and ride.
13	8/4/2017	NCTD	Bus Routes	Could transit priority elements be added to the Vista Way and Stewart Ave. intersection. NCTD Bus Route 302 uses Vista Way to serve the Hwy 78 corridor.
14	8/4/2017	NCTD	Safety	Ensure the width of the lanes when down to one lane in direction of travel meets the minimum requirements for a 40' bus.
15	8/4/2017	NCTD	Bus Routes	How will addition of Roundabouts effect bus routes and bus stop locations?. City should consider current bus routes, bus stop locations, and ability for NCTD busses to navigate the 12 proposed roundabouts?
16	8/4/2017	NCTD	Bus Routes	What steps will be taken in order to minimize impact to NCTD buses and routes during construction?
17	8/14/2017	NCTD	Rail	The project footprint is within the Sprinter track crossing; 2 blocks south of Coast and Oceanside Blvd. The City of Oceanside will need to get CPUC approval in the form of a GO88B. Also, a diagnostic review with the CPUC and the railroad will be required.

DEIR A3-2

DEIR A3-3

DEIR A3-4

DEIR A3-5

DEIR A3-6

DEIR A3-7

DEIR A3-8

DEIR A3-9

DEIR A3-10

DEIR A3-11

DEIR A3-12

**Letter
DEIR A3
Response****North County Transit District (NCTD)
Nedina Facchini, Senior Planner
August 24, 2017**

-
- DEIR A3-001 This introductory comment summarizes the project description as well as the various facilities and responsibilities of the commenter. In addition, this comment request that the City work with the commenter to ensure all comments prepared for the North Coast Highway 101 Streetscape Improvement Project DEIR are considered for updates to this FEIR for the project. The City has met with NCTD during the course of the development of the project to discuss their needs. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required.
- DEIR A3-002 This comment summarizes various requirements and development standards necessary for the design and construction of bus stops along Coast Highway, including compliance with the Americans with Disabilities Act (ADA) requirements. The City has met with NCTD during the course of the project study effort to review NCTD bus operations and needs. The project design process, which would occur following certification of EIR, would include development of appropriate roadway and streetscape designs to accommodate NCTD bus operations and needs, including ADA requirements, which would be facilitated through discussion between the City and NCTD. Since this comment does not raise any issue concerning the adequacy of the DEIR, no further response is required.
- DEIR A3-003 This comment states that the City will need to be file a California Public Utilities Commission (CPUC) General Order (G.O.) 88-B, which requires authorization of rail crossing modifications that meet certain criteria, for Alternative 1 for altering Coast Highway from 2 lanes to 4 lanes over Escondido Subdivision Sprinter Tracks. While this comment does not raise any issue concerning the adequacy of the DEIR, the City acknowledges that permits would be required from the CPUC during construction activities that cross railroad lines.
- DEIR A3-004 This comment states that fencing cannot interfere with visibility of any railroad warning devices or lights along Coast Highway. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required.
- DEIR A3-005 This comment states that parking is illegal within 7.5 feet of the railroad tracks and that the project would be required to enforce this law. While this comment does not raise any issue concerning the adequacy of the DEIR, the City acknowledges that enforcement of parking laws would be required with project implementation.

DEIR A3-006 This comment states that the project should address the potential of roundabouts causing a queue of vehicular traffic to stop on the grade crossing. The intersection of Coast Highway and Oceanside Boulevard is the only study intersection located in close proximity to an existing or planned grade crossing within the project's traffic study area. This intersection is proposed to be converted to a roundabout as part of the proposed project and is located about 625 feet north of the Sprinter grade crossing on Coast Highway.

Under Alternatives 1 through 3, this intersection would remain as a traffic signal controlled intersection in the existing condition scenario. Under the Existing + Project conditions, the peak 95th percentile vehicle queue for northbound Coast Highway, which is the critical movement associated with potential conflicts with the Sprinter tracks, is forecast to be 1.8 vehicles (about 35 feet) in AM peak hour and 15 vehicles (300 feet) in the PM peak hour. In the Future + Project conditions, the AM peak hour 95th percentile queue is forecast to be 2.2 vehicles (44 feet), while the PM peak hour 95th percentile queue is forecast to be 50.7 vehicles (1,000 feet). With the proposed project mitigation measure for the project scenario to maintain the existing traffic signal in place of the proposed roundabout, there is no anticipated impact from vehicle queues at the grade crossing resulting from the roundabout at Coast Highway and Oceanside Boulevard. No revision to the EIR is required in response to this comment.

DEIR A3-007 This comment states that a peak 15-minute traffic analysis should be performed for the PM Peak Hours to ensure that vehicular traffic caused by evening Coaster and Sprinter services are accounted for in the traffic analysis. The Traffic Impact Analysis contained in the DEIR as well as the revised Traffic Impact Analysis contained in the PRDEIR follow the City's traffic study guidelines, which call for the analysis of traffic conditions during the typical weekday AM and PM peak hours. Therefore, the traffic analysis contained in this EIR has accounted for increased vehicular traffic caused by evening rail transit services in the PM peak hours.

DEIR A3-008 This comment questions how NCTD bus stops would be accommodated in the project's proposed streetscaping design. Please refer to response A3-002 for a response to this comment.

DEIR A3-009 This comment requests that transit priority elements be added to the intersections of Coast Highway and Wisconsin Avenue and Vista Way and Stewart Avenue, as these intersections are important to various NCTD bus routes. As stated above, the project design process, which would occur following certification of EIR, would include development of appropriate roadway and streetscape designs to accommodate NCTD bus operations and needs. These designs would be developed by the City in discussion with NCTD. In addition, the intersection of Vista Way and Stewart Avenue was analyzed as a two-way-stop-controlled (TWSC) intersection with free flowing traffic for the east/west direction. Under

this configuration, bus routes moving in the east/west direction at this intersection do not stop.

- DEIR A3-010 This comment asks how the addition of roundabouts would affect bus routes and stops locations and states that the roadway design under the project can accommodate a 40-foot bus. Please refer to response DEIR A3-002 for a response to this comment.
- DEIR A3-011 This comment inquires about impacts to bus routes and facilities during construction of the project. As stated in Section 3.14, *Traffic and Transportation*, of the PRDEIR, construction of the Complete Streets improvements would require partial lane closures during construction of the roundabouts. However, MM-Complete Streets-TRAF 3 would require the construction contractor to prepare a Traffic Control Plan, which would show all signage, striping, delineated detours, flagging operations, and any other devices that would be used during construction to guide motorists, including buses, safely through the construction area and allow for adequate access and circulation to the satisfaction of the City. The Traffic Control Plan would be prepared in accordance with the City's traffic control guidelines. The Traffic Control Plan would ensure that congestion and traffic delay are not substantially increased as a result of the construction activities.
- DEIR A3-012 This comment states that since the project footprint is within the Sprinter track crossing, the City would need to get CPUC approval in the form of a G088B. Also, a diagnostic review with the CPUC and the railroad would be required. This comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City appreciates NCTD's participation in the planning and environmental review process.

CALIFORNIA COASTAL COMMISSION

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October 5, 2017

John Amberson
Transportation Planner
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

Re: Draft Environmental Impact Report Coast Highway Corridor Study Project

Dear Mr. Amberson:

Commission staff appreciates the opportunity to review and provide comments on the Coast Highway Corridor Study Draft Environmental Impact Report. The project consists of two components: Complete Streets improvements and a new Incentive District. The Complete Streets project includes modifications and improvements to approximately 3.5 miles of Coast Highway from its northern terminus at Harbor Drive, south to Eaton Drive. The changes include new roundabouts at up to 12 intersections, mid-block crosswalks, a reduction in travel lanes from four to two, continuous bike lanes, and additional landscaping improvements. The majority of the Complete Streets project is within the City of Oceanside’s coastal development permit jurisdiction, but portions of the project fall within the Commission’s appeal jurisdiction and the Commission’s permit jurisdiction. The portions within the Commission’s permit jurisdiction (including near San Luis Rey River, Loma Alta Creek, and south of Eaton Street near Buena Vista Lagoon) will require a coastal development permit from the Commission.

The second component of the Coast Highway Corridor Study is the creation of a new Incentive District that generally surrounds Coast Highway, from Seagaze Drive, south to Eaton Street and from Ditmar Street, west to Pacific Street. The Incentive District is divided into three subarea types: nodes, commercial villages and transitional avenues and it will be implemented through new zoning provisions. The proposed ordinance encourages redevelopment by allowing greater densities, increased height, reduced parking standards, and expanded permitted land uses. In exchange for these development incentives, projects would be required to provide community benefits. Adoption of the Incentive District requires a Local Coastal Program Amendment to amend both the City’s Land Use Plan and Implementation Plan.

Specific comments on the draft EIR are included below, separated by the two project components.

DEIR A4-1

October 5, 2017

Page 2

Complete Streets

- *Traffic and Alternatives:* Staff appreciates that the traffic study conducted for the project occurred during the summer, capturing conditions when the public would be travelling to and accessing the coast. However, the EIR should clarify how many traffic counts were conducted and if any counts occurred during a holiday or weekend when beach traffic is expected to be greatest.

DEIR A4-2

Under existing traffic conditions and without the project, all study intersections operate at an acceptable level of service (LOS). Under existing conditions and with the project, two intersections will operate at an unacceptable LOS. Under future traffic conditions and without the project, two intersections will operate at an unacceptable LOS. Under future traffic conditions and with the project, ten intersections will operate at an unacceptable LOS. The EIR proposes to mitigate the two unacceptable LOS intersections under existing conditions + project. The EIR also proposes mitigation measures for eight of the ten unacceptable LOS intersections under future conditions + project; however, two of the intersections cannot be mitigated with significant and unavoidable impacts projected at Coast Highway/Wisconsin Avenue and Vista Way/Stewart Street.

DEIR A4-3

While the multimodal enhancements are expected to improve local mobility, including safer pedestrian and bicycle access, these improvements should not come at the expense of coastal access by other visitors. Commission staff acknowledges that pedestrian and cycling enhancements will also serve public access but the EIR should demonstrate that lane reductions and/or street modifications will not result in significant traffic delays that would eventually discourage coastal visitors, especially regional users. Coast Highway/Highway 101 through the coastal communities serves as a scenic drive and visitor destination where users often just enjoy driving along the corridor and sightseeing. It is also unclear from the EIR and traffic analysis if the impacts on traffic are due to the construction of the roundabouts or the lane reductions, please clarify.

In addition, the City should analyze the feasibility of an alternative that includes only the minimum safety improvements (bike lane and mid-block crosswalks) without reducing the number of lanes along Coast Highway. Finally, the EIR does analyze several project alternatives, but it is unclear which option is the City's preferred alternative, please clarify.

DEIR A4-4

DEIR A4-5

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Page 3

- *Parking:* It is unclear how the public parking supply along Coast Highway will be impacted. The Project Description section of the EIR states that parking would be added or maintained along some segments of the roadway, but in other segments it would be removed. However, for some segments of the roadway, parking is not described, either currently or as proposed. The EIR should address what specific impacts to parking are expected to occur and should indicate the total number and location of parking spaces, both currently and with completion of the proposed project. Losses should be minimized or avoided by providing appropriate offsets, especially where that parking serves beach visitors.

DEIR A4-6

- *Construction:* Development of the “Complete Streets” project is expected to occur in phases, beginning with the northernmost segment and traveling southward. The EIR states that partial intersection closures would occur for construction of the proposed roundabouts; however, some through-traffic would be maintained at all times. Coast Highway is a major coastal accessway and construction of the complete streets improvements could negatively impact public access to the coast. The City should consider scheduling construction outside of the summer season when public access to the coast is at its peak. In addition, the EIR should describe where construction staging areas are proposed and any associated impacts.

DEIR A4-7

- *Views:* The EIR proposes to construct up to 12 roundabouts along Coast Highway at existing intersections. LCP Policy 6.4 states, “The City shall maintain existing view corridors through public rights-of-way” and Policy 6.13 states, “New development shall utilize optimum landscaping to achieve the following effects: [...] c. Frame and accent (but not obscure) coastal views.” The EIR concludes that because the proposed roadway improvements are two feet in height or less, there would be no impacts on public views. However, because many of the existing coastal views occur along the east to west streets, the EIR should specifically address how plants, trees, and other development proposed to occur within the roundabouts would impact views of the water, including visual simulations of the proposed development.

DEIR A4-8

- *Water Quality:* The project is adjacent to several water bodies, including San Luis Rey River, Loma Alta Creek, and Buena Vista Lagoon. While the EIR discusses water quality BMPs proposed during construction of the project, the EIR should discuss water quality impacts associated with the project itself and should include opportunities to reduce and treat urban runoff and improve water quality in

DEIR A4-9

October 5, 2017

Page 4

adjacent water bodies, such as with infiltration basins, improved drainage, reduction of impermeable surfaces, etc.

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DEIR A4-9

Incentive District

- *Land Use Changes:* The project includes changes to the City’s Land Use Plan to: 1) allow mixed-use and residential uses in the General Commercial designation, 2) allow mixed-use in the Coastal Dependent, Recreation, Visitor-Serving Commercial designation, and 3) delete the Light-Industrial land use designation. Changes to the LUP would be accompanied by the Incentive District Ordinance, a new zoning program which further specifies that development in the “avenue” segments may consist of stand-alone residential (no development incentives offered), while mixed-use developments within the “nodes” or “commercial villages” segments must provide a minimum commercial FAR of 0.20 or 0.25, depending on the lot size.

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DEIR A4-10

The EIR references a 2014 market analysis that indicated strong support for residential uses in the project area as motivation for the proposed Incentive District. The EIR concludes that development anticipated under the Incentive District would result in a similar pattern of development as is expected under current conditions, but redevelopment should occur at a faster rate. Given the changes in permitted land uses in support of residential uses, it is unclear how the new land use designations and incentive program will result in the same development as what is possible under current policies. The EIR should clarify how future build out under the Incentive District compares to future build out under current conditions. In addition, the EIR should demonstrate that the City will have adequate visitor-serving commercial developments to serve the public under the Incentive District in the future, assuming the project area is developed to its full residential potential.

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DEIR A4-11

While Commission staff concurs in concept that the entire Coast Highway corridor does not need to be commercially developed, the City must document that both the current and foreseeable demand for visitor commercial uses will be met. The City needs to identify and explain where prime visitor nodes are expected and then reserve such areas, including regulations to achieve the land use goals. The City should consider incorporating additional measures in the Incentive District Ordinance to encourage visitor-serving commercial uses and pedestrian orientation, such as by restricting residential uses to the upper levels of

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DEIR A4-12
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October 5, 2017

Page 5

mixed-use projects, requiring frontage along Coast Highway to be commercial in specific segments, etc.

DEIR A4-12

- *Height:* Projects proposed in the node segments could have a maximum height of 65 feet with an average height of 55 feet. The existing height limitation in this portion of the City is 45 feet or 4 stories, although much of Coast Highway appears to be developed with mostly one- and two-story buildings. The EIR should clarify if this height increase is available to all parcels in the node subareas, or just those with frontage along Coast Highway. In addition, the EIR should evaluate how this height increase is consistent with the certified LCP, if it will impact any public coastal views or surrounding community character, and should include visual simulations.

DEIR A4-13

- *Views:* The EIR concludes that the Incentive District will not significantly impact views; however, it appears that the proposed setback requirements may impact views along the east-west streets, especially in the node subareas where there is no minimum side-yard setback. Please clarify how the proposed setbacks differ from existing requirements and analyze any potential impacts on public views as a result, including through visual simulations.

DEIR A4-14

- *Parking:* The Incentive District modifies parking requirements for residential, eating and drinking establishments, and other non-residential uses. Standards for visitor accommodations would be the same as existing standards for hotels, and personal services would remain the same as well.

Compared to existing standards, which are based on bedrooms and dwelling units, the Incentive District determines parking requirements for new residential developments based on a square footage standard. Because of the change in metric, it is unclear how this would impact required parking, whether it would increase or reduce the required amount of parking for new residential developments. In accordance with LCP Policy 2.17, residential developments should be required to provide adequate parking to accommodate residents without adversely impacting the public parking supply. The EIR should address how this change in parking requirements will differ from current standards and if the change would affect the existing parking supply.

DEIR A4-15

Eating and drinking establishments and non-residential uses would also be required to provide fewer parking spaces under the proposed standards. The EIR

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should address how the proposed parking requirements will impact available public parking along the Coast Highway corridor and near the beach, both currently and at full development of the Incentive District, using a “worst-case scenario” where the project area is fully developed with the minimum parking allowed.

DEIR A4-16

- *Biology:* The EIR states that development of projects under the Incentive District could result in direct impacts to riparian habitat, possible wetlands, and other sensitive habitats located near Loma Alta Creek, Buena Vista Lagoon, and southwest of the Eaton Street and South Coast Highway intersection. However, the EIR would require formal site-specific identification of habitat and, if found, would require all impacts to be mitigated consistent with the City’s MHCP. Although the MHCP has been implemented since 2010, it has not been formally adopted by the City and it has not been certified by the Commission. The EIR should clarify what direct impacts are expected and provide further discussion of these identified impacts, including the amount. In addition, the EIR should clarify how the proposed impacts to wetlands would be consistent with the City’s LUP and policies regarding the diking, dredging, and filling of coastal waters (Policy III.C.4) or the protection of Buena Vista lagoon and Loma Alta Creek (Policies V.C.1, 2,7 and 8).

DEIR A4-17

We look forward to future collaboration on the Coast Highway corridor, and appreciate the commitments presented within the study to preserve and enhance coastal resources. If you have any questions or concerns, please do not hesitate to contact me at our San Diego District Office.

DEIR A4-18

Sincerely,



Kaitlin Carney
Coastal Planner

**Letter
DEIR A4
Response****California Coastal Commission (CCC)
Kaitlin Carney, Coastal Planner
October 5, 2017**

- DEIR A4-001 This comment provides an introduction to the comment letter and restates the project description. This comment also states that implementation of the project would require the City to obtain a coastal development permit from the CCC for the Complete Streets improvements and to process a Local Coastal Program Amendment to the City’s Land Use Plan and Implementation Plan for the Incentive District. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the DEIR, the City appreciates the commenter’s input on the required coastal approvals to implement the project. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.
- DEIR A4-002 The comment requests clarification on the timing of the traffic counts used in the TIA, specifically if the counts were collected during a holiday or weekend when beach traffic is anticipated to be greatest. As stated in the TIA prepared for the DEIR (IBI 2017), the TIA analyzed traffic conditions during the weekday AM and PM peak hours, using traffic counts obtained during the peak summer season as traffic is typically the highest during the summer months and thus captures a conservative representation of traffic conditions. This approach is consistent with the City of Oceanside’s traffic study guidelines, which does not recommend the analysis of traffic conditions during a holiday or weekend event for traffic impact studies. In addition, new traffic counts for the Caltrans interchanges were taken in March 2018 during the AM and PM peak hours as part of the revised TIA (2018) prepared for the PRDEIR.
- DEIR A4-003 This comment states that with project implementation two intersections would have significant and unavoidable traffic impacts in future conditions as determined by the analysis in the TIA prepared for the DEIR. This comment also requests that the EIR demonstrate that the lane reductions and/or street modifications would not result in significant traffic delays that would eventually discourage coastal visitors, especially regional users, and asks for clarification on whether traffic impacts are due to the construction of the roundabouts or the lane reductions.
- While the commenter is correct in its characterization of the significant and unavoidable traffic impacts determined in the TIA (2017) for the DEIR, new traffic impacts were determined based off the revised TIA (2018) prepared for the PRDEIR in 2018. Specifically, the revised TIA (2018) and the PRDEIR concluded that significant and unavoidable traffic impacts would occur at four intersections with project implementation based on the removal of the buildout of

the Vista Way/SR-78 & I-5 Interchange Project (i.e., it excludes HOV lanes and ramps) from the traffic model.

The EIR for the Coast Highway Corridor Project includes a comprehensive traffic impact analysis that assesses traffic conditions for both weekday peak hours and full weekday conditions. The traffic analysis was conducted using methodology that is consistent with the guidelines and requirements of the City of Oceanside, Caltrans, and SANDAG. The proposed roadway improvements identified in both the DEIR and PRDEIR are intended to incorporate Complete Streets enhancements to the Coast Highway corridor, enhancing the experience and safety for residents and visitors traveling the corridor, regardless of their mode of travel. As shown in the PRDEIR, seven of the ten intersections identified as impacted in future conditions can be sufficiently mitigated with the measures identified in the PRDEIR. Additionally, the proposed roundabouts are intended to promote more consistent vehicle flow through the corridor with the proposed reduction in travel lanes, when compared to traffic conditions with traffic signals. The four locations with significant and unavoidable impacts would not impact the overall progression and flow of traffic through the corridor, but would be areas of localized delay where forecasted delays would impact lower volume cross-streets more than the higher volume corridors of Coast Highway and Vista Way. Based on the results of this comprehensive traffic impact analysis, the proposed project is not forecasted to significantly impact regional traffic patterns or access to the coastal portions of Oceanside.

In addition, as stated in Section 3.14, *Transportation and Traffic*, of the PRDEIR, any partial lane closures required along Coast Highway during construction of the Complete Streets improvements and the Incentive District would require the preparation and implementation of a Traffic Control Plan, which would show all signage, striping, delineated detours, flagging operations, and any other devices that would be used to guide motorists, including buses, safely through the lane closure and allow for adequate access and circulation to the satisfaction of the City. The Traffic Control Plan would be prepared in accordance with the City's traffic control guidelines. The Traffic Control Plan would ensure that congestion and traffic delay are not substantially increased and would also detail how to access to the corridor, adjacent businesses, and the coastal areas during lane closures. Therefore, project implementation would not discourage coastal visitors from visiting the coastal zone in the city of Oceanside but would rather enhance coast visitors experience of Oceanside's coastal zone.

DEIR A4-004 This comment states that the City should analyze the feasibility of an alternative that includes only the minimum safety improvements (bike lanes and mid-block crosswalks) without reducing the number of lanes along Coast Highway. Due to the narrow curb-to-curb width (approximately 56 feet) of Coast Highway for the majority of the corridor, it is not feasible to implement Class II striped bike lanes on Coast Highway without removal of a traffic lane or on-street parking. Given

the commercial nature of the corridor, the proximity to the beach, and the existing and forecast traffic volumes, it was determined during the project development and community outreach process that removal of a traffic lane was preferable to removal of on-street parking to incorporate the proposed complete street improvements.

The No Project Alternative provides the most comparable analysis to the alternative that the commenter suggests as other safety improvements other than bike lanes, such as mid-block crosswalks and additionally lighting, would not substantially change the existing level of operation currently experienced along Coast Highway as these types of improvements do not directly affect the flow of traffic as they are used sporadically and are not predictable components of the traffic system. As discussed in Chapter 5, *Alternatives*, in the PRDEIR, the No Project Alternative would primarily have similar impacts as the proposed project with reduced impacts related to noise and vibration, public services, transportation and traffic, and utilities and greater impacts related to cultural resources (refer to Page 5-133 of the PRDEIR). However, while the No Project Alternative would not achieve any of the project objectives, this alternative was included in the environmental analysis for comparative purposes and to satisfy the requirements of the CEQA Guidelines.

DEIR A4-005 This comment acknowledges that the DEIR analyzes several project alternatives but requests clarification on which alternative is the City's preferred alternative. In Chapter 5, *Alternatives*, of the DEIR, Alternatives 1 and 2 were identified as the environmentally superior alternatives based on reduce impacts, especially traffic impacts, compared to the proposed project. However, with the revised analysis in the PRDEIR, it was determined that Alternative 3, which limits the Complete Streets improvements and the Incentive District from Harbor Drive to Morse Street, is the environmentally superior alternative. While the DEIR and PRDEIR identified the environmentally superior alternative in compliance with the CEQA Guidelines, the City has not identified a preferred alternative as each project alternative has been analyzed at a level of detail to allow the City to adopt any of the alternatives in place of the proposed project if it so chooses. Due to the controversy of the project, the City included evaluations of the alternatives, which were identified through agency and public input as well as direction from the City Council, in order to be able to adopt either the proposed project or one of alternatives based on the environmental document.

DEIR A4-006 This comment states that the DEIR lacks information on the project's impact to parking along Coast Highway, where there is no definitive determination of the addition or loss of parking spaces. The comment also emphasizes the importance of avoiding or offsetting any loss of parking spaces along Coast Highway as parking serves coastal users. While analysis of parking is not required under CEQA, the City acknowledges the CCC position on ensuring adequate parking is provided in the coastal zone and has included the following summary of the

parking analysis conducted for the proposed project, which is included as an appendix of the revised TIA (2018). The table below summarizes the change in the number and location of on-street parking spaces along Coast Highway between existing conditions, the proposed project, and the project alternatives, as presented in the revised TIA (2018) included in the PRDEIR.

Segment	No Project	Project	Alternative 1	Alternative 2	Alternative 3
Harbor to SR-76	45	45	45	45	45
SR-76 to Wisconsin	199	149	149	149	149
Wisconsin to Oceanside	98	79	79	79	79
Oceanside to Morse	6	92	6	92	92
Morse to Vista	95	95	95	95	95
Corridor On-Street Parking Total	443	460	374	460	460

As shown in the table above, the proposed project and Alternatives 2 and 3 would increase the public on-street parking supply along Coast Highway from approximately 443 spaces to 460 spaces. In contrast, Alternative 1 would result in a reduction in overall on-street parking supply, because of the inability to add new on-street parking in Segment 4 between Oceanside Boulevard and Morse Street. The project, Alternative 2, and Alternative 3 do redistribute some on-street parking supply from segment 2 (SR 76 to Wisconsin Avenue) to segment 4 (Oceanside Boulevard to Morse Street). This redistribution of parking supply does not impact coastal access as both segments are equal distance to the coast. Furthermore, segment 2 has substantially more existing public parking resources that serve the coastal zone and beach areas than does segment 4, so a redistribution of this public parking supply may have a net benefit for beach access as well as for businesses located in South Oceanside.

DEIR A4-007 This comment states that construction of the Complete Streets improvements should be scheduled outside of the summer season when public access to the coast is at its peak and also states that the DEIR should describe where proposed construction staging areas would be located. Prior to construction of the Coast Highway corridor improvements, the City of Oceanside would prepare a construction traffic management plan to address traffic detours, pedestrian and bicycle mobility, and conditions during construction so coastal access is maintained during construction. Since the parameters of the construction phases are preliminary at this time, the City has not identified staging areas for the project at this time. However, the City anticipates that staging would typically occur within construction work zones in Coast Highway’s right-of-way as well as on previously developed or disturbed City-owned or private-leased parcels near the corridor in order to minimize impacts or inconveniences during construction.

DEIR A4-008 This comment states that the DEIR should specifically address how landscaping and other development proposed within the roundabouts would impact views of the Pacific Ocean and should include visual simulations of the proposed development.

Prior to publishing the PRDEIR, the City surveyed and assessed the existing views of the Pacific Ocean from various vantage points along and in proximity to Coast Highway to further support the conclusions of the DEIR. This additional information was included in the PRDEIR. The photographs of each vantage point and visual assessment of the views are contained in the Coastal View Corridor Assessment (refer to Appendix D of PRDEIR). As summarized in Table 3.1-1, *Summary of Coastal View Corridor Assessment for the DEIR (2018)*, in Section 3.1, *Aesthetics*, of the PRDEIR, 7 of the 24 vantage points assessed were determined to have a good (5 vantage points) or exceptional (2 vantage points) view of the Pacific Ocean. Of those seven vantage points, only one vantage point (Surfrider Way) which offers a good view of the Pacific Ocean includes an intersection where a roundabout is proposed under the project. However, existing impediments at Surfrider Way include an existing median consisting of low-lying shrubs, scattered palm trees and signs, which are similar in character to the proposed Complete Streets improvements. Therefore, implementation of the Complete Streets improvements would not substantially change the current visual character of this intersection and would not affect its designation as a “good” quality view corridor. All other roundabouts are proposed at vantage points that have been designated as having limited or minimal views of the Pacific Ocean, where implementation of the Complete Streets improvements would not significantly impact those views. Furthermore, for any intersection improvements over 36 inches, the City would evaluate the improvement using the Coastal View Corridor Assessment to determine how to design or locate the improvements to avoid impacts to existing and potentially restored coastal views within the Coast Highway Corridor.

DEIR A4-009 This comment states that the DEIR should include an analysis of water quality impacts associated with the Complete Streets improvements and include opportunities to reduce and treat urban runoff and improve water quality. As discussed in Section 3.8, *Hydrology and Water Quality*, of the DEIR, all appropriate source-control best management practices (BMPs), temporary construction BMPs, and permanent stabilization and erosion control BMPs would be implemented during construction, even though the Complete Streets improvements are not subject to the City’s Standard Urban Stormwater Mitigation Plan. Implementation of the abovementioned BMPs in combination with the BMPs included in the project-specific stormwater pollution prevention plan and City requirements would minimize or eliminate the potential for sediment and other pollutants to be discharged from the project area.

Following completion of the Complete Streets improvements, the majority of the Complete Streets improvements area would continue to be paved and developed, and would not contain large areas of exposed soil or other construction-related materials. Areas of landscaping within the Complete Streets improvements would contain permeable soils, stabilized by vegetation, resulting in less runoff being discharged into the existing storm drain system, and ultimately the Pacific Ocean. Per City SUSMP requirements, all development projects must implement permanent stabilization and erosion control BMPs to prevent erosion and topsoil loss from occurring during the lifetime of the development. Thus, with implementation of operational BMPs and vegetation, the potential for sediment and other pollutants to be discharged from the Complete Streets improvements area would be minimized.

DEIR A4-010 This comment requests clarification on how future buildout under the Incentive District compares to future buildout under current conditions. As discussed in Section 3.11, *Population and Housing*, of the DEIR, adoption of the Incentive District would provide optional regulations and standards that a developer or property owner may choose in lieu of the existing underlying zoning within the Incentive District boundaries. The Incentive District would allow for different types of residential, commercial, and mixed-use developments throughout the corridor. The intent of the Incentive District is to provide a stimulus in the project area and to encourage the type of development that the City would prefer in the project area. Implementation of the Incentive District could increase the rate and intensity of population growth in the area directly affected by the Incentive District (i.e., the Incentive District zone boundaries). However, the relative growth that could occur under the Incentive District could also occur with the implementation of current land use regulations, which allow for similar densities and intensities of development.

The DEIR and PRDEIR properly examines traffic and other impacts based on a projection method which is used to address the anticipated future condition with implementation of the project. Table 2-1 of the DEIR and PRDEIR summarizes the anticipated land use development that could occur with adoption of the Incentive District through the year 2035. CEQA does not require assessment of a maximum build (sometimes referred to as “buildout”) scenario. Due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is not reasonably foreseeable and is highly unlikely. Given the highly unlikely and speculative nature that a maximum build scenario would occur within the project area, this scenario was determined to be inappropriate for inclusion in the EIR. The growth forecast to 2035 is a reasonable growth projection and was used to examine project impacts. For purposes of comparison, Table 2-1 was revised in the PRDEIR to include estimates for projected development to 2035 without the proposed project, and with the proposed project within the Oceanside Coast Highway Project Area and the traffic analysis study area.

- DEIR A4-011 This comment also requests that the DEIR demonstrates that the City would have adequate visitor-serving commercial to support the public under the Incentive District in the future. The DEIR does not include an analysis of the adequacy of visitor-serving commercial to support the public under the Incentive District as this is not an environmental impact required to be evaluated in an EIR per the CEQA Guidelines. However, as referenced on page 2-21 of the DEIR, a market analysis was conducted by Keyser Marston Associates for the Coast Highway study area that estimates supportable demand by land use category through 2030. The market analysis estimates a low and high range of potential square footage demand for retail/restaurant uses, with the high end of the range supporting 265,000 square feet by 2030. Furthermore, the market analysis indicates that the estimate for retail/restaurant demand considers the demand from new residential, office and hotel development and to the degree that these sectors do not meet the projections in the analysis, the demand for new retail/restaurant space would be correspondingly reduced. Table 2-1 of the PRDEIR provides projections of potential development within the proposed project study area. The “Retail” category estimates the potential for 1,919,000 square feet of retail uses, far exceeding the supportable demand for retail uses estimated in the market analysis. The market analysis supports the intent of the proposed project to create a better balance of land uses that would stimulate redevelopment through a targeted increase of residential, office, hotel, and retail/restaurant development in appropriate locations within the study area. In addition, the Incentive District introduces a minimum commercial requirement for mixed-use development and the expansion of allowed visitor serving and recreational uses throughout the Incentive District which would further support adequate opportunities for visitor-serving commercial uses within the study area.
- DEIR A4-012 This comment states that the City needs to identify and explain where prime visitor nodes are expected and reserve these areas in order to achieve the land use goals. This comment also suggests incorporating additional measures into the Incentive District to encourage visitor-serving commercial uses and pedestrian orientation. The City acknowledges the comment and notes its suggestions for additional measures to be incorporated into the Incentive District. However, the issue is beyond of the scope of CEQA, and does not need to be address within the EIR. The City appreciates the commenter for participating in this process. This comment will be included as part of this FEIR for the public record, review, and consideration by the decision-makers prior to a final decision on the project.
- DEIR A4-013 This comment states that the proposed maximum building height of 65 feet in the nodes is substantially taller than current height restrictions and existing building heights along the corridor. This comment also requests clarification on if the height increase is applicable to all parcels in the node areas or those with frontage along Coast Highway and if the height increase is consistent with the certified Local Coastal Plan. The proposed height increase would be applicable to all parcels within the Node areas in exchange for one or more public benefits

including public open space, public parking, or commercial floor area exceeding a floor area ratio of 25 percent. The Incentive District is an alternative to (and not a replacement of) existing zoning standards requiring public benefits and adherence to form-based development standards in order to take advantage of the additional height allowances. The intent of these allowances is to target appropriate development intensities for mixed-use development in Node areas, served by public transit. This is consistent with California Public Resources Code Section 30252 and 30253 which encourages new development to facilitate the provision or extension of transit service, provides for commercial facilities within or adjoining residential development and sites new development to minimize vehicle miles traveled. In addition, Section 1130C of the City’s Zoning Ordinance currently allows “high-rise structures” to exceed height limits, with no prescribed maximum, subject to approval of a conditional use permit. The Incentive District also further restricts height limits for standalone residential projects within Avenue segments to an average building height of 35 feet, in contrast to the underlying allowance of 45 feet for standalone commercial or mixed-use projects. As stated on page 2-25 of the DEIR, the City would be required to process and adopt a Local Coastal Program Amendment to ensure consistency with the Incentive District.

- DEIR A4-014 This comment requests clarification on how the proposed setbacks differ from existing requirements and states that any potential impacts on public views as a result should be addressed. As described in response DEIR A4-008, the City surveyed and assessed the existing views of the Pacific Ocean from various vantage points along and in proximity to Coast Highway to further support the conclusions of the DEIR. This additional information was included in the PRDEIR. The photographs of each vantage point and visual assessment of the views are contained in the Coastal View Corridor Assessment (refer to Appendix D of the PRDEIR). As summarized in Table 3.1-1, *Summary of Coastal View Corridor Assessment for the DEIR (2018)*, in Section 3.1, *Aesthetics*, of the PRDEIR, 7 of the 24 vantage points assessed were determined to have a good (5 vantage points) or exceptional (2 vantage points) view of the Pacific Ocean. The two exceptional view locations are located outside the Incentive District and are not subject to proposed changes to development standards. Only one of the 5 vantage points determined to have a good view is located within the Incentive District at Seagaze Drive. The current side yard setback requirement for properties along Seagaze Drive within the Incentive District are 0 feet and 10 feet at corner lots. The Incentive District at Seagaze Drive requires no minimums and a 10-foot maximum. Proposed setback standards are consistent in this area and additional form based standards would apply ensuring key building elements are designed to enhance street frontages where private development meets the public street providing enhanced protection of public views.

DEIR A4-015 This comment requests that the DEIR address how the change in parking requirements under the Incentive District would differ from current standards and affect the existing parking supply. As stated above in response DEIR A4-006, while the DEIR did not include an analysis of parking demand or parking impacts as that is not an environmental impact required to be evaluated in an EIR per the CEQA Guidelines, the proposed project and Alternatives 2 and 3 would increase the public on-street parking supply along Coast Highway from approximately 443 spaces to 460 spaces. In contrast, Alternative 1 would result in a reduction in overall on-street parking supply, because of the inability to add new on-street parking in Segment 4 between Oceanside Boulevard and Morse Street. In addition, the Incentive District planning effort includes the development of a Parking Management Strategies Report, which identifies a series of recommendations and strategies to address anticipate parking demand that would occur with new development in the Incentive District. These strategies include shared parking, new public parking facilities operated by the City, and incentives for new development to provide public parking in addition to private parking for the uses proposed on-site. Together, these strategies are intended to provide sufficient parking supply to accommodate existing and future parking demand within the boundaries of the Incentive District.

DEIR A4-016 Please refer to response DEIR A4-006 and DEIR A4-015 above.

DEIR A4-017 This comment states that the DEIR should provide further discussions on the direct impacts to biological resources, including quantified impacts for specific locations, which are expected with implementation of the Incentive District and clarify how proposed impacts to wetland would be consistent with the City's Local Coastal Plan. As discussed throughout the DEIR, due to the lack of details and uncertainty in the timing, location, and nature of future development and/or redevelopment projects proposed under the Incentive District, environmental impacts associated with the Incentive District were analyzed at a programmatic level.

Due to the lack of detail and uncertainty of the types and locations of future projects proposed under the Incentive District, the DEIR included adequate mitigation measures to ensure all potential impacts, either direct or indirect, to biological resources would be minimized or reduced to a less than significant level through incorporation of mitigation. Furthermore, the City could determine that additional biological surveys or mitigation measures are required for biological resources during review of the project application based on the location and/or nature of a future project under the Incentive District, which would ensure project-specific compliance with the City's biological resources policies, including the Local Coastal Plan. Alternatively, if a future project proposed under the Incentive District cannot demonstrate full consistency and coverage under the Coast Highway Corridor Study EIR, that project applicant would be required to complete subsequent environmental review in accordance

with CEQA and the CEQA Guidelines. With these safeguards in place, the DEIR has evaluated potential impacts to biological resources and provided measures to protect these resources adequately and consistent with CEQA.

DEIR A4-018 This comment provides a conclusion to the commenter letter and expresses appreciation for the project's commitments to preserve and enhance coastal resources. The comment does not raise any issue concerning the adequacy of the DEIR and no further response is required. The City appreciates the Coastal Commission's involvement in this process. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.

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