

## V2. CHAPTER 3

### PRDEIR – Individual Responses

This chapter contains the comment letters received from members of the public, including organizations and individuals, on the proposed Coast Highway Corridor Study Project (project) Partially Recirculated Draft Environmental Impact Report (PRDEIR) and the City of Oceanside’s (City’s) responses to significant environmental points that were raised in those comments. 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 V2.3-1** lists all individuals and organizations who submitted comment letters on the proposed project during the public review period of the PRDEIR.

**TABLE V2.3-1  
LIST OF INDIVIDUAL COMMENTERS ON THE PRDEIR**

<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Comment</b>	<b>Comment Page Number</b>	<b>Response Page Number</b>
PRDEIR I1	Henry and Terri Hawthorn	1/9/2019	V2.3-2	V2.3-4
PRDEIR I2	Shanna Schwarze	1/11/2019	V2.3-6	V2.3-7
PRDEIR I3	Vince and Colleen Balch	1/13/2019	V2.3-10	V2.3-12
PRDEIR I4	Greg and Kathy Sampson, Owners of Paradise by the Sea RV Park	1/14/2019	V2.3-15	V2.3-22
PRDEIR I5	Joel West, Save South O	1/14/2019	V2.3-24	V2.3-26
PRDEIR I6	Sally Prendergast, Sierra Club North County Coastal Group	1/14/2019	V2.3-28	V2.3-29
PRDEIR I7	Joel West, Save South O	1/14/2019	V2.3-31	V2.3-33
PRDEIR I8	Joel West, Save South O	1/14/2019	V2.3-35	V2.3-36

**From:** Gus Hawthorn <gushawthorn@gmail.com>  
**Sent:** Wednesday, January 09, 2019 7:28 PM  
**To:** John Amberson <JAmberson@ci.oceanside.ca.us>; City Council <Council@ci.oceanside.ca.us>  
**Subject:** Coast Highway Corridor Plan

Dear Mr. Amberson and Members of the City Council,

The Coast Highway Corridor Plan is a great opportunity for needed improvements, especially if it extends to south to at least Vista Way. However, please consider the following three areas of concern as input for the Coast Highway Corridor Plan.

PRDEIR I1-001

**Public Safety**

As do other La Salina Mobile Village residents, we go to the beach and back nearly every day, crossing the Coast highway twice each time. When the weather is nice we cross more often. The change to two lanes has slowed traffic, reduced noise and made our crossings much easier and safer. In the interest of public safety, please include the existing Coast Highway bike lanes from Morse to Oceanside Boulevard and the proposed crosswalk to the Loma Alta Creek beach path in the plan. Adding a crosswalk lined up with, or close to, the Loma Alta Creek beach path would greatly improve pedestrian safety in two ways. First, it would eliminate unsafe jaywalking that occurs as pedestrians cross the highway to get to and from the beach path. Jaywalking occurs because the only two controlled places to cross are the intersections at Morse and Oceanside Boulevard, both far from the path to the beach. Second, the crosswalk would encourage people to use the path instead of walking west to the end of Morse, down the dirt bank and across the railroad tracks to Buccaneer Park and the beach. Pedestrian traffic will also increase with the proposed beautification of the creek between the highway and railroad. Crossing the tracks is not only illegal, it is dangerous. The inclusion of the bike and traffic lanes, as currently configured, and the crosswalk will improve safety and the quality of life for residents of La Salina and surrounding neighborhoods. Importantly, doing so will also provide a safe route for children walking and riding their bikes to school. With regard to roundabouts at intersections I find them acceptable from a driving standpoint but they must include provisions for safe crossing by pedestrians, including those who are blind. Provisions for pedestrian crossing may be in the plan but if not they need to be included.

PRDEIR I1-002

PRDEIR I1-003

**Traffic Flow**

At the March 29, 2017, workshop one of the speakers stated that it took an excessive amount of time to enter Coast Highway traffic due to the single lane in each direction. That is not our experience based on entering and leaving La Salina Mobile Village numerous times over the years. We have entered the stream of cars as we leave La Salina Mobile at those times when vehicles stretch from Morse to Oceanside Boulevard, often in both directions. It never takes more than a minute or a minute and a half, if that long. The traffic is not always dense but when it is, without fail, someone in traffic yields and lets us in. Granted it may be more difficult in an RV but as the owner of Oceanside RV Park stated, it is not a big problem. The owner of Paradise by the Sea RV Park stated that they have on the order of 3,000 RVs entering and leaving the park each year. That means, on the average since it is a 24/7 year-round business, they have 8 RVs a day entering and leaving. Important too is that the RVs do not all enter or leave at the same time. Check in time is from 2:00 PM to 11:00 PM, a nine-hour window. Check out time is from 7:00 AM to 11:00 AM, a four-hour window. There will be some that leave at a high traffic time but those entering and leaving Oceanside RV Park across the street face the same traffic and, as noted above, the owner stated that it is not a big problem. Also, at the same workshop, mention was made that it took 10 minutes to get from “the dip” to Rite Aid at Oceanside Boulevard. I have made the drive from La Salina to Rite Aid numerous times and can tell you that it never has it taken me that long, even at heavy traffic times. The chart and data provided by resident Mindy Martin (same as requested by Mayor Wood and the City Council at that time) supports the fact that the single lane of traffic in each direction has not resulted in unacceptable travel times. The inclusion of roundabouts could improve travel times.

PRDEIR I1-004

**Building Heights**

The maximum building height of 65 feet is not acceptable. The height detracts from, as one resident at the workshop described it, the "beachy" look and feel of the Coast Highway and adjacent neighborhoods. Single story construction is much more conducive to keeping the coastal look and feel. Development must not turn the highway, in particular from Vista Way to Oceanside Boulevard, into a "canyon".

PRDEIR I1-005

In closing we would ask that our comments stated above be given serious consideration and included as input for the Coast Highway Corridor Plan. Addressing our concerns will enhance the plan and the resulting development will turn the corridor in to a destination for Oceanside visitors and a place of pride for residents.

PRDEIR I1-006

Respectfully,

Henry Hawthorn

Terri Hawthorn

110 Sherri Lane Oceanside, CA 92054

January 9, 2017

**Letter  
PRDEIR I1  
Response****Henry and Teri Hawthorn  
January 10, 2019**

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- PRDEIR I1-001 This comment expresses support for the project as it allows for needed improvements along the Coast Highway corridor but also presents three areas of concern to be included in the project. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PRDEIR, the City appreciates the commenters' support of the proposed project and this comment is included in this FEIR to be considered by the City prior to making a final decision on the project.
- PRDEIR I1-002 This comment expresses concern for public safety as pedestrians illegally cross Coast Highway and recommends that the project includes bike lanes from Morse Street to Oceanside Boulevard along with a crosswalk to the Loma Alta Creek beach path as means to improve pedestrian connectivity and safety. The City has prepared 30 percent preliminary engineering design plans as part of the Coast Highway Corridor Study, separate from the Environmental Impact Report (EIR). These preliminary design plans include a crosswalk to the Loma Alta Creek beach path and a bike lane from Morse Street to Oceanside Boulevard.
- PRDEIR I1-003 This comment states that while roundabouts are acceptable from a driving standpoint, they must also be designed with provisions for safe crossing by pedestrians, including the blind, where these provisions have been incorporated into the design plans. As stated in Section 3.14, *Transportation and Traffic*, of the PRDEIR, the environmental analysis included the incorporation of recommended design features from the National Cooperative Highway Research Program (NCHRP) Report 674, *Crossing Solutions at Roundabouts and Channelized Turn Lanes for Pedestrians with Vision Disabilities* to addresses issues with crossing safety at roundabouts for blind and visually impaired pedestrians (refer to page 3.14-47 of the PRDEIR). While the design of the Complete Streets improvements, including the roundabouts, is preliminary, the City of Oceanside would evaluate and consider the additional design features identified above during final design stages of the project.
- PRDEIR I1-004 This comment provides the commenter's opinion and observations on the existing traffic conditions around the La Salina Mobile Village area and states that traffic volumes and flows caused by the City's pilot study (referred to as "the dip") has not resulted in unacceptable travel time in the commenter's opinion. Furthermore, this comment also states that travel time could be improved with the installation of roundabouts. While this comment does not specifically address the adequacy or accuracy of the

environmental analysis provided in the PRDEIR, the City appreciates the commenters' support of the inclusion of roundabouts along Coast Highway and this comment is included in this FEIR for consideration by the City prior to making a final decision on the project.

PRDEIR I1-005 This comment expresses that a maximum building height of 65 feet is not supported the commenter and further expands upon this opinion. As discussed in Section 3.1, *Aesthetics*, of the PRDEIR, operation of the Incentive District would allow increased height of buildings only in the Node areas with discretionary approval up to a maximum of 65 feet compared to the existing limit of 45 feet. The Incentive District would also establish regulations intended to promote high-quality urban and architectural design and variability of massing and height, emphasizing the design of the interface between the private and public realms. Therefore, as projects are submitted to the City for approval under the Incentive District, the City's planning process would ensure that building heights are varied to avoid a "canyon" effect in the Node areas.

PRDEIR I1-006 This comment requests that the City give serious consideration to their submitted comments. The comments are included in this FEIR for consideration by the City prior to making a final decision on the project.

From: Shanna Schwarze <shannaschwarze@gmail.com>

Sent: Friday, January 11, 2019 3:24 PM

To: John Amberson <JAmberson@ci.oceanside.ca.us>

Subject: NO Oceanside road diet

Hi John,

I would like to register my disapproval with the proposed Oceanside road diet to go through all of Coast Hwy. I urgently request a "no change" decision.

PRDEIR I2-001

Here are the reasons this terrible idea needs to be stopped:

**SAFETY**

1) In the past 5 years there have been 3 fatalities along this stretch. 2 of those resulting from drunk drivers (which road diets would not stop).

PRDEIR I2-002

**EMERGENCY RESPONSE**

1)The entire neighborhood west of the 5 Fwy relies on two fire stations for emergency response. The only road that connects the entire neighborhood north to south is Coast Highway.

a) You proposed "roundabouts" but fire engines and ambulances still have to slow down considerably, practically to a stop, to mount the curb of the roundabouts, therefore they will affect emergency response times.

PRDEIR I2-003

b) Austin Assistant Fire Chief Leslie Bunte has calculated that for every life saved due to "traffic calming" 37 will be lost due to a 30 second delay in emergency response. A road diet on coast highway will reduce emergency response times as emergency vehicles will be stuck in the traffic created by the road diet.

c) In addition, Oceanside has a large blind population and the roundabouts do not provide safe access across the street for the blind. {Violates Americans with Disabilities Act}

PRDEIR I2-004

**BUSINESS IMPACT**

1) The City of Oceanside has not said how the road diet will impact parking – either less or more. A healthy economy needs parking spaces for the businesses!

PRDEIR I2-005

2) Oceanside business owners have said they rely on local residents for 60% of their yearly business. Oceanside cannot depend on summer tourism alone!

PRDEIR I2-006

3) you close off Oceanside to all residents east of the 5, they will simply go to Carlsbad or Vista. This is a thriving area - why would you send residents to other cities?

Instead, please just finish the coastal rail trail. That's the area that bike riders want - not Coast Highway.

PRDEIR I2-007

Thank you,  
Shanna Schwarze  
Resident, registered voter

**Letter  
PRDEIR I2  
Response**

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**Shanna Schwarze  
January 11, 2019**

PRDEIR I2-001 This introductory comment expressed opposition of the Coast Highway Corridor Study road diet and requests a “no change” decision on the project. The City acknowledges the comment and notes the opposition to the proposed roadway diet along Coast Highway. However, the comment does not raise any issue concerning the adequacy of the PRDEIR. This comment is included in this FEIR for consideration by the City prior to making final decision on the project.

PRDEIR I2-002 This comment states that there have been three fatalities along Coast Highway in the last 5 years, two of which were the result from drunk driving. This comment does not raise any issue concerning the adequacy of the PRDEIR and no further response is required.

PRDEIR I2-003 This comment states that emergency response times would be affected with implementation of the project due to the installation of roundabouts, and emergency vehicles would be stuck in the increased traffic caused by the road diet. This comment also included a quote from Austin Assistant Fire Chief Leslie Bunte that states, “for every life saved due to ‘traffic calming’ 37 lives will be lost due to a 30-second delay in emergency response.”

As stated in Section 3.14, *Transportation and Traffic*, of the PRDEIR and Section 3.12, *Public Services*, of the DEIR, construction of the Complete Streets improvements would not occur simultaneously throughout the corridor and would be required to implement a Traffic Control Plan during all partial roadway closures to ensure emergency access is not restricted. In addition, once the project is approved, the Oceanside Fire Department would continue to be part of the design process of the Complete Streets improvements, ensuring that the lane reduction and new roundabouts would accommodate large fire engines and response times for emergency services. Coast Highway’s reconfiguration would allow for heavy vehicle radii for turning and U-turns. The roundabouts would be constructed to allow access for semi-trucks, waste management trucks, and firetrucks. In addition, Coast Highway’s center median would be constructed with low curbs, approximately two feet wide, to allow left turning access to fire trucks and police mid-block. Therefore, operation of the Complete Streets improvements would not have significant impacts with regard to fire and police performance objectives and response times.

PRDEIR I2-004 This comment states that the proposed roundabouts do not provide a safe crossing option of Oceanside’s large blind population. These concerns were responded to previously in this FEIR; refer to response PRDEIR I1-003 for features identified above during final design stages of the project.

PRDEIR I2-005 This comment states that the City has not demonstrated how implementation of the project would affect parking and that parking is necessary for a healthy economy. While analysis of parking is not required under the California Environmental Quality Act (CEQA), information regarding 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 is presented in Section 9.0 of the appendices of the revised TIA (2018) included in the PRDEIR, as summarized in the table below.

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. No revisions to the PRDEIR are required in response to this comment.

PRDEIR I2-006      This comment expresses that Oceanside business owners rely on local residents for 60 percent of their yearly business and do not want the roadway changes to send residents to other surrounding cities. This comment does not raise any issue concerning the adequacy of the PRDEIR and no further response is required.

PRDEIR I2-007      This conclusory comment recommends finishing the Coastal Rail Trail instead of implementing the project. This comment does not raise any issue concerning the adequacy of the PRDEIR and no further response is required. 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.

January 13, 2019

Good afternoon Mr. Amberson

This letter is to inform you of our comments pertaining to the EIR for Coast Hwy.

First off there should be no developer incentives at all on any stretch of Coast Hwy. This City needs to quit feeling like they need to pay/reward people for building here.

PRDEIR I3-001

A petition with signatures from more than 400 Oceanside residents asking that no road diet or development incentives be instituted south of Oceanside Blvd., because these changes would damage the unique character of South Oceanside. However, the city neglected to study this alternative. Instead, as proposed by a (now former) council member, Alternative 3 in the current EIR includes both a diet and incentives for that part of South Oceanside between Oceanside Blvd. and Morse.

Neither the previous nor current EIR mention the guidelines of the Federal Highway Administration (FHWA)'s November 2014 *Road Diet Information Guide*. In particular, the EIR should mention that the 2013 afternoon rush hour traffic levels at the Oceanside Blvd, Morse, Cassidy and Vista Way intersections are already above the FHWA's recommended 750 vehicles per direction per hour. Also, with increased density provided by Alternatives 1 and 2, the Coast Highway traffic would also exceed the FHWA guidelines at the Mission intersection.

PRDEIR I3-002

The EIR continues to emphasize the bicycle safety benefits of the road diet, but does not mention the clear preference by existing cyclists for the more scenic (and less polluted) Pacific Street route. (Public comments on pp. 534-538 of this EIR call this to the city's attention). The new EIR does not mention that since the 2017 EIR, the city has applied for and received (in June 2018) a \$400k SANDAG grant for planning the completion of the Class I Rail Trail across Loma Alta Creek, which would further reduce the potential demand for the Class II bike lanes on Coast Highway.

PRDEIR I3-003

The road diet between Morse and Oceanside Blvd. began in 2016, and the city engineer was quoted as saying he hoped that the data "will prove we can do a two lane Coast Highway." However, no data from this "pilot project" have been publicly released, and such data -- particularly regarding peak hour and summer traffic impacts -- would be highly relevant to understanding the accuracy of the EIR traffic models. This data should be released for public comment and incorporated in any final EIR.

PRDEIR I3-004

The current EIR notes that, in response to the 2017 EIR, residents are concerned that "traffic might be diverted to side streets and that the adjacent neighborhoods would be negatively affected by the changes, including loss of parking." However, the 2,309 page EIR does not appear to quantify or discuss mitigation of these impacts.

PRDEIR I3-005

For example, Alternatives 1 and 2 would more than double Eastbound evening rush hour traffic off Coast onto Morse Street, from 156 cars/hour to 319 cars/hour (Fig. 4-1,5-5,5-7); Alternative 3 is even worse, nearly tripling traffic to 443 cars/hour. This traffic -- apparently due to the increased Coast Highway density -- would be dumped into residential neighborhoods, presumably en route to the freeway onramps at California or Cassidy Street at a time when most children are home from school. We have three schools in this area. The impact to Freeman and Tremont are not acceptable.

PRDEIR I3-005

The CEQA process (14 CCR § 15131b) says that economic impacts are part of understanding the significance of a proposed change. The 2017 EIR talks about the assumed increase in hotel rooms and commercial real estate. However, this current EIR (like its predecessor) does not talk about the potential impacts on existing businesses from increased traffic congestion, such as those that were experienced from the 2017 road diets instituted in the city of Los Angeles.

PRDEIR I3-006

Even with these omissions, we believe that the current EIR shows that the adverse impacts of the new Alternative 3 on South O are as bad (or in some cases worse) than Alternatives 1,2 and 4. With all that said, we believe the City should listen to the citizens and not change Coast Hwy. in any form or fashion from Oceanside Blvd. south to the City of Carlsbad.

PRDEIR I3-007

Respectfully,

Vince and Colleen Balch  
1442 Machado St.  
Oceanside CA 92054

**Letter  
PRDEIR I2  
Response****Vince and Colleen Balch  
January 13, 2019**

- PRDEIR I3-001 This introductory comment states that there should be no developer incentives along Coast Highway and that there should be no roadway diets south of Oceanside Boulevard as it would damage the unique character of South Oceanside, as supported by a petition with over 400 signatures from Oceanside residents. This comment also states that the inclusion of the new Alternative 3 instead includes extending the roadway improvements and Incentive District to the part of South Oceanside between Oceanside Boulevard and Morse Street. As stated in Chapter 5, *Alternatives*, of the PRDEIR, the inclusion of the new Alternative 3 in the PRDEIR was the result of direction from the City Council and City staff and was included to provide a comparison of the project as proposed to an alternative that limits the extent of the Complete Streets improvements and the Incentive District from the community of south Oceanside. Furthermore, this alternative was included in the analysis of the PRDEIR in response to public comments in favor of considering an alternative that maintained four lanes throughout the southern portion of Coast Highway and removed the Incentive District from the community of south Oceanside (refer to pages 5-87 and 5-89 in Chapter 5, *Alternatives*, of the PRDEIR).
- PRDEIR I3-002 This comment states that neither the DEIR or the PRDEIR mentioned the guidelines of the Federal Highway Administration’s (FHWA’s) November 2014 Road Diet Informational Guide and specifically highlights that the environmental analysis should mention that the 2013 afternoon rush hour traffic volumes at the Oceanside Boulevard, Morse Street, Cassidy Street, and Vista Way intersections already exceed the FHWA’s recommended 750 vehicles per direction per hour. In addition, the comment states that Mission Avenue intersection exceeds this threshold under Alternative 1 and 2. The traffic analysis conducted as part of the DEIR and PRDEIR is based on the standards and guidelines for traffic impact analyses adopted by the City of Oceanside and the California Department of Transportation (Caltrans). These two agencies have jurisdiction over the study intersections and study roadway segments included in the analysis. The FHWA document cited in the comment is a guideline report issued by FHWA to assist states and local jurisdictions with designing, studying, and evaluating roadways for possible road diets. This document does not set binding thresholds that jurisdictions would need to satisfy or evaluate under CEQA and is not applicable to the analysis contained in the PRDEIR.

- PRDEIR I3-003 This comment states that while the EIR mentions that the project would increase bicycle safety, it fails to acknowledge that bicyclists would rather use the more scenic route along Pacific Street. This comment also states that the EIR fails to that the City has obtained a \$400k SANDAG grant to complete the Class I Rail Trail across Loma Alta Creek, which further reduces the demand for bike lanes on Coast Highway. The DEIR and PRDEIR do not evaluate the demand for the completion of the Rail Trail as this is not a component of the proposed project. In addition, Alternative 1 includes limiting the Complete Street improvements to Oceanside Boulevard and Alternatives 2 and 3 includes limiting the Complete Streets improvements to Morse Street, where the DEIR and PRDEIR have evaluated these alternatives to a level of detail that the City Council could choose to adopt one of these alternatives in place of the project. At the time of approval, the City Council could take into consideration the completion of the Rail Trail in conjunction with the project and choose to adopt one of the alternatives that limit the Complete Streets improvements from South Oceanside, if so desired. No revisions to the PRDEIR are required in response to this comment.
- PRDEIR I3-004 This comment states that the traffic data captured by the pilot project along Coast Highway has never been released to the public and should be included in the traffic models in the EIR. This comment also states that this data should be released for public comment and incorporated into this FEIR. The Traffic Impact Analysis (TIA) (2017) and the revised TIA (2018) do not specifically analyze current traffic conditions for the City’s pilot project in place between Oceanside Boulevard and Morse Street as it is not a component under the proposed project. The City has conducted a separate traffic analysis for the pilot project. Furthermore, per CEQA Guidelines, the TIA (2017) and revised TIA (2018) analyze the existing condition for traffic conditions within the study corridor. The lane narrowing pilot project noted in the comment is a temporary pilot project, and as such is not appropriate for use as the existing condition for CEQA analysis. No revisions to the PRDEIR are required in response to this comment.
- PRDEIR I3-005 This comment states that the DEIR and the PRDEIR fail to quantify and mitigate traffic which may spillover onto adjacent side streets along Coast Highway for the project and alternatives’ traffic scenarios. The DEIR and PRDEIR include analysis of study intersections and roadway segments on streets parallel to the Coast Highway corridor. In locations where significant traffic impacts are identified in the DEIR and PRDEIR, appropriate mitigation measures to address these impacts are identified. The traffic figures cited in this comment for roadways such as Morse Street are not forecast to exceed the thresholds identified by the City of

Oceanside to result in a significant impact. No revisions to the PRDEIR are required in response to this comment.

PRDEIR I3-006

This comment states that under the CEQA process economic impacts are part of understanding the significance of a proposed change and states that the DEIR and PRDEIR failed to disclose the economic effects of traffic congestion on existing businesses along Coast Highway. The commenter incorrectly indicates that Section 15131(b) of the CEQA Guidelines says that economic impacts are part of understanding the significance of a proposed change. The exact language of Section 15131(b) is provided below:

*“Economic or social effects of a project may (emphasis added) be used to determine the significance of physical changes caused by the project... Where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant.”*

Furthermore, Section 15131(a) states:

*“Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”*

As noted in Section 15131(a), the focus of the analysis should be on the physical changes to the environment. Related to the example raised by the commenter (traffic congestion and effects on existing businesses) the EIR addresses the potential for traffic congestion in Chapter 3.14, *Transportation and Traffic*, of the PRDEIR. It is not clear from the comment what other physical effects might occur related to changes in traffic patterns other than the effects analyzed in the EIR. For this reason, no further expansion or analysis is provided in response to this comment.

PRDEIR I3-007

This comment states that the environmental effects of Alternative 3 are worse than the other three alternatives and states that the City should approve no changes to Coast Highway. The commenter is incorrect as Alternative 3 is the environmentally superior alternative as it would result in reduced environmental impacts compared to the project and the other three alternatives, as shown under heading 5.10, Comparative Summary of the Alternatives, in Chapter 5, Alternatives, of the PRDIER. This comment is included in this FEIR for consideration by the City prior making to a final decision on the project.

Monday, January 14, 2019

Paradise by the Sea Beach RV Resort  
Owners Greg & Kathy Sampson  
Managers Cole & Jenna Sampson  
1537 South Coast Highway  
Oceanside, CA 92054

RE: Coast Highway Corridor Project and (EIR)

Mr. Amberson,

The following are our comments on the Coast Highway Improvement Project and the “Save South O” group.

**Our Support:** We fully support the efforts to revitalize South Oceanside into a more tourism-centered and live/stay/play atmosphere! We appreciate the efforts to create an overlay to the zoning in our area. We have owned and operated our RV Resort for 40 years, and our goal is to continue offering affordable and memorable vacations for families from all socioeconomic backgrounds desiring to enjoy a beach vacation. We are the only Beach RV Resort in all of Southern California, and we draw guests from across the globe to spend their tourism dollars in Oceanside. Over 5,000 RV’s annually need to have reasonable access to our resort from both Oceanside Blvd (I-5) and Vista Way (78).

PRDEIR 14-001

**Our Stance:** Moving forward, we, along with the Coastal Commission, will continue to advocate for complete RV access to our business from both the north and south, and we will continue to advocate for the Incentive Overlay to attract more “tourism friendly” businesses and new residential projects to South Oceanside.

**WE SUPPORT ALTERNATIVE 2 and 3**

**Traffic:** We support measures to keep the current two-lane road diet between Oceanside Blvd. and Morse Street. While the downside of this road diet has been that RVs and passenger cars must wait up to 5 minutes for a break in traffic in order to make a left turn in and out of our business—the upside is that RVs can make wider right turns into our driveway, and our guests can ride bicycles in the bike lane. We hope that maintaining this current traffic pattern will attract “visitor-serving businesses” like ours.

PRDEIR 14-002

**Incentive Overlay:** We fully support the Incentive Overlay proposal that will draw developers that want to create a more live/stay/play atmosphere. Even if current shops and land-owners in “South O” do not want to sell or change, it is good for them to know they have the option to have their location possibly be used for something else than a used car lot or a boat repair yard.

PRDEIR 14-003

**“SAVE SOUTH O”**

In support of the “Save South O” movement, we will also lend support for Alternative 3. We understand that some of the residents and business owners are concerned with parking, traffic, and character changes to the small store-front locations and the “laid-back atmosphere” that is iconic to South Oceanside. We also recognize that “The Dip” between Oceanside Blvd. and Morse Street is its own distinct section and has no residential housing and no side streets and has many large and underutilized commercial lots that are in need of improvement and revitalization supported by Alternative 2 and 3 .

PRDEIR I4-004

**Roundabouts:** We have no issue with roundabouts being installed north of Oceanside Blvd. as long as they are wide enough for all vehicles to safely navigate. Our guests access our resort from Oceanside Blvd., Cassidy Street, and Vista Way I-5 off-ramps. **We definitely do not support roundabouts from Oceanside Blvd south to Vista Way because RVs will not be able to safely or physically pass through the roundabout due to the narrow street and insufficient diameter of any proposed roundabout.**

*Our Concern:* How can we be assured that 5,000+ RV drivers of varying skill abilities can make that turn every year to reach our business? All studies completed have been based on the turning radius of an 18-wheeler or city bus, which have a much different wheel base than that of an RV. Here is the data we gathered from RV manufacturers regarding the turning radius of a 46-foot motorhome (legal length is 46’ + 24’ cargo trailer= 70’ maximum): A 46-foot motorhome would need an 18’-20’ wide lane and at least 85 foot-wide diameter to complete a left turn from Oceanside Blvd to Coast Hwy. Meaning, a very small, low truck apron with little room for landscaping and décor due to off-tracking of the rear interior wheel of an RV. For example, a 46-foot Prevost Motorhome with a 55-degree wheel turn has a 45.4 foot turning radius when completing a U-turn on a dime in a parking lot (*See Exhibit C*), not factoring in a roundabout’s center island (and they have the best turning radius in the RV industry). That means that even without pulling a cargo trailer behind, it needs about a 96+-foot diameter due to overhang and the arc of the turn being centered around a center island, and not a dime in a parking lot. Manufacturers test the turning radius with a Prevost Bus at an idle/stop, so making the turn while in the flow of traffic is increasingly difficult. Coming from the I-5 west, and trying to navigate South on Coast Highway would mean having to veer right, then veer left, and then veer right again. We want to be part of a solution, and can participate in a turn radius test if it would help. **Our demand is that a roundabout will not hinder access to beach visitors driving to our RV resort. Oceanside Blvd, Cassidy, and Vista Way are our main pathways from the I-5 for accessing our resort and are not large enough intersections to accommodate a reasonably-sized roundabout.**

PRDEIR I4-005

**Loma Alta Creek Crosswalk:** As per a signed 2016 legal agreement from the City of Oceanside, if a crosswalk is ever installed on the stretch between Oceanside Blvd and Morse Street, it cannot be near the entrance of our resort (dangerous to both pedestrians and RV drivers), and cannot have a raised center pedestrian refuge. RV’s merging north onto Coast Hwy would not be able to make the merge without hitting the concrete refuge (*See attached Exhibit A*). Our suggestion would be at or on the Loma Alta Creek Bridge (*See attached Exhibit B*), it would be aligned with the beach access walk; or align

PRDEIR I4-006

## Comment Letter PRDEIR I4

closely with the bus stop on the east side of Coast Hwy.

PRDEIR I4-006

Thank you for your consideration. Please let us know if you would like us to participate in a field study showing the turning radius of a large motorhome (it's different than a semi-truck, fire engine or city bus). We will gladly join the city in their efforts to revitalize South O by offering our expertise regarding Recreation Vehicles.

PRDEIR I4-007

Sincerely,

Greg & Kathy Sampson  
Paradise by the Sea RV Resort

# Exhibit A

## ATTACHMENT 1



RV #2

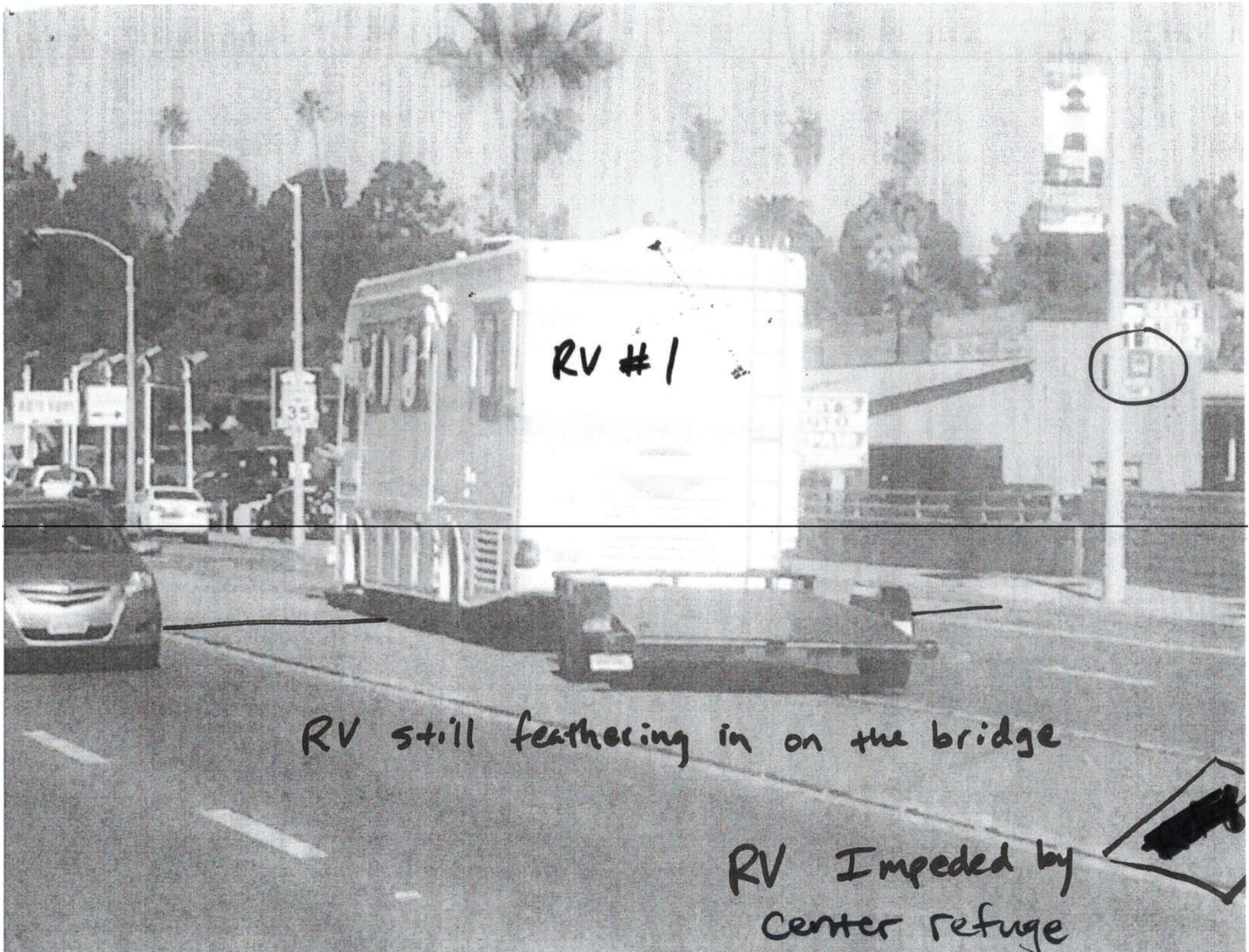
— Still in lane to merge

— Must move cross walk & have no center refuge.

Beach Trail

proposed crosswalk  
— bad location

0

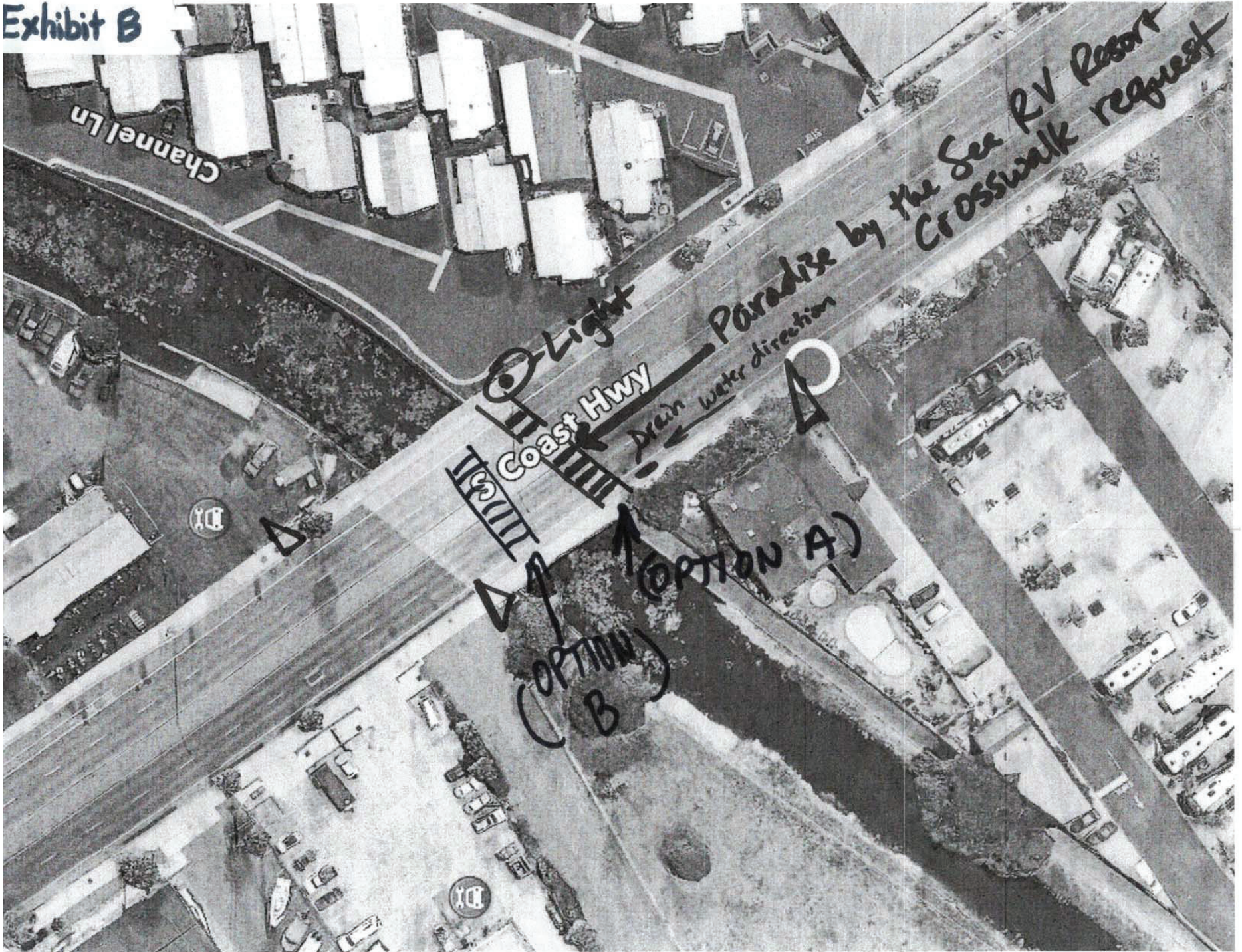


RV #1

RV still feathering in on the bridge

RV Impeded by  
center refuge

Exhibit B



ATTACHMENT 4

**SUCCESSFUL CROSSWALKS without center refuge:**

959 Vista Way, Oceanside, CA



Laguna Beach, CA



**Letter  
PRDEIR I4  
Response****Greg and Kathy Sampson  
Owners of Paradise by the Sea RV Park  
January 14, 2019**

- 
- PRDEIR I4-001 This comment expresses support for the project and states that the commenters will continue to advocate for complete RV access to their business from both the north and south along with the adoption of the Incentive District to attract more tourism-friendly businesses and residential projects to South Oceanside. Since this comment does not address the adequacy or accuracy of the PRDEIR, no further response is required. The City appreciates the commenter’s support and participation in this process. This comment is included in this FEIR for consideration by the City prior to making a final decision on the project.
- PRDEIR I4-002 This comment expresses support for the current two-lane road diet between Oceanside Boulevard and Morse Street as RVs can make wider right turns into their driveways and guests can ride bikes in the bike lanes. Since this comment does not address the adequacy or accuracy of the PRDEIR, no further response is required.
- PRDEIR I4-003 This comment expresses support of the proposed Incentive District as it would draw developers that want to create a more live/stay/play atmosphere as well as allow current business and land owners to know they have new development options. Since this comment does not address the adequacy or accuracy of the PRDEIR, no further response is required.
- PRDEIR I4-004 This comment expresses support for the new Alternative 3 as it would help to improve and revitalize the underutilized area around “the Dip.” Since this comment does not address the adequacy or accuracy of the PRDEIR, no further response is required.
- PRDEIR I4-005 This comment opposes installation of roundabouts from Oceanside Boulevard to Vista Way as RVs would not be able to safely or physically navigate through the roundabout due to narrow streets and insufficient diameter. This comment also provides a discussion on the geometric roadway parameters that do not would allow RVs to safely use Coast Highway if roundabouts were installed south of Oceanside Boulevard. The City has completed preliminary engineering (equal to a 30 percent level of design) during the Coast Highway Corridor Study process. This preliminary design effort included review of the proposed roundabouts to ensure that large vehicles such as trucks, fire trucks, and motor homes can travel through the roundabouts as proposed. The design of the roundabouts would be further advanced and refined during subsequent stages of project design.

In addition, Alternatives 1, 2, and 3 would alleviate this concern, as no roundabouts are proposed as part of these alternatives in the intersections of Coast Highway at Oceanside Boulevard, Morse Street, Cassidy Street, or Vista Way.

- PRDEIR I4-006      The comment highlights a legal agreement between the commenter and the City, which was signed in 2016, that if a crosswalk is ever installed on the stretch between Oceanside Boulevard and Morse Street, it cannot be near the entrance of the RV Resort (dangerous to both pedestrians and RV drivers) and cannot have a raised center pedestrian refuge. While the legal agreement referenced by this commenter was made in regard to the pilot project, the City would continue to honor the legal agreement under this project. Although the project description for the Coast Highway Corridor Study identifies a proposed mid-block pedestrian crosswalk on Coast Highway in the vicinity of Loma Alta Creek, the specific location for this crosswalk and its configuration would be determined by the City in subsequent stages of the engineering design plans for the Complete Streets improvements. As the design process progresses, the City would continue to work with this commenter and would consider vehicle movements, including in and out movements from adjacent driveways, along Coast Highway to avoid potential impacts related to sidewalk/parkway safety.
- PRDEIR I4-007      The comment provides a conclusion to the comment letter. This comment does not raise any issue concerning the adequacy or accuracy of the PRDEIR and therefore no further response is required. The City appreciates the commenter for participating in this process.
- PRDEIR I4-008      Attachments 1 through 4 have been included with the comment letter to visually demonstrate the commenters' points raised in the comments above.

Sent: Monday, January 14, 2019 3:38 PM

To: John Amberson <JAmberson@ci.oceanside.ca.us>

Subject: Comments on November 2018 Coast Highway EIR

Dear Mr. Amberson,

On behalf of the community group Save South O, I would like to submit the following comments on the accuracy and completeness of the November 2018 Coast Highway EIR.

PRDEIR I5-001

**1. Omitted Alternative**

In October 2016, Save South O presented petition signatures from more than 400 Oceanside residents asking that no road diet or development incentives be instituted south of Oceanside Blvd., because these changes would damage the unique character of South Oceanside. However, the city neglected to study this alternative. Instead, as proposed by a (now former) council member, Alternative 3 in the current EIR includes both a diet and incentives for that part of South Oceanside between Oceanside Blvd. and Morse.

PRDEIR I5-002

**2. Federal Road Diet Guidelines**

Neither the previous nor current EIR mention the guidelines of the Federal Highway Administration (FHWA)'s November 2014 *Road Diet Information Guide*. In particular, the EIR should mention that the 2013 afternoon rush hour traffic levels at the Oceanside Blvd, Morse, Cassidy and Vista Way intersections are already above the FHWA's recommended 750 vehicles per direction per hour. Also, with increased density provided by Alternatives 1 and 2, the Coast Highway traffic would also exceed the FHWA guidelines at the Mission intersection.

PRDEIR I5-003

**3. Bicycle Safety**

The EIR continues to emphasize the bicycle safety benefits of the road diet, but does not mention the clear preference by existing cyclists for the more scenic (and less polluted) Pacific Street route. (Public comments on pp. 534-538 of this EIR call this to the city's attention). The new EIR does not mention that since the 2017 EIR, the city has applied for and received (in June 2018) a \$400k SANDAG grant for planning the completion of the Class I Rail Trail across Loma Alta Creek, which would further reduce the potential demand for the Class II bike lanes on Coast Highway.

PRDEIR I5-004

**4. Data from Pilot Project**

The road diet between Morse and Oceanside began in 2016, and the city engineer was quoted as saying he hoped that the data "will prove we can do a two lane Coast Highway." However, no data from this "pilot project" have been publicly released, and such data -- particularly regarding peak hour and summer traffic impacts -- would be highly relevant to understanding the accuracy of the EIR traffic models. This data should be released for public comment and incorporated in any final EIR.

PRDEIR I5-005

**5.. Traffic Impacts**

The current EIR notes that, in response to the 2017 EIR, residents are concerned that "traffic might be diverted to side streets and that the adjacent neighborhoods would be negatively affected by the changes, including loss of parking." However, the 2,309 page EIR does not appear to quantify or discuss mitigation of these impacts.

PRDEIR I5-006

For example, Alternatives 1 and 2 would more than double Eastbound evening rush hour traffic off Coast onto Morse Street, from 156 cars/hour to 319 cars/hour (Fig. 4-1,5-5,5-7); Alternative 3 is even worse, nearly tripling traffic to 443 cars/hour. This traffic -- apparently due to the increased Coast Highway density -- would be dumped into residential neighborhoods, presumably en route to the freeway onramps at California or Cassidy Street at a time when most children are home from school.

PRDEIR 15-006

## 6. Economic Impacts

The CEQA process (14 CCR § 15131b) says that economic impacts are part of understanding the significance of a proposed change. The 2017 EIR talks about the assumed increase in hotel rooms and commercial real estate. However, this current EIR (like its predecessor) does not talk about the potential impacts on existing businesses from increased traffic congestion, such as those that were experienced from the 2017 road diets instituted in the city of Los Angeles.

PRDEIR 15-007

## Conclusion

Even with these omissions, we believe that the current EIR shows that the adverse impacts of the new Alternative 3 on South O are as bad (or in some cases worse) than Alternatives 1,2 and 4. Thus, on behalf of South O residents and merchants, we reiterate our call for no road diet or development incentives south of Oceanside Blvd.

PRDEIR 15-008

Joel West  
Save South O

**Letter  
PRDEIR I5  
Response****Joel West  
Save South O  
January 14, 2019**

- 
- PRDEIR I5-001      This comment provides an introduction to the following comments. This comment does not raise any issue concerning the adequacy of the PRDEIR. The City appreciates the commenter for participating in this process. This comment is included in this FEIR for consideration by the City prior to making a final decision on the project.
- PRDEIR I5-002      This comment states that there should be no developer incentives along Coast Highway and that there should be no roadway diets south of Oceanside Boulevard as it would damage the unique character of South Oceanside, as supported by a petition with over 400 signatures from Oceanside residents. This comment also states that the inclusion of the new Alternative 3 instead includes extending the roadway improvements and Incentive District to the part of South Oceanside between Oceanside Boulevard and Morse Street. Please refer to response PRDEIR I3-001 for the response to this comment.
- PRDEIR I5-003      This comment states that neither the DEIR or the PRDEIR mentioned the guidelines of the FHWA’s November 2014 Road Diet Informational Guide and specifically highlights that the environmental analysis should mention that the 2013 afternoon rush hour traffic volumes at the Oceanside Boulevard, Morse Street, Cassidy Street, and Vista Way intersections already exceed the FHWA’s recommended 750 vehicles per direction per hour. In addition, the comment states that Mission Avenue intersection exceeds this threshold under Alternative 1 and 2. Please refer to response PRDEIR I3-002 for the response to this comment.
- PRDEIR I5-004      This comment states that while the EIR mentions that the project would increase bicycle safety, it fails to acknowledge that bicyclists would rather use the more scenic route along Pacific Street. This comment also states that the EIR fails to that the City has obtained a \$400k SANDAG grant to complete the Class I Rail Trail across Loma Alta Creek, which further reduces the demand for bike lanes on Coast Highway. Please refer to response PRDEIR I3-003 for the response to this comment.
- PRDEIR I5-005      This comment states that the traffic data captured by the pilot project along Coast Highway has never been released to the public and should be included in the traffic models in the EIR. This comment also states that this data should be released for public comment and incorporated into this FEIR. Please refer to response PRDEIR I3-004 for the response to this comment.

- PRDEIR I5-006 This comment states that the DEIR and the PRDEIR fail to quantify and mitigate traffic which may spillover onto adjacent side streets along Coast Highway for the project and alternatives' traffic scenarios. Please refer to response PRDEIR I3-005 for the response to this comment.
- PRDEIR I7-007 This comment states that under the CEQA process economic impacts are part of understanding the significance of a proposed change and states that the DEIR and PRDEIR failed to disclose the economic effects of traffic congestion on existing businesses along Coast Highway. Please refer to response PRDEIR I3-006 for the response to this comment.
- PRDEIR I7-008 This comment states that the environmental effects of Alternative 3 are worse than the other three alternatives and states that the City should approve no changes to Coast Highway. Please refer to response PRDEIR I3-007 for the response to this comment.



January 14, 2019

John Amberson, Transportation Planner  
City of Oceanside  
Submitted via email

Subject: Comments on Recirculated DEIR Coast Highway Corridor Study

Dear Mr. Amberson:

This letter is in response to the recirculated DEIR for the Coast Highway Corridor Study and is submitted on behalf of the Sierra Club North County Coastal Group (NCCG). We appreciate the city's efforts in improving the S. Coast Highway Corridor Study with this recirculated DEIR. NCCG provided comments to you back in August of 2017 following our review of the DEIR. However, we believe the city still has failed to adequately address the results of the VMT analysis and therefore, remains non-compliant with the Office of Planning and Research (OPR) EIR Guideline. Please include further analysis and potential mitigation to comply with SB 743.

PRDEIR I6-001

PRDEIR I6-002

Thank you. We are committed to work with you toward the implementation of a project that meets your objectives and minimizes any adverse environmental impacts.

PRDEIR I6-003

Sincerely,

Sally Prendergast  
Chairperson, Sierra Club North County Coastal Group

**Letter  
PRDEIR I6  
Response**

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**Sally Prendergast  
Sierra Club North County Coastal Group  
January 14, 2019**

PRDEIR I6-001

This introductory comment expresses appreciation for being able to comment on the PRDEIR and states that the following comments are submitted on behalf of the Sierra Club North County Coastal Group. This comment does not raise any issue concerning the adequacy of the PRDEIR. The City appreciates the commenter for participating in this process. This comment is included in this FEIR for consideration by the City prior to making a final decision on the project.

PRDEIR I6-002

This comment states that the PRDEIR, similar to the DEIR, fails to adequately address the results of the VMT analysis and therefore remains non-compliant with the Office of Planning and Research EIR Guidelines. This comment also requests that this information be incorporated into this FEIR in order to comply with Senate Bill 743.

The commenter incorrectly states that the DEIR and PRDEIR did not adequately evaluate VMT as the TIA (2017), the revised TIA (2018), and Section 3.14, *Transportation and Traffic*, included a VMT analysis for the project. The City acknowledges that the State of California Office of Planning and Research (OPR) has issued guidance related to the implementation of Senate Bill 743. This guidance, Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018), identifies that using per capita or per employee VMT generated by new development that is 15 percent below that of existing development may be a reasonable threshold. This guidance document is careful to acknowledge that lead agencies have discretion to develop and adopt their own thresholds, provided that these thresholds are supported by substantial evidence. The City not yet adopted a specific target threshold for VMT reduction associated with the evaluation of new development. In the absence of a city-adopted threshold, the RPDEIR utilizes the OPR suggested threshold as a placeholder for this analysis.

It is important to clarify that the OPR suggested VMT reduction threshold of 15 percent below existing development is the threshold proposed to be applied to new land use development. The Coast Highway Corridor project does not propose any new land use development within the study corridor. The land use scenarios evaluated for both the Year 2035 Without Project traffic scenario and the Year 2035 With Project traffic scenario propose no changes to the City's General Plan land use map or land use intensities permitted by the City's zoning code.

The project description, as identified in the PRDEIR is to transform the Coast Highway roadway to become a complete street that safely accommodates all modes of transportation. Per the OPR technical advisory cited above transportation projects that would not likely lead to a substantial or measurable increase in vehicle travel include projects that reduce the number of through traffic lanes on a roadway, projects that involve the installation of roundabouts or traffic circles, and projects that include the addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way. The Coast Highway Corridor Project has all three of these attributes.

The project also proposes the adoption of a land use incentive district along portions of the Coast Highway corridor. The purpose of the Incentive District is not to propose new land use development in the corridor beyond that which is already envisioned in the City's General Plan but instead is to encourage the land use development permitted by the General Plan to occur in targeted locations along the corridor, particularly those located within 1/2 to 1 mile of the two existing transit stations located along the corridor – the Oceanside Transportation Center and the Coast Highway Sprinter Station. New land use development located within 1/2 mile of an existing transit station is considered to have a less than significant impact by OPR in the April 2018 Technical Advisory. Because the Coast Highway Corridor project is by definition a complete street transportation project and does not propose new land use development within the study corridor, it is not subject to the 15 percent per capita VMT reduction threshold suggested by OPR and no further mitigation measures related to VMT are required.

PRDEIR I6-003

This comment provides the conclusion to the comment letter. This comment does not raise any issue concerning the adequacy of the PRDEIR. The City appreciates the commenter for participating in this process.

From: Save South O <SaveSouthO@gmail.com>  
Sent: Monday, January 14, 2019 3:38 PM  
To: John Amberson <JAmberson@ci.oceanside.ca.us>  
Subject: Comments on November 2018 Coast Highway EIR

Dear Mr. Amberson,

On behalf of the community group Save South O, I would like to submit the following comments on the accuracy and completeness of the November 2018 Coast Highway EIR.

PRDEIR 17-001

**1. Omitted Alternative**

In October 2016, Save South O presented petition signatures from more than 400 Oceanside residents asking that no road diet or development incentives be instituted south of Oceanside Blvd., because these changes would damage the unique character of South Oceanside. However, the city neglected to study this alternative. Instead, as proposed by a (now former) council member, Alternative 3 in the current EIR includes both a diet and incentives for that part of South Oceanside between Oceanside Blvd. and Morse.

PRDEIR 17-002

**2. Federal Road Diet Guidelines**

Neither the previous nor current EIR mention the guidelines of the Federal Highway Administration (FHWA)'s November 2014 *Road Diet Information Guide*. In particular, the EIR should mention that the 2013 afternoon rush hour traffic levels at the Oceanside Blvd, Morse, Cassidy and Vista Way intersections are already above the FHWA's recommended 750 vehicles per direction per hour. Also, with increased density provided by Alternatives 1 and 2, the Coast Highway traffic would also exceed the FHWA guidelines at the Mission intersection.

PRDEIR 17-003

**3. Bicycle Safety**

The EIR continues to emphasize the bicycle safety benefits of the road diet, but does not mention the clear preference by existing cyclists for the more scenic (and less polluted) Pacific Street route. (Public comments on pp. 534-538 of this EIR call this to the city's attention). The new EIR does not mention that since the 2017 EIR, the city has applied for and received (in June 2018) a \$400k SANDAG grant for planning the completion of the Class I Rail Trail across Loma Alta Creek, which would further reduce the potential demand for the Class II bike lanes on Coast Highway.

PRDEIR 17-004

**4. Data from Pilot Project**

The road diet between Morse and Oceanside began in 2016, and the city engineer was quoted as saying he hoped that the data "will prove we can do a two lane Coast Highway." However, no data from this "pilot project" have been publicly released, and such data -- particularly regarding peak hour and summer traffic impacts -- would be highly relevant to understanding the accuracy of the EIR traffic models. This data should be released for public comment and incorporated in any final EIR.

PRDEIR 17-005

## 5. Traffic Impacts

The current EIR notes that, in response to the 2017 EIR, residents are concerned that "traffic might be diverted to side streets and that the adjacent neighborhoods would be negatively affected by the changes, including loss of parking." However, the 2,309 page EIR does not appear to quantify or discuss mitigation of these impacts.

For example, Alternatives 1 and 2 would more than double Eastbound evening rush hour traffic off Coast onto Morse Street, from 156 cars/hour to 319 cars/hour (Fig. 4-1,5-5,5-7); Alternative 3 is even worse, nearly tripling traffic to 443 cars/hour. This traffic -- apparently due to the increased Coast Highway density -- would be dumped into residential neighborhoods, presumably en route to the freeway onramps at California or Cassidy Street at a time when most children are home from school.

PRDEIR 17-006

## 6. Economic Impacts

The CEQA process (14 CCR § 15131b) says that economic impacts are part of understanding the significance of a proposed change. The 2017 EIR talks about the assumed increase in hotel rooms and commercial real estate. However, this current EIR (like its predecessor) does not talk about the potential impacts on existing businesses from increased traffic congestion, such as those that were experienced from the 2017 road diets instituted in the city of Los Angeles.

PRDEIR 17-007

--  
Joel West  
Save South O  
<http://SaveSouthO.wordpress.com>

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Twitter: [@SaveSouthO](https://twitter.com/SaveSouthO)

**Letter  
PRDEIR I7  
Response****Joel West  
Save South O  
January 14, 2019**

- 
- PRDERI I7-001      This comment provides an introduction to the following comments. This specific comment does not raise any issue concerning the adequacy of the PRDEIR. The City appreciates the commenter for participating in this process. This comment is included in this FEIR for consideration by the City prior to making a final decision on the project.
- PRDEIR I7-002      This comment states that there should be no developer incentives along Coast Highway and that there should be no roadway diets south of Oceanside Boulevard as it would damage the unique character of South Oceanside, as supported by a petition with over 400 signatures from Oceanside residents. This comment also states that the inclusion of the new Alternative 3 instead includes extending the roadway improvements and Incentive District to the part of South Oceanside between Oceanside Boulevard and Morse Street. Please refer to response PRDEIR I3-001 for the response to this comment.
- PRDEIR I7-003      This comment states that neither the DEIR or the PRDEIR mentioned the guidelines of FHWA’s November 2014 Road Diet Information Guide and specifically highlights that the environmental analysis should mention that the 2013 afternoon rush hour traffic volumes at the Oceanside Boulevard, Morse Street, Cassidy Street, and Vista Way intersections already exceed the FHWA’s recommended 750 vehicles per direction per hour. In addition, the comment states that Mission Avenue intersection exceeds this threshold under Alternative 1 and 2. Please refer to response PRDEIR I3-002 for the response to this comment.
- PRDEIR I7-004      This comment states that while the EIR mentions that the project would increase bicycle safety, it fails to acknowledge that bicyclists would rather use the more scenic route along Pacific Street. This comment also states that the EIR fails to that the City has obtained a \$400k SANDAG grant to complete the Class I Rail Trail across Loma Alta Creek, which further reduces the demand for bike lanes on Coast Highway. Please refer to response PRDEIR I3-003 for the response to this comment.
- PRDEIR I7-005      This comment states that the traffic data captured by the pilot project along Coast Highway has never been released to the public and should be included in the traffic models in the EIR. This comment also states that this data should be released for public comment and incorporated into this FEIR. Please refer to response PRDEIR I3-004 for the response to this comment.

PRDEIR I7-006            This comment states that the DEIR and the PRDEIR fail to quantify and mitigate traffic which may spillover onto adjacent side streets along Coast Highway for the project and alternatives' traffic scenarios. Please refer to response PRDEIR I3-005 for the response to this comment.

PRDEIR I7-007            This comment states that under the CEQA process economic impacts are part of understanding the significance of a proposed change and states that the DEIR and PRDEIR failed to disclose the economic effects of traffic congestion on existing businesses along Coast Highway. Please refer to response PRDEIR I3-006 for the response to this comment.

**From:** Save South O <SaveSouthO@gmail.com>  
**Sent:** Monday, January 14, 2019 4:41 PM  
**To:** John Amberson <JAmberson@ci.oceanside.ca.us>  
**Subject:** Re: Comments on November 2018 Coast Highway EIR (PS)

Dear Mr. Amberson,

Sorry to inconvenience you, but my wife reminded I left one concern off.

Joel

### 7. Tsunami Evacuation

According to the Oceanside Fire Department's web page, the city's official Tsunami Evacuation map of November 2013 lists Coast Highway as one of the major evacuation routes in the event of a tsunami. There is no mention of this in either EIR, nor has any analysis been done as to what the impact of the increased traffic (due to development incentives) or reduced traffic capacity (due to a road diet) would have on public safety in the event of a tsunami evacuation. Given the forecast traffic impacts (plus what we know from the pilot project), these could be particularly severe at evening rush hour or on a summer weekend.

PRDEIR I8-001

**Letter  
PRDEIR I8  
Response****Joel West  
Save South O  
January 14, 2019**

PRDERI I8-001

This comment states that the DEIR and the PRDEIR do not analyze the impacts of increased traffic due to the Incentive District or reduced traffic capacity due to the Complete Streets improvements to public safety in the event of a tsunami evacuation. This comment also states that traffic impacts would be particularly severe during evening rush hour and summer weekends.

As stated in Section 3.8, *Hydrology and Water Quality*, of the DEIR, implementation of the project would not increase the risk of tsunami inundation compared to existing conditions and the probability of tsunami large enough to exceed the banks of the Loma Alta Creek Slough and Buena Vista Lagoon and overflow to the adjacent parcels is low.

Furthermore, as discussed in Section 3.14, *Transportation and Traffic*, of the PRDEIR, construction and/or operation activities associated with the project could have the potential to result in partial lane closures, which could temporarily impact emergency access during an evacuation event. However, the project is required to implement mitigation measures which would require the preparation and implementation of a Traffic Control Plan in accordance with the City's traffic control guidelines to ensure that congestion and traffic delays are not substantially increased as a result of the lane closures. In addition, the Complete Streets improvements would be designed in accordance with all applicable City roadway regulations to ensure emergency access and evacuation times are satisfactory to the City's Traffic Engineer. The City appreciates the commenter for participating in this process. This comment and response are included in this FEIR for consideration by the City prior to making a final decision on the project.